

Tri-Valley Transit, Inc.

Title VI Program Update

March 26, 2024

Tri-Valley Transit, Inc. (TVT) is a small rural non-profit transportation provider. With a maximum of 38 buses in deviated fixed-route operation at any time, TVT is focused on serving its communities with personalized, friendly transportation service.

I. STATEMENT OF POLICY	2
II. NOTIFICATION TO BENEFICIARIES	3
III. TITLE VI COMPLAINT PROCEDURE AND FORM.....	3
IV. COMPLAINT AND LAWSUIT LOG	8
V. PUBLIC INVOLVEMENT AND OUTREACH PLAN/PROCESS.....	8
VI. LANGUAGE ASSISTANCE PLAN	11
INTRODUCTION.....	11
A. FOUR FACTOR ANALYSIS	12
B. MONITORING.....	17
VII. BOARD MEMBERSHIP.....	18
VIII. MONITORING OF SUBRECIPIENTS.....	20
IX. TRANSIT FACILITY	20
X. SERVICE STANDARDS	20

I. Statement of Policy

Tri-Valley Transit (TVT), as a subrecipient of federal grant money through the Vermont Agency of Transportation, is required by the FTA to conform to Title VI of the Civil Rights Act of 1964 and its amendments. Title VI of the Civil Rights Act of 1964 requires that no person in the United States, on the grounds of race, color or national origin be excluded from, be denied the benefits of, or be subjected to discrimination, under any program or activity receiving federal financial assistance. Presidential Executive Order 12898 addresses environmental justice in minority and low-income populations. Presidential Executive Order 13166 addresses services to those individuals with limited English proficiency.

TVT is committed to enforcing the provisions of Title VI and protecting the rights and opportunities of all persons associated with TVT or affected by its programs. TVT's commitment includes vigorously enforcing all applicable laws and regulations that affect TVT and those organizations, both public and private, which participate and benefit through our programs.

TVT will take positive and realistic affirmative steps to ensure that all persons and/or firms wishing to participate in its programs are given an equal and equitable chance to participate. Any sub-recipients and contractors are required to prevent discrimination and ensure nondiscrimination in all of their programs, activities and services.

Any person(s) who feels that they have been discriminated against is encouraged to report such violations in writing to the TVT office as described in section III.

Jim Moulton
Jim Moulton (Apr 22, 2024 10:31 EDT)

Jim Moulton, Executive Director

II. Notification to Beneficiaries

TVT's notice to beneficiaries of protection from discrimination on the basis of race, color, or national origin is provided below.

This notification is posted in the following means and locations:

- On all buses operated by TVT's operating divisions (AR and ONW)
- At all passenger shelters
- On the agency's website <https://www.trivalleytransit.org/title-vi>
- In all schedule booklets
- On all public meeting notices
- In the lobby of the Community Transportation Centers and the Randolph Depot.

Title VI of the Civil Rights Act

Tri-Valley Transit (TVT) operates its programs and services without regard to race, color and national origin as stipulated in the Title VI of the Civil Rights Act of 1964. If you feel you have been discriminated against based on your race, color or national origin, you may file a complaint with TVT's Title VI Officer. In Addison County call (802)388-2287 and in Orange/No. Windsor Counties call (802)728-3773, or email info@trivalleytransit.org, or click on the [complaint form](#) link below. You also have the right to file a complaint with the Vermont Agency of Transportation Title VI/ADA Coordinator at (802)595-6959. If you would like more information about your Title VI rights, please visit vtrans.vermont.gov/civil-rights/compliance/titlevi or call (802)595-6959.

III. Title VI Complaint Procedure and Form

Receiving and Documenting Complaints

Complaints via Phone Call, Email/Website or in Person: When a member of the public contacts TVT and states that s/he wishes to file a Title VI complaint, the person will be directly referred to the appropriate Title VI officer who will document the complaint using the Discrimination Complaint Form (attached). Should the Title VI officer be unavailable, the staff member assisting the complainant shall complete the Discrimination Complaint Form and forward to the HR Director or designee for processing and forwarding to the Title VI Officer. If the HR Director or designee is not available, a copy of the complaint will be given directly to the Title VI Officer. When the form is given directly to the Title VI Officers, they will be responsible for providing a copy to the HR Director or designee for processing. The Title VI Officer shall contact the complainant within five business days of receiving the complaint.

In the event that an individual calls in a complaint but does not specifically state that s/he wishes to file a Title VI complaint, the staff member taking the complaint shall follow the standard (non-Title VI) complaint documentation procedures. If the complaint **may** involve Title VI, the HR Director or designee shall forward the person's contact information and the complaint form to the Title VI officer.

Interim Title VI Officer: If the Title VI officer will be out of the office longer than five business days, an interim Title VI officer shall be selected and he/she shall be forwarded the Title VI complaint phone calls and emails until the permanent Title VI officer returns.

Using the Complaint Forms (see below)

1. A complaint form is used for all complaints and is initiated by the staff member receiving the complaint. If the complainant specifically files a Title VI complaint, the process shall be as described above including the use of the Discrimination Complaint Form.
2. Essential information on the form includes the following:
 - a. Date of the incident that is the subject of the complaint
 - b. Time of the incident
 - c. Location of the incident
 - d. Circumstances of the incident in as much detail as is available, including description of the issues, and the names and job titles of those individuals perceived as parties in the complaint.
3. The completed form, along with any other communication, will be submitted to the HR Director or designee for processing who will then forward to the department manager, Regional Director, Community Relations Manager and if appropriate, the Safety Officer and/or Title VI Officer of the appropriate TVT subregion. For complaints not deemed to be Title VI, the department manager will determine the jurisdiction and acceptability of complaint and any need for additional information. After any additional information is procured, the department manager in consultation with the Regional Director will determine appropriate action.
4. All Title VI complaints and possible Title VI complaints will be sent to the Title VI officer for review and if necessary, investigation.
5. The Title VI complainant will be provided with written notification of TVT's determination of whether the complaint falls under Title VI jurisdiction. If the complaint is not Title VI, standard complaint procedure will be followed.
6. A complaint may be rejected for the following reasons:
 - a. More than 180 days passed between the alleged incident and the filing of the initial complaint.
 - b. The allegation does not involve a basis covered under Title VI, such as race, color, or national origin.
 - c. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
 - d. The complainant cannot be located after reasonable attempts.
7. A complaint determined to be Title VI will be assigned a case number and be logged in a database maintained by the HR Director or designee identifying the complainant's name, date of incident, alleged harm, and the race, color, or national origin of the complainant.

8. The Title VI officer will initiate an investigation of the complaint, assisted by other members of TVT staff as necessary, and complete a report within 90 days of the Title VI determination. The report shall include a description of the incident, identification of those interviewed, findings, and recommendations for disposition.
9. The HR Director will review the report and with the Title VI Officer will refer the report to TVT's legal counsel, if deemed appropriate. The Title VI Officer will accept or reject the recommendation for disposition, in consultation with the HR Director and legal counsel, and if the individuals involved are found to be in noncompliance with Title VI, remedial actions will be determined.
10. The results of the investigation and the determination will be mailed to the complainant. Notice shall include information regarding appeal rights of the complainant and instructions for initiating such an appeal. Notice of appeals are as follows:
 - a. The first level of appeal is to the Executive Director of TVT. The Executive Director will review all the facts of the case and the process of the internal investigation. If any aberrations from normal procedure are discovered or if new facts come to light, TVT will reconsider the determination.
 - b. If the complainant is still dissatisfied with the determination and/or resolution set forth by TVT, the result may be appealed to VTrans. Complainant will be advised to contact:

Vermont Agency of Transportation
Office of Civil Rights & Labor Compliance
219 North Main Street
Barre, VT 05641

Appeals may also be submitted by telephone at (802) 595-6959

- c. If the complainant is dissatisfied with the determination and/or resolution set forth by VTrans, the same complaint may be submitted to FTA for investigation. Complainant will be advised to contact the Federal Transit Administration, Office of Civil Rights, Transportation Center, Kendall Square, 55 Broadway, Suite 920, Cambridge, MA 02142-1093.
11. A copy of the complaint and TVT's investigation report, letter of finding and remedial action plan will be submitted to VTrans within 120 days of the initial receipt of the complaint.

Enter the Complaint into the TVT Title VI Complaint and Lawsuit Log

Any Title VI complaint received by TVT shall be entered into the TVT Title VI Complaint and Lawsuit Log. The following information must be included in the log:

- Date the complaint was filed
- A summary of the allegations
- The status of the investigation
- Actions taken by the recipient in response



DISCRIMINATION COMPLAINT

Type of alleged discrimination being reported

Title VI Related? Yes _____ No _____ Maybe _____

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

Race _____ Color _____ National Origin _____

VT Public Accommodation Related? Yes _____ No _____ Maybe _____

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

Race _____ Creed _____ National Origin _____ Color _____ Marital Status _____

Sex _____ Gender Identity _____ Sexual orientation _____

ADA Related? Yes _____ No _____ Maybe _____

I believe the discrimination I experienced was based on my disability.

Complainant's Contact Information

Name: _____

Address: _____

Telephone: _____ Email: _____

Description of alleged occurrence Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses.

Date of Occurrence: _____ Time of Occurrence: _____ Location of Occurrence: _____

Details of Occurrence: _____

STOP HERE AND SUBMIT FORM TO YOUR REGIONAL DIRECTOR (OR CALL FOR HELP TO COMPLETE THE FORM)

Addison County Regional Director

email: info@trivalleytransit.org
fax: 802-388-1888
mail: 297 Creek Road, Middlebury, VT 05753
telephone assistance: 802-388-2287 (TDD 711)

Orange/No. Windsor Counties Regional Director

email: info@trivalleytransit.org
fax: 802-728-6232
mail: PO Box 356, Randolph, VT 05060
telephone assistance: 802-728-3773 (TDD 711)

Once we receive your discrimination complaint, you will be contacted within 5 days.

IV. Complaint and Lawsuit Log

There were no Title VI related complaints, lawsuits or investigations during this reporting period for either of the two operating divisions that comprise TVT. Among the complaints logged by TVT during this period, none of them were related to Title VI issues.

V. Public Involvement and Outreach Plan/Process

Public participation is an essential component of the planning process. From short-term service changes to long-range vision documents and investment strategies, input from the public about policies and services that affect them is critical to their successful implementation. TVT conducts public outreach efforts and public hearings on planning efforts and service changes. Prior to discussing the means of engaging minority and low income communities in these activities, a brief demographic profile of the TVT service area (see Table 1) is presented in order to identify locations in the county with concentrations of minority and low-income residents.

Overall, the TVT service area is overwhelmingly Caucasian and native born. Only 7.0% of residents are either Hispanic or of some race other than White. Exactly 96% of area residents were born in the United States. People in poverty are a bit more prevalent, with 7.7% of residents having incomes below the federal poverty line.

Cells highlighted in red in Table 1 indicate that the percentage in that census tract is above the service area average, reflecting a “concentration” of individuals in that category.

Only two tracts, the western portion of Middlebury and the northern section of Hartford, have concentrations in all three measures. Note that the Hartford, White River Junction and Norwich tracts are also part of the Advance Transit service area; TVT operates demand response service in this area and serves a few bus stops. Eastern Middlebury has concentrations in both minority and foreign-born individuals. A significant portion (over 40%) of the non-white population in Middlebury West is accounted for by people of Asian descent, many of whom attend Middlebury College.

As TVT carries out public involvement activities, the figures in Table 1 will inform staff about where additional outreach is needed to encourage minorities and low-income individuals to participate in the process.

Engaging Members of Protected Classes in the Planning Process

TVT employs many techniques to ensure all passengers, including minority and low income passengers, have meaningful access to public hearings and meetings and/or have the opportunity to comment outside of specific hearings or meetings. Because it serves a rural area with no major concentrations of minority or LEP individuals, it is impossible to engage these populations other than through the broad-based efforts that TVT pursues. TVT works constantly with social service agencies and seeks to engage minority and LEP individuals through these channels. If a community organization forms to represent minority or LEP persons in Addison, Orange and Northern Windsor counties, TVT will work closely with that organization.

Table 1: Demographic Characteristics of TVT Service Area

County	Tract	Town	Total Population	Non-White or Hispanic Population	Percent	Foreign Born	Percent	Below Poverty Line	Percent
Addison	9601	Monkton, Starksboro	3,892	174	4.5%	135	3.5%	209	5.4%
Addison	9602	Ferrisburgh	2,655	40	1.5%	53	2.0%	116	4.4%
Addison	9603	Vergennes	2,573	135	5.2%	74	2.9%	264	10.3%
Addison	9604	Panton, Addison, Weybridge, New Haven, Waltham	5,125	251	4.9%	193	3.8%	264	5.2%
Addison	9605	Bristol	3,789	180	4.8%	88	2.3%	330	8.8%
Addison	9606	Lincoln, Ripton, Granville, Hancock, Goshen	2,942	120	4.1%	82	2.8%	198	6.8%
Addison	9607	Middlebury East	3,861	423	11.0%	186	4.8%	207	5.4%
Addison	9608	Middlebury West	5,168	1214	23.5%	635	12.3%	269	12.0%
Addison	9609	Cornwall, Bridport, Shoreham, Whiting, Orwell	5,006	339	6.8%	269	5.4%	375	7.6%
Addison	9610	Salisbury	2,295	144	6.3%	111	4.8%	159	7.0%
Orange	9590	Newbury	2,038	171	8.4%	63	3.1%	178	8.7%
Orange	9591.02	Topsham, Corinth	2,576	122	4.7%	22	0.9%	395	15.4%
Orange	9593	Brookfield, Braintree	2,361	133	5.6%	20	0.8%	282	12.0%
Orange	9594	Randolph	4,777	143	3.0%	89	1.9%	245	5.6%
Orange	9595	Chelsea, Vershire, Tunbridge, Strafford	4,550	246	5.4%	53	1.2%	503	11.2%
Orange	9596	Thetford	2,765	236	8.5%	128	4.6%	170	6.2%
Orange	9597	Fairlee, West Fairlee	1,864	132	7.1%	53	2.8%	149	8.0%
Orange	9598	Bradford	2,789	110	3.9%	40	1.4%	346	12.8%
Windsor	9650	Norwich	3,584	286	8.0%	130	3.6%	198	5.5%
Windsor	9651	Royalton	2,755	197	7.2%	71	2.6%	327	11.9%
Windsor	9654	Stockbridge, Barnard, Pomfret, Sharon	4,316	176	4.1%	249	5.8%	308	7.1%
Windsor	9655.01	South Hartford	3,516	299	8.5%	74	2.1%	286	8.1%
Windsor	9655.02	North Hartford	2,655	255	9.6%	306	11.5%	306	11.8%
Windsor	9656	White River Junction/Wilder	4,433	403	9.1%	264	6.0%	284	6.5%
Windsor	9658	Woodstock	3,011	107	3.6%	92	3.1%	104	3.5%
Windsor	9659.01	Bridgewater, Plymouth	1,382	60	4.3%	57	4.1%	153	11.1%
Windsor	9668	Bethel, Rochester	3,257	186	5.7%	73	2.2%	290	8.9%
		TVT SERVICE AREA	89,935	6,282	7.0%	3,610	4.0%	6,915	7.7%

Source: 2017-2021 American Community Survey 5-year estimates

TVT's current outreach techniques include:

- 1) **Place notices in all local papers** –TVT will place notices of public hearings and meetings in all local papers (currently the *Addison Independent*, the *Addison Eagle* and the *Valley Voice for Addison County as well as The Herald, The Journal Opinion, and/or The Valley News*). These include hearings or meetings for new or changed services.
- 2) **Place notices on all TVT buses** – TVT will post a notice of any public meeting or hearing to be held by TVT on all TVT buses at least two (2) weeks in advance of the event. Because TVT buses are shared between all services and because notices are placed on all buses, TVT is confident that passengers on any route and of any race or economic level have the opportunity to see the notice of the meeting or hearing.
- 3) **Hold meetings within the affected community** – To the extent possible, public hearings and meetings are held within the affected community or neighborhood. While passengers who do not live within the community experiencing a route or schedule change would also be affected, TVT believes there is greater benefit to holding the meeting(s) in the area(s) where the change will take place.
- 4) **Make meetings accessible by transit** – TVT realizes that for many of our passengers, transit is their only transportation option. Therefore, it is imperative that public meetings and hearings be accessible by bus in order to ensure that all passengers have access to the information and an opportunity to weigh in on proposed route and schedule changes. This includes choosing sites accessible by bus and selecting times when bus service is available.
- 5) **Offer additional bus service when needed** – Despite TVT's best efforts, it is not always possible to make public hearings and meetings accessible by transit for 100% of our passengers. In situations where transit service might not run early or late enough to provide access to all passengers, TVT provides additional bus service to prevent someone from missing an opportunity to learn about and comment on proposed service changes due to a lack of transportation.
- 6) **Accept phone/email public comment** – If a passenger or member of the public is unable to attend a public hearing or meeting for any reason, TVT accepts comments and feedback via phone call and email. These comments are included at the end of the public hearing/meeting minutes and are therefore incorporated into the public record.
- 7) **Conduct Periodic Rider Surveys** – TVT conducts periodic surveys of its riders to determine their satisfaction with service quality and quantity and to solicit feedback on potential new or changed services.
- 8) **Place Suggestion Boxes On Buses** – All TVT buses have locked suggestion boxes mounted in the bus where passengers may place written feedback.
- 9) **Publish Contact Information Widely** – TVT provides contact information on all publications (schedules, brochures, posters, annual reports, newsletters, outside of buses, web site, etc.) with language encouraging public to make contact.

The Vermont Agency of Transportation published a Public Involvement Guide in June 2017. See <http://vtrans.vermont.gov/sites/aot/files/highway/documents/publications/VTransPublicInvolvementGuide2017.pdf>

The Guide contains some specific language regarding outreach to Title VI populations in chapters 2 and 4. TVT is incorporating the guidance in this document into its public outreach activities.

Table 2 below lists public meetings and other outreach efforts that have taken place since the last Title VI Program was submitted in July 2020. The number of meetings is relatively small due to the pandemic.

Table 2: Public Outreach Activities

Date	Activity	Location	Attendees/Responses
June, 2021	Meeting on Addison route changes	Zoom	0
February, 2022	O&D partners and SASH coordinators	Middlebury/Zoom	20
8/17/22	Meeting on Addison route changes	Zoom	4
10/22/22	Meeting on Thetford Connector	Zoom	0
1/10/23	Update on services	Middlebury	12
8/17/23	Proposed schedule changes	Middlebury	4
9/8/23	Meeting on Bradford Circulator	Fairlee	1
9/15/23	Meeting on Bradford Circulator	Bradford	0

VI. Language Assistance Plan

Introduction

The purpose of this policy is to assess the need for, and develop material for, those citizens of the area served by TVT who are limited in their English language proficiency. On August 11, 2000, President Clinton signed United States Executive Order 13166, “Improving Access to Services to Persons With Limited English Proficiency” (hereafter referred to as LEP). On the same day, the Assistant Attorney General for the Civil Rights Division of the United States Department of Justice (DOJ) issued a Policy Guidance Document titled “Enforcement of Title VI of the Civil Rights Act of 1964 - National Origin Discrimination Against Persons With Limited English Proficiency.” This Guidance Policy was prepared to help clarify Executive Order 13166. This action was prompted by an increase in the LEP population and recognition at the highest levels that for LEP individuals, language can be a barrier to accessing important services. Executive Order 13166 contains two major initiatives. The first is designed to better enforce and implement an existing obligation: Title VI of the Civil Rights Act of 1964, which prohibits recipients of federal financial assistance from discriminating based on national origin by, among other things, failing to provide meaningful access to individuals who are limited English proficient. Secondly, the Executive Order requires federal agencies that provide federal financial assistance to develop guidance to clarify those obligations for recipients of such assistance.¹

¹ Department of Justice - Civil Rights Division, Coordination and Review Section: Commonly Asked Questions Regarding Executive Order 13166 (<http://justice.gov/crt/cor/Pubs/lepqa.htm>).

A. Four Factor Analysis

The DOT guidance outlines four factors recipients should apply to the various kinds of contacts they have with the public to assess language needs and decide what reasonable steps they should take to ensure meaningful access for LEP persons:

1. The number and proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
2. The frequency with which LEP individuals come in contact with the program.
3. The nature and importance of the program, activity, or service provided by the recipient to the LEP community.
4. The resources available to TVT and overall cost.

Factor 1 – Prevalence of LEP Persons

According to the 2017-2021 ACS, 540 residents in the TVT service area ages 5 or older spoke English less than “very well.” The largest language among these LEP persons was Spanish, followed by Other Asian and Pacific Island languages, Chinese, Other Indo-European and French. This total number represents just 0.6% of the population ages 5 or older. A table below provides detailed figures for all census tracts in the TVT service area.

The forms of LEP interaction experienced by TVT include the following:

- Providing basic information on how to use public transit services in the area
- Purchasing fare media
- Making reservations on demand-response services such as Older Adults and Persons with Disabilities transportation and non-emergency medical transportation
- Handling passenger complaints
- Gathering data such as on-board customer surveys.

The tables presented below illustrate where LEP individuals reside within the TVT service area. These are based on 2017-2021 ACS data. The term “Linguistic Isolates” refers to people who speak English less than very well, the definition of LEP. Languages that had fewer than 5 individuals who speak English less than very well are not shown in the table.

Spanish speakers represent 34% of the LEP individuals in the TVT service area. According to a 2006 study by the Champlain Valley office of Equal Opportunity, the Spanish speaking families are likely part of the rural, migrant farming community in this part of Vermont.²

The presence of non-Spanish-speaking LEP individuals in the area can be partly attributed to the Vermont chapter of US Committee on Refugees and Immigrants (USCRI), formerly the Vermont Refugee Resettlement Program. USCRI - Vermont works with the United States Department of Health and Human Services’ Office of Refugee Resettlement to settle refugees in Vermont.

USCRI - Vermont provides a variety of services to refugees including case management, professional interpretation/translation, job placement, social adjustment/mental health counseling, family reunification and other federal assistance. The objective is to help refugees

² Champlain Valley office of Equal Opportunity, Champlain Valley Head Start Community Assessment 2006.

achieve economic and social self-sufficiency as quickly as possible. All refugees attend English Language Training provided by USCRI – Vermont and other community service providers.³ Refugees that have arrived in the TVT service area through USCRI - Vermont are provided with Medicaid privileges for a period of time up to eight months, and these privileges include a bus pass, when requested. Along with language services and other services offered by USCRI - Vermont, each of the settled refugees is eligible to be shown how to board TVT buses to meet their transportation needs. TVT will send representatives to meet with USCRI - Vermont and with refugee groups on occasions where a translator is available. The primary goal of this program is that, by the time that federal assistance ends for these refugees, they are gainfully employed and housed. By this time they are also proficient in getting around on TVT buses.

The percentages highlighted in red in Table 4 represent concentrations of LEP individuals in that they are higher than the service area average of 0.6%. The highest percentages of any single language are associated with Spanish speakers in Bristol and the large tract to the south and west of Middlebury. It is important to note that these percentages may be the highest in the region, but they are still very small, at less than 1.5%. The highest overall concentration of LEP individuals is in the White River Junction/Wilder area. Most of the fixed-route service in that area is operated by Advance Transit and so any interactions TVT may have with these individuals would related to demand response transportation.

³ State of Vermont, Agency of Human Services, Department for Children and Families, Bulletin 05-02F, November 16, 2005.

Table 3: Linguistic Isolates by Tract and Language

County	Tract	Description	Total:	Spanish	French, Haitian, or Cajun	German	Slavic languages	Other Indo-European languages	Chinese	Vietnamese	Tagalog	Other Asian and Pacific Is. languages	Other and unspecified languages	Total Linguistic Isolates
Addison	9601	Monkton, Starksboro	3,765	11	-	4	2	-	4	-	-	-	-	21
Addison	9602	Ferrisburgh	2,514	-	1	-	-	-	-	-	-	-	-	1
Addison	9603	Vergennes	2,531	11	6	-	-	-	-	-	-	-	-	17
Addison	9604	Panton, Addison, Weybridge, New Haven, Waltham	4,819	9	7	-	-	4	-	-	-	1	-	21
Addison	9605	Bristol	3,642	44	-	-	-	-	-	-	-	-	-	44
Addison	9606	Lincoln, Ripton, Granville, Hancock, Goshen	2,817	-	-	-	-	-	4	-	-	-	-	4
Addison	9607	Middlebury East	3,702	-	-	-	16	-	-	-	-	-	12	28
Addison	9608	Middlebury West	5,115	7	1	-	-	-	29	7	-	-	7	51
Addison	9609	Cornwall, Bridport, Shoreham, Whiting, Orwell	4,686	65	2	2	-	1	-	-	2	-	-	72
Addison	9610	Salisbury	2,202	-	-	-	-	-	-	-	-	-	-	-
Orange	9590	Newbury	1,871	-	-	-	13	-	12	-	-	-	-	25
Orange	9591.02	Topsham, Corinth	2,413	-	3	-	-	-	-	-	-	-	-	3
Orange	9593	Brookfield, Braintree	2,266	-	-	9	-	-	-	-	-	-	-	9
Orange	9594	Randolph	4,493	22	-	2	-	9	-	-	-	-	-	33
Orange	9595	Chelsea, Vershire, Tunbridge, Strafford	4,443	3	4	-	8	-	-	-	-	-	-	15
Orange	9596	Thetford	2,674	-	-	-	-	-	-	-	-	-	-	-
Orange	9597	Fairlee, West Fairlee	1,785	-	-	2	-	5	-	-	-	5	-	12
Orange	9598	Bradford	2,637	9	20	-	-	-	-	-	-	-	-	29
Windsor	9650	Norwich	3,313	-	-	-	-	-	-	-	-	-	12	12
Windsor	9651	Royalton	2,470	-	-	-	-	-	-	-	-	-	-	-
Windsor	9654	Stockbridge, Barnard, Pomfret, Sharon	4,100	-	4	-	-	-	-	-	-	-	-	4
Windsor	9655.01	South Hartford	3,402	-	-	-	-	-	-	-	-	28	-	28
Windsor	9655.02	North Hartford	2,560	-	-	-	-	-	-	-	-	-	-	-
Windsor	9656	White River Junction/Wilder	4,257	-	-	-	-	37	13	-	-	34	-	84
Windsor	9657	Hartland	3,303	-	-	-	-	-	-	-	-	-	-	-
Windsor	9658	Woodstock	2,902	-	-	-	4	-	-	-	10	-	5	19
Windsor	9659.01	Bridgewater, Plymouth	1,326	-	-	-	-	-	-	-	-	-	-	-
Windsor	9668	Bethel, Rochester	3,174	-	3	-	-	-	-	5	-	-	-	8
		TOTALS	89,182	181	51	19	43	56	62	12	12	68	36	540

Source: 2017-2021 American Community Survey 5-year estimates; languages with fewer than 5 speakers not shown in the table

Table 4: Percent of Linguistic Isolates by Tract and Language

County	Tract	Description	Spanish	French, Haitian, or Cajun	German	Slavic languages	Other Indo-European languages	Chinese	Vietnamese	Tagalog	Other Asian and Pacific Is. languages	Other and unspecified languages	Total Linguistic Isolates
Addison	9601	Monkton, Starksboro	0.3%	-	0.1%	0.1%	-	0.1%	-	-	-	-	0.6%
Addison	9602	Ferrisburgh	-	0.0%	-	-	-	-	-	-	-	-	0.0%
Addison	9603	Vergennes	0.4%	0.2%	-	-	-	-	-	-	-	-	0.7%
Addison	9604	Panton, Addison, Weybridge, New Haven, Waltham	0.2%	0.1%	-	-	0.1%	-	-	-	0.0%	-	0.4%
Addison	9605	Bristol	1.2%	-	-	-	-	-	-	-	-	-	1.2%
Addison	9606	Lincoln, Ripton, Granville, Hancock, Goshen	-	-	-	-	-	0.1%	-	-	-	-	0.1%
Addison	9607	Middlebury East	-	-	-	0.4%	-	-	-	-	-	0.3%	0.8%
Addison	9608	Middlebury West	0.1%	0.0%	-	-	-	0.6%	0.1%	-	-	0.1%	1.0%
Addison	9609	Cornwall, Bridport, Shoreham, Whiting, Orwell	1.4%	0.0%	0.0%	-	0.0%	-	-	0.0%	-	-	1.5%
Addison	9610	Salisbury	-	-	-	-	-	-	-	-	-	-	-
Orange	9590	Newbury	-	-	-	0.7%	-	0.6%	-	-	-	-	1.3%
Orange	9591.02	Topsham, Corinth	-	0.1%	-	-	-	-	-	-	-	-	0.1%
Orange	9593	Brookfield, Braintree	-	-	0.4%	-	-	-	-	-	-	-	0.4%
Orange	9594	Randolph	0.5%	-	0.0%	-	0.2%	-	-	-	-	-	0.7%
Orange	9595	Chelsea, Vershire, Tunbridge, Strafford	0.1%	0.1%	-	0.2%	-	-	-	-	-	-	0.3%
Orange	9596	Thetford	-	-	-	-	-	-	-	-	-	-	-
Orange	9597	Fairlee, West Fairlee	-	-	0.1%	-	0.3%	-	-	-	0.3%	-	0.7%
Orange	9598	Bradford	0.3%	0.8%	-	-	-	-	-	-	-	-	1.1%
Windsor	9650	Norwich	-	-	-	-	-	-	-	-	-	0.4%	0.4%
Windsor	9651	Royalton	-	-	-	-	-	-	-	-	-	-	-
Windsor	9654	Stockbridge, Barnard, Pomfret, Sharon	-	0.1%	-	-	-	-	-	-	-	-	0.1%
Windsor	9655.01	South Hartford	-	-	-	-	-	-	-	-	0.8%	-	0.8%
Windsor	9655.02	North Hartford	-	-	-	-	-	-	-	-	-	-	-
Windsor	9656	White River Junction/Wilder	-	-	-	-	0.9%	0.3%	-	-	0.8%	-	2.0%
Windsor	9657	Hartland	-	-	-	-	-	-	-	-	-	-	-
Windsor	9658	Woodstock	-	-	-	0.1%	-	-	-	0.3%	-	0.2%	0.7%
Windsor	9659.01	Bridgewater, Plymouth	-	-	-	-	-	-	-	-	-	-	-
Windsor	9668	Bethel, Rochester	-	0.1%	-	-	-	-	0.2%	-	-	-	0.3%

Factor 2. The frequency with which LEP individuals come in contact with the service.

LEP individuals, in general, depend much more on public transportation than those who are English proficient, thus the need for LEP individuals to use TVT services on a daily basis is frequent. Many of the area services already mentioned guide LEP individuals and refugees in their navigation of TVT's bus system. Experience has shown us that after just one or two rides, these individuals have no further problems in getting to any desired location in the service area.

TVT conducted a staff survey in October 2023 to determine the degree to which drivers and call center employees come in contact with LEP individuals. There was a total of 30 responses to the survey. The survey found the following results:

- Only 19% of respondents said they rarely or never had interactions with LEP individuals while 15% had interactions at least three times per week.
- Almost half of the drivers did not know which languages the LEP individuals spoke, but those who responded cited Spanish, French and African languages most commonly, with a few mentions of Ukrainian and Asian languages.
- Just over half of the interactions involved questions about how to use the bus system or about fares, and another 20% were questions regarding TVT or other forms of public transit. About 22% were questions not related to the bus system.
- Almost 80% of respondents felt that they were able to convey the desired information very well or pretty well, while no one felt they were unable to convey the information. The other respondents said that it varied, depending on the customer.
- About 80% respondents were aware of the availability of real-time translation services by telephone.
- About half of respondents felt that there were more people now who don't speak English well compared to a few years ago, and the other half felt it is about the same as it has been.

Factor 3. The nature and importance of the service provided by the program.

The importance of providing transportation services to the LEP population is lower than providing some other services to this population, such as emergency medical services or legal services to a person who has been arrested. Nevertheless, providing public transportation access to LEP persons is critical. An LEP person's inability to effectively utilize public transportation may adversely affect his or her ability to obtain health care, or education, or access to employment.

Denial or delay of access to TVT services to LEP individuals has never been a problem. TVT's system is designed with Merchants Row in Middlebury serving as the main hub in Addison County and downtown Randolph in Orange County.

Factor 4. The resources available to the recipient and costs.

TVT, like many rural not-for profit transit agencies throughout the country, has a very limited budget. For TVT to directly provide for language services for the few individuals in its service area who may need it to provide their transportation needs is not, at this time, a practical solution, given other options as described earlier. Translation of TVT's written materials and/or signs into a variety of languages cannot be justified at this time, as not only are the numbers of the potential benefactors very small, but the languages which would require translating into are constantly changing along with the origin of the refugees settling in the service area. Nonetheless, TVT produced a brochure in Spanish in 2018 for its Addison County clients on how to access demand response service. It is shown on the next two pages.

Fortunately, the services offered by many community-based organizations in the service area have proved more than adequate in providing meaningful access to LEP persons utilizing TVT services. TVT has the capacity to utilize the statewide telephone translation service supported by VTrans. It is not foreseen that the resources available or the cost of translation services will hinder the accommodation of the needs of TVT's LEP population.

B. Monitoring

TVT has described in previous sections that it is extensively aware of the demographics of its service area, and believes that through the services provided to LEP individuals that the public transportation needs of all individuals in its service area are being met without regard to ability to speak English. The data indicates that at this point in time, TVT does not need to take any further actions to assist LEP individuals.

DOT acknowledges that the implementation of a comprehensive system to serve LEP individuals is a process, and that a system will evolve over time as it is implemented and periodically reevaluated. Recipients are encouraged to document their efforts to provide LEP persons with meaningful access to federally assisted programs and activities.⁴

In light of this, TVT will continue to monitor its service population on an annual basis, and will be prepared to implement the appropriate services should that need be assessed. This annual monitoring process will include the following steps:

- Monitor current LEP populations in its service area,
- Track interactions with LEP individuals on the part of bus drivers and dispatchers
- Have "I Speak" cards available at public meetings and hearings
- Incorporate notices that translation services are available on notices for public meetings and hearings in Spanish and French, the two most common languages of LEP individuals in the service area (and the only ones with more than 100 LEP individuals)
- Ascertain whether existing procedures are meeting the needs of LEP persons,
- Continue to maintain awareness among management and staff of the regulations implementing Title VI of the Civil Rights Act of 1964, and
- Update the LEP assessment as necessary.

⁴ DOT Docket OST-2001-8696: Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons (Federal Register: December 14, 2005 – Volume 670, Number 239), § VIII.

¿Que es Dial-a-Ride y cuanto cuesta?

Dial-A-Ride proporciona alternativas para transportación para todos que viven en el condado de Addison.

*Típicamente, los viajes empiezan con una tarifa de \$20 con una adición de \$0.67 por cada milla adicional.

*Es importante que el pasajero lleve la tarifa en cantidad exacta. Los conductores no pueden proporcionar el cambio.

*Los despachadores hablan inglés pero tienen acceso a un intérprete.

*Servicios pueden incluir viajes para sitios de servicios alimentarios y citas médicas, sociales o citas relacionadas con el trabajo.

*Nuestros conductores no pueden alterar los viajes asignados ni aceptar solicitudes para viajes futuros. Las modificaciones de viaje, las cancelaciones y las futuras solicitudes de viaje deben ser realizadas por usted a través de la oficina

TVT y Addison Allies Network

Llame para programar su viaje ahora: **Servicios Dial-A-Ride**
802-388-2287



Contacte a TVT

Lunes – Viernes 7:00 am a 5:00 pm.

802-388-ACTR(2287)
info@trivalleytransit.org
297 Creek Road
Middlebury VT 05753



**TVT mantiene una base de datos de pasajeros, pero no comparte ninguna información con nadie. Todo es confidencial.*

Programando un Viaje

Para satisfacer sus necesidades de transporte comuníquese con la oficina de TVT tan pronto tenga la información completa de su viaje. Debe ponerse en contacto con TVT al menos 48 horas antes de su viaje. Informe al despachador si tiene necesidades especiales o si necesita una camioneta para acomodar sillas de ruedas. Notifique a la oficina tan pronto como sea posible si necesita cancelar o hacer cambios en la información de su viaje. No siempre es posible acomodar cambios de último minuto en el viaje.



Notas de Programación

1. Aunque TVT puede acomodar la mayoría de las solicitudes de viaje, hay ocasiones en que nuestro grupo de conductores voluntarios alcanza su límite y no podemos organizar su viaje según lo solicitado. Por lo tanto, ocasionalmente se le puede solicitar reprogramar su cita.
2. Informe a Despacho si espera llevar equipaje de cualquier tipo. Tenga en cuenta que nuestras subvenciones no nos permiten transportar artículos sin su presencia. También informe a Despacho si planea ir de compras y espera traer mucho mercado en el vehículo.
3. TVT le dará una cotización del total costo del viaje. Si es más de lo que puede pagar, puede rechazar el viaje.
4. Si tiene una emergencia médica, llame al 911. Si es fuera de horario y se encuentra en el Centro Médico Porter, infórmeles si necesita transporte a su casa.

Confidencialidad

A fin de garantizar que su viaje se complete con éxito, a veces es necesario que TVT comparta parte de su información personal con el conductor voluntario designado, sobre una base de "necesidad de saber." Nuestros conductores se mantienen en estricta confidencialidad y pueden ser retirados del servicio si se viola esta política. También nos gustaría recordarle que también es importante que mantenga la confidencialidad sobre otros pasajeros que están en el vehículo con usted.



Comunicación

Notifique a la oficina de TVT si ocurre cualquiera de las siguientes situaciones:

- ~Una cancelación de su(s) cita(s);
- ~Su destino es diferente al que originalmente solicitó;
- ~Desea que otras personas viajen con usted;
- ~Cualquier otra situación o problema inusual que surja antes de su viaje; o
- ~Cualquier problema con su viaje o conductor.

Nuestros conductores no pueden alterar los viajes asignados ni aceptar solicitudes para viajes futuros. Las modificaciones de viaje, las cancelaciones y las futuras solicitudes de viaje deben ser realizadas por usted a través de la oficina de TVT

Conductores Voluntarios

Conductores voluntarios desempeñan un papel crucial en nuestra organización, ya que aseguran que tenga acceso a transporte de bajo costo a los lugares críticos y citas que necesita para llegar. Sea cortés y respetuoso con sus conductores.

*Los voluntarios de TVT no pueden transportar pasajeros desabrochados. Asegúrese de ponerse su cinturón de seguridad tal como exige la ley de Vermont. TVT requiere que los padres proporcionen los asientos del automóvil para niños menores de 8 años.

Preocupaciones

Si tiene algún problema o inquietud sobre nuestros controladores o los servicios de TVT, comuníquese con el Administrador del programa al 802-388-2287. Por favor, no le pida a su conductor que le transmita una queja en su nombre, ni lo invite a hablar sobre otros conductores o pasajeros. TVT debe escuchar sus inquietudes directamente para tomar los pasos necesarios para enfrentar el problema. No podemos actuar sobre la información de "segunda mano". Tenga la seguridad de que no perderá sus privilegios de uso si presenta una queja.

VII. Board Membership

The TVT board of directors consists of eight members. All of the members of the present board identify as Caucasian, with one also identifying as Hispanic/Latino. Given that the non-white population of the TVT service area is only 7% of the total, the lack of minority representation is not unexpected.

When TVT seeks new Board members, it will:

- post openings in media stating specifically that minorities are encouraged to apply,
- post openings on buses stating specifically that minorities are encouraged to apply,
- post openings with other human-service agencies that serve minorities stating specifically that minorities are encouraged to apply.

TVT also has committees that include other members of the public. Among the non-board members on these committees, seven identify as White, one identifies as Asian and the other five chose not to identify any specific race.

See attached for Board Resolution adopting this Title VI Program.

VIII. Monitoring of Subrecipients

TVT has no subrecipients. It passes money through to Elderly Services Inc. for the purchase of vans, but it does not provide any operating funds.

IX. Transit Facility

TVT is in the planning stages of an expansion to its primary administrative/maintenance facility in Middlebury. The expansion will achieve secure, heated storage for our Middlebury fleet, near net-zero electricity for the entire facility, elimination of fossil fuel as back-up heat and reduced/eliminated reliance on municipal water for washing buses. This expansion was included in prior environmental documentation and permitting, and thus has no Title VI implications.

X. Service Standards

TVT operates two modes of scheduled service: local bus and commuter bus. The majority of its service is local bus, consisting of route-deviation shuttles in Middlebury, local routes connecting to the Snow Bowl and the neighboring towns of Vergennes and Bristol, route deviation service in the Bradford area that runs on weekdays, and once-per-week shopping shuttles. TVT also operates five commuter bus routes: two from Middlebury to Burlington via US 7 and VT 116, one from Middlebury to Rutland, and two to Hanover/Lebanon via I-89 and I-91. Two of the three Middlebury-based routes are operated in cooperation with neighboring transit agencies.

Service standards for these two modes of transit are presented below.

- 1) Vehicle Load
TVT has a load standard of 1.0 for both of its modes of transportation. Occasional trips have standees, but TVT monitors passenger loads and if load factors greater than 1.0 occur on a regular basis, service will be evaluated for improved frequency or greater vehicle capacity.
- 2) Vehicle Headway
TVT has three headway standards for its service. For the Middlebury Shuttle and the circulator in Bradford, buses operate on each alignment at least every 30 minutes during peak periods and every hour during off-peak periods. The headway for town-to-town routes will be at most 75 minutes during peak periods. Commuter routes do not have a headway, but operate at least two trips in the peak direction during each peak period.
- 3) On-time Performance
No vehicles in deviated fixed route service will operate ahead of schedule. Deviated fixed route services will arrive at designated stops no more than 5 minutes after the established schedule times at least 90% of the time, and will receive a rating of “most of the time” or higher based on annual rider surveys. There will be no “missed trips” as defined by 15 or more minutes late, except when conditions make it impossible to maintain scheduled service. Commuter routes will arrive at designated timepoints 0 to 5 minutes late at least 90% of the time.
- 4) Service Availability
Deviated fixed-route service will serve at least 95% of Census block groups in Addison County with a density of 3 households per acre or greater. Commuter routes will connect the town centers of at least all major communities within Addison county (Middlebury, Bristol and Vergennes) with each other and the major hubs (Burlington and Rutland) of neighboring regions. Orange and Windsor County towns will have access to the Upper Valley employment center.
- 5) Distribution of Transit Amenities
TVT routes serve a total of 11 shelters (2 of which are pending installation in January 2024). TVT owns six shelters in Addison County and serves five others in Orange County, one of which is town owned (Fairlee) and the other four of which are owned by VTrans and located at park & ride lots. TVT will continue to work with municipalities and institutions to provide passenger amenities wherever possible, and their placement will be determined to serve the greatest number of passengers.
- 6) Vehicle Assignment by Mode
TVT has three garages: one in Middlebury, one in Randolph and one in Bradford. TVT’s policy of assigning vehicles to routes is based strictly on needed capacity to ensure there are no standees. TVT’s fleet consists of cutaway vehicles and small buses to serve the commuter and local routes. The largest vehicles are used for those runs that have the highest ridership. All vehicles are cleaned and maintained to provide comfortable and reliable service to all passengers. TVT works with VTrans to replace vehicles as they reach the end of their useful life.






TVT Title VI Program 2024 BOD Approved 3.24.24

Final Audit Report

2024-04-22

Created:	2024-04-22
By:	Gina Tindall (gina@trivalleytransit.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAA9H_BgWDwIGq2IscKB1MnbIsUhaWCDOfo

"TVT Title VI Program 2024 BOD Approved 3.24.24" History

-  Document created by Gina Tindall (gina@trivalleytransit.org)
2024-04-22 - 2:30:15 PM GMT- IP address: 174.192.6.17
-  Document emailed to Jim Moulton (jim@trivalleytransit.org) for signature
2024-04-22 - 2:30:20 PM GMT
-  Email viewed by Jim Moulton (jim@trivalleytransit.org)
2024-04-22 - 2:30:57 PM GMT- IP address: 104.47.74.126
-  Document e-signed by Jim Moulton (jim@trivalleytransit.org)
Signature Date: 2024-04-22 - 2:31:14 PM GMT - Time Source: server- IP address: 108.20.74.239
-  Agreement completed.
2024-04-22 - 2:31:14 PM GMT