

TITLE VI PLAN AND PROCEDURES

December 8, 2021

Adopted by Jaunt, Inc. Board of Directors

Next Review: November, 2024



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I. INTRODUCTION

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides 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.” (42 U.S.C. Section 2000d).

The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities of Federal-aid recipients, sub-recipients, and contractors whether those programs and activities are federally funded or not.

Recently, the Federal Transit Administration (FTA) has placed renewed emphasis on Title VI issues, including providing meaningful access to persons with Limited English Proficiency.

Recipients of public transportation funding from FTA and the Virginia Department of Rail and Public Transportation (DRPT) are required to develop policies, programs, and practices that ensure that federal and state transit dollars are used in a manner that is nondiscriminatory as required under Title VI.

This document details how Jaunt, Inc incorporates nondiscrimination policies and practices in providing services to the public. Jaunt Inc’s Title VI policies and procedures are documented in this plan and its appendices and attachments. This plan will be updated periodically (at least every three years) to incorporate changes and additional responsibilities that arise.

II. OVERVIEW OF SERVICES

Jaunt, Inc. is a regional public transportation system providing demand response service to the citizens of Charlottesville and six surrounding counties in Central Virginia. Jaunt serves the elderly, individuals with disabilities, human service agency clients, and the general public.

Jaunt’s service area is oriented north-south primarily along the US 29 and US 15 corridors, and east- west along the I-64 corridor. US 29 and US 15 connect the Charlottesville area with the Washington, DC metropolitan area to the north, while I-64 connects it to the Richmond, Virginia metropolitan area to the east. Jaunt primarily serves the City of Charlottesville (in coordination with Charlottesville Area Transit and University Transit Service) and six surrounding counties: Albemarle, Buckingham, Fluvanna, Louisa, Nelson and Greene.

Jaunt’s service area is approximately 2,500 square miles with a population of over 200,000. Aside from the 37 square mile Charlottesville urbanized area and the Crozet and Lake Monticello urban clusters, the area is rural in nature with scattered populations and dispersed destinations. This presents distinct transportation needs for older adults, people with disabilities, and people with lower incomes.

III. POLICY STATEMENT AND AUTHORITIES

TITLE VI POLICY STATEMENT

Jaunt Inc is committed 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 (PL 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, whether those programs and activities are federally funded or not.

The Jaunt Inc Title VI Manager 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.



~~Ted Reick~~ *Reick*
Chief Executive Officer, Jaunt, Inc.

12/8/21
Date



Randy Parker
Board President, Jaunt, Inc.

12/8/21
Date



Garland Williams
Transit Director, City of Charlottesville, *CHARLOTTESVILLE AREA TRANSIT*

12/14/21
Date

AUTHORITIES

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance (refer to 49 CFR Part 21). The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of the terms “programs or activities” to include all programs or activities of Federal Aid recipients, sub recipients, and contractors, whether such programs and activities are federally assisted or not.

Additional authorities and citations include: Title VI of the Civil Rights Act of 1964 (42 U.S.C. Section 2000d); Federal Transit Laws, as amended (49 U.S.C. Chapter 53 et seq.); Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601, et seq.); Department of Justice regulation, 28 CFR part 42, Subpart F, “Coordination of Enforcement of Nondiscrimination in Federally-Assisted Programs” (December 1, 1976, unless otherwise noted); U.S. DOT regulation, 49 CFR part 21, “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964” (June 18, 1970, unless otherwise noted); Joint FTA/Federal Highway Administration (FHWA) regulation, 23 CFR part 771, “Environmental Impact and Related Procedures” (August 28, 1987); Joint FTA/FHWA regulation, 23 CFR part 450 and 49 CFR part 613, “Planning Assistance and Standards,” (October 28, 1993, unless otherwise noted); U.S. DOT Order 5610.2, “U.S. DOT Order on Environmental Justice to Address Environmental Justice in Minority Populations and Low-Income Populations,” (April 15, 1997); U.S. DOT Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Persons, (December 14, 2005), and Section 12 of FTA’s Master Agreement, FTA MA 13 (October 1, 2006).

IV. NONDISCRIMINATION ASSURANCES TO DRPT


In accordance with 49 CFR Section 21.7(a), every application for financial assistance from the Federal Transit Administration (FTA) must be accompanied by an assurance that the applicant will carry out the program in compliance with DOT’s Title VI regulations. This requirement is fulfilled when the Virginia Department of Rail and Public Transportation (DRPT) submits its annual certifications and assurances to FTA. DRPT shall collect Title VI assurances from sub-recipients prior to passing through FTA funds.

As part of the Certifications and Assurances submitted to DRPT with the Annual Grant Application and all Federal Transit Administration grants submitted to the DRPT, Jaunt Inc submits a Nondiscrimination Assurance which addresses compliance with Title VI as well as nondiscrimination in hiring (EEO) and contracting (DBE), and nondiscrimination on the basis of disability (ADA).

In signing and submitting this assurance, Jaunt Inc confirms to DRPT the agency’s commitment to nondiscrimination and compliance with federal and state requirements.

V. PLAN APPROVAL DOCUMENT

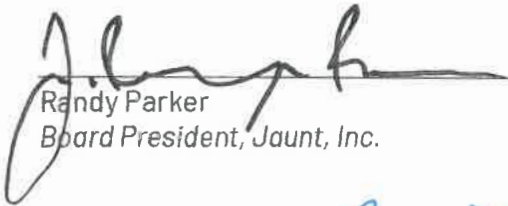
I hereby acknowledge the receipt of the Jaunt Inc Title VI Implementation Plan. I have reviewed and approve the Plan. I am committed to ensuring that no person is excluded from participation in, or denied the benefits of Jaunt Inc's transportation services on the basis of race, color, or national origin, as protected by Title VI according to Federal Transit Administration (FTA) Circular 4702.1B Title VI requirements and guidelines for FTA sub-recipients.



Ted Reich
Chief Executive Officer, Jaunt, Inc.

12/8/21


Date



Randy Parker
Board President, Jaunt, Inc.

12/8/21

Date



Garland Williams
Transit Director, City of Charlottesville, CHARLOTTESVILLE AREA TRANSIT

12/14/21

Date

VI. ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES

The Jaunt Inc'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. Specific areas of responsibility have been delineated below for purposes of clarity.

OVERALL ORGANIZATION FOR TITLE VI

The Title VI Manager and staff are responsible for coordinating the overall administration of the Title VI program, plan, and assurances, including complaint handling, data collection and reporting, annual review and updates, and internal education.

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 agency programs, (e.g., affected citizens, and impacted communities).
3. Conduct annual Title VI reviews of agency to determine the effectiveness of program activities at all levels.
4. Conduct Title VI reviews of construction contractors, consultant contractors, suppliers, and other recipients of federal-aid fund contracts administered through the agency.
5. Conduct training programs on Title VI and other related statutes for agency employees.
6. Prepare a yearly report of Title VI accomplishments and goals, as required.
7. Develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English.
8. Identify and eliminate discrimination.
9. Establish procedures for promptly resolving deficiency status and writing the remedial action necessary, all within a period not to exceed 90 days.

GENERAL TITLE VI RESPONSIBILITIES OF THE AGENCY

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, Jaunt, Inc 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, including coordination with community- and faith-based organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities.

2. Annual Report and Updates

As a sub-recipient of FTA funds, Jaunt Inc is required to submit a Quarterly Report Form to DRPT that documents any Title VI complaints received during the preceding quarter and for each year. Jaunt Inc will also maintain and provide to DRPT an annual basis, 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 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) 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 agency 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 agency's Title VI program to assure implementation of the Title VI plan. In addition, they will review agency operational guidelines and 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 agency 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 LEP 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 non-discrimination requirements. Jaunt Inc will report the complaint to DRPT within three business days (per DRPT requirements), and make a concerted effort to resolve complaints locally, using the agency's Title VI Complaint Procedures. All Title VI complaints and their resolution will be logged as described under Section 1. Data collection and reported annually (in addition to immediately) to DRPT.

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 to incorporate changes and additional responsibilities that arise. During the course of the Annual Title VI Program Review (item 3 above), the Title VI Manager will determine whether or not an update is needed.

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, training will be provided when any Title VI-related policies or procedures change (agency-wide training), or when appropriate in resolving a complaint. Title VI training is the responsibility of the Training Manager.

8. Title VI clauses in contracts

In all federal procurements requiring a written contract or Purchase Order (PO), Jaunt Inc's contract/PO will include appropriate non-discrimination clauses. The Title VI Manager will work with the Chief Executive Officer, Chief Operating Officer, IT Manager, and Marketing Manager who is/are responsible for procurement contracts and PO's to ensure appropriate non-discrimination clauses are included.

VII. PROCEDURES FOR NOTIFYING THE PUBLIC OF TITLE VI RIGHTS AND HOW TO FILE A COMPLAINT

REQUIREMENT TO PROVIDE A TITLE VI PUBLIC NOTICE

Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, Jaunt Inc shall disseminate this information to the public by posting a Title VI notice on the agency's

website and in public areas of the agency's office(s), including the reception desk, meeting rooms, and revenue service vehicles or by contacting the Jaunt Title VI Manager at 104 Keystone Place, Charlottesville, VA 22902 or via email at Title6@rideJaunt.org or (434) 296-3184.

TITLE VI COMPLAINT PROCEDURES

Requirement to Develop Title VI Complaint Procedures and Complaint Form.

In order to comply with the reporting requirements established in 49 CFR Section 21.9(b), all recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. Recipients must also develop a Title VI complaint form. The form and procedure for filing a complaint shall be available on the recipient's website and at their facilities.

Any individual may exercise his or her right to file a complaint with Jaunt Inc if that person believes that he or she has been subjected to unequal treatment or discrimination in the receipt of benefits or services. We will report the complaint to DRPT within three business days (per DRPT requirements), and make a concerted effort to resolve complaints locally, using the agency's Nondiscrimination Complaint Procedures. All Title VI complaints and their resolution will be logged and reported annually (in addition to immediately) to DRPT.

A person may also file a complaint directly with the Federal Transit Administration, Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th floor – TCR, 1200 New Jersey Avenue SE, Washington, DC 20590.

Jaunt Inc includes the following language on all printed information materials, on the agency's website, in press releases, in public notices, in published

documents, and on posters on the interior of each vehicle operated in passenger service:

Jaunt Inc is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services on the basis of race, color or national origin, as protected by Title VI in the Federal Transit Administration (FTA) Circular 4702.1B. For additional information on Jaunt Inc's nondiscrimination policies and procedures, or to file a complaint, please visit the website at www.rideJaunt.org or contact the Title VI Manager, 104 Keystone Place Charlottesville, VA 22902; 434-296-3184; title6@rideJaunt.org.

Instructions for filing Title VI complaints are posted on the agency's website and in posters on the interior of each revenue service vehicle operated in passenger service, agency's facility, and included within Jaunt Inc's brochures.

A copy of Jaunt Inc's Title VI Complaint Form is attached as APPENDIX B.

Procedures for Handling and Reporting Investigations/ Complaints and Lawsuits

Should any Title VI investigations be initiated by FTA or DRPT, or any Title VI lawsuits are filed against Jaunt Inc, the agency will follow these procedures:

Procedures

1. Any individual, group of individuals, or entity that believes they have been subjected to discrimination on the basis of race, color, or national origin may file a written complaint with the Title VI Manager. The complaint is to be filed in the following manner:
 - a. A formal complaint must be filed within 180 calendar days of the alleged occurrence.
 - b. The complaint shall be in writing and signed by the complainant(s).
 - c. The complaint should include:
 - the complainant’s name, address, and contact information (i.e., telephone number, email address, etc.)
 - the date(s) of the alleged act of discrimination (if multiple days, include the date when the complainant(s) became aware of the alleged discrimination and the date on which the alleged discrimination was discontinued or the latest instance).
 - a description of the alleged act of discrimination
 - the location(s) of the alleged act of discrimination (include vehicle number if appropriate)
 - an explanation of why the complainant believes the act to have been discriminatory on the basis of race, color, and national origin
 - if known, the names and/or job titles of those individuals perceived as parties in the incident
 - contact information for any witnesses
 - indication of any related complaint activity (i.e., was the complaint also submitted to DRPT or FTA?)
 - d. The complaint shall be submitted to the Jaunt Inc Title VI Manager at 104 Keystone Place Charlottesville, VA 22902 or title6@rideJaunt.org.
 - e. Complaints received by any other employee of Jaunt, Inc will be immediately forwarded to the Title VI Manager.
 - f. In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the Title VI Manager. Under these circumstances, the complainant will be interviewed, and the Customer Services Representative will assist the complainant in converting the verbal allegations to writing.
2. Upon receipt of the complaint, the Title VI Manager will immediately:
 - a. notify DRPT (no later than 3 business days from receipt)
 - b. notify the Jaunt Inc Chief Executive Officer
 - c. ensure that the complaint is entered in the complaint database
3. Within 3 business days of receipt of the complaint, the Title VI Manager will contact the complainant by telephone to set up an interview.
4. The complainant will be informed that they have a right to have a witness or representative present during the interview and can submit any documentation he/she perceives as relevant to proving his/her complaint.
5. If DRPT has assigned staff to assist with the investigation, the Title VI Manager will offer an opportunity to participate in the interview.
6. The alleged discriminatory service or program official will be given the opportunity to respond to all aspects of the complainant’s allegations.
7. The Title VI Manager will determine, based on relevancy or duplication of evidence, which witnesses will be contacted and questioned.
8. The investigation may also include:
 - a. investigating contractor operating records, policies or procedures
 - b. reviewing routes, schedules, and fare policies
 - c. reviewing operating policies and procedures
 - d. reviewing scheduling and dispatch records
 - e. observing behavior of the individual whose actions were cited in the complaint

9. All steps taken and findings in the investigation will be documented in writing and included in the complaint file.
10. The Title VI Manager will contact the complainant at the conclusion of the investigation, but prior to writing the final report, and give the complainant an opportunity to give a rebuttal statement at the end of the investigation process.
11. At the conclusion of the investigation and within 60 days of the interview with the complainant, the Title VI Manager will prepare a report that includes a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition. This report will be provided to the Chief Executive Officer, DRPT, and, if appropriate, Jaunt Inc's legal counsel.
12. The Title VI Manager will send a letter to the complainant notifying them of the outcome of the investigation. If the complaint was substantiated, the letter will indicate the course of action that will be followed to correct the situation. If the complaint is determined to be unfounded, the letter will explain the reasoning, and refer the complainant to DRPT in the event the complainant wishes to appeal the determination. This letter will be copied to DRPT.
13. A complaint may be dismissed for the following reasons:
 - a. The complainant requests the withdrawal of the complaint.
 - b. An interview cannot be scheduled with the complainant after reasonable attempts.
 - c. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
14. DRPT will serve as the appealing forum to a complainant that is not satisfied with the outcome of an investigation conducted by Jaunt Inc. DRPT will analyze the facts of the case and will issue its conclusion to the appellant according to their procedures.

TRANSPORTATION-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

Background

All recipients shall prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the recipient.

This list shall include the date that the transportation-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program submitted to DRPT every three years and information shall be provided to DRPT quarterly and annually.

SEE APPENDIX C- Investigations, Lawsuits and Complaints Document

PUBLIC OUTREACH AND INVOLVEMENT

PUBLIC PARTICIPATION PLAN

The Public Participation Plan (PPP) is a guide for ongoing public participation endeavors. Its purpose is to ensure that Jaunt, Inc. utilizes effective means of providing information and receiving public input on transportation decisions from low income, minority, and limited English proficient (LEP) populations, as required by Title VI of the Civil Rights Act of 1964 and its implementing regulations.

Under federal regulations, transit operators must take reasonable steps to ensure that Limited English Proficient (LEP) persons have meaningful access to their programs and activities. This means that public participation opportunities, normally provided in English, should be accessible to persons who have a limited ability to speak, read, write, or understand English.

In addition to language access measures, other major components of the PPP include: public participation design factors; a range of public participation methods to provide information, to invite participation and/or to seek input; examples to demonstrate how population-appropriate outreach methods can be and were identified and utilized; and performance measures and objectives to ensure accountability and a means for improving over time.

Jaunt, Inc established a public participation plan or process that will determine how, when, and how often specific public participation activities should take place, and which specific measures are most appropriate.

Jaunt, Inc will make these determinations based on a demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, and the resources available. Efforts to involve minority and LEP populations in public participation activities may include both comprehensive measures, such as placing public notices at all transit stations, stops, and vehicles, as well as targeted measures to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in our decision-making process.

- a. Jaunt, Inc will hold two public hearings per calendar year to give the public an open forum opportunity to express questions and comments. The public hearings will be hosted by Jaunt Inc. staff and will be held at locations that are wheelchair accessible. All public hearings will be advertised in the local newspapers and on Jaunt Inc.'s Facebook page no less than 30 calendar days before the scheduled public hearing. Each advertisement will state the date, time, and place of the public hearing. All public hearings will be held in locations providing complete handicap accessibility and in locations centrally located in the community to provide easy access to all residents. All public hearings will begin and be completed within timeframes when Jaunt Inc. is in operation, making the hearing more accessible to persons who require public transportation to attend the hearing.

- b. Jaunt Inc. utilizes social media to distribute information to the public. All relevant information is channeled through the social platform and can be viewed and commented on by Facebook users. The Facebook page encourages comments and questions on all topics. Facebook users are able to comment or direct message Jaunt Inc. at any time. Responses to comments and questions will be answered by the close of the following business day. Feedback is openly encouraged on the Facebook page.
- c. Jaunt Inc. will host two webinars per calendar year. Hosting webinars have proven to be a powerful tool to reach a large audience. With webinars, Jaunt Inc. is not limited to one location to reach residents. Viewers can watch and comment on a webinar using their smartphone, tablet, or computer at any location. Jaunt Inc. will host the webinars and discuss transportation related topics that will aim to solicit public participation and generate conversations between residents in Jaunt Inc.'s service area and Jaunt Inc. staff. All webinars will be advertised in the local newspapers and on Jaunt Inc.'s Facebook page no less than 30 calendar days before the scheduled webinar.
- d. Jaunt Inc. has staff members who attend community fairs and events. At these events, staff set up a table and distributes service guides and informational flyers. Jaunt Inc. staff initiates conversations with community residents and answers all questions or comments received. Outreach at community events is an effective and efficient way to reach a wide audience. Jaunt Inc. staff members attend community events that are hosted by local nonprofits and human service agencies in Jaunt Inc.'s service region.

SEE APPENDIX D-Summary of Outreach Efforts

VIII. LANGUAGE ASSISTANCE PLAN FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY (LEP)

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 Jaunt, Inc is based on FTA guidelines.

As required, Jaunt, Inc developed a written LEP Plan (below). Using 2010 and American Community Survey (ACS) Census data, Jaunt, Inc has evaluated data to determine 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

The need and resources for LEP language assistance were determined through a four-factor analysis as recommended by FTA guidance.

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

The agency has reviewed census data on the number of individuals in its service area 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 by Jaunt's service area. The agency's service area includes a total of 3,310 (1.46%) persons with Limited English Proficiency (those persons who indicated that they spoke English "less than very well" in the 2011-2015 ACS Census).

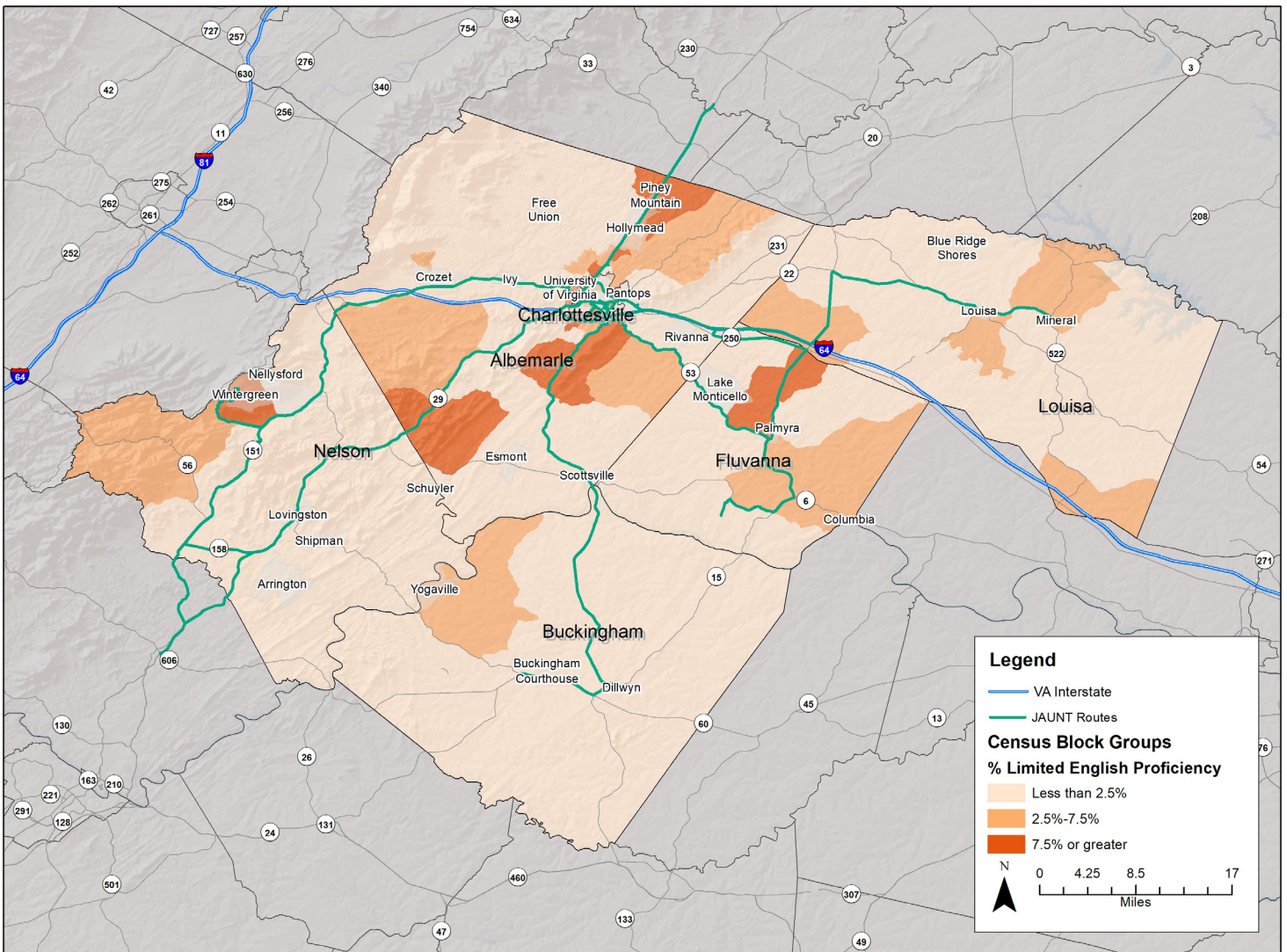
Information from the 2011-2015 ACS also provides more detail on the specific languages that are spoken by those who report that they speak English less than very well. Languages spoken at home by those with LEP are presented below. These data indicate the extent to which translations into other language are needed to meet the needs of LEP persons.

Table 1 – LEP by Language Spoken

Language	Number of LEP Population	Percent of Service Area Population Speaking Language	Percent of LEP Population Speaking Language
Spanish or Spanish Creole	3,310	1.46%	44.76%
Chinese	684	0.30%	9.25%
Arabic	485	0.21%	6.56%
Other Asian Languages	382	0.17%	5.17%
Korean	271	0.12%	3.66%
Other Indic Languages	269	0.12%	3.64%
Persian	263	0.12%	3.56%
German	237	0.10%	3.20%
French Creole	212	0.09%	2.87%
French	204	0.09%	2.76%
African languages	152	0.07%	2.06%
Serbo-Croatian	137	0.06%	1.85%
Thai	133	0.06%	1.80%
Russian	129	0.06%	1.74%
Hindi	66	0.03%	0.89%
Tagalog	57	0.03%	0.77%
Other West Germanic Languages	54	0.02%	0.77%
Japanese	46	0.02%	0.62%
Italian	41	0.02%	0.55%
Gujarati	39	0.02%	0.53%
Hebrew	38	0.02%	0.51%
Other Slavic languages	31	0.01%	0.42%
Other Indo-European languages	29	0.01%	0.39%
Scandinavian languages	24	0.01%	0.32%
Urdu	23	0.01%	0.31%
Greek	19	0.01%	0.26%
Vietnamese	19	0.01%	0.26%
Portuguese or Portuguese Creole	17	0.01%	0.23%
Armenian	17	0.01%	0.23%
Polish	5	0.00%	0.07%
Other and unspecified languages	1	0.00%	0.01%
Other Native North American languages	1	0.00%	0.01%
Total LEP Population	7,395	3.26%	
Total Service Area Population	226,988		

Spanish or Spanish Creole (3,310) is the most widely spoken language among LEP individuals in the Service Area. No other language group surpasses the Safe Harbor Provision. Figure 1 shows the percentage of LEP individuals in each Census Block Group. There are higher percentages around Charlottesville, as well as in the counties of Fluvanna, Albemarle, and Nelson.

Figure 1 - % LEP by Census Block Group



Factor 2: Assessment of Frequency with Which LEP Individuals Come Into Contact with the Transit Services or System

Jaunt, Inc reviewed the relevant benefits, services, and information provided by the agency and determined the extent to which LEP persons have come into contact with these functions through the following channels:

- Contact with transit vehicle operators;
- Calls to Jaunt’s customer service telephone line;
- Visits to the agency’s office;
- Access to the agency’s website;
- Attendance at community meetings or public hearings hosted by Jaunt, Inc;

Additionally, Jaunt employs a Spanish-speaking Customer Service Representative that answers calls to the Spanish language line.

Finally, Jaunt provides each driver and front-end staff with a language identification card and information to Jaunt’s language translation line.

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. To assist in language identification, we use a language identification flashcard based on that which was developed by the U.S. Census. (<http://www.lep.gov/ISpeakCards2004.pdf>) Further, tablets assigned to each bus are loaded with the Google Translate app.

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

Jaunt, Inc provides the following programs, activities and services:

- ADA Paratransit in Charlottesville, Albemarle County
- Albemarle County rural demand response
- Fluvanna County to Charlottesville
- Nelson County to Charlottesville
- Louisa County to Charlottesville
- Buckingham County to Charlottesville

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.

ADA Paratransit in Charlottesville, Albemarle County
Albemarle County rural demand response

The following are the most critical services provided by Jaunt, Inc for all customers, including LEP persons.

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

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

Costs

The following language assistance measures currently being provided by Jaunt, Inc:

- Bilingual Customer Service Representative – paid \$35,320/year; Employee spends approximately 25% of their day speaking with LEP person
- Language training to Jaunt’s Mobility Manager – Rosetta Stone (\$1,000) and private tutoring (\$2,500)
- Translation of schedules and public documents – \$1,900 was spent in FY18
- Multilingual telephone assistance services – \$435 was spent in FY18 (it is a cost per-use basis), staff is not needed to manage this service

We anticipate that these activities and costs will increase as follows.

- Bilingual Customer Service Representative – Annual salary will increase 3-5% to maintain competitive fair market value
- Language training to Jaunt’s Mobility Manager – Training costs to maintain language proficiency to remain \$3,500/year
- Translation of schedules and public documents – Anticipate this requirement increasing by 30% to accommodate additional documents to be translated
- Multilingual telephone assistance services – Anticipate this service remaining the same.

Based on the analysis of demographic data and contact with community organizations and LEP persons, Jaunt, Inc has determined that no additional services are ideally needed to provide meaningful access.

Resources

There are no additional financial resources available to expand language assistance. This amount is likely to be stable over time.

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:

- **Translation of vital documents into Spanish**
- **Language Line Translation Services for telephone contacts**

LEP IMPLEMENTATION PLAN

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

- Translation of vital documents into Spanish. These documents include:
 - Locality service brochures and Ride Guide
 - Application for reduced fare
 - All printed materials on ADA Paratransit, including brochure, eligibility application package, and passenger policies and procedures
- Attempt to hire bilingual staff with competency in spoken and written Spanish
- Language Line Translation Services

Agency staff who come into contact with LEP persons can access language services by offering the individual a language identification flashcard, having a supply of Spanish translated documents on hand, transferring a call to bilingual staff, and having a telephone menu allowing the customer to pre-select Spanish. All front-end staff are provided with a list of available language assistance services. This list is updated at least annually.

Responding to LEP Callers

Staff who answer calls from the public respond to LEP customers as follows:

- Upon calling the main number, callers may choose the option to select Spanish and are transferred to bilingual staff.
- If non-bilingual staff answer the phone for a Spanish-speaking customer, they are transferred to bilingual staff.
- If bilingual staff are not available or the caller speaks a language other than Spanish, staff will call the language line for translation assistance.
- LEP customers are able to schedule trips by using bilingual staff or translation assistance from the language line.

Responding to LEP Individuals in Person

The following procedures are followed when a LEP person visits our customer service and administrative office:

- Upon entry into the building the receptionist will contact bilingual staff.
- If the LEP customer speaks a language other than Spanish or bilingual staff are unavailable, the receptionist will use the language identification card to identify the language and call the language translation line for assistance.

The following procedures are followed by operators when an LEP person has a question on board a Jaunt, Inc vehicle: Each operator has an iSpeak card to help identify the spoken language. Once identified, the operator may choose to call the Language Line to conference in an interpreter, or to use the Google Translate on his/her tablet.

Staff Training

As noted previously, all Jaunt, Inc 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. This includes:

- A summary of the transit agency's responsibilities under the DOT LEP Guidance;
- A summary of the agency's language assistance plan;
- 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.

Also, all staff who routinely come into contact with customers, as well as their supervisors and all management staff, receive annual refresher training on policies and procedures related to assisting LEP persons at Jaunt, Inc's annual Spring Roadeo.

When financial resources are available, Spanish language training is provided to interested staff through local Spanish tutoring organizations.

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.
- on our website, with links to translations of vital documents
- through signs posted on our vehicles
- through ongoing outreach efforts to community organizations, schools, and religious organizations noted in Jaunt Inc's Public Participation Plan.
- use of an automated telephone menu system in the most common languages encountered.
- 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, Jaunt, Inc will solicit feedback on the effectiveness of language assistance provided and unmet needs. In addition, we will conduct periodic surveys of staff to understand which languages they encounter, review language line assistance and languages provided, and feedback through the Public Participation Plan of the adequacy and quality of the language assistance provided, and determine changes to LEP needs.

In preparing the triennial update of this plan, Jaunt, Inc 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." [This checklist is attached at the end of this plan.]

Based on the feedback received from community members and agency employees, Jaunt, Inc 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 Jaunt, Inc will attempt to identify the most cost-effective approaches.

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

MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES

Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, "deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program."

Jaunt, Inc has one board, the Board of Directors, for which membership is appointed.

1. Jaunt, Inc's Board of Directors is appointed by the governing localities it serves. Their appointment process requires residents to submit applications for City Council or Board of Supervisor approval.
2. See Appendix E – Table of Minority Representation on Committees By Race

IX. REQUIREMENTS OF TRANSIT PROVIDERS

REQUIREMENTS AND GUIDELINES FOR FIXED ROUTE TRANSIT PROVIDERS

The requirements apply to all providers of fixed route public transportation (also referred to as transit providers) that receive Federal financial assistance, inclusive of States, local and regional entities, and public and private entities.

Transit providers that are sub-recipients will submit the information to their primary recipient (the entity from whom they directly receive transit funds) every three years on a schedule determined by the primary recipient. The requirements are scaled based on the size of the fixed route transit provider.

REQUIRED: Service Standards and Policies

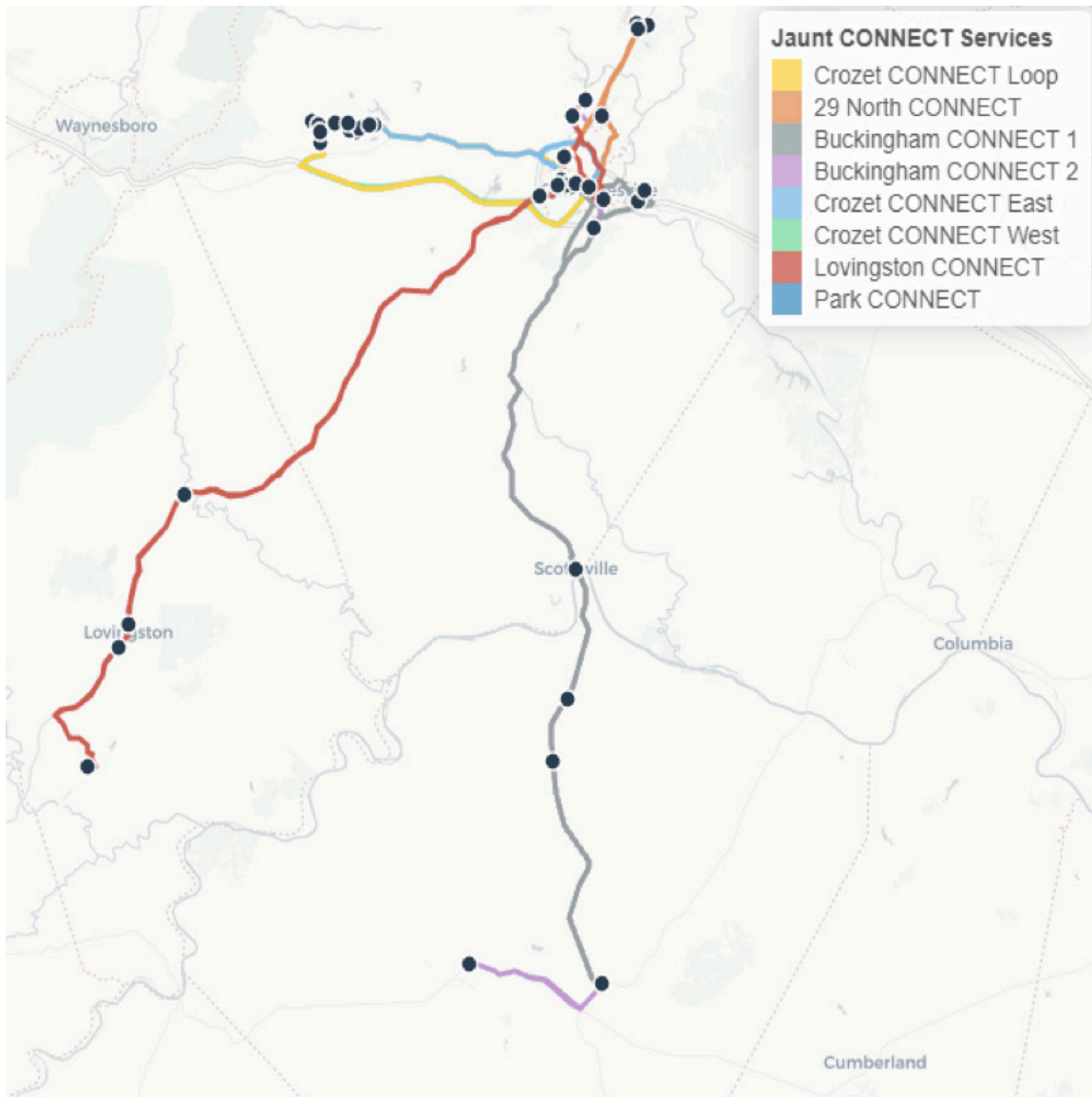
- Service Standards
 - Vehicle load, Vehicle headway, On-time performance, Service availability
- Service Policies
 - Transit amenities, Vehicle assignment

Jaunt, Inc. is required 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. Jaunt, Inc. has reviewed its services and policies 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 that address how services are distributed across the transit system service area to ensure that the distribution affords users equitable access to these services. As shown in the following maps, the agency's regional connections affords the opportunity for rural citizens to access important resources in the City of Charlottesville such as, work, healthcare, and day programs for seniors and people with disabilities. The agency's demand responsive services are available to all callers on a first-come first-served basis, without regard for race, color or national origin.

The following system-wide service standards are used to guard against service design or operations decisions from having disparate impacts. All of Jaunt, Inc'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 1, all of Jaunt, Inc's services meet this standards

Jaunt operates only a single mode – Bus:

Vehicle	Capacity	Load Factor	Standees
Chevy BOC	18	1	0
Chevy BOC	16	1	0
Ford BOC	16	1	0
Ford BOC	18	1	0
Ford Supreme	28	1	0
ARBOC	21	1	0

Load standards are thresholds of the ratio of passengers on board to seats available.

- **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 45 minutes, all of Jaunt, Inc'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 80%, all of Jaunt Inc'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. Jaunt designed its routes to meet community needs. Riders may meet the bus at a variety of locations within the service area which maximizes ridership with consideration of convenience. All of Jaunt's services meet this standard.

Service and Operating Policies

The Jaunt's 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. Jaunt, Inc 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). Jaunt's regional routes have limited stops and therefore limited amenities.

- **Vehicle assignment** - Vehicle assignment refers to the process by which transit vehicles are placed into service and on routes throughout the system. Jaunt, Inc 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 Operations Supervisor 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.
 - Vehicles are assigned in order to have the capacity to meet the demand of the route. Jaunt Inc's fleet is assessed on an annual basis. Any vehicle that has reached 100,000 miles or has aged 5 years is identified for replacement. Jaunt Inc purchases new vehicles each year. Jaunt Inc uses larger capacity vehicles on its Buckingham regional service in response to demand. The ARBOC transit vehicles are used primarily on rural regional connections in order to offer higher capacity on routes that do not require reservations. ALL of Jaunt's fleet is completely wheelchair accessible.

Monitoring Title VI Complaints

As part of the complaint handling procedure, the Title VI Manager investigates 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 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 DRPT.

Fare and Service Changes

Jaunt, Inc follows its adopted written policy for the public comment process for major service reductions and fare increases. With each proposed service or fare change, Jaunt, Inc considers the relative impacts on, and benefits to, minority and low income populations, including LEP populations. All planning efforts for changes to existing services or fares, as well as new services, have a goal of providing equitable service. This analysis is also conducted for service and fare changes planned for in Jaunt, Inc's Transportation Development Plan also include this equity analysis.

APPENDIX A

TITLE VI NOTICE TO THE PUBLIC, LIST OF LOCATIONS

To ensure Jaunt has provided adequate notice to the public regarding its Title VI plan and policies the following are the locations the notice is posted:

- On Jaunt's website
- All Jaunt revenue service vehicles
- Jaunt main headquarters where the public has access (reception area, conference room, and drivers workspace)

APPENDIX B

TITLE VI COMPLAINT FORM

Please provide the following information in order to process your complaint. Assistance is available upon request. Complete this form and mail or deliver to:

Title VI Compliance Officer, Jaunt, Inc, 104 Keystone Place Charlottesville, VA 22902

You can reach our office Monday-Friday from 8:00 am to 4:30 pm at 434.296.3184, or you can email the Title VI Compliance Officer at Title6@rideJaunt.org.

Complainant's Name: _____

Complete Address: _____

Telephone Number (home): _____ **(business):** _____

Email Address: _____

Person Discriminated Against (if other than complainant): _____

Complete Address: _____

Telephone Number: _____

The name and address of the agency, institution, or department you believe discriminated against you.

Name: _____ **Date of incident:** _____

Complete Address: _____

Identify the category of discrimination:

Race

Color

National Origin

Describe how you were discriminated against. What happened and who was responsible? If additional space is required, please attach extra sheets to form:

Does this complaint involve a specific individual(s) associated with Jaunt, Inc? If yes, please provide the name(s) of the individual(s), if known:

Where did the incident take place: _____

Are there any witnesses? If so, please provide their contact information: Yes No

Name: _____ **Telephone Number:** _____

Complete Address: _____

Name: _____ **Telephone Number:** _____

Complete Address: _____

Did you file this complaint with another federal, state or local agency; or with a federal or state court?

Yes No

If answer is Yes, check each agency complaint was filed with:

Federal Agency State Agency Local Agency
 Federal Court State Court Other

Please provide contact person information for the agency you also filed the complaint with:

Name: _____ **Telephone Number:** _____

Complete Address: _____

Sign the complaint in the space below. Attach any documents you believe support your complaint.

Complainant's Signature: _____ **Date** _____

APPENDIX C

INVESTIGATIONS, LAWSUITS, AND COMPLAINTS DOCUMENT

	DATE (month, date, year)	SUMMARY (include basis of complaint: race, color or national origin)	STATUS	ACTION(S) TAKEN
Investigations				
Lawsuits				
Complaints				

2015 complaints – zero (0)

2016 complaints – zero (0)

2017 complaints – zero (0)

2018 complaints – zero (0)

2019 complaints – zero (0)

APPENDIX D

SUMMARY OF OUTREACH EFFORTS

MEETING / AUDIENCE	DATE	LOCATION	AGENCY (i.e. single, joint)
CAT/Jaunt Public Meeting	October 12th and 13th	CitySpace, Charlottesville	CAT/Jaunt
Jaunt IAC Meeting 1 - Nelson	September 18th	Nelson Center, Lovingston	Jaunt
Jaunt Stakeholder Meeting	October 12th	Jaunt offices	Jaunt
Jaunt IAC 2	October 12th	Louisa County Office Building, Louisa	Jaunt
Jaunt IAC 3	November 2nd	Fluvanna County Social Services	Jaunt

APPENDIX E

TABLE – MINORITY REPRESENTATION ON COMMITTEES BY RACE

Jaunt, Inc has one board, the Board of Directors, for which membership is appointed. Jaunt, Inc’s Board of Directors is appointed by the governing localities it serves. Their appointment process requires residents to submit applications for City Council or Board of Supervisor approval.

COMMITTEE	BLACK OR AFRICAN AMERICAN	WHITE / CAUCASIAN	LATINO / HISPANIC	AMERICAN INDIAN OR ALASKA NATIVE	ASIAN	NATIVE HAWAIIAN OR OTHER PACIFIC ISLANDER	OTHER	TOTALS
Jaunt Board of Directors	2	11	0	0	0	0	0	13
% of Board of Directors	15%	85%	0%	0%	0%	0%	0%	100%
Availability in service area	13%	81%	2%	0%	3%	0%	1%	100%

APPENDIX F

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

Language Assistance Monitoring Checklist

Periodic monitoring of language assistance measures that have been implemented can help an agency determine if assistance is being provided competently and effectively. Agencies can use the following checklist to monitor their services. Actual monitoring should be tailored to what services the agency has implemented. Depending on the language assistance provided, the following questions could be answered by periodic monitoring:

Stations

- Are translated instructions on how to make fare payments available?
- Are translated schedules, route maps, or information on how to use the system available?
- Has the information been placed in a visible location?
- How many units of the material have been distributed?
- If such information is available, are station managers aware that they have this information?
- Are announcements audible?
- Are any announcements, such as security awareness announcements, made in languages other than English?
- Does the station display information or instructions using pictographs?
- Can a person who speaks limited English or another language receive assistance from a station manager when asking for directions? How is this assistance provided?

Vehicles

- Are translated instructions on how to make fare payments available?
- Are translated schedules, route maps, or information on how to use the system available?
- Has the information been placed in a visible location?
- How many units of the material have been distributed?
- If such information is available, are vehicle operators aware that they have this information?
- Are announcements audible?
- Are any announcements, such as security awareness announcements, made in languages other than English?
- Can a person who speaks limited English or another language receive assistance from a bus operator when asking about the destination of the vehicle? How is this assistance provided?

Customer Service

- Is the customer service telephone line equipped to handle callers speaking languages other than English?
- Can customer service representatives describe to a caller what language assistance the agency provides and how to obtain translated information or oral interpretation?
- Can a person speaking limited English or a language other than English request information from a customer service representative?

Community Outreach

- Are translators present at community meetings?
- Are translated versions of any written materials that are handed out at a meeting provided?
- Can members of the public provide oral as well as written comments?

Press/Public Relations

- Are meeting notices, press releases, and public service announcements translated into languages other than English?
- Does the agency website have a link to translated information on its home page?