



**City of Radford, Virginia  
Title VI Program  
For  
RADFORD TRANSIT**

**City of Radford  
10 Robertson Street  
Radford, VA 24141  
Phone: (540)731-3603 – Fax (540) 731-3699**

## **ABSTRACT**

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Title VI of the Civil Rights Act of 1964 states that: “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” Subsequent laws and Presidential Executive Orders added handicap, sex, age, or income status to the criteria for which discrimination is prohibited. The City of Radford’s Title VI Plan for Radford Transit System was developed to ensure the City of Radford is in compliance with nondiscrimination requirements as outlined in Title 23 CFR and 49 CFR and related laws and provides specific information on how to file a nondiscrimination complaint.

This Plan also provides an overview of Environmental Justice and Limited English Proficiency (LEP) concepts, definitions of Title VI and associated nondiscrimination acts, and how Title VI, Environmental Justice and LEP are incorporated into Radford Transit. Environmental Justice Guidelines and outreach strategies for minority, low-income, and LEP populations are also described.

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## **PURPOSE**

The purpose of the Radford Transit Title VI Program (the “Radford Transit Title VI Program” and sometimes referred to herein as the “Program”) is to ensure that the level and quality of transit service provided by the City, as the direct recipient, and the level and quality of transit service provided by RTW Management (the “RTW”) the independent contractor operating and providing the delivery of services for the Radford Transit system, RTW, Management contractor, is operated and conducted without regard to race, color, national origin or income status. Each direct recipient of Federal Transit Administration (“FTA”) funds must provide a compliance report with updates every three (3) years or whenever significant changes in the Radford Transit Title VI Program occur. Radford Transit currently receives and will annually apply for funding from the FTA, including operating and capital assistance from FTA under Section 5307.

The U.S. Department of Transportation (“DOT” or the “Department”) and FTA requires the City, and RTW, the City’s new contract service provider, which operates and provides the delivery of services for the Radford Transit system for the City, to comply with the general requirements of the Title VI regulations. The Radford Transit Title IV Program as provided for herein is to revise and update the Radford Transit Title VI Program to be consistent with current Federal Transit Administration (FTA) guidelines for Title VI compliance, and known as FTA Circular 4702.1B, dated October 1, 2012.

The purpose of this updated Radford Transit Title VI Program is to provide the City, as the recipient of FTA financial assistance, and RTW, the subrecipient and the City’s independent contractor service provider and operating and providing the services of the Radford Transit system and services for the City, with guidance and instructions necessary to carry out the U.S. Department of Transportation (“DOT” or “the Department”) Title VI regulations (9 CFR part 21), and to integrate into the Radford Transit programs and activities considerations expressed in the Department’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient “LEP” Person (70 FR 74087, December 14, 2005).

## **INTRODUCTION**

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Radford Transit is a public bus transit system (“Radford Transit”), of the City of Radford, Virginia (the “City”), providing safe, reliable and convenient public transit to the citizens of Radford, Radford University students, faculty and staff, and individuals who live in the City, and the surrounding areas. Radford Transit was established on August 8, 2011 through a joint partnership between Radford University, Radford City, the Virginia Department of Rail and Public Transportation, and the Federal Transit Administration.

RTW Management is the transit provider for the operations and delivery of services for the Radford Transit, and is an independent contractor of the City and provides the operations, delivery of services, and oversees the administrative operations and services of the Radford Transit for City. The Radford Transit business office and facilities are administered and maintained by RTW at the physical address of 1040 East Main Street, Radford, VA 24141. The Radford Transit business office telephone number is 540-831-5911 and is maintained by RTW. The services and hours of operation provided by RTW for the Radford Transit are available to the public by visiting the Radford Transit website at [www.radfordtransit.com](http://www.radfordtransit.com), and/or information may also be obtained by emailing the Radford Transit at [rtwradfordtransitdispatch@outlook.com](mailto:rtwradfordtransitdispatch@outlook.com), and are included in the printed Radford Transit bus routes and schedules.

RTW operates for the Radford Transit a network of ten (10) fixed route transit services to a population of approximately 18,120. The maps and routes of the Radford Transit System Bus Routes and maps routes are readily available on the Radford Transit website, [www.radfordtransit.com](http://www.radfordtransit.com) and is also provided and available in printed form and materials distributed throughout the Radford community at transit facilities and in transit bus vehicles. The Radford Transit fleet of vehicles consists of twenty (20) transit buses. The Radford Transit fleet of vehicles is maintained by RTW at the Radford Transit business office and facility located at 1040 East Main Street, Radford, VA 24141. Maintenance for the Radford Transit fleet of vehicles is contracted through RTW, as a part of the operating and services provided under the contractual agreement between the City and RTW, as the independent service provider of operations and services for Radford Transit.

Information is readily available to the public and passengers of the Radford Transit regarding the Routes and Times of services, operations calendar, maps and schedules, fares, and how to pay fares and to obtain passes, and additional Radford Transit public passenger rider tools, such as how to ride, bike and ride, mobile tools, connections, and medical transportation.

Radford Transit also provides passengers, on an as needed basis, route deviations which must be scheduled at least 24-hours in advance of the requested pick up time. Passengers requesting to schedule a deviated route service for those passengers in need of deviated route services may call for such services by telephone to the Radford Transit business office facility maintained by RTW for the Radford Transit at 540-831-5911 to arrange for deviated transit services. Information for the as needed basis route services is also available online at Radford Transit website at [www.radfordtransit.com](http://www.radfordtransit.com) or by email a request for information to [rtwradfordtransitdispatch@outlook.com](mailto:rtwradfordtransitdispatch@outlook.com).

## **TITLE VI POLICY STATEMENT**

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The City of Radford, Virginia (the “City”) is committed for the **Radford Transit** to ensuring that no person shall, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL100.259), be excluded from participation in, be denied the benefits of, or be otherwise subject to discrimination under any program or activity, whether those programs and activities are federally funded or not. Further, under the Americans with Disabilities Act (ADA) of 1990, no entity shall discriminate against an individual with a physical or mental disability in connection with the provision of transportation service.

The City of Radford Title VI Coordinator is responsible for initiating and monitoring Title VI activities, preparing required reports, and other responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200, and Title 49 CFR Part 21.

The City of Radford assigns Melissa Skelton, Transit Coordinator, as the organization’s Title VI Coordinator.

For more information on the City of Radford’s and Radford Transits nondiscrimination obligation or to file a Title VI complaint, contact:

Melissa Skelton, Transit Coordinator  
10 Robertson Street  
Radford, VA 24141  
540-267-3188

A written complaint may be files no later than 180 calendar days after the date of the alleged discrimination.

Information on non-English alternative formats may be obtained from the City of Radford and Radford Transit.

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Melissa Skelton  
Transit Coordinator  
City of Radford

August 8, 2022

Date

## **TITLE VI CIVIL RIGHTS COMPLIANCE HISTORY**

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Radford Transit has been a direct recipient and administer of federal transit funds since 2011. There has no transit related Title VI investigations, complaints, or lawsuits during the past three years. The Annual summary of Title VI investigations, complaints, or lawsuits is shown in Appendix D-1.



## TITLE VI AND OTHER NONDISCRIMINATION AUTHORITY

Title VI is usually referred to in the context of federal nondiscrimination laws. Title VI is one of eleven titles included in the Civil Rights Act of 1964. The following is a list of all of the Civil Rights Act titles:

- Voting Rights
- Public Accommodation
- Desegregation of Public Facilities IV
- Desegregation of Public Education
- Commission on Civil Rights
- Nondiscrimination in Federally Assisted Programs and Activities
- Equal Employment Opportunity
- Registration and Voting Statistics
- Intervention and Procedure after Removal in Civil Rights Cases
- Establishment of Community Relations Service
- Miscellaneous

Title VI “declares it to be the policy of the United States that discrimination on the ground of race, color, or national origin shall not occur in connection with programs and activities receiving federal financial assistance and authorizes and directs the appropriate federal departments and agencies to take action to carry out this policy.” Any organization that receives Federal funds is bound to comply with Title VI.

Since the Civil Rights Act of 1964, other nondiscrimination laws have been enacted to expand the range and scope of Title VI coverage and applicability:

- **The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970** prohibit unfair and inequitable treatment of persons displaced or whose property will be acquired as a result of federal-aid programs and projects.
- **The Federal Aid Highway Act of 1973** states that no person shall, on the grounds of sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance under this title or carried on under this title.
- **Section 504 of the Rehabilitation Act of 1973** states that no qualified handicapped person shall, solely by reason of his handicap, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity that receives or benefits from federal financial assistance. This Act protects qualified individuals from discrimination based on their disability.
- **The Age Discrimination Act of 1975** states that no person shall, on the basis of age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. This act prohibits age discrimination in Federally Assisted Programs.
- **The Civil Rights Restoration Act of 1987, P.L.100-209** amends Title VI of the 1964 Civil Rights Act to make it clear that discrimination is prohibited throughout an entire agency if any part of the agency receives federal assistance.

- **The Americans with Disabilities Act (ADA) of 1990** prohibits discrimination against people with disabilities in employment, transportation, public accommodation, communications, and governmental activities.
- **23 CFR Part 200** – Federal Highway Administration regulations: Title VI Program and Related Statutes – Implementation and Review Procedures provides guidelines for implementing the FHWA Title VI compliance program under Title VI of the Civil Rights Act of 1964 and related civil rights laws and regulations, and conducting Title VI program compliance reviews relative to the Federal-aid highway program.
- **49 CFR Part 21** – Nondiscrimination in Federally-Assisted Programs.
- **23 CFR Part 450** – Federal Highway Administration planning regulations.
- **23 CFR Part 771** – Federal Highway Administration regulations, Environmental Impact Procedures.
- **DOT Order 5610.2 on Environmental Justice** summarized and expanded upon the requirements of Executive Order 12898 to include all policies, programs, and other activities that are undertaken, funded, or approved by the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA), or other U.S. DOT components.
- **The National Environmental Policy Act (NEPA) of 1969** addresses both social and economic impacts of environmental justice. NEPA stresses the importance of providing for “all Americans, safe, healthful, productive and aesthetically pleasing surroundings,” and provides a requirement for taking a “systematic interdisciplinary approach” to aid in considering environmental and community factors in decision-making.
- **FHWA/FTA Memorandum Implementing Title VI Requirements in Metropolitan and Statewide Planning** - This memorandum provides clarification for field officers on how to ensure that environmental justice is considered during current and future planning certification reviews. The intent of this memorandum was for planning officials to understand that environmental justice is equally as important during the planning stages as it is during the project development stages.

In addition to the laws listed above, two executive orders must be taken into account when ensuring compliance with federal nondiscrimination laws, directives, and mandates:

- **Executive Order 12898 – Environmental Justice (February 11, 1994)**, a presidential mandate to address equity and fairness toward low-income and minority persons/population. Executive Order 12898 organized and explained the federal government’s commitment to promote Environmental Justice. Each federal agency was directed to review its procedures and make environmental justice part of its mission.
- **U.S. DOT Order 5610.2 (April 15, 1997)** expanded upon Executive Order 12898 requirements and describes process for incorporating Environmental Justice principles into DOT programs, policies, and activities • **FHWA Order 6640.23 (December 2, 1998) – FHWA Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.**
- **Executive Order 13166 – Limited English Proficiency (August 11, 2000)**, a presidential directive to federal agencies to ensure people who have limited English proficiency have meaningful access to services. Executive Order 13166 ensures federal agencies and their

recipients to improve access for persons with Limited English Proficiency to federally conducted and federally assisted programs and activities.

## **ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES**

City of Radford Transit Coordinator and Radford Transit's Title VI Manager is responsible for ensuring implementation of the agency's Title VI program. Title VI program elements are interrelated, and responsibilities may overlap. The specific areas of responsibility have been delineated below for purposes of clarity.

The Title VI Manager and staff are responsible for coordinating the overall administration of the Title VI program, plan, assurances, language assistance, complaint handling, data collection and reporting, annual review and updates, and internal education. Radford Transit has no subrecipients and is solely responsible for providing transit service and ensuring compliance with Title VI.

### **Detailed Responsibilities of the Title VI Manager**

The Title VI Manager is charged with the responsibility for implementing, monitoring, and ensuring compliance with Title VI regulations. Title VI responsibilities are as follows:

1. Process the disposition of Title VI complaints received.
2. Collect statistical data (race, color or national origin) of participants in and beneficiaries of our transit services, (e.g., affected citizens, and impacted communities).
3. Conduct annual Title VI review of Radford Transit to determine the effectiveness of the program plan.
4. Oversee the construction contractors, consultant contractors, suppliers, and other procurement vendors for non-discriminatory compliance.
5. Provide Radford Transit employees with instructive information on Title VI and other related nondiscrimination statutes.
6. Prepare a yearly report of Title VI accomplishments and program goals, as required.
7. Develop and maintain Title VI required information for dissemination to the general public and, where appropriate, in languages other than English.
8. Develop and maintain a Language Assistance Plan in concert with the Limited English Proficiency assessment.
9. Promptly prepare and implement a corrective action plan in response to a Title VI deficiency status from FTA, DRPT or another federal assistance agency.

### **General Title VI Responsibilities**

The Title VI Manager is responsible for substantiating that these elements of the plan are appropriately implemented and maintained, and for coordinating with those responsible for public outreach and involvement and service planning and delivery.

1. Data collection

To ensure that Title VI reporting requirements are met, Radford Transit will maintain:

- A database or log of Title VI complaints received. The investigation of and response to each complaint is tracked within the database or log.
- A log of the public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.
- A record of the frequency of encountering Limited English Proficiency (LEP) individuals.

2. Annual Report and Updates

As a recipient and sub-recipient of FTA funds, Radford Transit is required to submit a Quarterly Report Form to DRPT and a triennial report to the FTA that documents any Title VI complaints received during the preceding report period. Radford Transit will also maintain and provide to DRPT and the FTA, the log of public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

Further, we will submit to DRPT and the FTA updates to any of the following items since the previous submission, or a statement to the effect that these items have not been changed since the previous submission, indicating date:

- A copy of any compliance review report for reviews conducted in the last three years, along with the purpose or reason for the review, the name of the organization that performed the review, a summary of findings and recommendations, and a report on the status or disposition of the findings and recommendations.
- Limited English Proficiency (LEP) and Language Assistance Plan
- Procedures for tracking and investigating Title VI complaints
- A list of Title VI investigations, complaints or lawsuits filed with the agency since the last submission.
- A copy of the Radford Transit's notice to the public that it complies with Title VI and instructions on how to file a discrimination complaint.

3. Annual Review of Title VI Program

Each year, in preparing for the Annual Report and Updates, the Title VI Manager will review the Title VI program to assure implementation of the Title VI plan. In addition, the Title VI Manager will review the operational guidelines and program related publications, including those for contractors, to verify that Title VI language and provisions are incorporated, as appropriate.

4. Dissemination of Information Related to the Title VI Program

Information on our Title VI program will be disseminated to Radford Transit employees, contractors, and beneficiaries, as well as to the public, as described in the “public outreach and involvement” section of this document, and in other languages when needed according to the Language Assistance Plan (LAP) plan as well as federal and State laws/regulations.

5. Resolution of Complaints

Any individual may exercise his or her right to file a complaint if that person believes that he, she or any other program beneficiaries have been subjected to unequal treatment or discrimination in the receipt of benefits/services or prohibited by nondiscrimination requirements. All Title VI complaints and their resolution will be logged and reported annually to DRPT and FTA.

6. Written Policies and Procedures

Our Title VI policies and procedures are documented in this plan and its appendices and attachments. This plan will be updated periodically and at minimum every three years to incorporate changes and additional responsibilities that arise.

7. Internal Education

Our employees will receive training on Title VI policies and procedures upon hiring and upon promotion. This training will include requirements of Title VI, our obligations under Title VI (LEP requirements included), and required data that must be gathered and maintained. In addition, instructive materials will be provided when any Title VI-related policies or procedures change (agency-wide training), or when appropriate in resolving a complaint. Title VI education is the responsibility of Radford Transit’s t Director and Driver Trainer.

8. Title VI Clauses in Contracts

In federal procurements requiring a written contract or Purchase Order (PO), Radford Transit’s contracts/POs will include appropriate Civil Rights nondiscrimination clauses. The Title VI Manager will work with the Radford Transit and City of Radford staff who are responsible for procurement contracts and POs to ensure appropriate nondiscrimination clauses are included.

9. Equity Analysis to Determine Site or Location of a Facility

In the event Radford Transit should construct a transit facility, we will engage in outreach to individuals potentially impacted by the siting of a facility. Radford Transit will complete a Title VI equity analysis to compare the equity impacts of various siting alternatives, and the analysis will occur before the selection of the preferred site. When evaluating locations of facilities, we will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. The analysis will be done at the Census tract or block group where appropriate to ensure that proper perspective is given to localized impacts. If we determine that the location of the project will result in a disparate impact based on race, color or national origin, we will only locate the project in that location if there is a substantial legitimate justification for locating the project there and where there are no alternative locations that would have a less disparate impact based on race, color, or national origin. Radford Transit will show how both tests are met; by

showing how we considered and analyzed the alternatives to determine whether those alternatives would have less of a disparate impact based on race, color or national origin, and then implement the least discriminatory alternative

## **PROCEDURES FOR NOTIFYING THE PUBLIC OF TITLE VI RIGHTS AND HOW TO FILE A COMPLAINT**

### **Title VI Notice to the Public**

Title 49 CFR Section 21.9(d) requires recipients to inform members of the public of the protections against discrimination afforded to them by Title VI. The Radford Transit Title VI notice to the public shall contain and include the following requirements:

The minimum requirements of the Title VI Notice to the Public is set forth in the form attached hereto as **Appendix A** “Title VI Notice to the Public (General Requirement)”, is made a part hereof, and incorporated herein by reference as a part of the Radford Transit Title VI Program for the Radford Transit.

The Title VI Notice to the Public for the Radford Transit shall be posted, at a minimum, in all Radford Transit vehicles, transfer stations and in the reception area of the offices of the Radford Transit, and on the Radford Transit website. The posting, distribution, and content of the Title VI Notice to the Public are the responsibility of the Radford Transit Title VI Manager appointed by RTW, the subrecipient, of the Radford Transit. The Title VI Notice to the Public shall be amended and revised to address any necessary changes that may occur as to the appropriate contact information to be directed to the RTW as may be required for the Radford Transit, to ensure the public has the required notice and contact information at all times to ensure the public is notified of their Title VI rights. The last sentence set forth in the attached **Appendix A**, shall be provided in any language(s) spoken by LEP Populations that meet the Safe Harbor Threshold, as may be required.

Pursuant to Chapter III, FTA C 4702.1B, additional practices for fulfilling the notification requirement by the RTW for the Radford Transit Title VI Program of the Radford Transit, are as follows:

**Dissemination.** Radford Transit shall inform the public of their rights under Title VI through measures as posting the Title VI notice on posters, comment cards, or flyers, placed at stations, bus shelters, and in transit vehicles. The type, timing and frequency of these measures are at the discretion of RTW, as long as the type, timing, and frequency are sufficient to notify passengers and other interested persons of their rights under DOT’s title VI regulations with regard to the City’s Radford Transit Program.

**Document translation.** Notice detailing the Radford Transit’s obligations and complaint procedures shall be translated into languages other than English, as needed and consistent with DOT LEP Guidance and the recipient’s language assistance plan.

**Subrecipients.** RTW shall in order to reduce the administrative burden associated with this requirement of the City for the Radford Transit Program, may adopt the Title VI Notice developed by the City of Radford, provided for herein, as **Appendix A**, and the same may be modified accordingly, to notify passengers and other interested persons that they may file discrimination complaints directly with RTW, as the subrecipient.

**A. Title VI Form of Complaint.**

The City has established and requires the form of complaint as provided for in the attached **Appendix B**, “Title VI Complain Form,” and made a part, be used as the minimum requirements for the Title VI Form of Complaint for the Radford Transit as a part of the Radford Transit Title VI Program, in compliance with FTA C 4702.1B. The City requires the Form of Complaint to be readily available upon request, and posted on the Radford Transit website. RTW may and shall modify the contact information on the Title VI Form of Complaint as may be required should the need arise due to any changes as may require or as may be necessary to provide the correct address or phone numbers of the responsible parties appointed by the RTW to handle the Title VI Program requirements of the Radford Transit Title VI Program, or any additional supplemental information as may be required to process the complaint. RTW shall be responsible for the processing and procedures for addressing, updating, making readily availability to the public, and the distribution and collection of the Title VI Form of Complaint. The Title VI Form of Complaint shall be processed by RTW for the Radford Transit, pursuant to the requirements of an established written Title VI Complaint Procedure as identified herein below in Paragraph C, as a part of the Title VI Complaint Procedure, as required by the Radford Title VI Program.

**B. Title VI Complaint Procedure.**

Title VI of the Civil Rights Act of 1964, as amended, prohibits discrimination on the basis of race, color, or national origin. Subsequent laws and Presidential Executive Orders added handicap, sex, age, income status, and limited English proficiency to the criteria for which discrimination is prohibited, in programs and activities receiving federal financial assistance. As a recipient of federal assistance, the City has adopted a Discrimination Complaint Procedure as part of its Title VI Plan to comply with Title VI and associated statutes.

1. Any person who believes that he or she, individually, as a member of any specific class, or in connection with any disadvantaged business enterprise, has been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964, as amended, or any nondiscrimination authority, may file a complaint with the City or RTW. Instructions for filing Title VI complaints are posted on the agency’s website and in posters on the interior of each vehicle operated in passenger service, and are also included within brochures produced by the RTW. A complaint may also be filed by a representative on behalf of such a person. All complaints will be referred to the RTW Title VI manager and City’s Title VI Coordinator for review and action.
2. In order to have the complaint considered under this procedure, the complainant must file the complaint no later than 180 days after:
  - a. The date of the alleged act of discrimination; or
  - b. Where there has been a continuing course of conduct, the date on which that conduct was discontinued.

The City may extend the time for filing or waive the time limit in the interest of justice, specifying in writing the reason for so doing.

3. Complaints shall be in writing and shall be signed by the complainant and/or the complainant's representative. Complaints should set forth as fully as possible the facts and circumstances surrounding the claimed discrimination. In the event that a person makes a verbal complaint of discrimination to an officer or employee of Radford Transit, the person shall be interviewed by the Title VI Coordinator. If necessary, the Title VI Coordinator will assist the person in putting the complaint in writing and submit the written version of the complaint to the person for signature. The complaint shall then be handled in the usual manner.
4. Within 10 days, the City's Title VI Coordinator will acknowledge receipt of the allegation in writing, inform the complainant of action taken or proposed action to process the allegation, advise the respondent of their rights under Title VI and related statutes, and advise the complainant of other avenues of redress available, such as DRPT, and FTA.
5. Within 10 days, a letter will be sent to the DRPT Public Information Officer, and a copy to the FTA. This letter will list the names of the parties involved, the basis of the complaint, and the assigned investigator.
6. In the case of a complaint against Radford Transit, an FTA or DRPT investigator (as appropriate) will prepare a final investigative report and send it to the complainant, respondent, the City's Title VI Coordinator, FTA, and DRPT.
7. Generally, the following information will be included in every notification to the DRPT Public Information Officer:
  - a. Name, address, and phone number of the complainant.
  - b. Name(s) and address(es) of alleged discriminating official(s).
  - c. Basis of complaint (i.e., race, color, national origin, sex, age handicap/disability, income status, limited English proficiency).
  - d. Date of alleged discriminatory act(s).
  - e. Date of complaint received by the recipient.
  - f. A statement of the complaint.
  - g. Other agencies (state, local, or federal) where the complaint has been filed.
  - h. An explanation of the actions the recipient has taken or proposed to resolve the issue raised in the complaint.
8. Within 60 days, the City's Title VI Coordinator will conduct and complete an investigation of the allegation and based on the information obtained, will render a recommendation for action in a report of findings to the recipient of federal assistance. The complaint should be resolved by informal means whenever possible. Such informal attempts and their results will be summarized in the report of findings.
9. Within 90 days of receipt of the complaint, the City's Title VI Coordinator will notify the complainant in writing of the final decision reached, including the proposed disposition of



the matter. The notification will advise the complainant of his/her appeal rights with the DRPT, the FHWA, or FTA, if they are dissatisfied with the final decision rendered by the City. The City's Title VI Coordinator will also provide the DRPT Public Information with a copy of the determination and report findings.

10. In the case of a nondiscrimination complaint that was originated at the City and is turned over to and investigated by DRPT, FTA, FHWA, or another agency, the City's Title VI Coordinator will monitor the investigation and notify the complainant of updates, in accordance with applicable regulations and DRPT policies and procedures.
11. In accordance with federal law, the City will require that applicants of federal assistance notify the City of any lawsuits filed against the applicant or sub-recipients of federal assistance or alleging discrimination; and a statement as to whether the applicant has been found in noncompliance with any relevant civil rights requirements.
12. The City will submit Title VI accomplishment reports to DRPT, in compliance with DRPT's established processes.
13. The City and RTW will collect demographic data on staff, committees, and program areas in accordance with 23 CFR, 49 CFR, and DRPT's established procedures and guidelines.
14. Pursuant to the Virginia Public Records Act (VPRA) § 42.1-76 et seq., the City will retain Discrimination Complaint Forms and a log of all complaints filed with or investigated by the City.
15. Records of complaints and related data will be made available by request in accordance with the Virginia Freedom of Information Act (FOIA). The City will investigate all complaints received.

The City shall have sixty (60) days from receipt of the written complaint to investigate the complaint and respond to the complainant in writing with a determination. The complainant may appeal this determination to the Federal Transit Administration or the United States Department of Transportation within thirty (30) days of receipt of the determination. The City Title VI Complaint Form is included in Appendix B.

## **FTA PROCESS**

The letters of finding and resolution will offer the complainant and the recipient or sub-recipient the opportunity to provide additional information that would lead FTA to reconsider its conclusions. In general, FTA requests that the parties in the complaint provide this additional information within 60 days of the date the FTA letter of finding was transmitted. After reviewing this information, FTA's Office of Civil Rights will respond either by issuing a revised letter of resolution or finding to the party, or by informing the party that the original

letter of resolution or finding remains in force. FTA strives to transmit these letters within 30 to 60 days of receiving the complaint.

## **FILING A COMPLAINT DIRECTLY TO THE U.S. DEPARTMENT OF TRANSPORTATION**

A Title VI complaint may be filed with the U.S. Department of Transportation by contacting the Department at:

U.S. Department of Transportation  
Federal Transit Administration's Office of Civil Rights  
1200 New Jersey Avenue, SE  
Washington, D.C. 20590

## **COMPLAINT DATABASE**

Title VI Complaints will be archived in a complaint database and reviewed every 3 years to see if patterns are present or evolving and to ensure that issues are being resolved.

The Civil Rights Complaint Database includes:

- The name and address of the person(s) filing the complaint;
- Type of complaint: Title VI;
- Date of the complaint, investigation, or lawsuit;
- The basis of the complaint;
- Summary of the allegations;
- Actions taken by the City
- Status of the complaint, investigation, or lawsuit.

Radford Transit has never had any Title VI investigations, lawsuits, or complaints. Additionally, City has not received any Title VI compliance reviews related to any federally funded projects within the past three years.

### **C. Records and Reports for Radford Transit- Related Title VI Investigations, Complaints, and Lawsuits.**

All recipients and sub-recipients and/or the third party contractor providing activities and services for the Radford Transit are required to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin, regarding: Active investigations conducted by FTA and entities other than FTA; Lawsuits; and Complaints naming the recipient, subrecipient and/or third party contractor. To comply with 49 CFR Section 21.9(b), the City as the recipient and RTW as the sub-recipient, shall prepare and maintain a list of any active investigations conducted by entities other than FTA, lawsuits, or complaints naming the Radford Transit, the City and/or RTW that allege discrimination on the basis of race, color, or national origin.

The maintenance and content of the Record and Report for Radford Transit-Related Title VI Investigations, Complaints, and Lawsuits shall be the responsibility of the Radford Transit Title VI Manager appointed by the subrecipient, RTW.

A sample of the minimum required record to be maintained and provided for by the City of Radford and RTW for the Radford Transit in the attached **Appendix C**, and made a part hereof. The record to be maintained shall include the date that the transit-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and the actions taken in response, or final findings related to the investigation, lawsuit, or complaint. The list shall be maintained by RTW, and provided to the City upon request, and included in the Title VI Program submitted to FTA every three (3) years.

The list shall include only those investigations, complaints, or lawsuits that pertain to allegations of discrimination on the basis of race, color, and/or national origin in Radford transit-related activities and programs and that pertain to the Radford Transit and the City of Radford, as the recipient, for the submitting of the report to FTA, and not necessarily the larger agency or departments of RTW. At a minimum, RTW will annually provide the list to the City on an annual basis and shall include in the list of any Radford Transit public transportation-related Title VI investigations, complaints, or lawsuits filed with the Radford Transit since the time of the last submission by the City to FTA.

In addition, RTW and the City have agreed upon the compliance of the Data Collection and Reporting Procedures set forth in the attached **Appendix C-2**, attached hereto and made a part hereof, to comply with the requirements of Title VI and FTA C 4702.1B,

There have been no Title VI complaints, lawsuits or investigations at Radford Transit in the past three years.

#### **D. Public Participation Plan**

The City requires and has been established herein for the Radford Transit Title VI Program, a public participation plan that includes an outreach plan to engage minority and limited English Proficient populations, as well as a summary of outreach efforts made since the last Title VI Program submissions. The City requires and has included in the Public Participation Plan for the Radford Transit the integration, into community outreach activities, considerations expressed in the DOT Order on Environmental Justice and the DOT LEP Guidance for the Radford Transit. In order to integrate, into community outreach activities and considerations RTW has prepared the Public Participation Plan for the Radford Transit, attached hereto as **Appendix D**, and made part hereof. RTW is the responsible party for the implementation of the Public Participation Plan for the Radford Transit.

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

#### **E. Requirements to Provide Meaningful Access to LEP Persons.**

Title VI and its implementing regulations require the City, as an FTA recipient to take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP) for the Radford Transit. Consistent with Title VI of the Civil Rights Act of 1964, DOT';

implementing regulations, and Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” (65 FR 50121, Aug. 11, 2000), the City shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are Limited-English Proficient (LEP). FTA Circuitual C 4702.1B are incorporated herein by reference, and made a part hereof, and summarize the LEP requirements of the City for the Radford Transit. The Four Factor Analysis as set forth therein shall be addressed in the LEP Program for the Radford Transit by the RTW.

It is the responsibility of RTW to comply with the requirements to provide meaningful access to LEP Persons utilizing the services and operations of the Radford Transit. RTW has prepared and is responsible for the LEP Program for the Radford Transit, a copy of the Radford Transit LEP Program based on the DOT LEP Guidance is attached hereto as **Appendix E** “Language Assistance Plan For Persons with limited English Proficiency (LEP)”, which includes the related information regarding the City of Radford, are both incorporated herein by reference and made a part of the Radford Transit Title VI Program. RTW is responsible for and shall maintain for the Radford Transit a written LEP Plan, and shall provide to the City all of the related and relevant information, and/or needs regarding LEP for the Radford Transit, as a part of RTW operations and services for the City of the Radford Transit Program, and shall comply with all of the LEP requirements of Title VI as provided and established herein to comply with the requirements of FTA C 4702.1B for the Radford Transit Program.

**F. Procedures for ensuring equity in service and fare provisions.**

**Set System-Wide Standards and Policies.** Pursuant to Chapter IV of FTA C 4702.1B, the requirements of Chapter IV of FTA C 4702.1B are scaled based on the size of the fixed route transit provide. Accordingly, the City is only required to ensure the establishment of system-wide standards and policies to ensure equity in service. RTW has prepared and is responsible for the set of set system wide stands and policies for the Radford Transit. Attached hereto as **Appendix F**, “Procedures for Ensuring Equity in Service Provision”, and made a part hereof, are the policies and the required procedures to be followed and addressed by RTW for the Radford Transit, which are made a part of the Radford Transit Title VI Plan, to ensure equity in service for the Radford Transit.

**Fare and Service Changes.** The City is required to adopt written policy for the public comment process for major service reductions and fare increases on Radford Transit. With each proposed service or fare change, RTW shall consider the relative impacts on, and benefits to, minority and low income populations, including LEP Populations of the Radford Transit. All planning efforts for changes to existing services or fares, as well as new services, have a goal of providing equitable service, and must be approved by the City. **Appendix F**, “Procedures for Ensuring Equity in Service Provision”, provides for the for the related procedures and policies established for the Radford Transit relative to compliance with Fare and Service Changes, and made a part of the Radford Transit Title VI Program. The responsibility for the fare and services changes lies with RTW. RTW is required to provide the related information and issue to the City to be mutually addressed and evaluated before any considerations of fare and service changes of the Radford Transit Program to ensure compliance with FTA C 4702.1B.

The attached **Appendix F**, “Procedures for Ensuring Equity in Service Provision”, further sets for the compliance, monitoring procedures, and requirements of the policies and procedures pursuant

to FTA C 4702.1B for the Radford Transit Program of the City to ensure equity in service is provided, through the service policies and procedures, which are incorporated therein and includes the requirements for service standards by vehicle load, vehicle headway, on-time performance, service availability, and service and operating policies for distributing and siting of transit amenities and vehicle assignment, and Fare and Service Changes, for the Radford Transit Program that are made a part of the Radford Transit Title VI Program.

#### **G. Governing Body Approval of Title VI Plan**

The City of Radford is governed by an Elected City Council, but day to day operations and governance of the City is overseen by the City of Radford City Manager, David Ridpath. City Council has approved a resolution. Appendix G.

#### **H. Requirements of Construction.**

In order to integrate, into environmental analysis, considerations expressed in the DOT Order on Environmental Justice, recipients and sub-recipients should integrate an environmental justice analysis into their NEPA documentation of construction projects, as set forth in FTA C 4702.1B.

To date, the City has not performed any construction projects for the Radford Transit to date that qualify for such analysis. The Radford Transit expects to begin construction of a limited number of bus shelter facilities for passengers utilizing the transportation services of the Radford Transit, and will integrate an environmental justice analysis into their NEPA documents for construction, if required.

For new construction and major rehabilitation or renovation projects where National Environmental Policy Act (NEPA) documentation is required, RTW will integrate an environmental justice analysis into the NEPA documentation for submission to the City of Radford.

#### **I. Optional Transit-Related, Non-Elected Planning Boards, Advisory Councils or Committees.**

At this time, the City does not have a transit-related, non-elected planning board, advisory council or committees, or similar bodies, the membership of which is selected by the City.

#### **J. Oversight of compliance with Radford Transit Title VI Program.**

The City meets with the Transit Director, appointed by RTW, on a monthly basis to review the process and procedures of the Radford Transit to insure the Radford Transit operations and services are in compliance with the requirements of the Radford Transit Title VI Plan. The City requires the RTW to provide to the City matters relevant and related to the operations and services provided by RTW for the Radford Transit. RTW is required to provide the reports and records as set forth herein to the City on a timely basis and as requested. The Title VI program elements are interrelated and responsibilities may overlap. The specific areas of responsibility have been delineated herein for purposes of clarity for the Radford Transit Program. The designated parties responsible for the specific policies and procedures of implementation are the RTW. The City regularly and routinely monitors any issues that arise regarding the services and issues related to the Radford Transit.

## **L Monitoring Title VI Complaints**

As part of the complaint handling procedure, the Title VI Manager investigates for the Radford Transit possible inequities in service delivery for the route(s) or service(s) about which the complaint was filed. Depending on the nature of the complaint, the review examines span of service (days and hours), frequency, routing directness, interconnectivity with other routes and/or fare policy. If inequities are discovered during this review, options for reducing the disparity are explored, and service or fare changes are planned if needed.

In addition to the investigation following an individual complaint, the Title VI Manager periodically reviews all complaints received for the Radford Transit to determine if there may be a pattern. At a minimum, this review is conducted as part of preparing the Annual Report and Update for submission to the City of Radford.

To ensure Data Collection and Reporting Procedures are complied with RTW and the City have also established for the Radford Transit the additional Data Collection and Reporting Procedures attached hereto as **Appendix A, B, C, D, E, F, and G**, and incorporated herein by reference and made a part of the Radford Transit Title VI Program set forth herein.

## **APPENDIX A : NOTICE TO THE PUBLIC**

In order to comply with 49 CFR Section 21.9(d), the City of Radford and RTW shall provide information to the public regarding their Title VI obligations and apprise members of the public of the protections against discrimination afforded to them by Title VI. The paragraph below will be inserted into all significant transit-related publications that are distributed to the public, such as local papers advertising transit- related transportation related public hearings or meetings, planning documents, and informational brochures. The text will be placed permanently on the Radford Transit website in both English and Spanish ([www.radfordtransit.com](http://www.radfordtransit.com))

The City of Radford and RTW hereby gives public notice of its policy to assure full compliance with Title VI of the Civil Rights Act of 1964. The City of Radford and RTW is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services on the basis of race, color or national origin as protected by Title VI of the Civil Rights Act of 1964, as amended.

No person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality of transportation service furnished by the City of Radford and RTW on the basis of race, color, or national origin. Frequency of service, age and quality of vehicles assigned to routes, quality of stops serving different routes, and location of routes may not be determined on the basis of race, color or national origin.

Any person who believes that they have, individually, or as a member of any specific class of persons, been subjected to discrimination on the basis of race, color, or national origin may file a complaint with The City of Radford and RTW. A signed written complaint must be submitted within 180 days of the alleged discriminatory act (or latest occurrence). Complaints will be accepted in writing at the following address:

Melissa Skelton, Radford Transit Coordinator  
10 Robertson Street  
Radford, VA 24141  
540-267-3188  
[Melissa.Skelton@radfordva.gov](mailto:Melissa.Skelton@radfordva.gov)

Individuals may also file complaints directly with the U.S. Department of Transportation (USDOT), and/or the Federal Transit Administration (FTA) within the 180-day timeframe by contacting the Department at:

U.S. Department of Transportation  
Federal Transit Administration's Office of Civil Rights  
1200 New Jersey Avenue, SE  
Washington, D.C. 20590

Ciudad de Radford y RTW por este medio da aviso público de su política para asegurar el pleno cumplimiento con el Title VI de la Civil Rights Act de 1964. Ciudad de Radford y RTW se compromete a garantizar que ninguna persona sea excluida de participar en, o negado los beneficios de sus servicios por motivos de raza, color u origen nacional como protegida por el Title VI de la Civil Rights Act de 1964, según enmendada.

Ninguna persona o grupo de personas, deberá ser objeto de discriminación con respecto a las rutas, horarios, o la calidad del servicio de transporte proporcionado por Ciudad de Radford y RTW por motivos de raza, color u origen nacional. Frecuencia de servicio, la edad y la calidad de los vehículos asignados a las rutas, la calidad de las paradas que sirven diferentes rutas, y la ubicación de las rutas no pueden ser determinados por ningún motivo de raza, color u origen nacional.

Cualquier persona que cree que, de forma individual o como miembro de un grupo específico de personas, ha sido sometido a la discriminación por motivos de raza, color u origen nacional, puede presentar una queja con Ciudad de Radford y RTW. Una queja escrita y firmada debe ser presentada dentro de los 180 días del supuesto acto discriminatorio (o última ocurrencia). Las quejas serán aceptadas por escrito a la siguiente dirección:

Melissa Skelton, Radford Transit Coordinator  
10 Robertson Street  
Radford, VA 24141  
540-267-3188  
[Melissa.Skelton@radfordva.gov](mailto:Melissa.Skelton@radfordva.gov)

Las personas también pueden presentar quejas directamente con el U.S. Department of Transportation (USDOT), y / o la Federal Transit Administration (FTA) en el plazo 180 días.

U.S. Department of Transportation  
Federal Transit Administration's Office of Civil Rights  
1200 New Jersey Avenue, SE  
Washington, D.C. 20590



## **APPENDIX B: TITLE VI COMPLAING FORMS**

## TITLE VI COMPLAINT FORM

**Please print clearly or type your response into this form. You may file a signed, written complaint up to one hundred and eighty (180) days from the date of the alleged discrimination.**

<b>Section I:</b>				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
<b>Section II:</b>				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party: _____				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
<b>Section III:</b>				
I believe the discrimination I experienced was based on (check all that apply):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin				
Date of Alleged Discrimination (Month, Day, Year): _____				
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form. _____ _____				
<b>Section IV</b>				
Have you previously filed a Title VI complaint with this agency?			Yes	No
<b>Section V</b>				

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, check all that apply:	
<input type="checkbox"/> Federal Agency: _____	
<input type="checkbox"/> Federal Court _____	<input type="checkbox"/> State Agency _____
<input type="checkbox"/> State Court _____	<input type="checkbox"/> Local Agency _____
Please provide information about a contact person at the agency/court where the complaint was filed.	
Name:	
Title:	
Agency:	
Address:	
Telephone:	
<b>Section VI</b>	
Name of agency complaint is against:	
Contact person:	
Title:	
Telephone number:	

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below:

\_\_\_\_\_  
Signature Date

**Please sign and send this complaint to the following address:**

Melissa Skelton,  
Title VI Coordinatr  
10 Robertson Street  
Radford, VA 24141

Additional assistance in filing this complaint may be obtained by calling Radford Transit at 540-831-5911 or by calling Day Interpreting at 813-640-3888.

A copy of this form is also available on the Radford Transit website of [www.radfordtransit.com](http://www.radfordtransit.com)

**The complainant may file a Title VI complaint directly with the Federal Transit Administrator by filing a complaint with the:**

The Office of Civil Rights  
Attention: Title VI Program Coordinator  
East Building,  
5<sup>th</sup> Floor-TCR  
1200 New Jersey Avenue, SE,  
Washington, DC 20590.

<b>Sección I:</b>			
<b>Nombre:</b>			
<b>Dirección:</b>			
<b>Teléfono (Primario):</b>		<b>Teléfono (Secundario):</b>	
Dirección Correo Electrónico:			
¿Necesita comunicación en format accesible_	Letras Grandes		<b>Cinta de Audio</b>
	Teletipo		<b>Otro</b>
<b>Sección II:</b>			
¿Presenta esta queja en su propio nombre_		Si	No
*Si contestó "Si" a esta pregunta, prosiga a la <b>Sección III</b> .			
Si contestó "No" , provea el nombre y la relación entre usted y la persona para la cual presenta esta queja			
Por favor explique la razón por la cual presenta esta queja en nombre de un terceron:			
_____			
Por favor confirme que obtuvo permiso de la persona agraviada si esta presentando esta queja en nombre de un tercero		Si	No
<b>Sección III:</b>			
Creo que las discriminación que sufrí se basó en (Marque todas las que apliquen):			
<input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen Nacional			
Fecha de la presunta discriminación (Mes, Día, Año): _____			
Explique con la mayor claridad possible lo que pasó y por qué cree que fue objeto de dicriminación. Describa todas las personas involucradas. Incluya los nombres y la información de contacto del la)s= personas)s= involucradas si los sabe= If more space is needed, please use the back of this form.			
_____			
_____			
<b>Sección IV</b>			
¿Ha presentado previamente una queja del Título VI con esta agencia?		Si	No
<b>Sección V</b>			

¿Ha presentado esta queja con cualquier otro, estatal o agencia local Federal, o con cualquier corte federal o estatal? <input type="checkbox"/> Si <input type="checkbox"/> No En caso afirmativo, marque todo lo que corresponda: <input type="checkbox"/> Agencia Federal: _____ <input type="checkbox"/> Tribunal Federal _____ <input type="checkbox"/> Tribunal Estatal _____ <input type="checkbox"/> Agencia Estatal _____ <input type="checkbox"/> Agencia Local _____
Sírvanse proporcionar información sobre una persona de contacto en la agencia / tribunal donde se presentó la denuncia.
Nombre:
Título:
Agencia:
Dirección:
Teléfono:
<b>Sección VI</b>
Nombre de la agencia de queja es en contra:
Persona de contacto:
Título:
Número de teléfono:

Puede adjuntar cualquier material escrito o cualquier otra información que usted piensa que es relevante para su queja.

Firma y fecha requerida a continuación

\_\_\_\_\_

Firma Fecha

Por favor, envíe este formulario en persona en la dirección indicada más abajo, o envíe este formulario a:

Melissa Skelton, Título VI Oficial de Cumplimiento  
10 Robertson Street, Radford, VA 24141  
Teléfono: 540-267-3188;  
Email: Melissa.Skelton@radfordva.gov

Se puede obtener asistencia adicional para presentar una queja llamando a Radford Transit al 540-831-5911 o llamando a Day Interpreting al 813-640-3888.

Las personas también pueden presentar quejas directamente con el U.S. Department of Transportation (USDOT), y / o la Federal Transit Administration (FTA) en el plazo 180 días.

U.S. Department of Transportation  
Federal Transit Administration's Office of Civil Rights  
1200 New Jersey Avenue, SE  
Washington, D.C. 20590

**APPENDIX C-1**

**LIST OF TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS**

**List of Investigations, Lawsuits and Complaints**

	<b>Date</b> <b>(Month, Day, Year)</b>	<b>Summary</b> <b>(include basis of complaint: race, color, or national origin)</b>	<b>Status</b>	<b>Action(s) Taken</b>
<b>Investigations</b>				
1.				
2.				
<b>Lawsuits</b>				
1.				
2.				
<b>Complaints</b>				
1.				
2.				



## **APPENDIX C-2**

### **DATA COLLECTION AND REPORTING PROCEDURES**

#### **Data Collection**

To ensure that Title VI reporting requirements are met, Radford Transit maintains:

A log and database of Title VI complaints received. The investigation of and response to each complaint is tracked within the database.

A log of the public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities. The agency maintains the following records related to public outreach and involvement:

Paper files with copies of materials published or distributed for each planning project and service/fare change, as well as all news releases, public service announcements, surveys, and written summaries of in-person outreach events.

A log/database of public outreach and involvement activities, including dates, planning project or service/fare change supported (if applicable), type of activity, LEP assistance requested/provided, target audience, number of participants, and location of documentation within paper files.

#### **Annual Report and Triennial Updates.**

RTW provides annual reports and Triennial updates for the Radford Transit as provided for in 3.16.2.1, and 3.16.2. 2.

#### **Annual Reporting**

As a sub-recipient providing service in an area with less than a 200,000 population, in the operation of Radford Transit RTW submits an annual report to the City of Radford that documents any Title VI investigations/complaints/lawsuits during the preceding 12 months.

#### **Triennial Reporting**

Every three years, RTW submits to the City of Radford, a complete list of the investigations/complaints/lawsuits received in the prior three (3) years, a summary of the public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities, and any updates to this Title VI plan.

#### **Updates to the Title VI Plan**

As noted above, every three years, RTW submits to the City of Radford an update to this Title VI Plan. The triennial Title VI update includes the following items, or a statement to the effect that these items have not been changed since the previous submission, indicating date.

## APPENDIX D

### **PUBLIC PARTICIPATION PLAN AND PUBLIC OUTREACH AND INVOLVMENT**

#### **Public Outreach and Involvement**

Public outreach and involvement applies to and affects the City of Radford and RTW's mission and work program as a whole, particularly agency efforts and responsibilities related to RTW's service planning for the Radford Transit. The overall goal of RTW's public outreach and involvement policy for the Radford Transit is to secure early and continuous public notification about, and participation in, major actions and decisions by RTW regarding Radford Transit. In seeking public comment and review, RTW makes a concerted effort to reach all segments of the population, including people from minority and low-income communities, persons with limited English Proficiency and organizations representing these and other protected classes. RTW utilizes a broad range of public outreach information and involvement opportunities, including a process for written comments, public meetings after effective notice, settings for open discussion, information services, and consideration of and response to public comments.

#### **Public Outreach Activities**

The City of Radford and RTW takes the following steps to ensure that minority, low-income, and LEP members of the community have meaningful access to public outreach and involvement activities, including those conducted as part of the planning process for proposed changes in services, fares, and facilities development for the Radford Transit.

Publishing public notices within local newspapers of general circulation as well as those targeted at minority, low income and LEP persons and on the agency's website.

Public notices are issued to:

Announce opportunity to participate or provide input in planning for service changes, fare changes, new services, and new or improved facilities, early in the process;

Announce the formal comment period on proposed major service reductions and fare increases with instructions for submitting comments including a public hearing, or an opportunity for a public hearing with instructions for requesting a hearing if this is the City's policy at the end of the planning process;

Announce impending service and fare changes, after plan has been finalized.

Announce intent to apply for public transit funding from FTA, and to announce the formal comment period on the proposed program of projects, with a public hearing, or opportunity for one, annually in advance of submitting the ATP.

Posting public notices as described above at major passenger/public facilities and in all vehicles.

Sending news releases to news media, via newspapers, radio, television, web media, of general interest as well as those targeted at minority and LEP persons, as well as community-based organizations that serve persons protected under Title VI and which publish newsletters.

Sending public service announcements (PSAs) to news media of general interest as well as those targeted at minority, low income and LEP persons, as well as community-based organizations that serve persons protected under Title VI and which publish newsletters.

Conducting in-person outreach upon request at public meetings, community-based organizations, human service organizations which assist low income and LEP persons, places of worship, service organization meetings, cultural centers, and other places and events that reach out to persons protected under Title VI. The availability of RTW's staff for such speaking engagements is posted on the agency's website.

Conducting periodic customer satisfaction surveys which are distributed to passengers on vehicles.

The above activities are the responsibility of the Transportation Manager of the Radford Transit.

## **APPENDIX E**

### **LANGUAGE ASSISTANCE PLAN FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY (LEP)**

#### **Introduction and Legal Basis**

LEP is a term that defines any individual not proficient in the use of the English language. The establishment and operation of an LEP program meets objectives set forth in Title VI of the Civil Rights Act and Executive Order 13116, Improving Access to Services for Persons with Limited English Proficiency (LEP). This Executive Order requires federal agencies receiving financial assistance to address the needs of non-English speaking persons. The Executive Order also establishes compliance standards to ensure that the programs and activities that are provided by a transportation provider in English are accessible to LEP communities. This includes providing meaningful access to individuals who are limited in their use of English. The following LEP language implementation plan, developed by RTW based on FTA guidelines.

As required, RTW maintains a written LEP Plan. Using 2011-2015 American Community Survey (ACS) Census data, RTW has determined the extent of need for translation services of its vital documents and materials.

LEP persons can be a significant market for public transit, and reaching out to these individuals can help increase their utilization of transit. Therefore, it also makes good business sense to translate vital information into languages that the larger LEP populations in the community can understand.

#### **Assessment of Needs and Resources**

In order to prepare this plan, Radford Transit undertook the U.S. Department of Transportation four-factor LEP analysis:

#### **Factor 1: Assessment of the Number and Proportion of LEP Persons Likely to be Served or Encountered in the Eligible Service Population.**

Census data was reviewed on the number of individuals within the City of Radford that have limited English Proficiency, as well as the languages they speak.

U.S. Census Data – American Community Survey (2011-2015)

Data from the U.S. Census Bureau's American Community Survey (ACS) were obtained through [www.census.gov](http://www.census.gov) for the City of Radford. The agency's service area includes a total of 17,139 persons with 2.82% of persons with Limited English Proficiency (those persons who indicated that they spoke English "not well" and "not at all" in the 2015 ACS Census).

Information from the 2015 ACS also provides more detail on the specific languages that are spoken by those who report that they speak English less than very well. Languages spoken at home by those with LEP are presented below. These data indicate the extent to which translations into other language are needed to meet the needs of LEP persons.

Radford Transit Service Area		
Language Spoken at Home	Estimate	%
Population 5 years old and older	17,139	X
English only	16,268	94.9%
Language other than English	871	5.1%
Speak English less than "very well"		
Spanish	441	2.6%
Other Indo-European	221	1.3%
Asian and Pacific Island	103	0.006%
Other language	106	0.006%

It is noted that there are relatively low number of LEP persons in the Radford Transit service area, no language is spoken by over 5% or a total of 1,000 persons in the LEP population.

**Factor 2: Assessment of Frequency with which LEP Individuals come into contact with the Transit Services or System**

The relevant benefits, services, and information provided by the agency were reviewed and the extent to which LEP persons have come into contact with these functions was determined. This applies through the following channels:

- Contact with transit vehicle operators;
- Calls to RTW’s Radford Transit customer service telephone line;
- Visits to the agency’s headquarters;
- Access to the agency’s website

We will continue to identify emerging populations as updated Census and American Community Survey data become available for our service area. In addition, when LEP persons contact our agency, we attempt to identify their language and keep records on contacts to accurately assess the frequency of contact.

**Factor 3: Assessment of the Nature and Importance of the Transit Services to the LEP Population**

Based on past experience serving and communicating with LEP persons and interviews with community agencies, we learned that the following services/routes/programs are currently of particular importance LEP persons in the community.

The following are the most critical services provided by RTW through Radford Transit for all customers, including LEP persons, as follows:

- Safety and security awareness instructions
- Emergency evacuation procedures
- Public transit services, including reduced fare application process

Services targeted at low income persons

#### **Factor 4: Assessment of the Resources Available to the Agency and Costs**

Based on the analysis of demographic data and contact with community organizations and LEP persons, it was determined that the following additional services are ideally needed to provide meaningful access:

##### Resources

The available budget that could be currently be devoted to additional language assistance expenses is this amount is likely to be stable over time, however if it were to suffer reductions RTW would need to seek additional funding.

##### Feasible and Appropriate Language Assistance Measures

Based on the available resources, the following language assistance measures are feasible and appropriate for our agency at this time, as follows:

Utilizing contracted interpreter services available through RTW' overall language assistance program.

Utilizing the language department at Radford University to assist with language communication barriers if required.

#### **LEP Implementation Plan**

Through the four-factor analysis, RTW has determined that the following types of language assistance are most needed and feasible, as follows:

Translation of vital documents into Spanish. These documents include the System Map and Rider Guide

#### **Staff Access to Language Assistance Services**

Agency staff that comes into contact with LEP persons can access language services. All staff will be provided with a list of available language assistance services and additional information and referral resources (such as the contracted interpreter services available at no additional cost to riders). This list will be updated at least annually.

#### **Responding to LEP Callers**

Staff who answer calls from the public respond to LEP customers as follows: staff shall utilize the provided translation assistance on contract by RTW. To access this, contact the General Manager at 540-831-5911 or call Day Interpreting at 813-640-3888.

#### **Responding to Written Communications from LEP Persons**

The following procedures are followed when responding to written communications from LEP persons: staff shall utilize the provided translation assistance on contract by RTW. To access this, contact the General Manager at 540-831-5911 or call Day Interpreting at 813-640-3888.

### **Responding to LEP Individuals in Person**

The following procedures are followed when an LEP person visits our customer service and administrative office: staff shall present the visitor with a LEP information card which outlines the available resources (in multiple common languages) through our free language assistance program. Additionally, all RTW sites post notice about access to free translation services available at no additional cost.

The following procedures are followed by operators when an LEP person has a question on board a Radford Transit vehicle: staff shall present the rider with a LEP information card which outlines the available resources (in multiple common languages) through our free language assistance program. Additionally, staff may point out the LEP notice posted in all transit vehicles.

### **Staff Training**

As noted previously, all RTW's staff are provided with a list of available language assistance services and additional information and referral resources, updated annually.

All new hires receive training on assisting LEP persons as part of their sensitivity and customer service training, including but not limited to the following:

- A summary of the transit agency's responsibilities under the DOT LEP Guidance; and

- A summary of the agency's language assistance plan; and

- A summary of the number and proportion of LEP persons in the agency's service area, the frequency of contact between the LEP population and the agency's programs and activities, and the importance of the programs and activities to the population;

- A description of the type of language assistance that the agency is currently providing and instructions on how agency staff can access these products and services; and

- A description of the agency's cultural sensitivity policies and practices.

### **Providing Notice to LEP Persons**

LEP persons are notified of the availability of language assistance through the following approaches:

- Following our Title VI policy statement included on our vital documents; and

- On our website, with links to translations of vital documents in other languages; and

- Through signs posted on our vehicles and in our customer service and administrative offices; and

- Through ongoing outreach efforts to community organizations, schools, and religious organizations; and

- Sending translated news releases and public service announcements about the availability of translated information to newspapers and broadcast media that target local LEP communities.

LEP persons will also be included in all community outreach efforts related to service and fare changes.

**Monitoring/updating the plan**

This plan will be updated on a periodic basis (at least every three years), based on feedback, updated demographic data, and resource availability.

As part of ongoing outreach to community organizations, RTW will solicit feedback on the effectiveness of language assistance provided and unmet needs. In addition, we will conduct periodic review of updated Census data of the adequacy and quality of the language assistance provided, and determine changes to LEP needs.

In preparing the triennial update of this plan, RTW will conduct an internal assessment using the Language Assistance Monitoring Checklist provided in the FTA’s “Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers.”

Based on the feedback received from community members and agency employees, RTW will make incremental changes to the type of written and oral language assistance provided as well as to their staff training and community outreach programs. The cost of proposed changes and the available resources will affect the enhancements that can be made, and therefore RTW will attempt to identify the most cost-effective approaches.

As the community grows and new LEP groups emerge, RTW will strive to address the needs for additional language assistance.



## PROCEDURES FOR ENSURING EQUITY IN SERVICE AND FARE PROVISION

### Procedures for Ensuring Equity in Service Provision.

RTW is required for the Radford Transit to plan and deliver transportation services in an equitable manner. This means the distribution of service levels and quality is to be equitable between minority and low income populations and the overall population.

### Service Standards and Policies.

RTW has reviewed its services and policies for the Radford Transit to ensure that those services and benefits are provided in an equitable manner to all persons.

### Service Standards.

The agency has set standards and policies for the Radford Transit that address how services are distributed across the transit system service area to ensure that that distribution affords users equitable access to these services.

The following system-wide service standards are used for the Radford Transit to guard against service design or operations decisions from having disparate impacts. All of Radford Transit's services meet the agency's established standards; thus it is judged that services are provided equitably to all persons in the service area, regardless of race, color or national origin.

**Vehicle load:** Vehicle load is expressed as the ratio of passengers to the total number of seats on a vehicle at its maximum load point. The standard for maximum vehicle load is 23 passengers; all of Radford Transit services meet this standard.

**Vehicle headway:** Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given route. A shorter headway corresponds to more frequent service. The standard for vehicle headways is 5 minutes; all of Radford Transit's services meet this standard.

**On-time performance:** On-time performance is a measure of runs completed as scheduled. This criterion first must define what is considered to be "on time." The standard for on-time performance is 95%; all of Radford Transit's services meet this standard.

**Service availability:** Service availability is a general measure of the distribution of routes within a transit provider's service area or the span of service. The standard for service availability is all of Radford Transit services meet this standard.

### Service and Operating Policies

RTW's Radford Transit service and operating policies also ensure that operational practices do not result in discrimination on the basis of race, color, or national origin.

**Distribution and Siting of Transit Amenities.** Transit amenities refer to items of comfort, convenience, and safety that are available to the general riding public. RTW has a policy to ensure the equitable distribution of transit amenities across the system. This policy applies to seating (i.e., benches, seats), bus shelters and canopies, (c) provision of information, Intelligent Transportation Systems (ITS), waste receptacles (including trash and recycling). Passenger amenities are sited based on:

**Vehicle Assignment:** Vehicle assignment refers to the process by which transit vehicles are placed into service and on routes throughout the system. RTW assigns vehicles with the goal of providing equitable benefits to minority and low income populations. Vehicles are assigned with regard to service type (fixed-route, demand-response, or a hybrid type) and ridership demand patterns (routes with greater numbers of passengers need vehicles with larger capacities). For each type of assignment, newer vehicles are rotated to ensure that no single route or service always has the same vehicle. The Transportation Manager reviews vehicle assignments on a monthly basis to ensure that vehicles are indeed being rotated and that no single route or service always has the old or new vehicles.