

# **Southeast Vermont Transit**

## **Title VI Program**

**July, 2020**

**SEVT Title VI Program**

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Attachments:

SEVT BOD meeting minutes showing approval of Title VI Program dated **XXXX**

## I. Statement of Policy

Southeast Vermont Transit (SEVT), 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.

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

SEVT 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 SEVT office as described in section III.

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Randy Schoonmaker, Executive Director

## II. Title VI Notice to the Public

Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under VTrans' Title VI regulations and notify members of the public of protections against discrimination afforded to them on the basis of race, color, or national origin as provided below. SEVT posts its Title VI notice in the following means and locations:

- On all buses operated by SEVT
- On the agency's websites
  - [URL for SEVT website](#)
  - [URL for MOOver website](#)
  - [URL for Current website](#)
- In the reception areas and meeting rooms of SEVT's administrative offices
- On each division's schedule brochures

### **Your Rights under Title VI of the Civil Rights Act**

SEVT operates its programs and services without regard to race, color, and national origin as stipulated in 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 call (802) 464-8487 or file a written complaint with the Chief Executive Officer, Southeast Vermont Transit, 45 Mill Street, Wilmington, VT 05363. A complaint may also be filed with the Vermont Agency of Transportation, Office of Civil Rights, by calling (802) 249-9291. If you would like more information about your Title VI rights, visit the VTrans website at <http://vtrans.vermont.gov/civil-rights/compliance/titlevi> or call (802) 249-9291.

### III. Title VI Complaint Procedures and Form

#### **Receiving and Documenting Complaints**

*Complaints via Phone Call:* When a member of the public calls SEVT and states that s/he wishes to file a Title VI complaint, the call is transferred to the division's General Manager who will document the complaint using the Title VI Complaint Form (see below). Should the General Manager be unavailable to take the call, the person taking the call shall record the individual's contact information and state that the General Manager will call the person back. The General Manager shall call the individual back within five business days of receiving the message. If the General Manager will be out of the office longer than five business days, the Chief Executive Office shall receive the Title VI complaint calls until the General Manager returns.

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 person who takes the call shall follow the normal (non-Title VI) complaint documentation procedures. If after the call is taken it becomes clear that the complaint involves Title VI, the person's contact information shall be forwarded to the General Manager. The General Manager shall call the individual back and document the Title VI complaint using the Title VI Complaint Form.

*Complaints via regular mail or Email:* When a member of the public submits a complaint via regular mail or email that is related to Title VI, it shall be forwarded to the General Manager by whichever staff member receives it. If the emailed complaint does not include sufficient information to fill out the Title VI Complaint Form, the General Manager will contact the individual to obtain the needed information. In all cases, the General Manager will reply to the individual to confirm receipt of the complaint.

#### **Enter the Complaint into the SEVT Title VI Complaint and Lawsuit Log**

Any Title VI complaint received by SEVT shall be entered into the SEVT 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

#### **Internal Investigation of Title VI Complaints**

After a Title VI complaint is received and fully documented using the Title VI Complaint Form, the General Manager will initiate an internal investigation of the complaint. Such investigation might include, but is not limited to, speaking with administrative staff, maintenance department staff, and/or operations staff (including bus drivers), reviewing company policies and procedures and evaluating service characteristics and schedules. If requested by the complainant or warranted based on the investigation, the General Manager will contact the complainant at the conclusion of the investigation to report on any findings or potential changes as a result of the complaint.

Notice shall include information regarding appeal rights of the complainant and instructions for initiating such an appeal. The first level of appeal is to the Chief Executive Officer (CEO) of SEVT. The CEO 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, SEVT will reconsider the determination.

If the complainant is still dissatisfied with the determination and/or resolution set forth by SEVT, 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  
Phone: (802) 249-9291  
Fax: (802) 479-5506

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

#### **Update the SEVT Title VI Complaint and Lawsuit Log**

After conducting the internal investigation, the General Manager must update the status of the complaint in the SEVT Title VI Complaint and Lawsuit Log. This will include an explanation of any actions taken as a result of the complaint and/or internal investigation.

**Southeast Vermont Transit, Inc.  
Title VI Complaint Form**

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by Southeast Vermont Transit, Inc. (SEVT) may file a Title VI complaint.

Date Complaint Received: \_\_\_\_\_

Name of Complainant: \_\_\_\_\_

Address of Complainant: \_\_\_\_\_

Telephone (Home): \_\_\_\_\_ Telephone (Work): \_\_\_\_\_

Email Address of Complainant: \_\_\_\_\_

1. Date of Alleged Incident: \_\_\_\_\_

\_\_\_\_\_

2. Location of Alleged Incident: \_\_\_\_\_

\_\_\_\_\_

3. Name(s) of SEVT Staff Involved: \_\_\_\_\_

\_\_\_\_\_

4. Summary of the Allegations/Nature of the Complaint: \_\_\_\_\_

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Update of Complaint Status:

Date	Status of the Complaint	Actions Taken, if any
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## IV. Complaint and Lawsuit Log

SEVT has no active lawsuits at this time and has received no Title VI complaints or lawsuits in the past 3 years.

## V. Public Participation and Outreach Plan

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

### **Demographic Profile**

Overall, SEVT's service is overwhelmingly Caucasian and native born. Only 6% of residents are either Hispanic or some race other than White. Just under 97% of residents were born in the United States. People in poverty are much more prevalent, with 12.2% of residents having incomes below the federal poverty level. Table 1 below shows the detailed characteristics for each of the 27 Census tracts that comprise the SEVT service area.

The percentages highlighted in red in the table represent "concentrations" of minorities, foreign-born individuals, or individuals in poverty, defined as a percentage higher than that of the service area as a whole. Only the two tracts in Brattleboro plus Ludlow and the northern part of Springfield have concentrations in all three categories. The southern portion of Brattleboro has the highest percentages of non-white residents and low-income individuals in the service area. Westminster, West Brattleboro and Bellows Falls also have relatively high percentages of minority individuals.

Poverty is much more widespread in the SEVT service area than any of the other factors considered in the Title VI program. In the 2014-2018 American Community Survey data, which is the most recent available source for income data at the tract level, nearly 9,000 residents in the SEVT service area are estimated to be in households that have incomes below the federal poverty threshold. (In dollar terms, that threshold varies by household size.) This is twice the number of minority individuals and almost quadruple the number of foreign-born individuals. The greatest concentrations of people in poverty are in the southern part of Brattleboro, Bellows Falls and the southern part of Springfield.



As SEVT 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.

**Table 1: Demographic Characteristics of SEVT's Service Area**

County	Tract	Town	Total Population	Non-White or Hispanic Population	Percent	Foreign Born	Percent	Below Poverty Line	Percent
Windham	9670	Bellows Falls	2,993	276	9.2%	91	3.0%	700	23.4%
Windham	9671	Rockingham	2,075	103	5.0%	33	1.6%	309	14.9%
Windham	9672	Windham, Grafton, Athens, Townshend, Brookline	3,090	83	2.7%	103	3.3%	330	10.7%
Windham	9673	Londonderry	1,600	26	1.6%	62	3.9%	72	4.5%
Windham	9674	Jamaica	850	35	4.1%	21	2.5%	124	14.6%
Windham	9675	Wardsboro, Stratton, Somerset	947	60	6.3%	33	3.5%	98	10.3%
Windham	9676	Westminster	3,046	313	10.3%	85	2.8%	348	11.4%
Windham	9677	Putney	2,637	183	6.9%	34	1.3%	299	11.3%
Windham	9678	Newfane	1,806	56	3.1%	52	2.9%	167	9.2%
Windham	9679	Dover	1,252	77	6.2%	67	5.4%	84	6.7%
Windham	9680	Wilmington	1,517	105	6.9%	23	1.5%	119	7.8%
Windham	9681	Whitingham	1,622	107	6.6%	56	3.5%	124	7.6%
Windham	9682	Marlboro, Halifax	1,875	94	5.0%	71	3.8%	144	7.7%
Windham	9683	Dummerston	1,932	26	1.3%	28	1.4%	120	6.2%
Windham	9684	West Brattleboro	3,852	367	9.5%	132	3.4%	455	11.8%
Windham	9685	Brattleboro South	5,381	600	11.2%	240	4.5%	1,318	24.5%
Windham	9686	Brattleboro North	2,375	151	6.4%	174	7.3%	379	16.0%
Windham	9687	Guilford, Vernon	4,300	256	6.0%	187	4.3%	384	8.9%
Windsor	9657	Hartland	3,443	214	6.2%	99	2.9%	123	3.6%
Windsor	9659	Bridgewater, Plymouth, Reading, West Windsor	3,119	46	1.5%	96	3.1%	279	8.9%
Windsor	9660	Windsor	3,415	271	7.9%	57	1.7%	386	11.3%
Windsor	9661	Weathersfield	2,771	73	2.6%	68	2.5%	145	5.2%
Windsor	9662	Cavendish, Baltimore	1,620	30	1.9%	12	0.7%	213	13.1%
Windsor	9663	Ludlow	1,955	126	6.4%	76	3.9%	302	15.4%
Windsor	9665	Weston, Andover, Chester	4,145	224	5.4%	105	2.5%	332	8.0%
Windsor	9666	Springfield South	4,688	190	4.1%	78	1.7%	945	20.2%
Windsor	9667	Springfield North	4,361	304	7.0%	156	3.6%	559	12.8%
SEVT SERVICE AREA			72,667	4,396	6.0%	2,239	3.1%	8,858	12.2%

Source: American Community Survey 2014-2018 5-year data

### Measures to Ensure Minority, Low-Income and LEP Participation

As public transportation is perhaps disproportionately relevant to the daily lives of Title VI-protected groups and low-income Vermonters, SEVT will ensure that groups that represent these population are included in these outreach efforts and that representatives of these organizations are invited to participate.

All public meetings held as part of this public involvement process will be properly noticed in accordance with the requirements of Title VI of the Civil Rights Act of 1964 and the Vermont public meeting law (Vermont Title 1, Section 310 et seq., as annotated), including public announcements of all meetings at least 24 hours before the meeting. Notes are taken at all meetings so that members of the public are not required to submit written comments in order to have their opinions recorded.

SEVT works with the Windham Regional Commission and the Southern Windsor County Planning Commission who maintain contact with organizations that represent the interests of low-income and minority groups and notifies them of upcoming public outreach activities.

Meeting times and locations are designed to maximize accessibility for low-income and minority groups. A mix of daytime and early evening meetings are scheduled and transit access to the meeting is made available.

SEVT uses a wide variety of methods for public outreach. Specific to this Program, SEVT meets monthly with human service providers who serve minority and low income individuals, and provides written (translated as needed) information to Mount Snow who recruits a large number of international staff.

Table 2 below lists public meetings and other outreach efforts that have taken place since the last Title VI Program was submitted in 2017.

**Table 2: Public Outreach Activities**

Date	Activity	Location	Attendees/ Responses
2/21/2014	Public Meeting, Fares & Routes	Brattleboro, VT	11
4/17/2014	Public Meeting, Fares	Springfield, VT	3
4/17/2014	Public Meeting, Fares	Bellows Falls, VT	2
12/16/2016	Public Meeting, Fares	Springfield, VT	1
12/16/2016	Public Meeting, Fares	Bellows Falls, VT	1
1/10/2017	Public Meeting, Building Project	Bellows Falls, VT	0

## VI. Language Assistance Plan

### Introduction

On August 11, 2000, President Clinton signed Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency, to clarify Title VI of the Civil Rights Act of 1964. The Executive Order was issued to ensure accessibility to programs and services to otherwise eligible individuals not proficient in the English language.

The Executive Order stated that individuals with a limited ability to read, write, speak and understand English are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit, or encounter. These individuals are referred to as being limited in their ability to speak, read, write, or understand English, hence the designation, “LEP,” or Limited English Proficiency.

The USDOT published “Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficiency” in the December 14, 2005 Federal Register. The guidance explicitly identifies transit operations such as SEVT as organizations required to follow Executive Order 13166.

### 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 SEVT and overall cost.

### **Factor 1 – Prevalence of LEP Persons**

According to the 2011-2015 ACS, 651 residents of SEVT’s service area ages 5 or older spoke English less than “very well”. The largest language categories among these LEP persons was Spanish or Spanish Creole, followed by other Chinese and Laotian. This total number represents just 0.92% of the population ages 5 or older. Tables presented below show the number and percentages of LEP persons by Census tract.

The forms of LEP interaction that SEVT may experience include the following:

- Inquiries regarding basic information on how to use public transit services in the area
- Purchasing fare media
- Making reservations on demand-response services such as ADA complementary paratransit, Elderly and Disabled (E&D) transportation, and general public dial-a-ride
- Handling passenger complaints
- Gathering data such as on-board customer surveys.

The tables presented below illustrate where LEP individuals reside within SEVT's service area. The term "Linguistic Isolates" refers to people who speak English less than very well, the definition of LEP. Languages that had fewer than five individuals who speak English less than very well are not shown in the table.

As shown in Table 3, there are only six tracts in the service area with more than 50 LEP individuals. By municipality, the Town of Brattleboro has, by far, the greatest number of LEP individuals, with 238 among its three tracts. These LEP individuals include 71 Loatian speakers, 53 Chinese speakers, 49 Spanish or Spanish Creole speakers, 24 speakers of African languages, 21 speakers of other Pacific Island languages, 15 other Asian language speakers, and 5 French speakers.

Table 4 shows the concentration of linguistically isolated (LI) individuals; tracts with percentages highlighted in pink have a percentage of these individuals that is higher than the service-area-wide average. There are 9 tracts with concentrations, but only Brattleboro has more than 200 LI individuals. The highest concentration is in Londonderry at 3.4% (51 individuals), followed by thenorthern part of Brattlebor at 2.8% (70 individuals) and Jamaica at 2.6% (23 individuals), all well below the 5% safe harbor threshold.

The data show, confirmed by SEVT staff experience, that LEP is not a widespread issue in its service area. No language group exceeds 1,000 individuals or 5% of the population in any tract in SEVT's service area. Thus, according to the safe harbor provision in the federal guidance for LEP, oral translation services provided by SEVT, as well as access to written translations when requested, are sufficient to meet the requirements for accommodations for LEP individuals.

### **Factor 2 – Frequency of Contact with LEP Persons**

It can be assumed that LEP individuals, in general, depend more on public transportation than those who are English proficient, thus the need for LEP individuals to use SEVT services on a daily basis may be frequent. Many of the area's employers and social service agencies that may have contact with LEP individuals will help in their navigation of SEVT's bus system.

### **Factor 3 – Importance to LEP Persons of Program, Activities and Services**

The importance of providing transportation services to the LEP population is lower than providing some other services to this population, such a 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, education, or access to employment.

Denial or delay of access to SEVT services to LEP individuals in the SEVT service area has never been a problem.

Table 3: Linguistic Isolates by Tract and Language

County	Tract	Total Population 5+	Spanish or Spanish Creole	French (incl. Patois, Cajun)	Italian	German	Scandinavian languages	Greek	Russian	Other Indo-European languages	Chinese	Korean	Laotian	Other Asian languages	Tagalog	Other Pacific Island languages	Arabic	African languages	Total Linguistic Isolates	
Windham	9670	Bellows Falls	2,928	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0
Windham	9671	Rockingham	1,960	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0
Windham	9672	Windham, Grafton, Athens, Townshend, Brookline	2,945	-	3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3
Windham	9673	Londonderry	1,492	-	15	5	6	-	-	25	-	-	-	-	-	-	-	-	-	51
Windham	9674	Jamaica	874	-	-	-	8	-	-	-	-	-	-	-	-	-	15	-	-	23
Windham	9675	Wardsboro, Stratton, Somerset	904	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0
Windham	9676	Westminster	3,044	-	-	11	-	-	-	-	-	-	-	-	-	-	-	-	-	11
Windham	9677	Putney	2,582	1	-	-	-	-	-	-	-	-	-	4	-	-	-	-	-	5
Windham	9678	Newfane	1,740	-	-	2	-	-	-	-	-	-	-	-	-	-	-	-	-	2
Windham	9679	Dover	1,264	-	-	-	-	-	-	-	-	-	-	-	4	-	-	-	-	4
Windham	9680	Wilmington	1,966	11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	11
Windham	9681	Whitingham	1,257	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0
Windham	9682	Marlboro, Halifax	1,882	6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6
Windham	9683	Dummerston	1,876	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0
Windham	9684	West Brattleboro	3,545	9	-	-	-	-	-	-	27	-	33	-	-	-	-	-	-	69
Windham	9685	Brattleboro South	5,165	31	-	-	-	-	-	-	-	-	38	-	-	21	-	9	-	99
Windham	9686	Brattleboro North	2,492	9	5	-	-	-	-	-	26	-	-	15	-	-	-	15	-	70
Windham	9687	Guilford, Vernon	3,954	-	-	-	15	-	-	3	-	-	-	-	-	-	-	-	-	18
Windsor	9657	Hartland	3,205	-	27	-	10	-	-	-	-	-	-	-	-	-	-	-	-	37
Windsor	9659	Bridgewater, Plymouth, Reading, West Windsor	3,007	9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9
Windsor	9660	Windsor	3,289	-	-	-	14	-	-	-	15	-	-	-	-	-	-	-	-	29
Windsor	9661	Weathersfield	2,686	6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6
Windsor	9662	Cavendish, Baltimore	1,727	-	7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	7
Windsor	9663	Ludlow	2,069	-	10	-	-	-	-	-	9	-	-	-	-	-	-	-	-	19
Windsor	9665	Weston, Andover, Chester	4,096	48	-	-	-	-	8	-	-	30	-	-	-	-	-	-	-	86
Windsor	9666	Springfield South	4,381	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0
Windsor	9667	Springfield North	4,327	38	9	2	-	31	-	-	-	-	-	-	6	-	-	-	-	86
		SEVT SERVICE AREA	70,657	168	76	20	47	6	31	8	28	77	30	71	19	10	21	15	24	651

Source: 2011-2015 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	Spanish or Spanish Creole	French (incl. Patois, Cajun)	Italian	German	Greek	Russian	Other Indo-European languages	Chinese	Korean	Laotian	Vietnamese	Other Asian languages	Tagalog	Other Pacific Island languages	Arabic	African languages	Total Linguistic Isolates
Windham	9670	Bellows Falls																0
Windham	9671	Rockingham																0
Windham	9672	Windham, Grafton, Athens, Townshend, Brookline	0.1%															0.2%
Windham	9673	Londonderry	1.0%	0.3%			1.7%											3.4%
Windham	9674	Jamaica			0.9%											1.7%		2.6%
Windham	9675	Wardsboro, Stratton, Somerset																0
Windham	9676	Westminster		0.4%														0.4%
Windham	9677	Putney	0.0%										0.2%					0.2%
Windham	9678	Newfane		0.1%														0.1%
Windham	9679	Dover												0.3%				0.3%
Windham	9680	Wilmington	0.6%															0.6%
Windham	9681	Whitingham																0
Windham	9682	Marlboro, Halifax	0.3%															0.3%
Windham	9683	Dummerston																0
Windham	9684	West Brattleboro	0.3%						0.8%		0.9%							1.9%
Windham	9685	Brattleboro South	0.6%								0.7%				0.4%		0.2%	1.9%
Windham	9686	Brattleboro North	0.4%	0.2%					1.0%				0.6%				0.6%	2.8%
Windham	9687	Guilford, Vernon			0.4%		0.1%											0.5%
Windsor	9657	Hartland		0.8%	0.3%													1.2%
Windsor	9659	Bridgewater, Plymouth, Reading, West Windsor	0.3%															0.3%
Windsor	9660	Windsor			0.4%			0.5%			0.1%							0.9%
Windsor	9661	Weathersfield	0.2%															0.2%
Windsor	9662	Cavendish, Baltimore		0.4%														0.4%
Windsor	9663	Ludlow		0.5%				0.4%										0.9%
Windsor	9665	Weston, Andover, Chester	1.2%				0.2%		0.7%									2.1%
Windsor	9666	Springfield South																0
Windsor	9667	Springfield North	0.9%	0.2%	0.0%		0.7%							0.1%				2.0%

#### **Factor 4 – Resources Available and Cost**

Due to the very low numbers of LEP persons in Vermont overall, coupled with SEVT's own experience, the cost to accommodate them has not been burdensome. VTrans provides in-person and telephone translation services to VTrans subrecipients as listed below. Documents may also be translated through Google Translate at no cost. SEVT has access to the Telelanguage contract. It's not expected that the resources available or the cost of translation services will hinder the accommodation of the needs of SEVT's service area's LEP population.

Telelanguage Inc.  
514 SW 6<sup>th</sup> Avenue 4<sup>th</sup> Floor  
Portland, OR 92204  
Tim Bernal, Project Manager  
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Translation of SEVT's written materials and or signs into a variety of languages cannot be justified at this time, as the number of the potential benefactors is very small.

#### **Monitoring**

SEVT has described previously in this program that it is 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, SEVT does not need to take any further actions to assist LEP individuals.

The 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. (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.)

In light of this, SEVT 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,
- 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.



## VII. Board Membership

The SEVT eight-member Board of Directors is a non-elected board. SEVT encourages the participation of minorities on its Board of Directors by advertising locally when a position becomes vacant, and actively seeking diverse participation by reaching out to individuals whose qualifications meet the needs of the Board.

### MINORITY REPRESENTATION ON COMMITTEES AND COUNCILS

<u>Body</u>	<u>Caucasian</u>	<u>Latino</u>	<u>African American</u>	<u>Asian American</u>	<u>Native American</u>
Population	94%	2.0%	0.9%	0.9%	0.1%
Board of Directors	100% Male=88% Female=12%	0%	0%	0%	0%

SEVT has no citizen input committees, planning boards or advisory councils.

See attached for SEVT Board of Director's meeting minutes adopting this Title VI Program.

## VIII. Monitoring of Subrecipients

SEVT has no subrecipients.

## IX. Transit Facilities

Neither operating division of SEVT has constructed or will construct any maintenance facilities in the past three or coming three years.

## X. System-wide Service Standards and Policies

SEVT operates two modes of service: local bus and commuter bus. The MOOver division's service is primarily local bus, consisting of deviated fixed routes in the Deerfield Valley connecting the neighboring towns of Wilmington, Dover, Whitingham, and Readsboro, and outlying towns of Bennington and Brattleboro. The Current division operates local service in the towns of Brattleboro, Bellows Falls and Springfield, and local service connecting outlying towns of Putney, Westminster, Rockingham, Chester, Ludlow, and two towns in New Hampshire, Walpole and Hinsdale. The Current division also operates commuter service to the Upper Valley, serving the towns of Ascutney, Windsor, Harland, White River Junction, with the final destination of Lebanon, New Hampshire. During the winter months, both divisions add local routes are to serve the ski areas.

Service standards for these modes of transit are as follows:

## Vehicle Load

SEVT collects ridership data on all routes and strives to provide a seat to most passengers. During peak periods it is expected that some passengers may have to stand, but the number of standing passengers will be kept to reasonable levels. Also, services will be designed so that when passengers do have to stand, they will not have to stand for long periods of time.

Two different techniques are used to keep passenger loads within acceptable levels. The first is to match vehicle type with ridership levels, and to use larger vehicles on higher ridership routes. The second method is to provide more frequent service, with service frequencies set to keep passenger loads within the limits as set forth as follows:

### Maximum Passenger Loading (as a Percentage of Seating Capacity)

	<u>Peak Periods</u>	<u>Off-Peak Periods</u>	<u>All Day</u>
Local Bus	120%	100%	100%
Local-Tourism Bus	160%	100%	100%
Commuter Bus	100%	100%	100%

Included in Local Bus service is winter service provided to the ski areas (Local-Tourism Bus). During peak periods, passenger loading may reach up to 160% for short periods of time over short distances.

### Maximum Passenger Loads by Vehicle Type

	<u>Seats (Typical)</u>	<u>Maximum Load</u>
16' Van	5	8
20-22' Transit Bus (Small Bus)	8	13
20-25' Transit Bus (Small Bus)	14	24
24-25' Transit Bus (Small Bus)	16	26
25-30' Transit Bus (Medium Bus)	20	32
30' Transit Bus (Medium Bus)	22	35
29-32' Transit Bus (Medium Bus)	24	38
30' Transit Bus (Medium Bus)	26	41
30-33' Transit Bus (Medium Bus)	28	45
32-35' Transit Bus (Medium Bus)	30	48
35' Transit Bus (Medium Bus)	32	51
35-37' Transit Bus (Medium Bus)	34	54
33-35' Transit Bus (Medium Bus)	36	58
40' Transit Bus (Large Bus)	43	52
40' Transit Bus (Large Bus)	44	53

## Vehicle Headway

SEVT bases bus headways on both policy and productivity. The minimum service frequency guidelines define the minimum service frequencies at which each type of service should operate. Based on demand and budget, many services could operate more frequently, and in these cases, the service frequencies would be based on ridership and loading levels. SEVT separates Local-Tourism

and Local-Town to Town to more accurately define the minimum service frequencies for those subcategories of Local. SEVT’s headway standards are set forth as follows:

	<u>Weekdays</u>	<u>Weekends</u>
Local Bus	1 hour	1 hour
Local-Tourism Bus	30 minutes	30 minutes
Local-Town to Town Bus	3 hours	3 hours
Commuter	3 hours	3 hours

### On-Time Performance

On-time performance for the SEVT bus system is measured at time points. A vehicle is considered on time if it leaves its time point up to 5 minutes past its scheduled departure time. For the last time point on each trip, the arrival time is used instead of the leave time.

SEVT’s target is for the fixed-route bus system to be 90 percent on-time or better. Individual routes are expected to be within 20 percent of the target goal for each mode. For Title VI purposes, all routes are expected to be within 20 percent of the actual system-wide average or better.

### Percentage of On-Time Trips by Route Classification

	<u>Percentage of On-Time Trips</u>
Local Bus	90%
Commuter Bus	90%

### Service Availability Standard

SEVT will strive to distribute its fixed-route and deviated fixed-route bus transit service so that in towns within the service area with populations exceeding 5,000, at least 35 percent of all residents are within a ¼ mile walk of bus service.

### Vehicle Assignment Policy

Vehicle assignment refers to the process by which vehicles are placed into service at garages and routes throughout the system. It is SEVT’s policy to assign buses to routes based on bus service span, fuel capacity, passenger capacity, special bus length, turning radius or other special features, and to systematically manage the fleet’s vehicle life.

### Distribution of Transit Amenities

Installation of transit amenities along bus routes are based on the number of passenger boardings and transfers at stops along the routes. SEVT’s main transit amenity is bus shelters. SEVT purchases and constructs bus shelters as deemed appropriate, and as funding allows. The maintenance of the bus shelters is the responsibility of either SEVT or the town in which the bus shelter resides. SEVT’s standard is that bus shelters are located, when possible, at bus stops that serve the greatest number of passengers.