



**ROWAN
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Rowan Transit System

Title VI Plan - FY22

Adopted: August 5, 2021 by the Rowan Transit Advisory Committee

TAC Chair: Edward Hailey

Signature:

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Rowan Transit System
2726 Old Concord Road
Salisbury, NC 28146

Rowan Transit System Title VI Plan

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Section 1: Policy Statement

Policy Statement

The Rowan Transit System as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the North Carolina Department of Transportation (NCDOT) will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the U.S. Department of Transportation implementing regulations.

Title VI Plan Elements

The Rowan Transit System's Title VI plan includes the following elements:

1. Evidence of Policy Approval
2. Notice to the Public
3. Complaint Procedure
4. Complaint Form
5. List of transit related Title VI Investigations, Complaints and Lawsuits
6. Public Participation Plan
7. Language Assistance Plan
8. Minority Representation Table and Description

Note: Additional materials will be attached, if required.

Section 2: Title VI Notice to the Public

The Rowan Transit System's Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

The Rowan Transit System

The Rowan Transit System operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Rowan Transit System.

For more information on the Rowan Transit System's civil rights program, and the procedures to file a complaint, contact 704-216-8889, (TTY 800-735-2962); email rowantransit@rowancountync.gov ;or visit our administrative office at 2726 Old Concord Road, Salisbury, NC 28146. For more information, visit www.rowantransit.com

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language, contact 704-216-8889.
Si se necesita informacion en otro idioma de contacto, 704-216-8889..

The **Transit System's** Notice to the Public is posted in the following locations:

- Agency website www.rowantransit.com
- Public areas of the agency office
- Inside vehicles

Section 3: Public Involvement Plan

Rowan Transit will coordinate with individuals, institutions, and/or organizations to reach out to members in the affected minority/low-income communities. We will provide opportunities for public participation through means other than written communication.

Public Meetings:

- All Public meetings will be held in convenient and accessible locations and facilities
- Meeting material will be available in a variety of formats upon previous request.
- A variety of advertising means will be used to inform the media of public meetings.
- Assistance to persons with disabilities will be available upon previous request.

Notice to the Public

Rowan Transit provides notice to the public of our Title VI obligations on our web site located at www.rowantransit.com. Notice is also posted at the Rowan Transit Office, in transit vehicles and is to be referenced in future publications.

Public Involvement Process

The main objectives are to:

1. Comply with the public involvement and environmental justice requirements of the Federal and State regulations, and provide specific opportunities for local citizens and citizen-based organizations to discuss their views and provide input on the subject areas addressed in plans, projects or policies of Rowan Transit, and
2. Inform and educate citizens and other interested parties about ongoing Rowan Transit planning activities, and their potential role in those activities.
3. Work with other local and state organizations that have similar goals and requirements.
4. Study other transit organizations that have been successful in Public Participation Efforts.

Experience has shown difficulty in reaching a large span of the population and keeping them involved. Federal and State regulations require us to provide the public with information and to reach out and include traditionally under-served populations. This document has been prepared to serve that purpose.

Outreach Tools

A. General Public Relations

General public relations may be defined as any action that might reach any citizen, whether or not that citizen has specific interest or knowledge regarding transportation planning. This group of techniques includes the followings: announcements targeted at newspapers and radio; posters or pamphlets displayed in public places; and signs posted near future or current transportation project sites. Meetings or hearings that are held in public places and covered by the media can act as general public relations.

These techniques are ways to keep the general public aware of the presence of the planning organization and the status of specific projects so that they may develop an interest and choose to become better informed or actively involved.

B. Events

There are a broad variety of ways to educate and engage the public. In general, the earlier public involvement is sought, the better. It is also a better use of citizens' free time to participate in a process that will determine the direction of a project that may take years to complete. Citizens may get frustrated when they are invited to join late in the process - when the values and goals have already been decided and the details have been hammered out. The following tools are arranged from most participatory to least.

Special Events are held to bring attention to a specific activity or issue. Special events may take the form of a fair or special educational lecture with civic groups or other public entities. Special events are a way to expose a large number of people to a project or program.

Surveys are an efficient method of gathering input from a large number of people at an early stage of the planning process. This is particularly useful when trying to understand the goals and aspirations of a community before attempting to address any specific problems. As an outreach tool, surveys are a good way to identify citizens who may want to become further involved. Surveys may be administered in person or on the phone or distributed via mail, on the Internet, or at public places. A labor intensive activity, implementation of survey might be aided by volunteers and student interns.

Public Hearings are usually held when an agency has completed a plan and needs to present it for public review before moving forward with the plan. As with all of these tools, care must be taken to ensure that the public is made fully aware of the event well in advance, and that the goals and values of the plan are clearly stated.

Community Forum Meetings are held to discuss programs and activities within communities, and the public is engaged to discuss their needs in general.

C. Direct Marketing and Education

Direct marketing and education is meant to reach out and provide specific information to specific parties. For example, landowners or leaders of an ethnic community may be sought out and personally invited to come to a meeting. Similarly, lower income groups may be specifically targeted to be educated about their rights, or children or families may be targeted to begin a discussion on a specific program. Direct marketing and education can take place through direct mass mailings, radio, press advertising, or through meetings with specific groups of people such as local clubs, homeless people, property owners, or housing authorities. It can also be through making direct phone calls or meeting with key people who desire to participate in a given process. This is the most labor intensive and potentially most fruitful way to create a diverse and active public participation process.

Plan Monitoring and Evaluation

Evaluation of the success of any public involvement efforts must be result-oriented. It is never safe to assume that just because people don't come to an event that they are uninterested in the project. The goal is to educate and include the public at all levels of planning, not just to invite them. Evaluation, then, must be two-fold. The first part is to track what efforts are being made, and the results of those efforts, and the second part is to make regular assessments of the success of a technique within a given program, and to strategize for future successes.

Tracking Efforts and Success

In order to track our public participation efforts, it is necessary that the individuals involved record their efforts.

1. Rowan Transit will keep a log of all outreach activities.
2. Copies should be kept of any print ads, and transcripts of any public service announcements.
3. Notes should be made after the meeting regarding the overall tone of the meeting and any ideas or observations made regarding the process.

Section 4: Limited English Proficiency Plan (LEP)

Plan Components

As a recipient of federal US DOT funding, the Rowan Transit System (RTS) is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

Limited English Proficient (LEP): Refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak or understand English. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

The RTS Language Assistance Plan includes the following elements:

1. The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.
2. A description of how language assistance services are provided by language
3. A description of how LEP persons are informed of the availability of language assistance service
4. A description of how the language assistance plan is monitored and updated
5. A description of how employees are trained to provide language assistance to LEP persons
6. Additional information deemed necessary

Methodology

To determine if an individual is entitled to language assistance and what specific services are appropriate, the Rowan Transit System has conducted a *Four Factor Analysis*¹ of the following areas: 1) Demography, 2) Frequency, 3) Importance and 4) Resources and Costs.

LEP Four Factor Analysis

Factor 1: Demography: What is the number or proportion of LEP persons served and the languages spoken in the service area?

Overview

The first factor of the *Four Factor Analysis* is the basis of the Language Assistance Plan. It requires the Rowan Transit System to review its US Census data to determine if it meets the *LEP Safe Harbor Threshold*.

US Census and American Community Survey (ACS) Data²

The Rowan Transit System did the following:

¹ DOT LEP guidance <https://www.civilrights.dot.gov/page/dots-lep-guidance>

² The ACS publishes data in many forms on the Census Bureau American Fact Finder website <http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml>

1. Inserted a copy of the RTS county LEP data in the Title VI plan.
2. Analyzed the LEP demographic data for the RTS program and/or service area by calculating the *Safe Harbor Threshold* for two to three of the largest language groups identified other than English.
 - a. The *Safe Harbor Threshold* is calculated by dividing the population estimate for a language group that “Speaks English less than very well” by the total population of the county.
 - i. The *LEP Safe Harbor Threshold* provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less) RTS must provide translation of vital documents in written format for the non-English users.
 - ii. Examples of written translation of vital documents include the Title VI policy statement and/or Notice to the Public (Appendix 2), Title VI Complaint Procedure (Appendix 3), Title VI Complaint Form (Appendix 4), and ADA paratransit eligibility forms.
3. Explained the results of the analysis of the county LEP data in the demographic section of the *Four Factor Analysis*.

Factor 2: Frequency: How often does your staff (and/or contractor/lessee) come into contact with LEP persons?

Overview

LEP persons are persons identified as speaking English less than very well, not well or not at all. Just because a person speaks a language other than English doesn't mean they don't speak English or are identified as LEP. The summary below discusses the frequency with which RTS staff, and/or its contractor/lessee come into contact with LEP persons. It also provides information on the how staff is instructed to meet the needs of LEP persons.

Factor 3: Importance: How does the program, service or activity affect people's lives?

Overview

The summary below discusses how the Rowan Transit System's program and services impact the lives of person's within the community. The Transit System will specify the community organizations that serve LEP persons, if available.

Factor 4: Resources and Costs: What funding and other resources are available for LEP outreach?

Overview

The summary below discusses the low cost methods used by RTS to provide outreach to LEP persons as well as train staff (and/or its contractor/lessee) on Title VI and LEP principles.

Additional Required Elements

In addition to the *Four Factor Analysis (listed below as item #1)*, the Transit System will address the following elements:

- Item #2:* A description of how language assistance services are provided by language
- Item #3:* A description of how LEP persons are informed of the availability of language assistance service
- Item #4:* A description of how the language assistance plan is monitored and updated
- Item #5:* A description of how employees are trained to provide language assistance to LEP persons

And, any additional information deemed necessary.

Transit System – Summary of the Language Assistance Plan Components

Item #1 – Results of the Four Factor Analysis <i>(including a description of the LEP population(s) served)</i>
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Factor 1 – Demography

The Rowan Transit System contracts with a transit provider to provide transportation service for Rowan County.

The US Census Bureau – American Fact Finder (2008-2012) reports there are numerous languages spoken in Rowan County. Some of these languages include Spanish, German, Russian, Japanese, Hmong, and Vietnamese. After English, the second largest language group is Spanish.

The Safe Harbor Threshold is calculated by dividing the population estimate for a language group that “speaks English less than very well” by the total population of the county. The LEP Safe Harbor Threshold provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less), the Transit System must provide translation of vital documents in written format for non-English speaking persons.

In Rowan County, with a population estimate of 129,275 76; 4,965 persons have identified themselves as Spanish speaking and “speaks English less than well”. This language group is 3.8% and below the 5% threshold, but greater than the 1,000 person threshold. This means Rowan Transit System is required to provide written translation of vital documents. All of the other language groups listed above are below the safe harbor threshold. This means, at this time, the Rowan Transit System is not required to provide written

translation of vital documents in these languages. See table and map depicting language demographics in appendix N.

Rowan Transit System currently provides written translation of vital documents and publishes a timetable and route map in Spanish on its website.

In the future, if RTS meets the Safe Harbor Threshold for any other language group, it will provide written translation of vital documents in such languages and also consider measures needed for oral interpretation.

Factor 2 – Frequency

The Rowan Transit System (and its contractor) will be trained on what to do when they encounter a person that speaks English less than well. The Rowan Transit System and/or its contractor will track the number of encounters and consider making adjustments as needed to its outreach efforts to ensure meaningful access to all persons and specifically to LEP and minority populations of RTS programs and services.

The Rowan Transit System's contractor/transit provider provides rides to 98,638 persons per year. While formal data has not been collected, the contractor has indicated it has encountered (0) zero LEP persons using the service within the last six months.

Our contractor/transit provider has an open door policy and will provide rides to any person who requests a ride. If an individual has speech limitations, the dispatcher or driver will work with the Transit Manager, if needed to ensure the individual receives access to the transportation service.

Factor 3 – Importance

The Rowan Transit System and our contractor/transit provider understand an LEP person with language barrier challenges also faces difficulties obtaining health care, education or access to employment. A transportation system is a key link to connecting LEP persons to these essential services.

The Rowan Transit System has identified activities and services which would have serious consequences to individuals if language barriers prevented access to information or the benefits of those programs. The activities and services include providing emergency evacuation instructions in our facilities, stations and vehicles and providing information to the public on security awareness or emergency preparedness.

The Rowan Transit System's assessment of what programs, activities and services that are most critical included contact with community organization(s) that serve LEP persons, as well as contact with LEP persons themselves to obtain information on the importance of the modes or the types of services that are provided to the LEP populations.

Factor 4 – Resources and Costs

Even though the Rowan Transit System does not have a separate budget for LEP outreach, the County has worked with our contractor/transit provider to implement low cost methods of reaching LEP persons. Rowan County uses Language Line services on an as needed, pay as you go basis. There has been no need for this service over the past year. RTS staff works with the Department of Social Services who has a Spanish speaking person on staff that assists in the translation of documents. This has ensured RTS can provide assistance to LEP Spanish-speaking persons, when needed.

Item # 2 – Description of how Language Assistance Services are Provided, by Language

The Rowan Transit System provides language assistance through Language Line Services. The service can be used for any language likely to be encountered in Rowan County.

Item # 3 - Description of how LEP Persons are Informed of the Availability of Language Assistance Service

The Rowan Transit System and its contractor/transit provider does the following to inform LEP persons of the availability of language assistance services: publishing timetables and route maps in languages other than English, striving to employ multilingual staff, and creating and posting multi-language announcements, posters and other information.

Item # 4 – Description of how the Language Assistance Plan is Monitored and Updated

The Rowan Transit System reviews its plan on an annual basis or more frequently as needed. In particular, RTS will evaluate the information collected on encounters with LEP persons as well as public outreach efforts to determine if adjustments should be made to the delivering of programs and services to ensure meaningful access to minority and LEP persons.

Item # 5 - Description of how Employees are Trained to Provide Language Assistance to LEP Persons

Rowan Transit System employees are oriented on the principles of Title VI and the RTS Language Assistance Plan. New employees will be provided guidance on the needs of clients served and how best to meet their needs. RTS will ensure its contractor/transit provider also educates its staff on Title VI requirements, and specifically LEP provisions.

An important discussion point is that of language assistance. If a driver, dispatcher or employee needs further assistance related to LEP program participants, her/she will work with the Rowan Transit System's Title VI Coordinator and/or its contractor/transit provider to identify strategies to meet the language needs of the participants of the program or service.

As part of our annual check in meeting, if relevant, the Rowan Transit System will meet with its contractor/transit provider to discuss updates of the Rowan Language Assistance Plan.

Section 5: Processing Complaints of Discrimination

Title VI Complaint Procedure

The Rowan Transit System's Title VI Complaint Procedure is made available in the following locations:

- Agency website
- Hard copy in the central office
- Available in appropriate languages for LEP populations, meeting the Safe Harbor Threshold.

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the Rowan Transit System may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

Rowan Transit System investigates complaints received no more than 180 days after the alleged incident. The Rowan Transit System will process complaints that are complete.

Once the complaint is received, the Rowan Transit System will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

The Rowan Transit System has 30 days to investigate the complaint, absent a 15 day extension for extenuating circumstances. If more information is needed to resolve the case, the county may contact the complainant.

The complainant has 7 business days from the date of the letter to send requested information to the investigator assigned to the case.

If the investigator is not contacted by the complainant or does not receive the additional information within 7 business days, the county can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two (2) letters to the complainant: a closure letter or a letter of finding (LOF).

- ✓ A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- ✓ A letter of finding (LOF) summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant wishes to appeal the decision, she/he has 7 days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

If information is needed in Spanish, contact 704-216-8889.
Si se necesita información en español, llame 704-216-8889

Title VI Complaint Form

Rowan Transit System's Title VI Complaint Procedure is made available in the following locations:

- Agency website, either as a reference in the Notice to Public or in its entirety
- Hard copy in the central office
- Available in Spanish

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
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
Section III:				
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.				

Section IV				
Have you previously filed a Title VI complaint with this agency?			Yes	No
Section V				
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:	
Section VI	
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 submit this form in person at the address below, or mail this form to:

Rowan Transit System, Title VI Coordinator
 2726 Old Concord Rd
 Salisbury, NC 28146

Section 6: Transit Related Title VI Investigations, Complaints and Lawsuits

Subrecipient: Rowan County		
Contact Person: Valerie Steele	Signature:	Date:

Check One:

_____ There have been no investigations, complaint and/or lawsuits filed against us during the report period.

_____ There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

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