



Charlottesville Area Transit

Title VI Plan

Triennial Cycle December 1, 2016 – November 30, 2019

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Prepared by: Christina Downey
Grants & Procurement Coordinator
(Title VI Coordinator)
Charlottesville Area Transit

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Introduction

Charlottesville Area Transit (hereafter referred to as “CAT”) provides fixed-route public transportation for the Charlottesville City, VA and a very limited portion of surrounding Albemarle County, VA. CAT is a division of the City of Charlottesville and is considered a “small transit” system with 36 revenue vehicles and a UZA of fewer than 200,000. As a direct recipient of Federal Transit Administration (FTA) funds, Charlottesville Area Transit is required to submit a Title VI Program to FTA Region III’s Civil Rights Officer once every three years. This document highlights CAT’s efforts with regards to Title VI compliance and procedures taken to assist citizens who have Limited English Proficiency (LEP). Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color, or national origin in programs or activities receiving federal financial assistance.

This Title VI Program is a compilation of documents and procedures that demonstrate how the City of Charlottesville’s Transit Services Division, complies with the Federal Transit Administration’s Title VI requirements per Circular 4702.1B in order to:

- Ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner;
- Promote full and fair participation in public transportation decision-making without regard to race, color, or national origin;
- Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

In accordance with 49 CFR Section 21.7(a), CAT submits annual Certifications and Assurances with every application for financial assistance from FTA, which include assurances signed by Charlottesville’s City Attorney, that CAT will carry out its activities and programs in compliance with Title VI regulations.

Charlottesville Area Transit (CAT) has one subrecipient of Federal funds. JAUNT provides ADA Complimentary Paratransit Services as per TITLE 49-CRF PART 37-Transportation Services for Individuals with Disabilities (ADA). JAUNT receives Federal 5307 pass-through Operating Funds through CAT and is required to comply with all federally mandated rules and regulations, including Title VI. CAT evaluates and monitors JAUNT’s capacity to properly satisfy all Federal Civil Rights regulations.

Upon request, alternative formats of this document will be produced for people with disabilities. Please call (434) 970-3849 or TTY 711 (RELAY) or email downeyc@charlottesville.com

Authorities

STATUTORY AUTHORITY

Section 601 of Title VI of the Civil Rights Act of 1964 states the following: “No person in the United States shall, on the ground 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”.

REGULATORY AUTHORITY

The U.S. Department of Justice (“DOJ”) Title VI regulations can be found at 28 CFR § 42.401 et seq., and 28 CFR § 50.3. The U.S. Department of Transportation (“DOT”) Title VI implementing regulations can be found at 49 CFR part 21. All programs receiving financial assistance from FTA are subject to Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and DOT’s implementing regulations.

Title VI Policy Statement

Charlottesville Area Transit is committed to full compliance with Title VI of the Civil Rights act of 1964, and related statutes and regulations in all programs and activities. CAT will ensure that “no person 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 CAT sponsored program or activity.

Every effort will be made to prevent discrimination through the impacts of CAT’s programs, policies and activities on minority and low-income populations. CAT will take all reasonable steps to provide meaningful access to services for persons with limited English Proficiency (LEP).

The City Manager of the City of Charlottesville has delegated the authority to Leslie Beauregard, Assistant City Manager. Leslie Beauregard has direct access to the City Manager. Christina Downey, CAT Title VI Coordinator, is designated to oversee all day-to-day Title VI and other transit-related discrimination complaints and investigations.

CAT is committed to ensuring the civil rights and meaningful access of its services to all service beneficiaries.

Maurice Jones
City Manager
City of Charlottesville

Notification & Disseminations of CAT's Title VI Obligations

CAT takes the following steps to notify the public and CAT employees of CAT's obligations to Title VI.

Title VI Public Notices

CAT shall not discriminate against any person with respect to any transit program or service. CAT actively provides information regarding its Title VI obligations to the public using a variety of methods. CAT's Title VI Plan and complaint procedures are available on CAT's buses, website and are posted at the Downtown Transit Station and other public areas in both English and Spanish. CAT will attempt to provide this information in languages and formats other than English and Spanish upon request.

Employee Information and Training

Title VI information is disseminated to CAT employees annually via the Employee Education form (**Attachment A**) which are hand-delivered by Transit Operations Supervisors before the beginning of each Federal Fiscal Year. All employees are provided a copy of the Title VI Policy Statement and are required to sign the Employee Acknowledgement of Receipt (**Attachment B**). This form reminds employees of CAT's Title VI policy, and of their responsibilities in their daily work and duties.

*All CAT employees have read and signed the Title VI Acknowledgement Statement for FFY2017 as of October 7, 2016.

During New Employee Orientation, CAT employees are informed of the provisions of Title VI and CAT's expectations to perform their duties accordingly. All new employees sign a statement that that they have read and understand Title VI requirements.

Subcontractors and Vendors

All project agreements with subrecipients contain all required federal clauses. Subcontractors and vendors who receive payments from CAT where funding originates from any federal assistance are subject to the provisions of Title VI of the Civil Rights Act of 1964. Written contracts shall contain non-discrimination language, either directly or through the bid specification package which becomes an associated component of the contract.

The Title VI Notice is shown below is posted in English and Spanish on CAT's website, in all CAT buses, route guides (abridged), CAT offices, and in the Downtown Transit Station.

Title VI Notice to the Public – English

Notifying the Public of Rights under Title VI City of Charlottesville Charlottesville Area Transit

Charlottesville Area Transit (CAT) operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964. Any person who believes he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with CAT.

For information and procedures to file a complaint, contact Christina Downey, CAT Title VI Coordinator, at 434-970-3849 (TTY dial 711); email downeyc@charlottesville.org; or visit CAT's administrative office at 1545 Avon Street, Ext, Charlottesville, VA 22902. For more information on all of CAT's civil rights programs and to view CAT's Title VI Plan, visit www.CatchTheCat.org.

A complaint may also be filed directly with the Federal Transit Administration's 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 or format, contact Christina Downey at 434-970-3849.

Title VI Notice to the Public - Spanish

Notificación Pública de los derechos Bajo el Título VI Ciudad de Charlottesville Charlottesville Area Transit

Charlottesville Area Transit (CAT por su siglas en inglés) opera sus programas y servicios, sin distinción de raza, color u origen nacional, de conformidad con el Título VI de la Ley de Derechos Civiles de 1964. Cualquier persona que cree que ha sido perjudicada por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja en el CAT.

Para más información y los procedimientos para presentar una queja, póngase en contacto con Christina Downey, CAT Coordinador del Título VI, al 434-970-3849 (TTY Marque 711); al correo electrónico downeyc@charlottesville.org; o visite la oficina administrativa de CAT ubicada en la 1545 Avon Street, Ext, Charlottesville, VA 22902. Para más información sobre todos los programas de derechos civiles de CAT y ver el plan del Título VI del CAT, visite www.CatchTheCat.org.

Una queja también puede ser presentada directamente en la Oficina de la Administración Federal de Tránsito de los Derechos Civiles, Atención: Coordinador del Programa Título VI, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

Si necesita información en otro idioma o formato, póngase en contacto con Christina Downey a (434) 970-3849.

Title VI Complaint Procedures

All citizens are granted equal access to CAT's transit services. Any person who believes that he or she has been excluded from participation in, been denied the benefits of, or otherwise subjected to unlawful discrimination under any CAT program or activity, and believes the discrimination is based upon race, color or national origin may file a complaint with CAT. Complaints must be filed within *180 calendar days* of the alleged discriminatory act.

To submit a complaint by mail or in person, customers may fill out CAT's Title VI complaint form from CAT's website and mail/email/bring to:

CAT Title VI Coordinator
1545 Avon St., Ext.
Charlottesville, VA 22902
Email: downeyc@charlottesville.org
Phone: (434) 970-3849

CAT Customer Complaint Line: Complaints can be recorded verbally 24 hours a day, seven days a week at (434) 970-3649, option 2.

Title VI complaints alleging discrimination will be immediately investigated by CAT's Title VI Coordinator. CAT shall provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. CAT's Discrimination Complaint form is available in English and Spanish (**Attachments C & D**), and for customers who are deaf, hard of hearing, or have difficulty speaking to communicate, Charlottesville Area Transit utilizes the services of Virginia Relay to facilitate calls. Virginia Relay is available by dialing 711.

CAT has *30 calendar days* to investigate a Title VI complaint. A letter/email acknowledging receipt of a complaint will be mailed to complainant within *10 calendar days* (**Attachment E**). If more information is needed to investigate or resolve the case, CAT may contact the complainant. The complainant has *15 calendar days* from the date of the letter to send requested information. A complainant's failure to provide completed forms and requested information may result in the administrative closure of the complaint. A case can be administratively closed if a complainant no longer wishes to pursue a case.

Upon completion of an investigation, CAT's Title VI Coordinator will send one of two written response letters to the complainant regarding whether the complaint was/ was not a founded Title VI violation (**Attachments F & G**). In any letter notifying a complainant that the complaint is not substantiated, the complainant is also advised of his or her right to 1) appeal within *15 calendar days* of receipt of the written decision, and 2) how to file a complaint externally with the Federal Transit Administration.

CAT provides information to the public regarding Title VI policy and complaint information on its buses, CAT's website and at Charlottesville's Downtown Transit Station. Title VI information and complaint procedures are also posted in common areas of CAT's Administration, Operations and Maintenance departments.

Title VI Investigations, Complaints, & Lawsuits

In order to comply with the reporting requirements of 49 CFR Section 21.9(b), FTA requires CAT to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations conducted by entities other than FTA; lawsuits; and complaints naming the recipient. This list shall include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by CAT/City of Charlottesville in response, or final findings related to, the investigation, lawsuit, or complaint.

CAT has had one transit-related Title VI complaint during this reporting period. This complaint was filed with the EEOC by a CAT employee subsequent to her employment termination. CAT/City of Charlottesville has had no other Title VI complaints, investigations or lawsuits.

The CAT Title VI Coordinator/City of Charlottesville Attorney’s Office (if filed with EEOC) maintains permanent records, which include, but are not limited to, copies all Title VI complaints and/or lawsuits and related documentation, and records of correspondence to and from complainants, and Title VI investigations.

Description/ Name	Date	Summary (basis of complaint)	Status	Action(s) Taken (Final findings)
Complaints				
Leitress Garland	8/4/2015	Filed a complaint with EEOC alleging race and sex discrimination and retaliation after she was terminated following verbal altercations with a co-worker which violated the City’s policies on sexual harassment and workplace violence.	The City’s position statement disputing the claim was filed with the EEOC on September 23, 2015.	No response has been received from the EEOC.
Investigations				
None				
Lawsuits				
None				

Public Participation Plan

A Public Participation Plan is a guide for CAT's ongoing public participation endeavors. Its purpose is to ensure that CAT utilizes effective means of providing information and receiving public input on transportation decisions from low income, minority and limited English proficient (LEP) populations, as required by Title VI of the Civil Rights Act of 1964. Efforts toward Public Outreach since CAT's last Title VI Plan submission are as follows:

CAT utilizes the approved Charlottesville-Albemarle's MPO Public Participation Plan for its Transit Improvement Plan (TIP) which includes publication of CAT's Program of Projects as well as a public hearing and comment period. The MPO's plan can be found at:

<http://campo.tjpd.org/wp-content/uploads/2016-PPP.pdf>

CAT publishes notices of all transit-related public meetings in the Regional Newspaper, the Daily Progress. Although Charlottesville does not have an LEP group that meets the Safe Harbor threshold of five percent (5%) or 1,000 persons, of the total population, CAT has resolved to voluntarily publish notices of these meetings in Nuevas Raices, the region's only Spanish news publication.

CAT actively engages in the use of Printed and Social Media in order to expand its public outreach efforts. CAT includes information on its website regarding transit activities, meetings, route changes and the Title VI Plan. CAT can supply most documents, upon request, in a variety of alternative formats and the use of Google Translator enables multi-lingual options. Transit related documents are available on the website.

The International Rescue Committee (IRC) has a chapter of their organization located in the City of Charlottesville. The IRC responds to humanitarian crisis around the world and, in part, assists with the relocation of displaced global refugees into US Communities. The individuals that the IRC serves are significantly variable LEP groups. CAT and the IRC have coordinated efforts and resources for several years for CAT to make informational presentations about transit services for new refugees who have been relocated to Charlottesville. Presentations occur every six weeks and the IRC provides interpreters for each language present at any given meeting.

As CAT updates its technologies, new methods of public outreach will be available and utilized.

Transit Advisory Board

Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, “deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program.”

CAT established a Transit Advisory Board (TAB) on 2/20/2014, consisting of non-elected members from the community, CAT, City Council, Albemarle County, University of Virginia (UVA), the Metropolitan Planning Organization (MPO), and JAUNT. Board meetings take place monthly and are open to the public. The Advisory Board’s meeting minutes are available to the public on CAT’s website at www.CatchTheCat.com.

Several of CAT’s Advisory Board members sit on other community committees and boards, including Belmont Bridge, MPO, West Main Street, PLACE, and Streets That Work. There are no non-board members that sit in from other groups or boards, however, the Transit Advisory Board is subject to Open Meetings regulations and may be attended by any person who chooses, as well as the press.

A breakdown of CAT’s Advisory Board by race is below. The Board currently has two minority members. CAT will encourage minority representation on the Board by advertising for minority board members. CAT will advertise on its website, social media and in the regional Spanish-speaking newspaper.

Name	Title	Agency	Appointed / Invited	Race
John Jones	CAT Transit Manger	City of Charlottesville	Staff	Caucasian
John Crosby	Citizen	n/a	Invited	Caucasian
Lena Seville	Citizen	n/a	Appointed	Caucasian
Diantha McKeel	Albemarle County	Albemarle County Sup.	Appointed	Caucasian
Jason Ness	Office of Economic Development	City of Charlottesville	Appointed	Caucasian
J’Riah Guerrero	Mobility Specialist	JAUNT	Appointed	Hispanic/ African American
Kristin Szakos	Charlottesville City	City of Charlottesville	Appointed	Caucasian
James Mann	Citizen	n/a	Invited	Caucasian
Peter Thompson	Director	Senior Center, Inc.	Appointed	Caucasian
Kathy Welch	Citizen	Citizen	Invited	Caucasian
Will Cockrell	Planner	Cville-Albemarle MPO	Appointed	Caucasian
Rebecca White	Director	UVA Transit System	Appointed	Caucasian
L.J. Lopez	Citizen	City of Charlottesville	Invited	Hispanic
Grant Duffield	Executive Director	Housing Authority	Invited	Caucasian

Subrecipient Oversight (Title VI)

Title 49 CFR Section 21.9(b) states that if “a primary recipient extends Federal financial assistance to any other recipient, such other recipient shall also submit such compliance reports to the primary recipient as may be necessary to enable the primary recipient to carry out its obligations under this part.” JAUNT is Charlottesville’s demand-responsive paratransit service provider and is a subrecipients of FTA 5307 Operating Assistance funds through CAT.

With the adoption of this Title VI Program, CAT requires JAUNT to be fully compliant with FTA Circular 4702.1B, *Title VI Requirements and Guidelines for Federal Transit Administration Recipients*. CAT monitors JAUNT’s compliance with Title VI by means of annual on-site and desk audits of JAUNT each October for the previous Federal fiscal year to ensure general reporting requirements of Circular 4702.1B. The CAT Title VI Coordinator, Accountant, Maintenance Manager and Transit Manager all take part in the oversight audit annually and CAT maintains records of Jaunt’s Title VI Plan as a standard auditing practice. Lack of compliance with the Title VI program or the submittal schedule will delay or halt disbursement of federal funds.

Review includes:

- Review of JAUNT’s Title VI Plan including
 - LEP Plan and Census Data
 - Public Participation Plan
 - Title VI complaint procedures and forms
 - Records of any Title VI investigations, complaints, or lawsuits.
 - Written procedures for investigating and tracking Title VI complaints and proof that the public may access this information upon request;
- On-site tour of JAUNT facilities to ensure appropriate posting of Title VI information;
- Ensuring Civil Rights verbiage in contracts;
- Review of Public Notices to beneficiaries of their rights under Title VI in facility, website and on vehicles;
- Review of all Title VI Trainings;
- Table of JAUNT’s transit-related non-elected planning boards, advisory councils, or committees, depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

JAUNT’s last triennial Title VI Plan is dated APRIL 8, 2015 and its next Title VI Program submission is scheduled for April 2017.

Governing-Body Approval of Title VI Plan

Charlottesville is governed by an Elected City Council, but day to day operations and governance of the City is overseen by the Charlottesville City Manager, Maurice Jones. Mr. Jones has read and approved CAT’s Title VI Plan. (**Attachment H**).

Limited English Proficiency Plan (LEP)

Executive order 13166, *Improving Access to Services for Persons with Limited English Proficiency*, indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds.

The following *Limited English Proficiency (LEP) Plan* has been prepared to address Charlottesville Area Transit's (CAT) obligations as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964 and the Federal Transit Administration Circular 4702.1B, which states that the level and quality of transportation service shall be provided without regard to race, color, or national origin.

CAT provides fixed-route public transportation for the Charlottesville City, VA and a very limited portion of Albemarle County which surrounds Charlottesville. The aggregate square miles which CAT serves in Albemarle County's urban ring is 13 square miles out of a total area of 726 square miles, or 1.8% of the total county.

CAT has developed this LEP Plan to help identify Charlottesville's LEP population accessing CAT services and reasonable steps for providing language assistance to those persons. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how CAT can identify a person who may need language assistance, and the ways in which assistance may be provided. This plan includes the required Four-Factor Analysis.

Four- Factor Analysis:

In order to prepare this plan, CAT's LEP Plan administrator undertook the U.S. Department of Transportation (U.S.DOT) four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a CAT program, activity or service.
2. The frequency with which LEP persons come in contact with CAT programs, activities or services.
3. The nature and importance of programs, activities or services provided by CAT to the LEP population.
4. The resources available to CAT and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis are as follows:

1. The number and proportion of LEP persons eligible to be served or likely to be encountered in the service area:

The geographic boundaries within which CAT provides service include the City of Charlottesville and 13 square miles of Albemarle County. CAT examined U.S. Census data as defined by “Languages Spoken in the Home” for ages five (5) years and older for the City of Charlottesville and ascertains the LEP population who may access CAT’s services.

City of Charlottesville: The predominant language spoken in the City of Charlottesville English. The U.S. Census’s 2010-2014 American Community Survey 5-Year Estimates (ACS) estimates that 36,169 (86%) of the Charlottesville City population speak *English only*; of the 5,886 (14%) of the city’s population that speak a language other than English, 2,406 (5.7%) speak English “*less than very well.*”

The two predominant non-English languages spoken in the City of Charlottesville are Spanish and Chinese. Of the 1,781 people who speak Spanish in Charlottesville, 747 (1.8% of total population) are estimated to speak English “*less than very well.*” Of the 1,065 persons who speak Chinese in Charlottesville, 560 (1.3% of total population) are estimated to speak English “*less than very well.*”

Charlottesville, Virginia LANGUAGE SPOKEN AT HOME	Estimate	Percent of total population
Population 5 years old and over	42,055	X
English only	36,169	86 %
Language other than English	5,886	14%
Speak English less than “very well”	2,406	5.7%
Spanish or Spanish Creole	1,781	4.2%
Speak English less than "very well"	747	1.8%
Other Indo-European languages (not including Spanish or Spanish Creole)	1,302	3.1%
Speak English less than "very well"	317	.75%
Chinese	1,065	2.5%
Speak English less than "very well"	560	1.3%
Other Asian and Pacific Islander languages (not including Chinese)	953	2.7%
Speak English less than "very well"	319	.75%
African languages	276	.65%
Speak English less than "very well"	118	.03%
Other and unspecified languages	17	.04%
Speak English less than "very well"	0	X

2. Frequency of Contact by LEP Persons with CAT Services:

CAT's Title VI Coordinator conducted and reviewed (non-scientific) survey responses from CAT customer service representatives, bus drivers and other staff which focused on the frequency and type of LEP languages that they may encounter (**Attachment I**). Of the 97 staff that responded, they reported that contact with LEP persons is as follows:

Predominant languages that CAT staff reported coming into contact with are:

- Spanish (#1)
- Arabic (#2)
- Asian-Pacific (#3)

Contact with LEP persons per month:

- Never have contact - 12
- 1-4 times per month – 35
- 5-10 times per month – 15
- 11-20 times per month – 6
- Every Day – 29

Most respondents of the survey commented that they are normally able to communicate and answer questions of LEP persons through use of other passengers on the bus, or by using hand signals and the CAT Rider's Guide.

No despondence reported having translation services requested.

Several respondents suggested that CAT drivers and customer service staff be provided basic language classes.

3. The nature and importance of programs, activities or services provided by CAT to the LEP Population:

The predominant LEP population likely to utilize CAT services is Spanish-speaking. CAT provides route information, Title VI policy information and complaint procedures in Spanish. CAT's website uses Google Translate in order for Spanish-speaking customers to access the entire website. Further, CAT publishes its Title VI policy in the only Spanish newspaper in the region. There is no singular geographic concentration of any one type of LEP population in the CAT service area. The majority of the population speaks English fluently. As a result, there are few organizations within the CAT service area that focus on outreach to LEP individuals of any *one* ethnicity or language.

However, the City of Charlottesville is fortunate to have a chapter of the International Rescue Committee (IRC) based in the City. The IRC responds to humanitarian crisis around the world and, in part, assists with the relocation of displaced global refugees into US Communities, Charlottesville being one of them. CAT and the IRC have coordinated efforts and resources for several years in order for CAT to make presentations at the IRC to refugees who have been relocated to Charlottesville. These presentations occur on average about every six weeks and specifically focus on teaching newly arrived refugees how to understand and navigate CAT's transit system, including routes, maps, customer service, CAT Apps, online resources, as well as the use of time-tables and the fare system. IRC staff arrange for translators to be present for each language represented at any given presentation.

4. The resources available to CAT and overall cost to provide LEP assistance:

CAT reviewed its available resources that could be used for providing LEP assistance. Due to the relatively low LEP population, CAT does not currently provide for LEP-specific budgeting of resources. CAT has determined which of its documents are the most important to be translated at this time, and has done so for the Spanish-speaking members of our community. CAT has a Customer Service employee that speaks Spanish fluently, and has several bus drivers who speak Spanish and various Arabic languages. In the previously noted LEP Survey, staff was asked, among other questions, what other languages they spoke fluently and if they would be willing to assist CAT with translation services for customers. The response to the LEP survey was very positive and CAT has LEP translation resources on staff not previously available. CAT management is currently discussing the logistics of how to best put these staff resources to use. CAT has utilized a City of Charlottesville employee from a separate department in order to translate documents into Spanish as needed, including Title VI information and complaint procedures. The employee survey showed that requests for translation services are almost non-existent, but if requested or required, CAT would utilize the IRC or the University of Virginia's international student programs.

Limited English Proficiency Plan

Based on the four-factor analysis, CAT developed its Limited English Proficiency Plan as outlined in the following section.

1. Identifying LEP individuals who need language assistance

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to CAT programs and activities. The LEP population in Charlottesville continues to be relatively low. However, as the LEP population increases, CAT will take the following steps to identify an LEP person who needs language assistance:

- Survey CAT customer service representatives and bus drivers to see if requests for language assistance are increasing, and if so which languages, to determine whether increased language assistance might be needed at future events.
- When CAT sponsors an event, have a staff person greet participants as they arrive. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English.
- Have Census Bureau *Language Identification Flashcards* available at the customer service desk and easily accessible to drivers as needed.

2. Language Assistance Measures

Although CAT's service area has a relatively low percentage of LEP individuals, that is persons who speak English "less than very well" or "not at all", CAT will strive to offer the following measures when LEP persons are encountered:

- When LEP services are requested or identified by need, CAT will utilize resources available to accommodate LEP persons.
- If a customer asks for language assistance and CAT determines that the client is an LEP person and that language assistance is necessary to provide meaningful access, reasonable efforts will be made to provide free language assistance.

- CAT will periodically assess client needs for language assistance based on requests for interpreters and/or translation.
- When an interpreter is needed, in person or on the telephone, staff will attempt to determine what language is required by using “*I speak*” language identification cards and then access language assistance at one or more of the available resources identified.

3. Staff Training

The following training will be provided to CAT staff:

- Annual Information on CAT’s Title VI Policy and LEP responsibilities.
- Use of the *Language Identification Flashcards*.
- Information on how to document language assistance requests.
- Information on how to handle a potential Title VI/LEP complaint.

4. Providing Notice to LEP Persons

Translation of Documents - Spanish

CAT currently has its Title VI policy and complaint form translated into Spanish. CAT’s abridged Spanish-language Route Guide is currently being updated, and it should be available to customers by January 2017. CAT will publish Public Meeting Notices in a regional Spanish-language newspaper for any major services changes, including fare changes.

Translation of Documents - Other languages

The cost and benefits of translating documents for potential LEP groups, the expense of translating the documents, the barriers to meaningful translation or interpretation of transit information, the likelihood of frequent changes in documents, the existence of multiple dialects within a single language group, and other relevant factors make it an unjustified expense to have documents translated into other languages at this time.

Due to the small local LEP population, CAT does not have a formal outreach procedure in place. Translation resources have been identified and are limited in this region. However, when and if the need arises for LEP outreach, CAT will consider the following options:

- When staff prepares a document, or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas may be printed in an alternative language based on the known LEP population.
- Bus schedules, maps, and other transit publications will be made available in an alternative language when and if a specific and concentrated LEP populations are identified and requests made.

5. Safe Harbor Provision

Federal law provides a “Safe Harbor Provision,” which outlines circumstances that can provide a “safe harbor” (FTA Circular 4702.1B) for recipients regarding translation of written materials for LEP populations. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or

likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations.

The CAT service area has a low LEP population that speak English "less than very well;" under 1000 people for the predominant LEP groups. Due to the higher Spanish-speaking population (though still under the Safe Harbor threshold), CAT provides some translated documents, including Title VI information.

When necessary to provide meaningful access for LEP clients, CAT will provide qualified interpreters with 48 hours' notice upon request and at no charge.

Informal Interpreters:

- Informal interpreters may include the family members, friends, legal guardians, service representatives or advocates of the LEP client. City staff will determine whether it is appropriate to rely on informal interpreters, depending upon the circumstances and subject matter of the communication. However, in many circumstances, informal interpreters, especially children, are not competent to provide quality and accurate interpretations. There may be issues of confidentiality, competency, or conflict of interest.
- An LEP person may use an informal interpreter of his or her own choosing and at their expense, either in place of or as a supplement to the free language assistance offered by the CAT. If possible, CAT/City should accommodate an LEP client's request to use an informal interpreter in place of a formal interpreter.
- If an LEP client prefers an informal interpreter, after CAT has offered free interpreter services, the informal interpreter may interpret. In these cases, the client and interpreter should sign a waiver of free interpreter services.
- If a LEP client wants to use his or her own informal interpreter, CAT reserves the right to also have a formal interpreter present.

6. Monitoring and Updating the LEP Plan

Monitoring the success of CAT's LEP Plan is an ongoing process and the plan will be adjusted as demographic and language fluctuations occur in the Charlottesville area.

- CAT will update the LEP as required by U.S. DOT.
- CAT will continue to conduct surveys of CAT drivers and customer service staff to collect more accurate data of how often front-line staff comes into contact with LEP persons as well as determining language resources on staff.
- CAT will continue to work with the IRC to keep track of new LEP groups being settled in Charlottesville.
- CAT will continue to seek out new resources, such as new technologies that might assist in serving the LEP population.

Community Outreach Plan

Community Outreach is a requirement of Title VI. Recipients and subrecipients shall seek out and consider the viewpoints of minority and low-income populations in the course of conducting public outreach. Recipients have wide latitude to determine what specific measures are most appropriate and should make this determination based on the composition of the affected population, the public involvement process, and the resources of the recipient.

As an agency receiving federal financial assistance, CAT has made the following community outreach efforts:

Board Meetings:

The MPO Policy Board meets bi-monthly and the public is invited to attend and comment.

CAT Advisory Board Meetings are opened to the Public and the Press and meetings schedules are posted on the CAT's website.

ADA Advisory Committee

CAT staff shall attend and participate at regular quarterly meetings of the City's ADA Advisory Committee. Citizens and committee members are given the opportunity to advise on CAT compliance with required accessibility standards. CAT makes necessary adjustments to maintain equitable service to all persons.

Transit Improvement Plan (TIP)

The TIP is a fiscally constrained planning document that addresses transportation projects and programs. The TIP process includes public hearings and public comment periods. CAT files its Program of Projects with Charlottesville Neighborhood Development Office annually for public review.

Public Meetings

When significantly new or altered service is proposed, information is disseminated via media release to the neighborhoods affected and public meetings are offered. All meetings are held in locations accessible by public transportation.

Customer Complaint Process

Citizens have several methods with which to contact CAT to make a complaint. All complaints are confidential.

Customer Outreach Assistance

CAT provides Spanish-speaking guests with information on public transit services in Spanish. Customer Service staff have provided "on the bus" transit orientation training to LEP individuals and refugee populations in the past and are available to do so upon request. CAT's transit system information is presented to the IRC every six weeks.

CAT submits to the Virginia Department of Rail & Public Transportation annually an application for funding. The application requests funding for both capital and operating assistance.

Part of the annual application is a public notice, which includes a 30-day public comment period.

Equity Analysis (Construction Projects)

CAT has not engaged in any project requiring land acquisition and/or displacement of persons from their residences or businesses during this reporting period, nor has any plans to do so. As standard policy, CAT integrates environmental justice analysis into any NEPA documentation required in connection with any construction projects. Those involving categorical exclusions are submitted to the FTA and include a section on community disruption and environmental justice. CAT policy and reporting integrates the following into environmental assessments or impact statements:

- Description of low-income and minority population within the area affected by the project, and description of the method used to identify the population;
- Discussion of adverse effects of the project during and after construction;
- Discussion of positive effects;
- Description of mitigation and environmental enhancement actions incorporated into the project to address any adverse effects of a construction project;
- Discussion of remaining effects and, if any, why further mitigation is not proposed;
- A comparison of mitigation and environmental enhancement actions that affect predominately low-income and minority areas with mitigation implemented in predominately low-income and minority areas.

CAT Service Standards & Policies

CAT Policy on Disparate Impact

The requirement for this policy comes from Federal Transit Administration (FTA) Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients" which became effective October 1, 2012. The Circular requires any FTA recipient that operates 50 or more fixed route vehicles in peak service and serving a population of 200,000 or greater to evaluate any fare change and any major service change at the planning and programming stages to determine whether those changes have a discriminatory impact. Even though at this time CAT does not meet the size criteria specified for this policy, the City is committed to ensuring that changes made to transit services do not have disparate impacts on any citizens or neighborhoods within the CAT service area.

The purpose of this policy is to establish a threshold which identifies when adverse effects of a major service change or any fare change are borne disproportionately by minority populations.

A disparate impact occurs when the minority population adversely affected by a fare or service change is ten percent more than the average minority population of Charlottesville Area Transit's service area.

Disparate impacts on routes with either span of service changes and/or frequency changes will be determined by analyzing all routes with such changes together. Disparate impacts on routes with segment elimination, re-routing, or route elimination will be determined on a route by route basis.

If Pierce Transit finds a potential disparate impact, the agency will take steps to avoid, minimize or mitigate impacts then reanalyze the modified service plan to determine whether the impacts were removed. If CAT chooses not to alter the proposed changes, the agency may implement the service or fare change if there is substantial legitimate justification for the change AND the agency can show that there are no alternatives that would have less of an impact on the minority population and would still accomplish the agency's legitimate program goals.

Charlottesville Area Transit (CAT) Service Standards and Facility Guidelines

(rev. 11-17-2016)

Purpose of Transit Guidelines and Standards

Many public transit agencies implement guidelines and standards to guide transit service development, design, and provision. Service design guidelines identify methods, procedures, and criteria for designing, evaluating, and adjusting the performance of fixed-route public transit services. They act as tools for maximizing the overall usefulness of the public transportation system for customers, ensuring consistency of the route structure, and providing consistent criteria for establishment of service levels.

Guidelines differ from standards in that guidelines tend to be more flexible in nature. A standard on the other hand is a more firm measure used as a basis for judgment or comparison.

Guiding Factors for CAT Service and Facility Development:

CAT guidance for service and facility development comes from many sources including CAT's recent Transit Development Plan (TDP), Transit Study, the City of Charlottesville's P3 Strategic Initiatives, historical agency guidelines, published industry best practices and application of professional knowledge and judgment. For the purposes of this discussion, service and facility guidelines standards are considered for those elements of CAT's system which are not already specifically guided by federal, state or local laws or regulations, which themselves may direct or define CAT services. CAT has at different points in time identified service guidelines to provide direction for tracking performance, evaluating service changes and identifying services not meeting the desired levels of performance as well as identifying design guidelines for facility development. Given the evolution of CAT's transit system and the ongoing evolution of best practices across the transit industry, some previously-identified guidelines are no longer relevant. Consequently, there is no one document that CAT points to as the basis for service and facility development decisions but rather decision-making rests upon a variety of sources. These sources include planner knowledge and experience, adaptations of previously identified guidelines, national research by industry experts such as the Transportation Research Board, and review of service and facility guidelines used by other agencies. The TDP and the Transit Study include policies and strategies that guide service and facility development in both specific and general ways.

Charlottesville Area Transit Service Availability:

- Span of Service – CAT provides services Monday through Saturday to all areas during the hours from 6:00 AM to 6:00 PM. Some routes have identified demand that make it necessary to operate until 11:00 PM. On those identified routes, service will be provided at least hourly. Routes are surveyed and evaluated annually to determine the necessity of service expansions and adjustments to schedules are made accordingly based upon these evaluations.

Charlottesville Area Transit Vehicle Assignment:

- Fleet vehicle assignment is based upon CAT’s established Route Hierarchy as follows:
 1. Key Routes, which include the Free Trolley and Route 7 utilize 35-foot coaches and 35-foot Trolleys;
 2. Local Routes, 30-foot coaches or 26-foot cutaways, depending upon conditions and time of day;
 3. Lifeline Routes, at this time only Route 11, 30-foot coaches.

Service Standards and Facility Guidelines

There are certain guidelines that CAT uses regularly and which affect various aspects of CAT’s service design, delivery and system management investments. Some guidelines suggest best practices for service design, methods of evaluating service quality or to identify thresholds at which service or facility investments should be made. For example:

- *Service Quality – Overloads:* A route is defined as overloaded when it is at or above 1.3 times seated capacity or at 1.2 times seated capacity with passengers standing for 20 minutes or longer
- *Service Quality – Schedule adherence:* A route is defined as on-time if it is up to 5 minutes late or 1 minute early. CAT targets to achieve a 90 percent on-time rate.
- *Service Design – Deviation:* Routings should only deviate from a more direct pathway where the number of riders boarding/alighting on deviation offsets the number of minutes lost for through riders.
- *Facility Investment – Threshold for installation of a shelter:* 50 or more riders per day in Charlottesville, 35 or more outside of Charlottesville.

General Service planning principles and samples of service guidelines to help document the basis for decision-making is included in Appendix A.

Service Evaluation Guidelines

CAT has established service evaluation guidelines for regular assessment of the performance of all routes. The evaluation process is intended to provide clear, consistent information about the performance of individual transit services to aid planners and decision-makers in developing service changes. The intent of the process is to identify very successful services as well as unsuccessful ones, utilize simple evaluation criteria to improve the consistency of use, and define performance thresholds that reflect unique performance aspects of different markets and types of service.

The service evaluation guidelines are applied in the annual Route Performance Report, which assesses service performance of all regular service. Performance assessment is based on comparison to other members of the same group of routes and routes are grouped by subarea and time period for similarity in operating conditions. Thresholds for “strong” and “below average” performance are determined for each subarea and time-period group, based on average route performance in each group.

The Route Performance report focuses on four measures: riders per revenue hour, fare revenue to operating expense ratio, passenger miles per revenue hour and passenger miles divided by platform miles.

Guidelines and Measures for Developing New Service and Evaluating Existing Service

General principles identified as part of CAT’s service evaluation update process state that guidelines should:

- 1) Be simple to use and understand by a wide audience;
- 2) Rely on criteria that are measurable and methods that are quantifiable to ensure consistent application over time;
- 3) Require all services to meet minimum expectations at some point so that limited public resources can be responsibly and efficiently targeted;
- 4) Clearly delineate actions stemming from both poor and strong performance;
- 5) Provide more than one chance for a service to demonstrate performance but limit the amount of time a service has to perform before resources are reallocated (i.e. poor performers cannot continue forever).

During the Transit Study, CAT developed the following Service Design and Scheduling Guidelines:

Service Design

- Develop a service hierarchy, including Key Routes, Local Routes, and Lifeline Routes;
- Operate service consistently throughout the day;
- Realign service to improve reliability and directness;
- Consolidate duplicative services;
- Expand service to new areas.

Schedule

- Adjust service frequencies and spans to better match demand;
- Adjust Saturday schedules and discontinue some poorly utilized routes on Saturdays.

Published Industry Research and Best Practices

Published research is a valuable source of information and guidance, for both service design and facility design. Some of the specific documents used by CAT include:

- Transportation Research Board (TRB) Transit Cooperative Research Program (TCRP) *Transit Capacity and Quality of Service Manual*
- Transportation Research Board (TRB) Transit Cooperative Research Program (TCRP) Report 95: Chapter 9: *Transit Scheduling and Frequency*
- Transportation Research Board (TRB) Transit Cooperative Research Program (TCRP) Report 95: Chapter 10: *Bus Routing and Coverage*.

Other Agency Guidelines, Standards and Practices

Additionally, planners often review practices of other agencies. Appendix B includes a more detailed list of resources used to develop the agency guidelines currently in use.

Overview of Factors Addressed By Guidelines

Service and facility guidelines can play a role in helping an agency meet its goals and objectives by providing flexible performance targets. Therefore, it is important that an agency select guidelines that correspond with their performance goals and targets.

This section is designed to provide an overview of quality of service measures and guidelines included in the TCRP Transit Capacity and Quality of Service Manual and a briefing of current service guideline practices of other transit agencies.

Land Use

Land use affects the level and nature of travel demand, and therefore influences transit service levels. Where employment centers and high density development exist, there is a greater opportunity for a greater transit market, given that other attributes present in the area are transit supportive. On the national scale, a ten percent increase in population density has been shown to correspond with a five percent increase in transit boardings.

CAT serves a mix of areas including neighborhoods, University grounds, and commercial centers. Residential densities in Eastern and Southern neighborhoods in the City are on average higher than those of the Northern neighborhoods, especially when compared to the highest density neighborhoods of Charlottesville. These differences offer unique challenges to transit service that affects decisions made about service frequency and service coverage. Land use and development patterns also affect accessibility to transit. To make transit service more attractive and to enhance service levels, areas served with transit service must also provide accessibility to pedestrians.

Access to Transit

Access to a transit stop or transit center is a critical point in connecting citizens with transit service. Best practices suggest that a quarter mile is the farthest transit agencies should expect passengers to walk to buses. CAT attempts to locate bus stops so that customers walk no more than a quarter of a mile to access a bus stop. There are multiple components to transit accessibility that include not only walking distance, but factors such as street design and pedestrian pathways.

Street designs, pedestrian crossings, weather and topography also affect pedestrian accessibility and willingness to walk. When streets are designed to provide more direct access for pedestrians to transit routes and neighborhood amenities, this may encourage more people to travel via alternative modes. Wide and busy streets can discourage pedestrian travel, so the provision of signalized crossings in such areas makes pedestrian travel friendlier. The difficulty pedestrians have crossing the street can be expressed by the amount of delay they experience when crossing the street.

Pedestrians become impatient when their wait exceeds 30 seconds and display risk-taking behaviors such as jay-walking or running across the street. For transit providers, locating transit stops where there are designated pedestrian crossings and adequate pedestrian amenities can help encourage further use of the transit system. TCRP's *Manual* suggests pedestrian access be measured through pedestrian level of service (LOS), which could be measured by determining traffic volumes, facility type, and amount of separation between pedestrians and traffic in the vicinity of a transit stop.

Service Quality Factors

Aside from factors that affect actual service provision, there are additional components of service that impact service quality and ultimately, transit system performance. These areas including service frequency, on-time performance and travel time can serve as both performance measurements and service guideline areas for transit agencies to consider.

Service Frequency

Service frequency is important to attracting more transit riders. Service frequency determines how often a user can access the transit mode available, provided it is during the time and destined for the place the user wishes to travel. TCRP Report 100 identifies average headway as the commonly used service measure for frequency. With more frequent service, transit users have more flexibility in selecting travel times and shorter waits when a bus is missed or the schedule is unknown. Increased service frequencies can make transit a more attractive form of travel. Many transit agencies have implemented policy headways, which specify the frequency in minutes that a type of transit service operates. Policy headways are considered a guideline that provides a minimum requirement for different types of service including express, local and commuter services.

On-Time Performance

On-time performance is the commonly used measure for service reliability, which is tied to service frequency. If the service is scheduled for arrival every 20 minutes, but arrives late, it impacts both the frequency and reliability of the service. CAT employs on-time performance as a measure to manage transit route performance. The TCRP Manual identifies “on-time” as a vehicle being 0 to 5 minutes late, with early departures not considered to be on-time. Transit vehicles running early can be a significant contributor to low on-time performance. On-time performance is particularly valuable to measure vehicles with less frequent service while headway adherence may be a better measure to determine reliability on transit service operating at headways of 15 minutes or less. Headways are an important guideline in service reliability because vehicles that do not adhere to headways can cause longer wait times for passengers and a stacking of transit vehicles, leading to a decline in the efficiency of the service.

Travel Times

Travel times for commuters are also a consideration in thinking about service guidelines. Total trip time for transit users includes travel time to the transit stop, wait time for the transit vehicle, on-board travel time and any additional transfer or walking time to their final destination. Passengers perceive travel times differently during portions of their trip. Travelers tend to value waiting and walking time to transit higher than in-vehicle time. Transfers further impose a perceived cost on riders. From the perception of a transit user, transfer wait time costs tend to be greatest during the first few minutes and decline as waiting duration increases. When passengers have to transfer, it is estimated that the penalty is 5-15 minutes of in-vehicle time. There are means to reduce perceived travel times through increased comfort, improvements in walking conditions, reduced waiting times and increases in speed and reliability of a service.

Passenger Loads

Transit can become less attractive for passengers when they encounter crowded vehicles. Crowded transit vehicles can deter users while also slowing down transit operations. The degree of passenger crowding, can be measured by load factor. CAT regularly monitors the load factor on route trips through available data and with a load factor of 1.0, meaning that there are an equal number of

seats and passengers on that trip at its maximum load point. Passenger loads and service frequencies interact, with higher boarding volumes and higher frequency, passengers can be assured that their waiting time will be minimal for the next bus.

Charlottesville Area Transit operates only a single mode – Bus:

LOAD FACTORS	Capacity	Load Factor	Standees
26-Foot Body on Chassis Small Bus	20	1.0	0
30-Foot HD Transit Coach	28	1.3	8*
35-Foot HD Transit Coach	32	1.3	9*

Use of Guidelines to Evaluate Services

- **Tie Between Guidelines and Performance Measures** - Many agencies develop guidelines to help guide and evaluate service. There tends to be a close linkage between service standards or guidelines, and agency performance measures.
- **Guidelines as One Component of an Evaluation System** – Established guidelines are one component of an evaluation system which sets expectations for route or system performance, they are not used in isolation to discontinue poorly performing routes. Services that consistently perform poorly are subject to monitoring, review and possible action to modify or improve it. Poor performing services will be put on probation and evaluated on a continual basis. If efficiency becomes even more urgent in the context of rising operating costs and possibly lost grant subsidies, CAT may need to consider applying the route performance thresholds and other service evaluation in a more aggressive manner.

Additional Issues for Discussion

Many transit agencies have developed guidelines to help track and evaluate performance. Published guidelines or standards can help provide a basis for planners to make difficult decisions when balancing service quality with efficiency. Identified guidelines can assist policymakers and stakeholders in judging whether an agency’s actions are consistent and based on established criteria. They can also help ensure consistency across service, service types and facilities. As CAT’s system evolves due to initiatives such as the Transit Study and fluctuations in the transit market there may be value in updating guidelines to better reflect and guide CAT’s service and facility development. In addition, it may be important to establish guidelines to help respond to the emerging issues of fuel shortages and increasing demand for transit which suggest that new, innovative approaches to service delivery may be needed to meet demand.

- 1) **A “standard” typically establishes a direct link between identified criteria and specific actions, providing consistency but lacking flexibility. Where does CAT need standards?**

- 2) A “guideline” typically establishes an indirect link between identified criteria and specific actions, providing flexibility and opportunity for the application of professional and political judgment to dynamic situations and conditions. Where does CAT need guidelines?
- 3) Where should CAT use the emerging best practices and industry standards?
- 4) Should CAT’s guidelines be compiled in a single document including annotations of industry documents and sources defining best practices or regulations?
- 5) What is the right balance between detailed guidelines and simplicity?

Appendix A: Guidelines for Transit Service Design

The following guidelines for transit service design represent some common service planning principles used by CAT. They have been adapted from CAT’s documents, national industry research and service guidelines used by other transit agencies.

Coverage

The closeness of a transit route to a person’s origin or destination is a key factor in choosing to use transit. A suggested standard for bus route spacing is approximately every 800 feet in urban, higher density areas, and every 0.25 mile in lower density areas. Closer spacing may be justified where the nature of the terrain discourages pedestrian travel. Adequate and well-maintained sidewalks along with good street lighting encourage transit use. One-quarter mile (1,320 feet) in flat terrain is the accepted standard for walking access to bus transit; some studies suggest pedestrians will walk greater distances to access more frequent service. CAT strives to design service so that 90% of City residents are within a one-quarter mile walk to a CAT bus stop.

General-purpose dial-a-ride service that has flexible routing can be used to expand the coverage of fixed-route service where demand levels, topography, or poor street connectivity restrict fixed-route coverage. (*CAT’s Bus Stop placement guidelines are attached as Appendix D*)

Route travel time

Both absolute travel time and transit travel time in relation to competing modes are factors that influence the choice to use transit. Total transit travel time is influenced by route length, route spacing, service frequency and distance between stops, posted speed limits, traffic congestion, signal timing, and the fare-collection system. Transit routes should be designed to be as short as possible to serve their markets. A maximum travel time of 60 minutes per one-way trip is highly desirable to maximize productivity and maintain acceptable schedule reliability in mixed-traffic conditions.

Directness of travel

Circuitous transit routings are not attractive because they lengthen transit travel times to be more unfavorable in relation to automobile travel. Transit travel times should be no more than 20-25% longer than comparable trips by automobile. As a general rule, bus routes should not serve off-route stops where a significant number of through riders would be delayed. Service should be provided in both directions on the same street wherever possible to maximize customer convenience and service effectiveness. One-way routes, loops, and “snakes” should be avoided when designing bus routes except where required by street configurations or route terminals, since they increase travel times for through riders.

Level of service

The level of service for a bus route can be defined in terms of either the number of trips per hour past a given point, or the frequency in minutes (also called “headway”) between bus trips. The two definitions are not necessarily the same for the customer. For example, a route could operate four trips per hour, but not an even 15-minute frequency, if the trips are not scheduled evenly. Service frequency is also an important measure of convenience for transit riders. Either levels of demand for service or policy determine how often transit service operates. “Policy headways” are a quality control tool used by some transit agencies to specify certain service frequencies that maximize customer attraction while meeting a minimum standard of effectiveness. Frequencies of every 30 minutes during weekday rush hours and every 60 minutes during other times are considered minimum thresholds for effective fixed-route service in urban areas.

Span of service

The number of hours per day when transit service is provided along a route, segment of route, or between two locations also plays a role along with frequency and coverage in determining the availability of transit service to potential users. Transit service must be available near the time a trip needs to be made in order for transit to be a travel option. Ideally, transit service should operate according to the standard time periods specified (peak rush hours, midday, evening, etc.) to minimize customer uncertainty. Minimum frequencies, or “policy headways,” can be set by type of route and time period.

Load standards

Load standards are thresholds of the ratio of passengers on board to seats available. Historically, CAT’s guidelines provided everyone a seat during nonpeak periods and tolerated standees for no longer than 20 minutes during weekday peak hours.

CAT’s identified *Transportation Service Guidelines* gave the highest priority to alleviating peak loads greater than 1.30, load factors between 1.20 and 1.30 where passengers are standing 20 minutes or longer, and loads between 1.0 and 1.20 during non-peak periods. Peak trips with load factors between 1.0 and 1.20 are the second priority. A full seated load would have a load factor of 1.0. Today, CAT attempts to address any load where passengers are standing 20 minutes or longer, and any passenger load exceeding a 1.20 average load factor.

Route duplication

Operation of more than one route on the same street should be avoided when the routes serve common destinations, except for streets approaching a downtown or urban center, transit center, or park-and-ride facility.

Transfers

Requiring transfers between routes can add to a rider’s total trip time by transit, but can provide increased choice of destinations accessible by transit. Waiting times for changing from one route to another can be minimized by providing frequent service on one or several routes, or by coordinating schedules at certain locations such as transit centers, park-and-ride facilities, or key intersections. One form of schedule coordination is called “timed transfer,” where routes arrive and leave at the same time, with at least a five-minute wait. These recurring waits are known as “pulses.” Routes sometimes can be scheduled to arrive a certain number of minutes before or after the service to which they are connecting. Other, more limited forms of coordination are also used, such as scheduling connections in the predominant direction of travel. Scheduling for timed connections sometimes requires additional buses and service hours.

Turnbacks

On longer transit routes, a turnback (sometimes called a “shortline”) might be used where passenger loads decline sharply, or where ridership cannot justify a higher service frequency. Turnbacks tend to be more common on higher frequency routes operating every 15 minutes or more often, where the potential savings in operating cost from not operating the same frequency over the entire route are greater.

Appendix B: Service and Facility Development Resources

Service Planning and Implementation

TCRP Report 100: Transit Capacity and Quality of Service Manual

TRB’s Transit Cooperative Research Program (TCRP) Report 95: Chapter 9 – *Transit Scheduling and Frequency* http://www.trb.org/news/blurb_detail.asp?id=3747

TRB’s Transit Cooperative Research Program (TCRP) Report 95: Chapter 10 – *Bus Routing and Coverage*. http://www.trb.org/news/blurb_detail.asp?id=4045

TRB's Transit Cooperative Research Program (TCRP) Report 30: *Transit Scheduling*. http://www.trb.org/news/blurb_detail.asp?id=2617

Myths and realities in walkable catchments: The case of walking and transit. *Roads & Transport Research*. Jun 2003, page no. unknown by Ker, I., & Ginn, S. (2003).

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http://www.findarticles.com/p/articles/mi_qa3927/is_200306/ai_n9255068.

King, R. D. (1998). New designs and operating experiences with low-floor buses (TCRP report 41).

Benn, H. P. (1995). Bus route evaluation standards (TCRP synthesis of transit practice 10).

Washington DC: Transportation Research Board.

Transit Route Facilities Development Resources

ADA Accessibility Guidelines for Buildings and Facilities, amended August 2005

APTA Standard Bus Procurement Guidelines – June 28, 2002

TCRP Report 19, Guidelines for the Location and Design of Bus Stops, Texas Transportation Institute, Texas A&M Research Foundation, Texas A&M University, 1996

Appendix C: Service Guidelines at Charlottesville Area Transit

(Charlottesville Area Transit operates only a single mode – Bus):

Vehicle Load Factors:

	<u>Capacity</u>	<u>Load Factor</u>	<u>Standees</u>
26-Foot Body on Chassis Small Bus	20	1.0	0
30-Foot HD Transit Coach	28	1.3	8*
35-Foot HD Transit Coach	32	1.3	9*

***CAT Policy:**

- *Service Quality – Overloads:* A route is defined as overloaded when it is at or above 1.3 times seated capacity or at 1.2 times seated capacity with passengers standing for 20 minutes or longer.

Headway:

- *Route travel time* - Both absolute travel time and transit travel time in relation to competing modes are factors that influence the choice to use transit. Total transit travel time is influenced by route length, route spacing, service frequency and distance between stops, posted speed limits, traffic congestion, signal timing, and the fare-collection system. Transit routes should be designed to be as short as possible to serve their markets. A **maximum travel time** of 60 minutes per one-way trip is highly desirable to maximize productivity and maintain acceptable schedule reliability in mixed-traffic conditions.
- *Level of service* - The level of service for a bus route can be defined in terms of either the number of trips per hour past a given point, or the frequency in minutes (also called headway”) between bus trips. CAT develops route services with minimum frequencies of every 30 minutes during weekday rush hours and every 60 minutes during other times. Two major routes on the system, Route 7 serving the northern commercial corridor and the Free Trolley serving the University Grounds, operate on 20 minute peak hour headways.

On-Time Performance:

- *Service Quality – Schedule adherence:* A route is defined as on-time if it is up to 5 minutes late or 1 minute early. CAT targets to achieve a 90 percent on-time rate.

Service Availability: Span of Service

CAT provides services Monday through Saturday to all areas during the hours from 6:00 AM to 6:00 PM. Some routes have identified demand that make it necessary to operate until 11:00 PM. On those identified routes, service will be provided at least hourly. Routes are surveyed and evaluated annually to determine the necessity of service expansions and adjustments to schedules are made accordingly based upon these evaluations.

Route	Route Type	Service Days	Service Hours
1	Local	Monday – Friday	6:15AM – 10:05PM
2	Key	Monday – Saturday Sunday	6:35AM – 11:42PM 7:35AM – 5:42PM
3	Local	Monday – Saturday	6:00AM – 11:45PM
4	Local	Monday – Friday Saturday	6:25AM – 12:00AM 6:00AM – 12:00AM
5	Local	Monday – Saturday *Sunday Service Route 12	6:15AM – 11:00PM
6	Local	Monday – Saturday	6:30AM – 12:00AM
7	Key	Monday – Saturday *Sunday Service Route 12	6:25AM – 11:32PM

8	Local	Monday – Friday Saturday	6:30AM – 6:57PM 6:30AM – 6:27PM
9	Local	Monday – Saturday	6:45AM – 6:42PM
10	Local	Monday – Saturday	6:30AM – 11:27PM
11	Lifeline	Monday – Friday Saturday	6:00AM – 9:27PM 6:00AM – 6:27PM
12	Key	Monday – Saturday *Sunday Service Route 12	NO WEEKDAY SERVICE 7:45AM – 5:45PM
Trolley	Key	Monday – Saturday Sunday	6:35AM – 11:32PM 8:00AM – 5:47PM

Charlottesville Area Transit Vehicle Assignment: Fleet vehicle assignment is based upon CAT’s established Route Hierarchy as follows:

1. Key Routes including the Free Trolley, Route 2, Route 7, and Route 12 utilize 35-foot coaches and 35-foot Trolleys;
2. Local Routes, 30-foot coaches or 26-foot body-on-chassis coaches, depending upon road and weather conditions and time of day;
3. Lifeline Routes, Route 11 only, 30-foot coaches.

Appendix D: Charlottesville Area Transit Bus Stop Policy

It is Charlottesville Area Transit (CAT) policy to encourage the city, county, and developers to coordinate with CAT on the location of bus stops. CAT does not own or maintain the bus stop areas, and the ultimate decision for placement of the bus stop is made by the jurisdiction in which the stop is located.

When properly located, adequately designed, and effectively enforced, bus stops can improve service and expedite general traffic flow. Decisions regarding bus stop spacing and location call for a careful analysis of passenger service requirements (demand, convenience, and safety), the type of bus service provided – local routes, key routes, or lifeline routes - and the interaction of stopped buses with general traffic flow.

Bus Stop Spacing

Bus stops are the locations where bus passengers access the CAT system. Bus stops must therefore be convenient to the places where passengers wish to go. Convenience and speed must be balanced in determining appropriate bus stop placement, as too many stops can slow down travel times. In most areas CAT generally seeks to have bus stops 800 to 1,000 feet apart. This target has been set with the goal of increasing travel speed for CAT buses. Passenger usage of bus stops is also an important factor when considering bus stop placements or removals.

Bus stops should be close enough that passengers can walk to them easily, but far enough apart to help buses move quickly. The matrix that follows serves as a general guideline for bus stop spacing. Some discretion may be applied when balancing CAT’s interest in improving service and expediting traffic flow with consideration of passenger’s safety, interests, and needs.

The matrix below lists CAT’s bus stop spacing for the three different service types. It is CAT’s intent to use the maximum bus stop spacing unless superseded by other determining factors such as topography (hills), limited access areas (freeways or bridges), traffic / pedestrian safety factors, surrounding attractors, and transfer points.

Bus Stop Spacing Guidelines:

Service Type	Spacing (feet)	Explanation
Local (Routes 1, 3, 4, 5, 6, 8, 9, & 10)	800 - 1,300 feet	Stops may be located more closely than listed based on trip attractors, stop activity or demand, transfer points or other land uses that may warrant it.
Key (Routes 2, 7, 12 & Trolley)	1,000 - 1,300 feet	Stops may be located more closely than listed based on trip attractors, stop activity or demand, transfer points or other land uses that may warrant it provided that the increased stops do not cause operational delays
Lifeline (Route 11)*	1,000 - 1,300 feet	Stops may be located more closely than listed based on trip attractors, stop activity or demand, or transfer points. Service may use local stops where necessary to provide geographic coverage.

**Where there is no underlying local service, Lifeline service can act as a local service and use stop spacing criteria for local service.*

Some CAT routes may have stops that do not conform to the spacing criteria in this policy.

Bus Stop Location

Bus stops on the street are usually located along the street curb for direct, safe, passenger access to and from the sidewalk, waiting, and walking areas. Stops may be located either in the intersection exit (far – side), the intersection approach (near – side), or at mid-block.

- Far – side stops are the preferable choice for service in general because they reduce conflicts between right-turning vehicles and stopped buses, eliminate site distance deficiencies on approaches to an intersection, and encourage pedestrian crossing at the rear of the bus.
- Near – side stops are acceptable when a far – side stop is deemed unsafe or impractical.

- Mid – block stops are considered special case stops and are to be used only when no other alternative is available and only upon approval of the CAT manager and the jurisdiction where the bus stop will be located.

When bus stops are initiated or relocated, bus stop locations shall be chosen such that, to the maximum extent practical, the areas where lifts or ramps are to be deployed comply with the Americans with Disabilities Act Accessibility Guidelines (ADAAG).

Bus Stop Enforcement

Local law enforcement agencies shall enforce all state laws, local ordinances and regulations governing bus stops.

Bus Stop Installation or Removal

All bus stop locations must be approved by the appropriate local jurisdiction (City or County staff). CAT Staff will also coordinate with appropriate local staff (NDS in Charlottesville or Community Development in the County and at times private property owners) to consider traffic patterns, street design, traffic safety issues, and impacts to adjacent properties. Upon receipt of a letter of approval from the city traffic engineer, and after any improvements to the street, if required, have been completed by the municipality (i.e., paving, striping or painting curbs), the bus stop will be installed by CAT. In the event that CAT receives a request to remove or relocate a bus stop, CAT staff will first analyze requests, and, if necessary, consult *with the appropriate jurisdiction's staff*.

Charlottesville Area Transit (CAT) Distribution of Transit Amenities

(Rev. 11-17-2016)

Transit amenities for the CAT system include, but are not limited to, bus stops, benches, shelters, bike racks, transit centers, schedules, system maps, intelligent transportation systems, and language proficiency measures. CAT has a fixed bus stop program.

Bus Stops

CAT's service standard is to provide, at a minimum, landing pads at all bus stops. Where funding and right-of-way allow, CAT will also improve sidewalks and pedestrian ramps. CAT conducted an analysis of all current bus stops using the following factors to prioritize which bus stops should receive enhancements and to determine what enhancements to implement.

- 1) Stop usage
- 2) Number of routes serving a stop
- 3) Existing condition of stop
- 4) Need to acquire right-of-way (ROW) to make necessary improvements
- 5) Improvements already planned by local and state jurisdictions
- 6) Density of elderly population in area
- 7) Density of low income population in area
- 8) Density of minority population in area

- 9) Nearby destinations
- 10) Walkability to the bus stop
- 11) Pedestrian safety concerns

Stops serving elderly, low income and minority origins and destinations were weighted higher, therefore they received higher priority. With the completion of the study, CAT has been implementing the suggested modifications to the transit amenities at the fixed stops. CAT will use its ongoing federal transit enhancement funds to continue this work.

Benches

The CAT service standard is to have a bench at every stop that has enough right-of-way (ROW) to allow for a bench. If a specific need is identified by drivers or customer comments, based on the stop usage or demographics of the population using a stop, CAT may install a bench at a particular stop. The locations will be compared against the minority/nonminority and low income/ non low-income routes.

Shelters

The CAT service standard for shelters is to have a minimum of 50 passengers daily boarding or off boarding at that location. The number of passengers using each stop comes from the NTD survey sampling conducted by CAT on an on-going basis. CAT currently has shelters at 39 of its 321 stops and has funding and plans to install new and replacement shelters at additional existing bus stops. CAT will continue to use its ongoing federal capital enhancement funding to place shelters at qualifying stops.

Bike Racks

The CAT service standard is to have two-capacity bike racks on all buses. CAT currently has bike racks on all route buses. CAT will conduct an analysis of which bus stops warrant and have room for bike racks as the bus stop system goes through future enhancements.

Schedule

The CAT service standard is to provide schedules on buses, at City owned buildings and other high volume locations throughout the service area. Outlets are selected based on the location and availability of the facility to the general public. There is no charge for the schedules.

CAT posts all schedule information, including maps and times, on its website.

The CAT service standard also calls for providing the schedule information in large type on the website, in formats that can be accessed by text readers, and providing translation services upon request. Detailed routing information, including left/rights, is also provided on the website.

System Map

The CAT service standard is to provide a system map and customer service number on all bus shelters and major transfer locations.

Intelligent Transportation System

CAT's service standard is to have electronic fare payment systems on all fixed-line vehicles. CAT has met this service standard. Due to changes in technology, the current electronic system will only accept cash payments. CAT has upgraded its fare collection to allow for e-ticketing and accepting other electronic media as fare payments. CAT also utilizes AVL technologies and mobile applications to track routes in the system. The implementation phases of these projects were prioritized based on

how many people each technology could reach, with the elderly, disabled and low-income populations a priority.

Service Availability

CAT's uses the ratio of 70% of its service based on ridership and demand and 30% of its service based on serving the transit dependent population as a guideline for establishing service availability. CAT uses the industry standard of ¼-mile walking distance when assessing what area a route serves and how far customers can travel to a bus stop. Initial stop locations on all route services are identified using the ¼-mile walking standard. Exact stop placement may be adjusted from this target location based on destinations, passenger safety, bus safety, vehicle safety or site restrictions. Within downtown areas, the service standard is to have stops every two blocks.



Title VI Employee Annual Education Policy Form

FOR FEDERAL FISCAL YEAR 2017 (*October 1, 2016 – September 30, 2017*)

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color, and national origin in programs and activities receiving federal financial assistance. The Federal Transit Administration works to ensure nondiscriminatory transportation in support of their mission to enhance the social and economic quality of life for all Americans. The FTA Office of Civil Rights is responsible for monitoring FTA recipients' Title VI programs and ensuring their compliance with Title VI requirements.

Charlottesville Area Transit Title VI Policy:

No person shall, on the grounds of race, color or national origin, be excluded from participating in, be denied the benefits of, or be subject to discrimination under any Charlottesville Area Transit program or activity.

All CAT employees are expected to consider, respect, and observe this policy in their daily work and duties. If a citizen approaches you with a question or complaint regarding their Civil Rights, please direct him or her to the Title VI Coordinator for CAT, Christina Downey at 434-970-3849.

In all dealings with citizens, use courtesy titles (i.e. Mr., Mrs., or Miss) to address them without regard to race, color or national origin.



Employee Acknowledgement of Receipt of Title VI Policy

FOR FEDERAL FISCAL YEAR 2017 (*October 1, 2016 – September 30, 2017*)

I hereby acknowledge the receipt of the Charlottesville Area Transit Title VI Policy. I have read and understand the policy and am committed to ensuring that no person is excluded from participation in, or denied the benefits of Charlottesville Area Transit’s services on the basis of race, color, or national origin, as protected by Title VI of the Civil Rights Act of 1964.

Print Name

Signature

Date



CAT Discrimination Complaint Form (Page 1 of 2)

If you think you have been discriminated against on the basis of race, color, or national origin or that you were excluded or denied service by CAT due to a disability, please fill out this form and send or email it to: CAT ADA/Title VI Coordinator, 1545 Avon St. Ext., [Charlottesville VA. 22902](http://Charlottesville.VA.22902). Or email it to: downeyc@charlottesville.org



Name (Complainant):		Phone:	Home address (St #, city state, zip):
Email Address:			
Date of Incident:	Route #:	Bus #:	
Time of incident:	Location of incident:	Driver Name/Description:	
Discrimination based on:		<input type="checkbox"/> ADA Accessibility <i>If your complaint is regarding Bus or Bus Stop Accessibility, please fill out your contact information on this page and then move to <u>PAGE 2</u></i>	
TITLE VI: <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin ADA: <input type="checkbox"/> Disability <input type="checkbox"/> ADA Accessibility (see blue bo			
Please describe the alleged discrimination incident. You may attach a separate sheet of paper if necessary. You should include all specific details that might assist in investigating the allegation. Please also provide any other documentation that is relevant to this complaint.			
11. Please list below an person(s) we may contact for additional information to support or clarify your complaint (witnesses, fellow employees, supervisors, others):			
<u>Name:</u>		<u>Relationship:</u>	<u>Contact Information:</u>
Signature: (complainant must sign and date)			Date:

ADA Accessibility Complaint Form (Page 2 of 2)

Your ADA accessibility complaint/concern is regarding: <i>(check one)</i>	
<input type="checkbox"/> Bus Stop <input type="checkbox"/> Landing Area <input type="checkbox"/> Bus Shelter <input type="checkbox"/> Bus <input type="checkbox"/> Other	
Bus Stop Location:	
What is the bus stop number?	
What route(s) or destination(s) does the bus stop serve?	
What is the direction of bus travel on that street? <i>(Northbound, Southbound, Eastbound, Westbound)</i>	
Please include any other information that will help CAT locate the bus stop.	
Landing Area Issues: (An area for a lift/ramp to deploy, when getting on or off the bus)	
Is there a landing area that can accommodate a customer using a mobility device?	<input type="checkbox"/> YES <input type="checkbox"/> NO
If so, are there problems with the landing area surface? <i>Please describe the problem(s).</i>	
Describe any obstacles that would limit the mobility of a wheelchair user? (i.e., trash receptacle, newspaper boxes, landscaping, etc.)	
Is the sidewalk or pathway leading to the bus stop accessible for a person using a wheelchair or mobility device?	
Passenger Shelter Issues:	
Please describe the issue if your complaint/concern is regarding Passenger Shelter accessibility.	
Bus Accessibility Issues:	
Bus Number (if applicable)	
Please describe any accessibility issues you may have experienced (<i>inoperable lift, securement apparatus, etc</i>)	
Other:	
If your complaint or concern is something other than what is listed here, please explain:	

ADA Formulario de Queja de Accesibilidad (Página 2 de 2)

ADA su queja de accesibilidad /preocupación está relacionado: (Marque uno):	
<input type="checkbox"/> Parada de Autobús <input type="checkbox"/> Área de Aterrizaje <input type="checkbox"/> Refugio de Autobús <input type="checkbox"/> Autobús <input type="checkbox"/> Otros	
Ubicación de la Parada de Autobús:	
¿Cuál es el número de la parada de autobús?	
¿Qué rutas o destinos sirve la parada de autobús?	
¿Cuál es la dirección del recorrido del autobús en esa calle? (Hacia el norte, hacia el sur, hacia el este, hacia el oeste)	
Por favor incluya cualquier otra información que ayudará a CAT a localizar la parada de autobús.	
Temas del área de aterrizaje: (Una zona para una ascensor/rampa implementar, cuando subir o bajar del autobús)	
¿Hay una zona de aterrizaje que puede acomodar a un cliente que usa un dispositivo de movilidad?	<input type="checkbox"/> SI <input type="checkbox"/> NO
Si es así, ¿hay problemas con la superficie de la zona de aterrizaje? Por favor, describa el problema (s).	
¿Describir cualquier obstáculo que limite la movilidad de un usuario de silla de ruedas? (es decir, basura de receptáculo, periódico, cajas, jardinería, etc.)	
¿La acera o camino que lleva a la parada de autobús accesible para una persona que usa una silla de ruedas o movilidad dispositivo?	
Temas de Refugio de Pasajeros	
Por favor describa el problema si su queja/preocupación es sobre accesibilidad del refugio de pasajeros.	
Problemas de Accesibilidad del Autobús	
Numero de Autobús (si corresponde)	
Por favor describa cualquier problemas de accesibilidad que puede haber experimentado (elevación inoperable, aparato de aseguramiento, etc.)	
Otros	
Si su queja o preocupación es algo distinto de lo que se encuentra listado aquí, por favor explique:	

FILE LOCATION: J Drive: PWTRANSIT: Charlottesville Area Transit: Planning: Civil Rights

Attachment E: Acknowledgment Letter of Receipt of Title VI Complaint



Acknowledgment Letter of Receipt of Title VI Complaint

Today's Date

Ms. Jo Doe
1234 Main St.
Charlottesville, VA 22902

Dear Ms. Doe:

This letter is to acknowledge receipt of your Title VI complaint against Charlottesville Area Transit alleging _____.

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by the following methods:

Telephone: 434-970- 3849
Email: Downeyc@charlottesville.org
Mail: Title VI Coordinator
1545 Avon Street, Ext.
Charlottesville, VA 22902

Sincerely,

Title VI Coordinator
Charlottesville Area Transit

Attachment F: Notification to Complainant that Title VI Complaint Is Substantiated



Notification to Complainant that Complaint Is Substantiated

Today's Date

Ms. Jo Doe
1234 Main St.
Charlottesville, VA 22902

Dear Ms. Doe:

The matter referenced in your letter of _____ (date) against Charlottesville Area Transit alleging a Title VI violation has been investigated.

(An/Several) apparent violation(s) of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

Thank you for calling this important matter to our attention. You were extremely helpful during our review of the program. (If a hearing is requested, the following sentence may be appropriate.) You may be hearing from this office, or from federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

Name
Title VI Coordinator



Notification to Complainant that the Title VI Complaint Is Not Substantiated

Today's Date

Ms. Jo Doe
1234 Main St.
Charlottesville, VA 22902

Dear Ms. Doe:

The matter referenced in your complaint of _____(date) against the Charlottesville Area Transit alleging _____has been investigated.

CAT's Title VI Coordinator has analyzed all available materials and facts pertaining to your case for evidence of CAT's failure to comply with any of the civil rights laws. The results of the investigation did not indicate that the provisions of Title VI of the Civil Rights Act of 1964 were violated in this case. As you know, Title VI prohibits discrimination based on race, color, or national origin in any program receiving federal financial assistance.

I therefore advise you that your complaint has not been substantiated, and that I am closing this matter in our files as of the date of this letter. You have the right to 1) appeal the decision with CAT within *15 calendar days* of receipt of this letter and/or 2) file a complaint externally with the Federal Transit Administration at:

*Federal Transit Administration
Office of Civil Rights
Attention: Complaint Team
East Building, 5th Floor – TCR
1200 New Jersey Avenue, SE
Washington, DC 20590*

Thank you for taking the time to contact us. If I can be of assistance to you in the future, do not hesitate to call me.

Sincerely,

Name
Title VI Coordinator

CITY OF CHARLOTTESVILLE

"A World Class City"

Office of The City Manager

P.O. Box 911 • Charlottesville, Virginia 22902

Telephone 434-970-3101

Fax 434-970-3890

www.charlottesville.org



October 18, 2016

Lynn A. Bailey
Civil Rights Officer, Region III
Federal Transit Administration
U.S. Department of Transportation
1760 Market Street, Suite 500
Philadelphia, PA 19103

Dear Ms. Bailey,

In conjunction with the 2016 Title VI program update submitted by the City of Charlottesville (Charlottesville Area Transit), I hereby report that I have read and approved the 2016 Title VI Plan for Charlottesville Area Transit.

You may contact Christina Downey at (434) 970-3849 or at downeyc@charlottesville.org with any questions or issues.

Sincerely,

Maurice Jones
City Manager
City of Charlottesville



Limited English Proficiency (LEP) Employee Questionnaire

Employee Name: _____

It is a requirement of Title VI of the Civil Rights Act of 1964 that CAT provide meaningful access to people with **Limited English Proficiency** (LEP). Treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. CAT would like to determine the frequency with which CAT staff comes into contact customers who do not speak English very well or at all. Please fill out the brief questionnaire below regarding your interaction with LEP customers.

1. **What is your position at CAT?** Bus Driver DTS Customer Service Representative

Dispatch Supervisor Administration Maintenance

2. In a **ONE MONTH** period, how often do think you come into contact with Non-English speaking CAT customers (include phone contact if you have it).

Never 1-4 times a month 5-10 times a month 11-20 times a month
 20+ times a month Every day other

3. In a **ONE MONTH** period, how often do you get a request for translation services (include phone contact if you have it).

Never 1-4 times a month 5-10 times a month 11-20 times a month
 20+ times a month Every day Other _____

4. **Which language (besides English) do you come into contact with most often? (check one)**

Spanish Asian Pacific Languages French
 Arabic Other _____

5. **Are you familiar with the "I Speak" cards available for non-English speaking riders?** Yes No

6. **Is English your primary language?** Yes No

7. **Do you speak any language besides English?** Yes No If yes, which? _____

8. **Would you be interested in assisting with CAT translation services?** Yes No N/A

9. **How do you assist LEP persons who seek assistance?** _____

10. **Can you recommend ways in which CAT could improve your ability to communicate with members of the public who do not speak English very well or at all?** _____