

Introduction

This program reflects that Bristol Virginia Transit is committed to ensuring that its services are fully accessible to all individuals without regard to race, color, national origin, age and gender.

Authorities

Title VI of the Civil Rights Act of 1964 provides that no person in the United States shall, on the grounds of race color or national origin, be excluded from participation in, be denied the benefits of or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance.

Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of terms “programs or activities” to include all programs or activities of Federal Aid recipients, sub recipients and consultants, whether such programs and activities are federally assisted or not.

Federal Transit Administration Civil Rights Assurance

Bristol Virginia Transit hereby certifies that as a condition of receiving Federal financial assistance under the Federal Transit Act of 1964, as amended, it will ensure that:

No person on the basis of race, color, national origin, age or gender will be subjected to discrimination in the level and quality of transportation services and transit-related benefits.

Bristol Virginia Transit will compile, maintain and submit in a timely manner Title VI information required by FTA Circular 4702.1 and in compliance with the Department of Transportation’s Title VI regulation, 49 CFR Part 21.9.

Bristol Virginia Transit will make it known to the public that those persons alleging discrimination on the basis of race, color, or national origin as it relates to the provision of transportation services and transit related benefits may file a complaint with the Federal Transit Administration and/or the U.S. Department of Transportation.

Bristol Virginia Transit is responsible for ensuring that all sub recipients of FTA funds comply with all applicable federal and state regulations and program requirements.

Introduction

Bristol Virginia Transit began services to the citizens of Bristol, Virginia in 1982. Bristol Virginia Transit has prepared this Title VI report to the Federal Transit Administration, (FTA), providing for a program to ensure that transit services made available is equitably distributed, and provides equal access and mobility to any person without regard to race, color, or national origin.

This report has been prepared pursuant to Title VI of the Civil Rights Act of 1964, FTA Circular 4702.1, "Title VI Program Guidelines for Federal Transit Administration Recipients," (26 May 1988), and FTA Circular 4702.1A, dated May 13, 2007 "Title VI and Title VI-Dependent Guidelines for Federal Transit Administration Recipients, and a recent Memorandum from the FTA's Director of Civil Rights outlining Title VI Program updates requirements and paperwork reduction.

Public Transportation Service

Bristol Virginia Transit operates three fixed routes offering service throughout the urbanized area of Bristol, Virginia. All routes provide service on weekdays. There is no service on Saturdays, Sundays or on nationally recognized holidays. Routes operate between the hours of 6:00 AM and 6:00 PM.

Bristol Virginia Transit minority customers utilize the services on a daily basis. All Bristol Virginia Transit services are available to all persons without regard to race, creed, color, religion, sex, age, or ethnic background.

General Reporting Requirements

Bristol Virginia Transit has submitted its annual Title VI assurance as part of its annual Certification and Assurance submission to FTA.

Title VI Complaint Procedures

Title VI complaints against the City and Transit System are investigated by the Office of the City Manager. Procedures for filing a complaint are available to members of the public upon written request.

Record of Title VI Investigations, Complaints, or Lawsuits

Over the reporting period Bristol Virginia Transit has not received and complaints or lawsuits alleging discrimination based on violation of the American with Disabilities Act of 1990 or Title VI related issues.

There are currently no lawsuits or complaints alleging that Bristol Virginia Transit has discriminated against any one on the basis of race, color or national origin with respect to service or other transit benefits.

Recordation of Title VI Investigations, Complaints and Lawsuits

The City and Transit System maintains a list of any active investigations that allege discrimination on the basis of race, color, or national origin. This list includes the date of the investigation, lawsuit or complaint; a summary of the allegation(s); the status of the investigation, lawsuit or complaint; and actions taken by the City and Transit System or sub recipient in response to the investigation, lawsuit or complaint.

Limited English Proficiency

Bristol Virginia Transit has taken responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its activities for individuals who are Limited English Proficient (LEP). The City has no formal written policy on LEP however an assessment performed by Bristol Virginia shows that it serves very few LEP persons.

Notification of Beneficiaries

The City and Transit System provides information to the public and sub recipients regarding its Title VI obligations.

Pending Applications for Financial Assistance provided by the Federal Transit Administration

Bristol Virginia Transit currently has pending applications for Section 5307 funds.

Civil Rights Compliance Review Activities

Bristol Virginia Transit's last Title VI update was approved by FTA in 2015.

Analysis of Construction Projects

Bristol, Virginia's urbanized area is under 200,000 population.

There are currently no construction projects funded with FTA funds. All future construction projects will follow guidelines in FTA Circular 4702.1A.

Public Participation

Bristol Virginia Transit relies on the Bristol Urban Area Metropolitan Planning Organization Public Participation Plan adopted October 29, 2007 and amended on December 15, 2011. This plan is available to any and all persons upon request.

Environmental Justice

On February 11, 1994, President Clinton issued Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations". The City recognizes that the goal of Environmental Justice is to ensure that any adverse human health or environmental effects of any government activities do not disproportionately affect minority or low-income populations. The City recognizes that Environmental Justice does not intend to provide preferential treatment to these populations, but rather fair treatment to all populations.

Specific to transportation, Executive Order 12898 has been issued in order to ensure that all federally funded transportation-related programs, policies, and activities that have the potential to cause adverse affects, specifically consider the effects on minority and low-income populations.

The City is committed to the value of protecting individuals from discrimination on the basis primarily of race, color and national origin in transportation programs and activities as required under Title VI of the 1964 Civil Rights Act.

Service Standards and Policies for Fixed-Route Transit Providers

FTA Circular 4702.1B outlines additional reporting guidelines for recipients of FTA funding that operate fixed route transit service. Title VI regulations require recipients to insure that no person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality of the public transportation services provided on the basis of race, color, or national origin. To ensure compliance with this requirement, all providers of fixed-route public transportation shall incorporate system-wide service standards and system-wide service policies in their Title VI Program. *(Program Note: Additional reporting requirements are identified for transit agencies operating 50 or more vehicles. Bristol Virginia Transit operates three regular weekday fixed routes in peak service and qualifies for a reduced level of reporting.)*

Effective Practices to Fulfill the Service Standard Requirement – *FTA requires all fixed route transit providers to develop quantitative standards for all fixed route modes of operation for the following service indicators.*

- 1. **Vehicle Load** – Vehicle load can be expressed as the ratio of passengers to the total number of seats on a vehicle. Bristol Virginia Transit will strive to maintain vehicle loads that do not exceed the vehicles achievable seating capacities for all fixed routes in service. Historically, regular weekday transit routes have had very few standing passengers. However, to ensure service quality any route consistently operating at more than 100% of its seating capacity will be evaluated to reduce overcrowding. The following vehicle load factors represent peak and off-peak hours of service.

Bristol Virginia Transit Vehicle Load Factors (Fixed Route*)

Route	Vehicle	Seated	Standing	Total	Load Factor	
Exit 7/Wal-Mart	Starcraft Allstar	19	8	27	1.27	1
East Bristol	Starcraft Allstar	19	8	27	1.27	1
Kroger/Food City	Chevrolet Supreme	19	8	27	1.27	1

***No other modes of fixed route service are provided by Bristol Virginia Transit**

2. **Vehicle Headways** – Vehicle headway is the amount of time between vehicle frequencies on a given route and is typically measured in minutes (i.e. every 30 minutes). Bristol Virginia Transit’s headways are 60 minutes for all fixed routes; therefore vehicle frequency per route is one vehicle per hour. This includes both peak and off-peak service.

System headways have increased over the years to account for urban expansion from the city core, specifically the commercial areas at I-81 Exit 7 to the urban fringe. Although this has reduced service frequency, the headway time adjustments have been applied to all fixed routes to maintain consistency in transit schedules and transfers between routes.

3. **On-Time Performance** – On-time performance is a measure of runs completed as scheduled between route origins and destinations. Bus time performance can be impacted by various factors including traffic congestion, detours, weather, and a larger than anticipated number of boardings of passengers with accessibility needs.

“On-time” for Bristol Virginia Transit fixed-route service is defined as vehicles departing not more than one (1) minute early or ten (10) minutes late at each published time-point. In order to provide flexibility for route deviation services, a fifteen-minute layover at the Downtown Transit Center is programmed for each route (Note: A 60-minute headway for all BVT routes consists of a 45 minute route and a 15 minute layover except for the Exit 7/Wal-Mart Route). BVT’s performance objective goal is 80% or more for on-time service. Any route consistently operating at more than 15 minutes late will be evaluated for options to restore on-time performance.

4. **Service Availability** – Service availability is a general measure of the access and distribution of routes within a transit provider’s service area. Bristol Virginia Transit operates a system of three fixed-routes, which provides service to commercial and residential areas as well as medical campuses and educational institutions. Approximately 75 percent of the total population of Bristol, Virginia is within ½ mile of bus service.

Effective Practices to Fulfill the Service Policy Requirement – *FTA requires all fixed route transit providers to develop quantitative policies for all fixed route modes of operation for the following service procedures.*

1. **Vehicle Assignment Policy** – Vehicle assignment refers to the process in which transit vehicles are placed in service in reference to vehicle size, age, etc. Bristol Virginia Transit maintains a fleet of four body-on-chassis buses for fixed-route

service. As such, all routes are provided service with the same vehicle type and vehicle features.

2. **Transit Amenities Policy** – Transit amenities refer to fixed items of comfort and convenience available to the general riding public. Bristol Virginia Transit does not maintain any bus shelters or stand-alone transit stops on any fixed routes. Scheduled route stops include designated facilities (i.e. commercial and medical areas); however, all routes can be boarded by passenger flag stops along the route. The Downtown Transfer Center is available to all routes and includes a waiting area, restrooms, and route information.

**BRISTOL VIRGINIA TRANSIT
TITLE VI COMPLAINT FORM**

Name: _____

Address: _____

Phone Number: _____ (H) _____ (W)

Email address: _____

Have you previously filed a Title VI Complaint with the City of Bristol, Virginia?
Yes _____ No _____

If yes give date filed: _____

Have you filed this complaint with any of the following agencies?

Transit Provider _____ Department of Transportation _____

Department of Justice _____ Equal Employment Opportunity Commission _____

Federal Transit Administration _____ Other _____

Have you filed a lawsuit regarding this complaint? Yes _____ No _____

Name of Agency complaint filed with: _____

Contact Person: _____ Title: _____

Telephone Number: _____

On separate sheets, please describe your complaint. You should include specific details such as names, dates, times, route numbers, witnesses and any other information that would assist us in our investigation of your allegations. Please also provide any other documentation that is relevant to this complaint.

Please sign here: _____ Date: _____

Please mail your completed form to:

Director, Human Resources
Title VI Complaint
300 Lee Street
Bristol, Virginia 24201
276-645-7354

LIMITED ENGLISH PROFICIENCY PLAN Bristol Virginia Transit

This document serves as the plan for Bristol Virginia Transit (BVT) to provide services to Limited English Proficiency (LEP) individuals in compliance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency. The transit system has developed this Limited English Proficiency Plan to help identify reasonable steps to provide language assistance for LEP persons seeking access to BVT services. This plan details procedures on how to identify a person who may need language assistance, the ways in which language assistance may be provided, training staff, providing notice to LEP persons, and information for future updates.

FOUR FACTOR ANALYSES

In developing the LEP plan, the Bristol transit system undertook the U.S. Department of Transportation policy guidance to utilize the four factor LEP analysis for assessing language needs and determining what steps should be taken to ensure access for LEP persons. The four factors include: 1) number of LEP individuals in the service area, 2) frequency of contact with LEP individuals, 3) importance of the program, and 4) resources available and costs.

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

According to Census 2010 and Quick Facts 20012-2016, approximately 2.7% of Bristol’s population speaks a language other than English at home. Of that population, 0.5% speaks English less than “very well”. The Bristol transit service area is 2.0% Hispanic and has a total minority population of 10.7%. The following tables provide racial makeup and language spoken at home for the Bristol Tennessee Virginia service area.

Race and Hispanic Origin

Race and Hispanic	City of Bristol	
Total	17,340	
White	15,480	89.3%
Black or African American	1,160	6.7%
American Indian and Alaska Native	36	0.2%
Asian	12	0.1%
Native Hawaiian and Pacific Islander	0	-
Two or more races	306	1.8%
Hispanic or Latino	343	2.0%

Source: U.S. Census Bureau, Census 2016

Language Spoken at Home

Language Spoken at Home	City of Bristol	
Population 5 years and over	16,493	
English only	16,048	97.3%
Language other than English	445	2.7%
Speak English less than “very well”	35	0.2%
Spanish	64	0.4%
Speak English less than “very well”	17	0.1%
Other Indo-European languages	107	0.6%
Speak English less than “very well”	13	0.1%
Asian and Pacific Island languages	9	0.1%
Speak English less than “very well”	5	0.1%

Source: U.S. Census Bureau, Census 2016

- 2) The frequency with which LEP individuals come in contact with a BVT program, activity, or service.

Bristol Virginia Transit assesses the frequency at which staff and operators have or could possibly have contact with LEP persons. This includes documenting phone inquiries, request for translated documents, and surveying drivers. To date, BVT has had no requests for interpreters and no request for translated documents. Staff and drivers have had very little to no contact with LEP individuals. Currently, the frequency of contact with LEP persons associated with local public transportation services has been on a one-time basis and infrequent.

There is no large geographic concentration of any one type of LEP individuals in the transit service area and no identified social, service, professional, or leadership organizations that focuses on outreach or membership of LEP individuals.

- 3) The nature and importance of the program, activity, or service provided by the transit system to the community.

Public transportation can be vital to many people’s lives, especially those that have no other means of transportation. A Bristol Transit ridership survey in 2006 indicated the primary trip purposes for transit customers were shopping and business, with medical trips being the second most identified trip. While Bristol Virginia Transit does provide an importation service for the community, the service is limited with no evening hours of service or weekend service available. Transit service is offered weekdays from 6:15 a.m. to 6:15 p.m., with two routes (buses) in operation in the morning and afternoon, and 3 routes (buses) in service for the mid-day hours, which tends to have the highest demand for service. ADA paratransit services are provided by one lift-equipped van and is operated citywide on a demand-response basis.

It is believed that any delay of access to information provided by BVT would not have serious implications on a LEP individual.

4) The resources available to BVT and the overall costs.

Funds available for Bristol Virginia Transit for LEP services would be derived entirely from existing operating budgets and compete with other operational requirements on an annual basis. It is anticipated that the cost of providing transit services will continue to grow, with the major potential for cost increases in the foreseeable future due to national trends, such as insurance and fuel costs.

No bilingual staff has been identified; however, oral interpreter and translation services have been established on an as needed basis. BVT has also taken inventory of available organizations that the transit system could partner with for outreach and translation efforts.

LANGUAGE ASSISTANCE MEASURES

Bristol Virginia Transit's LEP program was established after review of the four factors in the DOT LEP Guidance. As a result of this analysis, the transit system's LEP process was based on the limited frequency of contact with different types of languages and the low percentage of identified LEP populations. As a public transportation agency serving very few LEP persons, the transit system does not maintain an extensive LEP plan but has taken reasonable steps to provide access to programs and activities for LEP persons.

Considering the relatively small scale of the Bristol Transit system, the small number of LEP individuals in the service area, and the limited financial resources, it is necessary to limit language aid to the most basic and cost-effective services. Language assistance measures currently available to Bristol Virginia Transit customers include:

- 1) Use of the Census Bureau's "I Speak Cards" by transit operators and staff to assist in identifying LEP individuals who need language assistance.
- 2) Several local resources are available, and maintained on file, for assistance with individuals with limited English proficiency. These include colleges and universities that provide foreign language curriculums that will provide translation services with advanced notice. In addition, the Bridge Refugee Service maintains a list of local translators.
- 3) The City has contracted on an as needed basis with an interpreter service through the Police central dispatch.

STAFF TRAINING

It is important that staff members, especially those having contact with the public, know their obligation to provide meaningful access to information and services for LEP persons. Transit staff will be provided the LEP Plan and will be trained on procedures

and protocols to follow. This information will also be part of the staff orientation process for new hires. Training topics include:

- 1) Understanding Title VI and LEP responsibilities;
- 2) Use of the “I Speak Cards”;
- 3) How to access and use the oral interpretation services;
- 4) Documentation of language assistance requests.

PROVIDING NOTICE TO LEP PERSONS

In order to advise the public on their rights under Title VI, and to provide notice to LEP persons that language assistance measures are available, the following options are available and will be incorporated, as appropriate:

- 1) Notices indicating that language assistance is available posted at various municipal transit properties including on board vehicles.
- 2) Stating in documents and outreach materials that language services are available.
- 3) Working with community-based organizations and other stakeholders to inform LEP individuals of available services.
- 4) Providing statements in public notices that services are available for persons requiring special accommodations for disabilities or language assistance.

MONITORING AND UPDATING THE LEP PLAN

This plan is designed to be flexible and one that can be easily updated. At a minimum, the Bristol Virginia Transit system will follow the Title VI Program update schedule to review the LEP process. Each update should examine all plan components including:

- 1) How many LEP persons have been encountered?
- 2) What is the current LEP population in the service area?
- 3) Are the existing language assistance measures meeting the current needs?
- 4) Have available resources, such as technology, changed?
- 5) Were any complaints received?

DISSEMINATION OF THE LEP PLAN

Bristol Virginia Transit will post the LEP Plan on the transit page of the City of Bristol’s website (www.bristolva.org). Copies the plan will be provided to any person or agency requesting a copy and LEP persons may obtain copies/translations of the plan upon request. Any questions or comments regarding this plan should be directed to Bristol Virginia Transit staff at 276-645-7474.

**Bristol Virginia Transit
LIMITED ENGLISH PROFICIENCY ASSESSMENT**

Provider:		Bristol Virginia Transit			
Date Completed:		January 25, 2018			
1. Go to the U.S. Census website (www.census.gov) and list the racial make-up of each city or county you serve (number and percentage). (Enter the city or county name and state into the "population finder." Select "go." Select link for "fact sheet.")					
City/County	White	Black or African American	American Indian or Alaska Native	Asian	Hispanic or Latino
Bristol Virginia	15,480 89.3%	1,160 6.7%	36 0.2%	12 0.1%	343 2.0%
2. Survey your drivers. Do they indicate that there is a need for language assistance for riders? If so, which languages?		No			
3. Survey your receptionist, customer service representative, and schedule/dispatcher. Do they indicate that there is a need for language assistance for riders? If so, which languages?		No			
4. Contact human service agencies. Do they indicate a need for language assistance for potential transit users? If so, which languages?					
Agency		Response			
Department of Social Services		No			
Virginia Employment Commission		No			

5. Contact local towns and cities, including the police departments. Do they indicate a need for language assistance for potential transit users? If so, which languages?	
Town/City/Department	Response
Police Department	Not for transit. They have Spanish to English software.
Fire Department	No
6. Contact the local school systems. Do they indicate a need for language assistance for potential transit users? If so, which languages?	
School System	Response
Bristol Virginia School System	No. There are no LEP in the school system using the transit for transportation to school.
7. Do the responses indicate a need for language assistance for potential transit users? If so, which languages? If yes, please prepare and submit an LEP plan.	No