



GREATER ROANOKE TRANSIT COMPANY

TITLE VI PROGRAM UPDATE

July 2021

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## OBJECTIVES

The Greater Roanoke Transit Company (GRTC) has in place a program based on Title VI of the Civil Rights Act of 1964. The objectives of the program are as follows:

- A. To ensure that the level and quality of transportation service is provided without regard to race, color, or national origin.
- B. In providing transportation services identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations.
- C. To promote the full and fair participation of all affected populations in transportation decision making.
- D. To prevent the denial, reduction, or delay in benefits related to transportation programs, activities, and services that benefit minority populations or low-income populations.
- E. To ensure meaningful access to programs, activities, and services by persons with limited English proficiency.

## SUBMISSION OF CIVIL RIGHTS ASSURANCE

The Greater Roanoke Transit Company (GRTC) HERBY CERTIFIES THAT, as a condition of receiving Federal financial assistance under the Urban Mass Transportation Act of 1964, as amended, it will insure that:

1. No person on the basis of race, color, or national origin will be subjected to discrimination in the level and quality of transportation services and transit-related benefits.
2. GRTC will compile, maintain, and submit in a timely manner Title VI information required by the Federal Transit Administration (FTA) Circular 4702.1B, dated October 1, 2012, and in compliance with the Department of Transportation's Title VI regulations at 49 CFR Part 21.
3. GRTC will submit an annual Title VI assurance as part of the annual Certification and Assurance submission to the FTA. GRTC will collect Title VI assurances from any sub-recipients prior to passing thru FTA funds.

The person or persons whose signature appears below are authorized to sign this assurance on behalf of the grant applicant or recipient.

Kevin L. Price, General Manager  
(Name and Title of Authorized Officer)

\_\_\_\_\_  
Date

\_\_\_\_\_  
(Signature of Authorized Officer)

## TITLE VI COMPLAINT PROCEDURES

As part of the Greater Roanoke Transit Company's (GRTC) Title VI program, GRTC maintains the following procedure for investigating and tracking Title VI complaints filed against the company:

These procedures do not deny the right of the complainant to file formal complaints with other State or federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to obtain early resolution of complaints at the lowest level possible.

Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited under Title VI and related statutes may file a complaint.

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

1) A formal complaint must be filed within 180 days of the alleged occurrence. Complaints shall be in writing and signed by the individual or his/her representative, and will include the complainant's name, address and telephone number; name of alleged discriminating official, basis of complaint (race, color, national origin), and the date of alleged act(s). A statement detailing the facts and circumstances of the alleged discrimination must accompany all complaints.

The preferred method is to file your complaint in writing using the *GRTC Title VI Complaint Form*, and sending it to:

Title VI Officer  
P.O. BOX 13247  
Roanoke, VA 24032

2) In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the GRTC Title VI Officer by calling (540) 982-0305. Under these circumstances, the complainant will be interviewed, and the GRTC Title VI Officer will assist the Complainant in converting the verbal allegations to writing.

3) When a complaint is received, the GRTC Title VI Officer will provide a written acknowledgment to the Complainant, within ten (10) days by registered mail.

4) If a complaint is deemed incomplete, additional information will be requested, and the Complainant will be provided 60 business days to submit the required information. Failure to do so may be considered good cause for a determination of no investigative merit.

5) Within 15 business days from receipt of a complete complaint, GRTC will determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant investigation. Within five (5) days of this decision, the GRTC General Manager or his/her authorized designee will notify the Complainant and Respondent, by registered mail, informing them of the disposition.

a. If the decision is not to investigate the complaint, the notification shall specifically state the reason for the decision.

b. If the complaint is to be investigated, the notification shall state the grounds of GRTC's jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting the investigator.

6) When GRTC does not have sufficient jurisdiction, the GRTC General Manager or his/her authorized designee will refer the complaint to the appropriate state or federal agency holding such jurisdiction.

7) If the complaint has investigative merit, the GRTC General Manager or his/her authorized designee will instruct the GRTC Title VI Officer to fully investigate the complaint. A complete investigation will be conducted, and an investigative report will be submitted to the GRTC General Manager within 60 days from receipt of the complaint. The report will include a narrative description of the incident, summaries of all persons interviewed, and a finding with recommendations and conciliatory measures where appropriate. If the investigation is delayed for any reason, the GRTC Title VI Officer will notify the appropriate authorities, and an extension will be requested.

8) The GRTC General Manager or his/her authorized designee will issue letters of finding to the Complainant and Respondent within 90 days from receipt of the complaint.

9) The Complainant may also file a complaint with the Federal Transit Administration:

Federal Transit Administration  
Office of Civil Rights  
1200 New Jersey Avenue SE  
Washington, DC 20590

FTA Complaint procedures can also be found on the FTA web site at: [www.fta.dot.gov](http://www.fta.dot.gov).

GRTC and sub-recipients will maintain a list of any active investigations conducted by entities other than FTA, lawsuits, or complaints naming GRTC or sub-recipients that allege discrimination on the basis of race, color, or national origin. The list will include the date of 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 GRTC or sub-recipient in response to the investigation, lawsuit, or complaint.

Be advised, there are no active lawsuits or complaints naming GRTC, which allege discrimination on the basis of race, color, or national origin with respect to the service or other transit benefits provided by GRTC; nor have there been any civil rights compliance review activities conducted in the last three years other than those conducted as part of the triennial review process and as part of GRTC's Title VI program review.

Please see Attachment A for instructions to the general public in regards to filing a Title VI complaint.

# LANGUAGE IMPLEMENTATION PLAN

## GRTC Limited English Proficient (LEP) Plan

### **Introduction**

The purpose of this limited English proficiency policy guidance is to clarify the responsibilities of recipients of federal financial assistance from the U.S. Department of Transportation (DOT) and assist them in fulfilling their responsibilities to Limited English Proficient (LEP) persons, pursuant to Title VI of the Civil Rights Act of 1964 and implementing regulations. It was prepared in accordance with **Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq.**, and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance, and; **Executive Order 13166**

Executive Order 13166 "Improving Access to Services for Persons With Limited English proficiency," reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled "Enforcement of Title VI of the Civil Rights Act of 1964--National Origin Discrimination Against Persons With Limited English Proficiency." (See 65 FR 50123, August 16, 2000 DOJ's General LEP Guidance). Different treatment based upon a person's inability to speak, read, write, or understand English may be a type of national origin discrimination. Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies such as the Greater Roanoke Transit Company (GRTC) and governments, private and non-profit entities, and sub-recipients.

### **Plan Summary**

GRTC has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to GRTC services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English. This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available, and information for future plan updates. In developing the plan while determining GRTC's extent of obligation to provide LEP services, GRTC undertook a U.S. Department of Transportation four factor LEP analysis which considers the following: 1) The number or proportion of LEP persons eligible in the GRTC service area who may be served or likely to encounter a GRTC program, activity, or service; 2) the frequency with which LEP individuals come in contact with an GRTC services; 3) the nature and importance of the program, activity or service provided by GRTC to the LEP population; and 4) the resources available to GRTC and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

# Four Factor Analysis

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

GRTC examined the US Census report from 2020 and was able to determine that approximately 7.6%, or 9,467 people within GRTC’s service area age 5 and older spoke a language other than English. Of the 9,467 people reporting they speak other languages than English, 4,646 people speak Spanish, 2,852 people speak an Other Indo-European Language, 1,194 people speak an Asian/Pacific Island Language and 775 people speak a language listed as “other”. Please see the chart below which illustrates the “Language spoken at home by Ability to speak English for the population 5 years and over” for the Roanoke, VA Urbanized Area (2020).

City	Population	Speaks English "Only" or Speaks English "Very Well"	Speaks English "Less than Very Well"	% of Population that Speaks English "Less than Very Well"
Roanoke	92,446	89,354	3,092	3.34%
Salem	24,182	23,837	345	1.43%
Vinton	7,751	7,668	83	1.07%
Total	124,379	120,859	3,520	2.83%

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

GRTC assesses the frequency at which staff and drivers have or could possibly have contact with LEP persons. This includes documenting phone inquiries and verbally surveying drivers. GRTC has had no requests for interpreters and zero requests for translated GRTC documents. The staff and drivers have had very little contact with LEP individuals.

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

The provision of public transportation is a vital service, especially for people without access to personal vehicles. For example, a county’s regional planning activities potentially impact every person within the county. Development of a coordinated plan to meet the specific transportation needs of seniors and people with disabilities also will often meet the needs of LEP persons. An LEP individual may have a disability that prevents him/her from using fixed route service, thus making him/her eligible for ADA complementary paratransit. Transit providers, States, and MPOs must assess their programs, activities and services to ensure they are providing meaningful access to LEP persons.

There is no large geographic concentration of any one type of LEP individuals in the GRTC service area. The overwhelming majority of the population, 97% speak only English. Therefore, there is a lack of any social, service, professional and leadership organizations within the GRTC service area that focuses on outreach or membership of LEP individuals. As part of its 2018 Transit Development Plan, GRTC re-evaluated its LEP plans to ensure no environmental changes had occurred since the 2017 Title VI submission.

**4. The resources available to GRTC and overall costs**

GRTC assessed its available resources that could be used for providing LEP assistance, including which documents would be the most valuable to be translated if and when the populations supports, taking an



inventory of available organizations that GRTC could partner with for outreach and translation efforts, and what level of staff training is needed. GRTC currently employs a Spanish speaking Information Officer that interacts with GRTC passengers at the transfer center. After analyzing the four factors, the GRTC developed the plan outlined in the following section for assisting persons of limited English proficiency. As there is no large geographic representation of LEP persons in the GRTC service area, costs associated with LEP requirements will be budgeted on an as needed basis and based on projects as listed in GRTC planning documents.

## **LIMITED ENGLISH PROFICENCY PLAN OUTLINE**

### **How to Identify an LEP Person who Needs Language Assistance**

Below are tools to help identify persons who may need language assistance:

- Examine records requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings;
- Survey drivers and other first line staff on an annual basis at the beginning of each fiscal year regarding their experience on having any direct or indirect contact with LEP individuals.
- 43% of the population that speaks “a language at home other than English” speaks Spanish. GRTC will make its Spanish speaking staff members readily available throughout the service day as the need arises. GRTC has also launched Google Translate on its main website to assist LEP customers with basic transit service information.

### **Language Assistance Measures**

GRTC will implement the following LEP procedures. The creation of these steps are based on the very low percentage (7.6%) of persons speaking other languages or not speaking English at least “well,” and the lack of resources available in the GRTC service area:

- Census Bureau’s “I Speak Cards” are to be located at the Customer Service window in the transfer center at all times.
- GRTC will make its Spanish speaking staff members readily available throughout the service day as the need arises.
- Direct LEP customers to GRTC’s website & the Google Translate feature located within the website for basic transit service information.

### **GRTC Staff Training**

All GRTC staff will be provided with the LEP Plan and will be educated on procedures to follow. This information will also be part of the GRTC staff orientation process for new hires. Training topics are listed below:

- Understanding the Title VI policy and LEP responsibilities;

- What language assistance services GRTC offers;
- Use of LEP “I Speak Cards”;
- Documentation of language assistance requests;
- How to handle a Title VI and/or LEP complaint

### **Outreach Techniques**

As of this draft of the GRTC LEP Plan, GRTC does not have a formal practice of outreach techniques due to the lack of LEP population and resources available in the service area. However, the following are a few options that the GRTC will incorporate for LEP outreach:

- If staff knows that they will be presenting a topic that could be of potential importance to an LEP person or if staff will be hosting a meeting or public hearing in a geographic location with a known concentration of LEP persons, meeting notices, fliers, advertisements, and agendas will be printed in an alternative language, based on known LEP population in the area.
- When running a general public meeting notice, staff will insert the clause, based on the LEP population and when relevant, that translates into “A (insert alternative Language) translator will be available”. For example: “Un traductor del idioma español estará disponible” This means “A Spanish translator will be available”.
- Key print materials, including but not limited to schedules and maps, will be translated and made available at the GRTC transfer center, on board vehicles and in communities when a specific and concentrated LEP population is identified.

### **Safe Harbor Provision**

GRTC will use the Safe Harbor Provisions to determine circumstances for translation of written materials for LEP populations. GRTC currently translates its’ written materials into Spanish (6,477 persons), such as GRTC’s Starline Trolley Ride Guide. GRTC plans to translate its’ Valley Metro Ride Guide into Spanish in the near future.

### **Monitoring and Updating the LEP Plan**

This plan is designed to be flexible and is one that can be easily updated. At a minimum, GRTC will follow the Title VI Program update schedule for the LEP Plan. The next required Title VI Program update must be forwarded to the FTA by January 2020.

Each update should examine all plan components such as:

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

- Were any complaints received?

### **Dissemination of the GRTC Limited English Proficiency Plan**

GRTC includes the LEP plan on the GRTC website ([www.valleymetro.com](http://www.valleymetro.com)) together with its Title IV Policy and Complaint Procedures. GRTC's Notice of Rights under Title VI to the public posted in the GRTC transfer center, on all GRTC vehicles, and in selected printed materials also refers to the LEP Plan's availability.

Any person, including social service, non-profit, and law enforcement agencies and other community partners with internet access will be able to access the plan. Copies of the LEP Plan will be provided, on request, to any person(s) requesting the document via phone, in person, by mail or email. LEP persons may obtain copies/translations of the plan upon request.

Any questions or comments regarding this plan should be directed to the GRTC Title VI Officer.

GRTC Title VI Officer  
P.O. Box 13247  
Roanoke, VA 24032

## **NOTIFICATION OF BENEFICIARIES OF PROTECTION UNDER TITLE VI**

GRTC shall provide information to the public regarding GRTC's Title VI obligations and apprise members of the public of the protections against discrimination afforded them by Title VI. This will be accomplished by publishing a notice in the local newspaper, and flyers in the transfer center. Additionally, GRTC will place the notice on GRTC's web site. The contents of the notice shall include:

1. A statement that the agency operates programs without regard to race, color, and national origin.
2. A description of the procedures that members of the public should follow in order to request additional information about GRTC's nondiscrimination policy.
3. A description of the procedures that members of the public should follow in order to file a discrimination complaint against GRTC.

A copy of the above referenced notice is included as Attachment A.

### **ADDITIONAL INFORMATION REQUESTS**

GRTC recognizes that it may be asked, at the discretion of the FTA, for information other than that required by FTA Circular 4702.1B to investigate complaints of discrimination or to resolve concerns about possible noncompliance with Title VI.

## **PUBLIC PARTICIPATION PLAN**

GRTC's Public Participation Plan (PPP) has been prepared to ensure that no one is precluded from participating in GRTC's service planning and development process. It ensures that:

- Potentially affected community members will have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health;
- The public's contribution can and will influence GRTC's decision making;
- The concerns of all participants involved will be considered in the decision-making process; and
- GRTC will seek out and facilitate the involvement of those potentially affected.

GRTC has developed a public participation plan to encourage and guide public involvement efforts and enhance access to GRTC's transportation decision-making process by minority and Limited English Proficient (LEP) populations. The public participation plan describes the overall goals, guiding principles and outreach methods that GRTC uses to reach its riders.

## Goals of the Public Participation Plan

The overarching goals of GRTC's PPP include:

- **Clarity in Potential for Influence** - The process clearly identifies and communicates where and how participants can have influence and direct impact on decision making.
- **Consistent Commitment** - GRTC communicates regularly, develops trust with riders and our community and builds community capacity to provide public input.
- **Diversity** - Participants represent a range of socioeconomic, ethnic and cultural perspectives, with representative participants including residents from low income neighborhoods, ethnic communities and residents from Limited English Proficiency.
- **Accessibility** - Every reasonable effort is made to ensure that opportunities to participate are physically, geographically, temporally, linguistically, and culturally accessible.
- **Relevance** - Issues are framed in such a way that the significance and potential effect is understood by participants.
- **Participant Satisfaction** - People who take the time to participate feel it is worth the effort to join the discussion and provide feedback.
- **Partnerships** - GRTC develops and maintains partnerships with communities through the methods described in its public participation plan.
- **Quality Input and Participation** - That comments received by GRTC are useful, relevant and constructive, contributing to better plans, projects, strategies and decisions.

## Objectives of the Public Participation Plan

GRTC's Public Participation Plan is based on the following principles:

- **Flexibility** - The engagement process will accommodate participation in a variety of ways and be adjusted as needed.
- **Inclusiveness** - GRTC will proactively reach out to and engage low income, minority and LEP populations from the GRTC service area.
- **Respect** - All feedback will be given careful and respectful consideration.

- **Proactive and Timeliness** - Participation methods will allow for early involvement and be ongoing.
- **Clear, Focused and Understandable** - Participation methods will have a clear purpose and use for the input, and will be described in language that is easy to understand.
- **Honest and Transparent** - Information provided will be accurate, trustworthy and complete.
- **Responsiveness** – GRTC will respond and incorporate appropriate public comments into transportation decisions.
- **Accessibility** – Meetings will be held in locations which are fully accessible and welcoming to all area residents, including, but not limited to, low-income and minority members of the public and in locations relevant to the topics being presented and discussed.

**GRTC will use its public participation plan when considering fare changes, modifications to routes and schedules and other transit planning projects when:**

- A fare increase or significant change in the method of fare payment is being considered;
- A new route is established;
- An existing route is proposed for elimination;
- Considering the total discontinuance of service on any route or group of routes on any given day when service is currently offered;
- Any system-wide change in service hours that exceeds (plus or minus) 10% of current total service hours;
- Routing on any given route or group of routes that affects more than 25% of the riders using the affected route(s); or
- Schedules are changed on any given route or group of routes that reduces the total number of one-way bus trips by more than 25% of the current number of bus trips.
- For minor schedule and service changes not rising to the level of those above, GRTC will post service change notices on appropriate buses and stops sixty days in advance of the change date.

**Outreach Efforts – Alerting Riders and Encouraging Engagement**

GRTC’S PPP includes the following outreach efforts:

- A Title VI review of the proposal is conducted;
- Public outreach venues, dates and times are determined with consideration of the proposed changes and their impact on specific locations/populations within the GRTC service area;
- Bilingual (English and Spanish) public outreach materials and a program will be developed;
- All public meetings are properly publicized and advertised in local newspapers, including a minority newspaper. Notices are placed in GRTC’s transfer center, on buses, and on GRTC’s website. Public meetings are held at the Roanoke Valley-Alleghany Metropolitan Planning Commission conference room and other locations determined to be affected by any proposed service change. All locations are easily accessible to GRTC bus routes, and to people with disabilities.

## Addressing Comments

### The Incorporation of Public Comments into Decisions

All comments received through the public participation plan are given careful, thoughtful consideration.

Because there are a number of different ways riders or members of the community can comment on proposed service or fare changes (mail, email, public meetings and others), all comments are assembled into a single document.

## SITING OF FIXED FACILITIES

GRTC has not constructed any new facilities since its last Title VI update (February 2014). Therefore no Title VI equity analysis was conducted for this program submission period.

## GRTC SERVICE STANDARDS

1. Vehicle Load Standards – The average of all loads during the peak operating period should not exceed the vehicle’s available capacities, which are: 43 passengers for a 35’ bus (**Fixed Route**); 29 passengers for a medium duty commuter coach (**Commuter**); 48 passengers for a replica trolley shuttle (**Starline Trolley**); 57 passengers for a 45’ commuter coach (**Commuter**); 16 passengers for a “body-on-chassis” shuttle bus (**Fixed Route**).

2. Vehicle Headway Standards –

**Fixed Route** - GRTC’s transit service operates Monday through Saturday from 5:45 am to 8:45 pm providing hourly service throughout the service day. Peak period service Monday through Friday provides 30 minute service on select routes from 6:15 am to 9:45am, then resumes in the afternoon from 3:45 pm to 6:15 pm.

**Starline Trolley** - GRTC’s trolley service operates Monday through Friday from 7:00 am to 7:00 pm providing 15-minute service throughout the service day. Peak period service Monday through Friday provides 10 minute service from 10:00 am to 2:00 pm.

**Regional Commuter** - GRTC’s commuter service operates Monday through Saturday from 5:45 am to 8:45 pm providing one hour & twenty minute service throughout the service day, connecting the Roanoke Valley and the New River Valley.

3. On-time Performance Standards – A GRTC transit vehicle is considered on-time if it departs a designated scheduled time point no more than 5 minutes late. GRTC’s on-time performance goal is 93% or better. GRTC monitors its on-time performance via on-road supervision, supported by GPS technology, and tracks its performance via monthly reports provided by the transportation staff.
4. Service Availability Standards – Local bus stops will not be more than one quarter mile apart. GRTC’s goal is to distribute transit service so that 80% of all residents in GRTC’s service area have reasonable access to transit service.

## GRTC SERVICE POLICIES

1. Vehicle Assignment Policy – GRTC’s policy with respect to vehicle assignment is service type specific. GRTC generally provides three types of service: Fixed Route, Commuter Service, and a Downtown Trolley Service. Please see the chart below illustrating GRTC’s bus assignments per service type.

<b>Service Type</b>	<b>Fixed Route</b>	<b>Commuter Service</b>	<b>Downtown Trolley Service</b>
Vehicle Type	35’ Transit Bus	45’ Commuter Coach	35’ Replica Trolley Bus

2. Transit Stop Amenities Policy – Transit amenities are distributed on a system-wide basis. GRTC transit stop amenities include bus stop shelters (large and small), equipped with benches, and trash receptacles. The location of transit stop amenities is determined by factors such as level of ridership, individual and community requests, and GRTC staff recommendations.

<b>Transit Amenity</b>	<b>Transit Amenity Threshold</b>
Large Transit Bus Stop Shelter*	35% of transit vehicle capacity per bus stop
Small Transit Bus Stop Shelter*	25% of transit vehicle capacity per bus stop

\* All GRTC transit bus stop shelters include solar lighting, passenger bench (2 or 4 seats), and trash receptacle. GRTC began its current transit bus stop shelter program in 2011. All GRTC transit bus stop shelters are in good or new condition.

## MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES

Title 49 CFR Section 21.5(b)(1)(vii) states that GRTC may not, on the ground 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.” GRTC does not have any planning or advisory boards. GRTC does hold stakeholder meetings with representatives from localities serviced by GRTC’s Starline Trolley and Smart Way Commuter service.

## PROVIDING ASSISTANCE TO SUB-RECIPIENTS

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.” GRTC will assist its’ sub-recipients in complying with the Department of Transportation’s (DOT) Title VI regulations, including the general reporting requirements. GRTC will provide to its’ sub-recipients the following sample documents to assist in sub-recipient compliance:

1. Notices to the public informing beneficiaries of their rights under DOT's Title VI regulations, procedures on how to file a Title VI complaint, and the recipient's Title VI complaint form.
2. Procedures for tracking and investigating Title VI complaints filed with a sub-recipient, and when GRTC expects to be notified by the sub-recipient of complaints received by the sub-recipient.
3. Demographic information on the race and English proficiency of residents served by the sub-recipient. This information will assist the sub-recipient in assessing the level and quality of service it provides to communities within its service area and in assessing the need for language assistance.

GRTC has no current sub-recipients.

## MONITORING SUB-RECIPIENTS

GRTC shall ensure that all sub-recipients are complying with the DOT Title VI regulations. GRTC will require each of its sub-recipients to submit the following at least every three years, as applicable:

- A copy of the sub-recipients of Title VI Program;
- Compliant Form;
- Public Participation Plans;
- Language Assistance Plans.

In April 2018, GRTC will send correspondence to all its' sub-recipients informing them of the changes to the FTA guidance. GRTC will then assign dates for sub-recipients to submit their Title VI Programs.

Once GRTC receives a sub-recipient's Title VI Program, written correspondence will be sent to the sub-recipient informing them that GRTC has received the Title VI Program and full review will be completed within 60 days. After a thorough review of the sub-recipient's program, GRTC will determine if the program is compliant or non-compliant with the DOT's Title VI regulations. If the program is compliant, GRTC will send the sub-recipient a correspondence indicating as such with a due date for the next program update. If the program is not fully compliant, GRTC will send the sub-recipient a correspondence indicating which areas of the program are deficient and offer assistance on any corrective actions indicated. Sub-recipients whose Title VI Programs have deficiencies will be given 30 days to cure such deficiencies. All final sub-recipient Title VI Programs will be stored electronically.



## Appendix A

To the Greater Roanoke Transit Company's Title VI update  
Dated July 2021

The Greater Roanoke Transit Company (GRTC) hereby gives public notice that it is GRTC's policy to assure full compliance with Title VI of the Civil Rights Act of 1964, Federal Transit Administration (FTA) Circular 4702.1B , and related statutes and regulations in all programs and activities. Title VI requires that no person shall, on the grounds of race, color, or national origin be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any FTA program or other activity for which GRTC receives federal financial assistance.

Persons wishing to request additional information on GRTC's Title VI policy may contact GRTC at 540-982-2222 or write to the following address, PO Box 13247, Roanoke, Virginia 24032.

Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited under Title VI and related statutes may file a complaint as prescribed by GRTC's TITLE VI COMPLAINT PROCEDURES.

The Complainant may also file a complaint with the Federal Transit Administration:  
Federal Transit Administration  
Office of Civil Rights  
1200 New Jersey Avenue SE  
Washington, DC 20590

FTA Complaint procedures can also be found on the FTA web site at: [www.fta.dot.gov](http://www.fta.dot.gov).

## Appendix B

GRTC's List of public policy locations – Title VI

1. Campbell Court Transfer Center
2. Roy Z. Meador Administrative Building

Attachment C  
GRTC's List of public outreach/input opportunities – Title VI

1. Smart Way Express/Smart Way Route Modification – July 2018
2. STAR Pass Fee Adjustment – January 2019
3. Minor Route Modifications – April 2019