## **POLICY 8.0: TITLE VI PROGRAM**

Section 601 of Title VI of the Civil Rights Act of 1964 states the following: "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 subjected to discrimination under any program or activity receiving federal financial assistance." GVT falls directly under this title, as it receives financial assistance from the Federal Transit Administration (FTA).

This program complies with FTA requirements. For compliance specific to Mesa County as a subrecipient of Federal Highway Administration (FHWA) funding, please see the Title VI Plan on Mesa County's website at <a href="https://www.mesacounty.us/">https://www.mesacounty.us/</a>. Scroll to the bottom of the page and click on "Nondiscrimination Policy."

To ensure compliance with Title VI, Chapter III, Section 4 requirements, the following is provided:

#### **ARTICLE I: INCLUSIVE PUBLIC PARTICIPATION PLAN**

Grand Valley Transit (GVT) has undertaken the following public outreach and involvement activities since the previous Title VI program submission in 2018: press releases, public open houses, legal ads, and local coordinating council (LCC) meetings. In 2019, GVT added the position of Mobility Manager, which has greatly augmented GVT's public engagement capabilities. This includes "Mobile Mesa County" social media accounts on Facebook and Instagram, which are used to promote GVT and Grand Valley Metropolitan Planning Organization (GVMPO) planning activities, among other local multimodal topics. In 2020 GVT updated the Coordinated Transit and Human Services Transportation (CTHS) Plan as a part of the 2045 Grand Valley MPO Regional Transportation Plan. Outreach for these plans included flyers in English and Spanish, which were posted on buses, transfer facilities, among other locations. These plans also involved special engagement of the Local Coordination Council (LCC), which includes several organizations that serve the needs of minority and Limited English Proficiency (LEP) communities. Communication with the public has been elevated since the onset of the Coronavirus pandemic. Informational flyers regarding public health measures, temporary schedule changes, and other critical information has been posted on buses, loading areas, and inside GVT facilities. These flyers included Spanish translations.

The membership of the LCC is not selected by the GVMPO or Mesa County and therefore a table depicting the demographics of this council is not required.

GVT has established a Public Participation Process which strives for an open exchange of information and ideas between the public and transit decision makers. Please see GVRTC Policy 2.0 for the complete Public Participation Process. To ensure that minority and low-income persons have meaningful access to GVT planning activities, the following measures are taken by GVT.

For fare changes or major service changes described in Policy 2.0 Article II flyers are placed on all the buses serving the routes as well as at the transfer facilities. Open houses and committee meetings are held at various locations within the community which are served by GVT and held during GVT's operating hours and include early morning and/or late afternoon to early evening hours. Notices in English and Spanish about the public open houses are placed in the local newspapers, on all transfer facility bus shelters, and in all revenue facilities. Information about what would be discussed or available at the open house are also posted on the GVT website and community members are given the option to call, email, or hand-write their comments or questions if they did not want to or could not attend.

For adoption of GVT's Program of Projects described in Policy 2.0 Article IV, and for developing FTA transportation plans, GVT will rely on the Public Participation Plan of the GVMPO. The GVMPO Public Participation Plan conveys a wide range of public engagement strategies that can be deployed appropriate to the various plans being developed. In all cases GVT will utilize the information in this program to ensure public engagement is conducted in an inclusive manner.

#### ARTICLE II: ACCESS TO SERVICES BY PERSONS WITH LEP

Please see GVRTC Policy 9.0 for the complete Limited English Proficiency (LEP) Policy.

Based on the most recent GVT Onboard Survey and Counts (2015), 3% of respondents chose Spanish as their primary language and another 1% of respondents reported Filipino, German, Japanese, Swahili, Cherokee as their primary language. In addition, the 2019 American Community Survey 5 Year Estimates reflected 2% of Mesa County residents speak English less than "very well" with 7% who primarily speak a language other than English. With this information, GVT's system map is in both English and Spanish and GVT teams with bilingual professionals when interpreters are needed to assist with transit riders and to convert documents into Spanish. In addition, the GVT website has installed the Google Translate tool, which converts text into about 100 different languages. Figure 1 shows density of LEP households in the GVT service area.

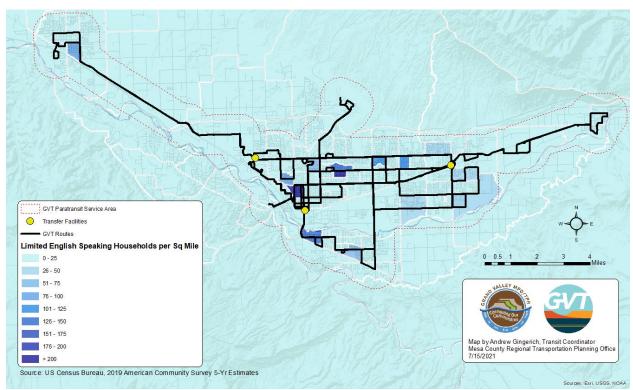


Figure 1: Limited English Proficiency by Census Block Group

Figure 1 shows that concentrated locations of LEP households are in somewhat discrete areas and that these areas are well served by current transit service. GVT will be mindful of these locations when considering service changes, notifications, and public outreach efforts.

#### **ARTICLE III: TITLE VI COMPLAINT PROCEDURES**

See Appendix A for the complaint procedure document provided by GVT. GVT provides copies in both English and Spanish on our website.

#### **ARTICLE IV: TITLE VI INVESTIGATIONS, COMPLAINTS, OR LAWSUITS**

We have not had any Title VI investigations, complaints or lawsuits.

#### ARTICLE V: NOTIFYING BENEFICIARIES OF THEIR RIGHTS UNDER TITLE VI

Notification of Title VI rights are provided on GVT's system maps which are available on all the buses as well as various businesses throughout the community including all the GVT transfer facilities and administrative office. In addition, GVT has this notification on the agency website at <a href="http://gvt.mesacounty.us.">http://gvt.mesacounty.us.</a>. The website was redesigned in 2021 in order to consolidate and streamline information. The "ADA & Non Discrimination Policy" page is accessible from a link at the bottom of the home page, as well as the dropdown of the "Rider Information" tab at the top of the home page. These are features of the website template, meaning these links are available from any page of the GVT website.

The statement of rights, in both English and Spanish, are on Grand Valley Transit's system map and the "ADA and Non Discrimination" page of the website. It reads:

"In accordance with the provisions of the Americans with Disabilities Act (ADA) and the Civil Rights Act of 1964, GVT does not discriminate on the basis of disability, race, color, gender, age or national origin. For more information about these statutes, or to file a complaint, contact GVT. Information in non-English alternative formats may be obtained through GVT at (970) 256-7433. Individuals will be permitted to use service animals, as defined within ADA guidelines as necessary."

#### **ARTICLE VI: SUBRECIPIENTS**

Mesa County does not have any subrecipients.

#### ARTICLE VII: SYSTEM-WIDE SERVICE STANDARDS AND POLICIES

The Department of Justice and Department of Transportation regulation implementing Title VI state that Federal agencies should require information on the manner in which federally funded services are provided. To address this requirement, the FTA requests information on the system-wide service policies and standards used by the local transit system which relate to service considerations covered by Title VI.

#### a. Effective Practices to Fulfill the Service Standard

#### (1) Vehicle load

The average of all loads during the peak operating period should not exceed vehicles' achievable capacities, which are 40 passengers for a 33' cutaway bus, 37 passengers for a 31' cutaway bus, 18 passengers for a 26' cutaway bus, 56 passengers on a 40' low floor bus, 42 passengers for a 32' low floor bus, and 54 passengers for a 30' low floor bus.

### (2) **Vehicle headway**

- Service operates every 60 minutes from 5:15am and continues until 8:05pm on seven routes, six days a week (routes 1, 3, 5, 6, 7, 9, and 11)
- Service operates every 60 minutes from 4:45am and continues until 8:35pm on three routes, six days a week (routes 4, 8, and 10)
- Service operates every 60 minutes from 5:45am and continues until 8:35pm on one route, six days a week (route 2)

Scheduling involves the consideration of a number of factors including: ridership productivity, transit/pedestrian friendly streets, density of transit-dependent population and activities, relationship to the Grand Valley 2045 Regional Transportation Plan, relationship to major transportation developments, land use connectivity, and transportation demand management.

## (3) **On-time performance**

GVT operates a spoke and hub system; all routes begin at transfer centers perform a loop and then return to one of three transfer centers. A vehicle is considered on time if it departs a scheduled timepoint zero minutes early and no more than 5 minutes late. GVT's on-time performance objective is 93% or greater. GVT continuously monitors on-time performance and system results are published and posted as part of monthly performance reports covering all aspects of operations.

#### (4) Service availability

When providing transit service to an area, it is the goal of GVT to provide service that is most helpful to the largest populations of Mesa County's low income and minority areas. Truly, when GVT first planned transit routes for operation in 2000, service was designed around serving the economically disadvantaged, disabled, and elderly populations for access to employment, education, medical services, shopping, and personal trips. That is still the goal of GVT today.

GVT will distribute transit service so that 90% of all residents in the service area are within a  $\frac{1}{2}$  mile walk of bus service and in densely populated areas, residents are within  $\frac{1}{4}$  mile walk of bus service.

#### AND/OR

Local bus stops will be not more than one-quarter of a mile apart. Express bus stops will be one-half to three quarters of a mile apart, excluding highways or other limited access facilities.

Demographic and service profile maps available in Article VII of this policy indicate that GVT routes serve all areas in the metropolitan area with high concentrations of minority populations, LEP households, families in poverty, zero vehicle housing units, and housing units with one or zero vehicles available.

### b. Effective Practices to Fulfill the Service Policy

### (1) Distribution of transit amenities

Transit amenities refer to items of comfort and convenience available to the general riding public such as passenger shelters and benches. It is the policy of GVT to distribute its transit amenities in a manner to serve a maximum number of customers. GVT has communicated the need for equitable placement of amenities and will continue to monitor these placements.

<u>Bus Shelters:</u> As of February 2021, GVT owns and maintains most shelters serving the fixed route system. Some shelters are owned by other jurisdictions or government entities. Several factors help to determine whether a bus stop will receive a shelter. These factors include ridership volume, availability of physical space, and visual impact of the shelter for advertising purposes, the level of cooperation of the property owners

adjacent to the site, the need for added protection form inclement weather, and local government land use regulations. Currently there are 53 shelters located along GVT routes.

<u>Bus Benches:</u> As of February 2021, GVT owns and maintains most benches serving the fixed route system. Some benches are owned by other jurisdictions or government entities. Several factors help to determine the placement of bus benches. These factors include ridership volume, availability of physical space, the level of cooperation of the property owner adjacent to the site and local government land use regulations. Currently there are 134 benches along, GVT routes.

#### (2) Vehicle assignment

Low-floor buses are deployed on frequent service and other high-ridership routes, so these buses carry a higher share of ridership than their numerical proportion of the overall bus fleet. All buses are equipped with air conditioning, bike racks, and ADA accessible ramps or lifts. Bus assignments take into account the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route. Routes with lower ridership may be assigned 30-foot buses rather than the 40-foot buses. Some routes requiring tight turns on narrow streets are operated with 30-foot rather than 40-foot buses.

#### **ARTICLE VIII: FACILITY SITE EQUITY ANALYSIS**

No facilities have been constructed in the previous three years. However, a Title VI equity analysis will be conducted during the planning stage for all projects requiring land acquisition and the displacement of persons from their residences and businesses with regard to the location of the facility.

# ARTICLE IV: REQUIREMENTS FOR METROPOLITAN TRANSPORTATION PLANNING ORGANIZATIONS

# (1) A demographic profile of the metropolitan area that includes identification of the locations of minority populations in the aggregate

Included below is Mesa County's racial demographics compared to the state of Colorado taken from the 2019 American Community Survey 5 Year Estimates.

Race and Hispanic or Latino Origin (Percent of Total Population)			
	Mesa County	Colorado	
White	94.0%	84.0%	
Black or African American	0.7%	4.2%	
American Indian and Alaska Native	0.9%	1.0%	
Asian	0.9%	3.2%	
Native Hawaiian and Other Pacific			
Islander	0.1%	0.2%	
Some other race	1.1%	3.9%	
Two or more races	2.3%	3.7%	
Hispanic or Latino origin (of any race)	14.5%	21.5%	
White alone, not Hispanic or Latino	81.4%	68.1%	

Source: US Census Bureau, 2019 American Community Survey 5-Yr Estimates

Figure 2: Race and Hispanic Origin Profile of Mesa County and State of Colorado

Drawing from the 2019 American Community Survey, the maps below identify the aggregate minority and non-minority populations, populations with no vehicle available and one vehicle available, and also populations in poverty in the GVT service area.

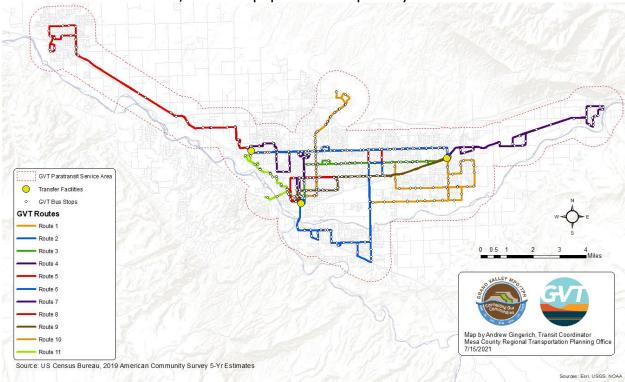


Figure 3: GVT Service Area

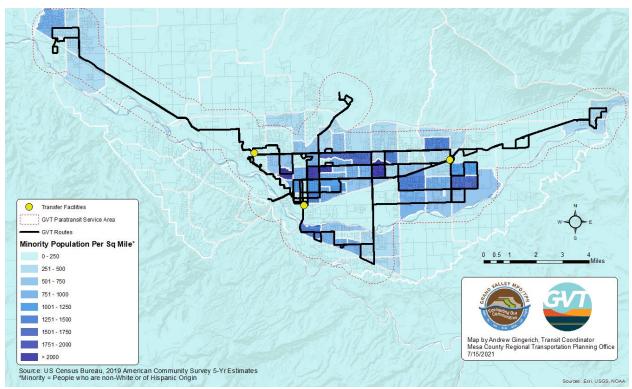


Figure 4: Minority Populations

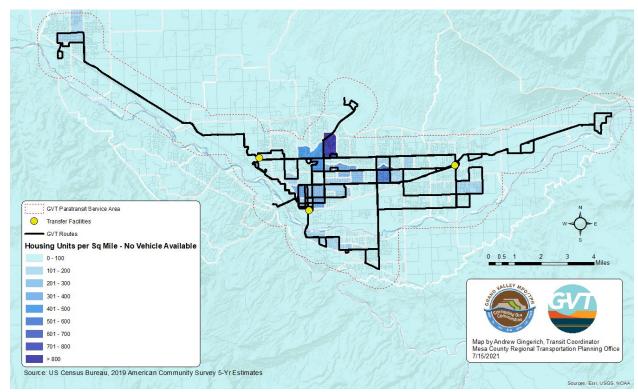


Figure 5: Housing Units without Vehicle Available

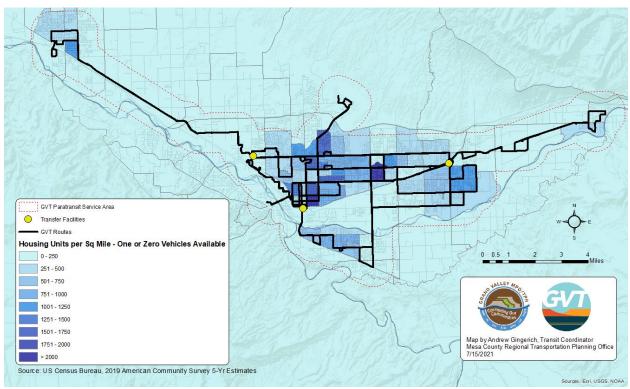


Figure 6: Housing Units with One or Zeros Vehicles Available

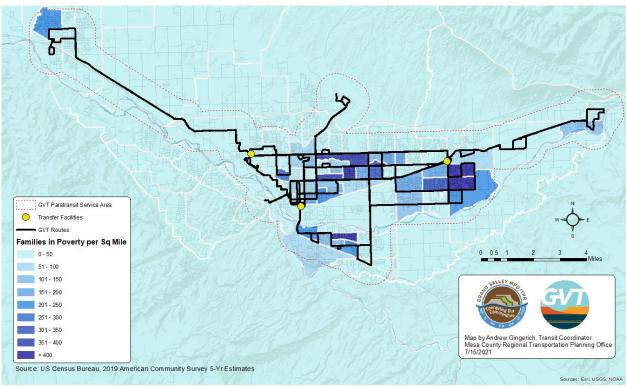


Figure 7: Families in Poverty

Furthermore, the 2045 Mesa County Coordinated Transit & Human Services Transportation Plan (finalized in 2020; valid until updated in conjunction with the 2050 RTP) identified the Census tracts most in need of transit service in the Mesa County area. See Figure 8 for the excerpt from that plan. The full plan may be found at <a href="http://rtpo.mesacounty.us/">http://rtpo.mesacounty.us/</a>.

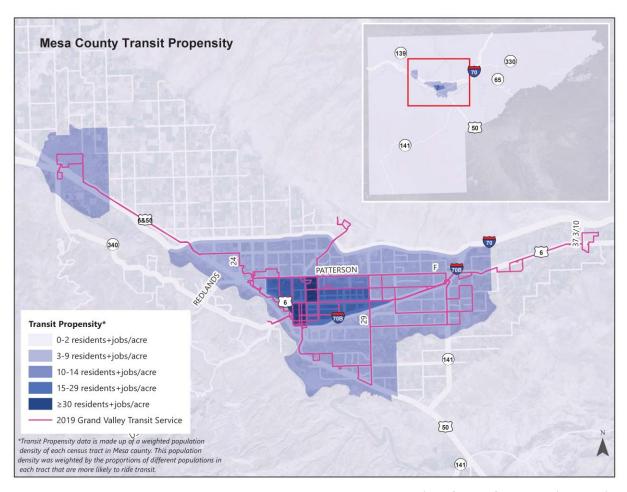


Figure 8: Mesa County Transit Propensity

# (2) Description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process

To ensure the mobility needs of minority populations are addressed when planning service, such as changes to routes, service hours, or fare policy, GVT utilizes the transit propensity analysis developed for the Mesa County Coordinated Transit & Human Services Transportation Plan and data from the U.S. Census Bureau. Notices of public planning meetings are advertised in English and Spanish and posted in all buses and transit facilities. Since all routes serve minority, low-income, and zero vehicle areas, notices placed inside GVT buses are equally accessible to all populations.

Please see GVRTC Policy 2.0 for the complete Public Participation Process.

# (3) Demographic maps that show the impacts of the distribution of State and Federal funds in the aggregate public transportation projects

The Grand Valley MPO is a designated recipient of FTA Section 5307 funds. This funding goes directly into the operational costs of the GVT system, equally investing service in all routes. Therefore, the impacts of the distribution of State and Federal funds in the aggregate for public transportation purposes is applied equally to minority populations and non-minority populations. See maps (above) showing how GVT routes target Census blocks that show minority, low-income, and zero or low vehicle access populations.

# (4) An analysis of the MPO's transportation system investments that identifies and addresses any disparate impacts on the basis of race, color, or national origin

As highlighted by the Mesa County Coordinated Transit & Human Services Transportation Plan and demographic maps, GVT's existing fixed routes serve almost all minority, low-income, and zero vehicle concentrations in the metropolitan area. GVT's route and bus stop siting goal is to be within ¼ mile of these aggregate populations in order to best serve the Mesa County metropolitan area.

# POLICY 9.0: LIMITED ENGLISH PROFICIENCY (LEP) POLICY

#### **ARTICLE I: INTRODUCTION**

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

#### **ARTICLE II: EXECUTIVE ORDER 13166**

Executive Order 13166 "Improving Access to Services for Persons With Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled "Enforcement of Title VI of the Civil Rights Act of 1964--National Origin Discrimination Against Persons With Limited English Proficiency." (See 65 FR 50123, August 16, 2000 DOJ's General LEP Guidance). Different treatment based upon a person's inability to speak, read, write, or understand English may be a type of national origin discrimination.

Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies such as Grand Valley Transit (GVT), and governments, private and non-profit entities, and subrecipients.

#### **ARTICLE III: PLAN SUMMARY**

Mesa County has developed this Limited English Proficiency (LEP) Plan to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to GVT services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available, and information for future plan updates.

In developing the plan while determining Mesa County's extent of obligation to provide LEP services, Mesa County undertook a U.S. Department of Transportation four factor LEP analysis which considers the following: 1) The number or proportion of LEP persons eligible in Grand Valley Transit's (GVT) service area who may be served or likely to encounter an GVT program, activity, or service; 2) the frequency with which LEP individuals come in contact with GVT services; 3) the nature and importance of the program, activity or service provided by GVT to the LEP population; and 4) the resources available to GVT and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

#### **ARTICLE IV: FOUR FACTOR ANALYSES**

**1.** The number or proportion of LEP persons eligible in the GVT service area who may be served or likely to encounter a GVT program, activity, or service. GVT examined data from the 2019 American Community Survey 5 Year Estimates., the most recent data available from the U.S. Census Bureau. GVT analyzed data for the geographies of the City of Grand Junction, City of Fruita, Town of Palisade and Mesa County.

Individuals Speaking English less than "Very Well"								
Data Catagoriu	City of Fruita		City of Grand Junction		Town of Palisade		Mesa County	
Data Category	Total	Percent	Total	Percent	Total	Percent	Total	Percent
Population 5 years and over	12546		58338		2516		142616	
Speak only English	11508	92%	53646	92%	2329	93%	132847	93%
Speak a language other than English	1038	8%	4692	8%	187	7%	9769	7%
Spanish	844	7%	3675	6%	168	7%	7771	1%
Speak English less than "very well"	207	2%	1082	2%	32	1%	2283	2%
Other Indo-European languages	145	1%	668	1%	4	0%	1199	1%
Speak English less than "very well"	0	0%	148	0%	0	0%	220	0%
Asian and Pacific Island languages	0	0%	251	0%	15	1%	613	0%
Speak English less than "very well"	0	0%	76	0%	15	1%	259	0%
Other languages	49	0%	98	0%	0	0%	186	0%
Speak English less than "very well"	0	0%	0	0%	0	0%	28	0%
Total Speak English less than "very well"	207	2%	1306	2%	47	2%	2790	2%
Source: US Census Bureau, 2019 American Community Survey 5-Yr Estimates								

Figure 9: Individuals Speaking English "Not Well" or "Not at All"

The Census data in the table above shows there are a relatively low number of persons in Mesa County as well as municipalities in the metropolitan area that have difficulty speaking English. The majority of these persons speak Spanish as their primary language. GVT used the same dataset to map LEP households per square mile, at Census tract geographies. Figure 10 (below) shows that concentrated locations of LEP households are located in somewhat discrete areas and that these areas are well service by current transit service.

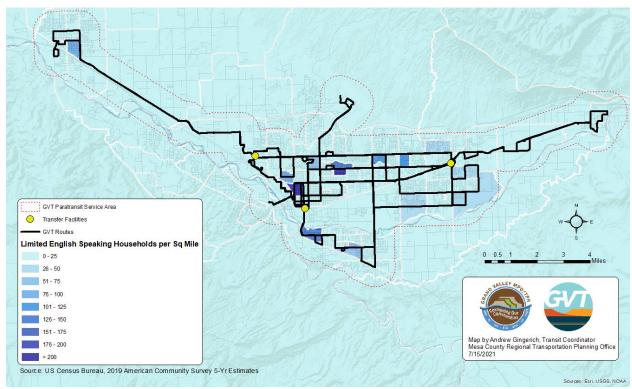


Figure 10: Limited English Proficiency by Census Block Group

In addition, based on the most recent GVT Onboard Survey and Counts (2015), 3% of respondents chose Spanish as their primary language and another 1% of respondents reported Filipino, German, Japanese, Swahili, Cherokee as their primary language.

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

GVT assesses the frequency at which staff and drivers have or could possibly have contact with LEP persons. This may include the following: documenting phone inquiries, verbally surveying drivers and dispatchers, as well as on-board passenger surveys. GVT has not had a request for interpreters or translated GVT documents since the implementation of the previous LEP Plan. The staff and drivers have had limited contact with LEP individuals, however dispatchers have reported a slight increase in LEP encounters since the Downtown Transfer Facility began to accommodate Greyhound and Bustang regional bus service.

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

The numbers and percentages of LEP persons in our service area are low but as a transportation provider we are sensitive to the current and potential need to service LEP individuals. Therefore, in recent years we have undertaken the following efforts: we have maintained our LEP policy and procedures; printed Grand Valley Transit's system map in

both English and Spanish; created a list of local Spanish interpreters; teamed with Mesa County Department of Human Services to convert other Grand Valley Transit informational flyers and pamphlets into Spanish when needed or requested. Grand Valley Transit also provided Basic Spanish for Transit Employees booklets for all drivers and office staff.

#### 4. The resources available to GVT and overall costs

GVT assessed its available resources that could be used for providing LEP assistance. This included identifying how much a professional interpreter and translation service would cost on an as needed basis, which documents would be the most valuable to be translated if and when the populations supports doing so, taking an inventory of available organizations that GVT could partner with for outreach and translation efforts, and determining what level of staff training is needed.

After analyzing the four factors, GVT developed the plan outlined in the following section for assisting persons of limited English proficiency.

#### **ARTICLE V: LIMITED ENGLISH PROFICIENCY PLAN OUTLINE**

- **1.** How to Identify an LEP Person who Needs Language Assistance Below are tools to help identify persons who may need language assistance:
  - Examine records requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings;
  - When GVT sponsored workshops or conferences are held, set up a sign-in sheet table, have a staff member greet and briefly speak to each attendee. To informally gage the attendee's ability to speak and understand English, ask a question that requires a full sentence reply;
  - Have the Census Bureau's "I Speak Cards" at the workshop or conference sign-in sheet table (contained herein as <u>APPENDIX B</u>). While staff may not be able to provide translation assistance at this meeting, the cards are an excellent tool to identify language needs for future meetings. Also, have the cards available at the GVT Operations and Transfer Facilities; and
  - Frequently survey drivers and other first line staff of any direct or indirect contact with LEP individuals.
- **2. Language Assistance Measures -** GVT has or will implement the following LEP procedures. The creation of these steps are based on the very low percentage of persons speaking other languages or not speaking English at least "well" in GVT's service area:
  - The GVT website has the Google Translate tool, converting text into about 100 different languages;
  - Review Census updates as they become available;
  - Periodically review perceived LEP needs with drivers and other first-line staff;

- Make periodic contacts with School District 51, Colorado Mesa University, Child & Migrant Services and other community agencies that may know of LEP persons or groups;
- Census Bureau's "I Speak Cards" are to be located at GVT's Operations and Transfer Facilities;
- The computers located at GVT's Operations and Transfer Facilities will have Google
  Translate added to the favorites listing for the translations of blocks of texts. This
  will aid GVT staff in the interpretation of services on a one-on-one basis for LEP
  individuals using GVT;
- When an interpreter is needed, in person or on the telephone, and GVT's staff has
  exhausted the above options, staff will first attempt to determine what language
  is required. Staff can then use a telephone interpreter service such as Language
  Line Services at http://www.languageline.com
- **3. GVT Staff Training -** All GVT staff will be provided with the LEP Plan and will be educated on procedures to follow. This information will also be part of GVT's staff orientation process for new hires. Training topics are listed below:
  - Understanding the Title VI policy and LEP responsibilities;
  - What language assistance services GVT offers;
  - Use of "I Speak Cards";
  - How to access Google Translate via the computer(s) in the GVT's Operations Facility;
  - How to use the telephone interpreter and translation services;
  - Documentation of language assistance requests;
  - How to handle a Title VI and/or LEP complaint.
- **4. Outreach Efforts -** Similarly, as the need arises, GVT will consider the following outreach efforts:
  - Identify agencies in our area that may serve LEP populations and provide information on our services to them.
  - If staff knows that they will be presenting a topic that could be of potential importance to an LEP person or if staff will be hosting a meeting or a workshop in a geographic location with a known concentration of LEP persons, meeting notices, fliers, advertisements, and agendas will be printed in an alternative language, based on known LEP population in the area.
  - When running a general public meeting notice, staff will insert the clause, based on the LEP population and when relevant, that translates into "A (insert alternative Language) translator will be available". For example: "<u>Un traductor del idioma</u> <u>español estará disponible</u>" This means "<u>A Spanish translator will be available</u>".
  - Key print materials, including but not limited to schedules and maps, will be translated and made available at GVT's Operations Facility, on board vehicles and in communities when a specific and concentrated LEP population is identified.

**5. Monitoring and Updating the LEP Plan -** This plan is designed to be flexible and is one that can be easily updated. At a minimum, GVT will follow the Title VI Program update schedule for the LEP Plan.

Each update should examine all plan components such as:

- How many LEP persons were encountered?
- Were their needs met?
- What is the current LEP population in GVT's service area?
- Has there been a change in the types of languages where translation services are needed?
- Is there still a need for continued language assistance for previously identified GVT programs? Are there other programs that should be included?
- Have GVT's available resources, such as technology, staff, and financial costs changed?
- Has GVT fulfilled the goals of the LEP Plan?
- Were any complaints received?
- **6. Dissemination of GVT's Limited English Proficiency Plan -** GVT includes the LEP Plan with its Title VI Policy and Complaint Procedures. GVT's Notice of Rights under Title VI to the public is posted on all system maps and on the GVT website.
  - Any person, including social service, non-profit, and law enforcement agencies and other community partners with internet access will be able to access the plan.
  - Copies of the LEP Plan will be provided, on request, to any person(s) requesting the document via phone, in person, by mail or email. LEP persons may obtain copies/translations of the plan upon request.
  - Any questions or comments regarding this plan should be directed to the GVT's Title VI Coordinator.

GVT's Title VI Coordinator Mesa County Regional Transportation Planning Office Dept. 5093, PO Box 20,000

Grand Junction, CO 81502-5001

Phone: 970-683-4339

Email: <a href="mailto:grandvalleytransit@mesacounty.us">grandvalleytransit@mesacounty.us</a>

#### **APPENDIX A**

#### **GRAND VALLEY TRANSIT'S**

#### TITLE VI PUBLIC NOTICE OF RIGHTS / COMPLAINT PROCESS

#### **Public Notice of Rights**

The following statement shall be printed on Grand Valley Transit's system maps, which are on all transit buses, administrative office as well as all three transfer facilities and on Grand Valley Transit's website (<a href="www.gvt.mesacounty.us">www.gvt.mesacounty.us</a>). (Documents will be translated into languages other than English, upon request.) (Los documentos serán traducidos a idiomas con excepción de inglés, a petición.)

Statement of Rights: In accordance with the provisions of the Americans with Disabilities Act (ADA) and the Civil Rights Act of 1964, Grand Valley Transit (GVT) does not discriminate on the basis of disability, race, color, gender, age, or national origin. For more information about these statutes, or to file a complaint, contact GVT. Information in non-English alternative formats may be obtained through GVT at (970) 256-7433. Individuals will be permitted to use service animals, as defined within ADA guidelines as necessary.

# <u>Title VI Information, Limited English Proficient (LEP) information and Complaint Process (for printed materials, website, and other mediums upon request)</u>

Grand Valley Transit (GVT) grants all persons equal access to all its transportation services. It is further the intent of GVT that all persons are aware of their rights to such access. This is designed to serve as an educational tool for persons so that they may understand one of the civil rights laws that protect their benefit of GVT's programs and services, specifically, as it relates to Title VI of the Civil Rights Act of 1964.

#### What is Title VI?

Title VI is a section of the Civil Rights Act of 1964 requiring 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 subjected to discrimination under any program or activity receiving federal financial assistance."

#### What is LEP?

As part of Title VI requirements, Grand Valley Transit has developed a Limited English Proficiency (LEP) Plan to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to Grand Valley Transit services as required by Executive Order 13166 "Improving Access to Services for Persons With Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000). A Limited English Proficiency

person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

### **GVT's Complaint and Investigation Procedures**

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990, for alleged discrimination in any program or activity administered by GVT.

These procedures do not deny the right of the complainant to file formal complaints with other State or Federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and GVT may be utilized for resolution. Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited under Title VI and related statutes may file a complaint.

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

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

Grand Valley Transit strongly encourages the use of the attached <u>Grand</u> <u>Valley Transit's Discrimination Complaint Form</u> when filing official complaints.

The preferred method is to file your complaint in writing using <u>Grand</u> <u>Valley Transit's Discrimination Complaint Form</u>, and sending it to:

Grand Valley Transit
Attn: Title VI Coordinator
525 S. 6<sup>th</sup> Street
Dept. 5093, PO Box 20,000
Grand Junction, CO 81502-5001

2) In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to Grand Valley Transit's Title VI Coordinator. Under these circumstances, the complainant will be interviewed, and Grand Valley Transit's Title VI Coordinator will assist the Complainant in converting the verbal allegations to writing.

- 3) When a complaint is received, the Title VI Coordinator will provide written acknowledgment to the Complainant, within ten (10) calendar days by registered mail.
- 4) If a complaint is deemed incomplete, additional information will be requested, and the Complainant will be provided 60 calendar days to submit the required information. Failure to do so may be considered good cause for a determination of no investigative merit.
- 5) Within 15 calendar days from receipt of a complete complaint, Grand Valley Transit will determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant investigation. Within five (5) calendar days of this decision, the Regional Transportation Planning Director or his/her authorized designee will notify the Complainant and Respondent, by registered mail, informing them of the disposition.
  - a. If the decision is not to investigate the complaint, the notification shall specifically state the reason for the decision.
  - b. If the complaint is to be investigated, the notification shall state the grounds of Grand Valley Transit's jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting the investigator.
- 6) When Grand Valley Transit does not have sufficient jurisdiction, the Regional Transportation Planning Director or his/her authorized designee will refer the complaint to the appropriate State or Federal agency holding such jurisdiction.
- 7) If the complaint has investigative merit, the Regional Transportation Planning Director or his/her authorized designee will instruct the Title VI Coordinator to fully investigate the complaint. A complete investigation will be conducted, and an investigative report will be submitted to the Transportation Director within 60 calendar days from receipt of the complaint. The report will include a narrative description of the incident, summaries of all persons interviewed, and a finding with recommendations and conciliatory measures where appropriate. If the investigation is delayed for any reason, the Title VI Coordinator will notify the appropriate authorities, and an extension will be requested.
- 8) The Regional Transportation Planning Director or his/her authorized designee will issue letters of finding to the Complainant and Respondent within 90 calendar days from receipt of the complaint.

9) If the Complainant is dissatisfied with Grand Valley Transit's resolution of the complaint, he/she has the right to file a complaint with the:

Federal Transit Administration Office of Civil Rights Attention: Complaint Team East Building, 5th Floor – TCR 1200 New Jersey Avenue, SE Washington, DC 20590

FTA Complaint procedures can also be found on the FTA web site at: <a href="www.fta.dot.gov">www.fta.dot.gov</a>. These procedures are also outlined in FTA Circular 4702.1B, Chapter IX.

### **Grand Valley Transit Discrimination Complaint Form**

Instructions: If you would like to submit an ADA or Title VI complaint to Grand Valley Transit, please fill out the form below and send it to: Grand Valley Transit, Attn: ADA & Title VI Coordinator, 525 S. 6<sup>th</sup> Street, Dept. 5093, PO Box 20,000, Grand Junction, CO 81502-5001. For questions or a full copy of Grand Valley Transit's ADA or Title VI policy and complaint procedures call 970-255-7188 or email grandvalleytransit@mesacounty.us.

1. Name (Complainant):		
2. Phone:	3. Home address	
	Street: City:	State: Zip:
4. If applicable, name of person(s) w	ho allegedly discrim	inated against you:
5. Location and position of person(s)	if known:	6. Date of incident:
7. Discrimination because of:   Race	□ Color	□ Age
□ National Origin	□ Disability	□ Gender
8. Explain as briefly and clearly as powere discriminated against. Indicate wother persons were treated different pertaining to your case.	who was involved. B	e sure to include how you feel
9. Why do you believe these events of	occurred?	

10. What other information do you think is relevant	nt to the investigation?
11. How can this/these issue(s) be resolved to you	ur satisfaction?
12. Please list below any person(s) we may contain support or clarify your complaint (witnesses):	
Name: Address:	Phone number:
13. Have you filed this complaint with any other for with any federal or state court?  ☐ Yes ☐ No	ederal, state, or local agency; or
If yes, check all that apply:    Federal   Federal   court     Local agency   State   agency	□ State court
If filed at an agency and/or court, please provide at the agency/court where the complaint was filed Agency/Court: Contact's Name: Addr	i.
Signature (Complainant):	Date of filing:

## Formulario de queja de discriminación de tránsito de Grand Valley

Instrucciones: Si usted quisiera presentar una queja del ADA o título VI a Grand Valley Transit, rellene por favor el impreso abajo y envíelo a: Grand Valley Transit, Attn: ADA & Title VI Coordinator, 525 S. 6<sup>th</sup> Street, Dept. 5093, PO Box 20,000, Grand Junction, CO 81502-5001. Para las preguntas o una copia completa de la política del ADA y título VI del Grand Valley Transit y de procedimientos de queja llamada 970-255-7188 o email grandvalleytransit@mesacounty.us

1. Nombre (denunciante):				
2. Teléfono:	3. Dirección de comienzo de la pista en disco (calle No., ciudad, estado, cierre relámpago):			
4. Si fuera aplicable, nombre de la usted:	s personas que al	egado discriminaron contra		
<ol><li>Localización y posición de perso sabido:</li></ol>	onas si está	6. Fecha del incidente:		
7. Discriminación debido a: ☐ Raza	□ Color	□ Edad		
□ Origen nacional	<ul> <li>Discapacidad</li> </ul>	□ Género		
8. Explique tan brevemente y claramente como posible qué sucedió y cómo usted cree le discriminaron contra. Indique quién estaba implicado. Esté seguro de incluir cómo usted siente que trataron a otras personas diferentemente que usted. También, ate cualquier material escrito referente a su caso.				
9. ¿Por qué usted cree estos acon	tecimientos ocurri	ió?		

10. ¿Qué la otra inf	ormación usted pien	sa es relevante	a la investigación?
11. ¿Cómo se pued	le esto/estas edicion	es resolver a su	satisfacción?
contacto con para d	vor debajo de cualqu que la información ac		
(testigos): Nombre:	Dirección:	N	úmero de teléfono:
	hivado esta queja co on federal o tribunal No	•	federal, estado, o
-	do el que apliqúese: l	☐ Tribuna	al estatal
	n una agencia y/o ui una persona de cont		•
Agencia/corte:	Nombre de contacto:	Dirección:	Número de teléfon
Finns a /ala a constitution	\ .		Facility of the Parameters
Firma (denunciante	); 		Fecha de la limadura:

# APPENDIX B

# I SPEAK CARDS

Cei	nsus est  Cunited states Census 2010 LANGUAGE IDENTIFICATION FLASHCARD	
العربية.	ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث	1. Arabic
	ում՝ ե՛ս ջ ՜ս չում՝ կատարև ջ այս .ջառակուսում՝, ոսում՝ կամ՝ կարդում՝ և ջ Հայերե՛ս:	2. Armenian
যদি আ	পিনি বাংলা পড়েন বা বলেন তা হলে এই বাব্চে দাগ দিন।	3. Bengali
្រា ឈូមបរ	ញ្ហាក់ក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។	4. Cambodiar
Motka	i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.	5. Chamorro
如果你	r能读中文或讲中文,请选择此框。	6. Simplified Chinese
如果的	r能讀中文或講中文,請選擇此框。	7. Traditional Chinese
Označi	ite ovaj kvadratić ako čitate ili govorite hrvatski jezik.	8.Croatian
Zaškrtr	něte tuto kolonku, pokud čtete a hovoříte česky.	9. Czech
Kruis d	lit vakje aan als u Nederlands kunt lezen of spreken.	10. Dutch
Mark th	his box if you read or speak English.	11. English
	اگر خواندن و نوشتن فارسي بلد هستيد، اين مربع را علامت	12. Farsi
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	Cocher ici si vous lisez ou parlez le français.	13. French
	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	14. German
	Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.	15. Greek
	Make kazye sa a si ou li oswa ou pale kreyòl ayisyen.	16. Haitian Creole
	अगर आप हिन्दी बोलते या पढ़ सकते हों तो इस बक्स पर चिह्न लगाएँ।	17. Hindi
	Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	18. Hmong
	Jelölje meg ezt a kockát, ha megérti vagy beszéli a magyar nyelvet.	19. Hungarian
	Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	20. Ilocano
	Marchi questa casella se legge o parla italiano.	21. Italian
	日本語を読んだり、話せる場合はここに印を付けてください。	22. Japanese
	한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	23. Korean
	ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກພາສາລາວ.	24. Laotian
	Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	25. Polish
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	Assinale este quadrado se você lê ou fala português.	26. Portuguese
	Însemnați această căsuță dacă citiți sau vorbiți românește.	27. Romanian
	Пометьте этот квадратик, если вы читаете или говорите по-русски.	28. Russian
	Обележите овај квадратић уколико читате или говорите српски језик.	29. Serbian
	Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.	30. Slovak
	Marque esta casilla si lee o habla español.	31. Spanish
	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	32. Tagalog
	ให้กาเกรื่องหมายลงในช่องถ้าท่านอ่านหรือพูคภาษาไทย.	33. Thai
	Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.	34. Tongan
	Відмітьте цю клітинку, якщо ви читаєте або говорите українською мовою.	35. Ukranian
	اگرآپاردو پڑھتے ما پولتے ہیں تواس خانے میں نشان لگائیں۔	36. Urdu
	Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.	37. Vietnamese
	באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.	38. Yiddish
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