



## **Charlottesville Area Transit**

### **Title VI Plan**

**December 1, 2022 – November 30, 2025**

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<b>Table of Contents</b>	<b>Page</b>
Introduction	3
Authorities	4
Title VI Policy Statement	4
Notification & Disseminations of CAT’s Title VI Obligations	5
Title VI Notice to the Public – English	6
Title VI Notice to the Public – Spanish	7
Title VI Complaint Procedures	8
Title VI Investigations, Complaints, & Lawsuits	9
Public Participation Plan	9
Transit Advisory Board	11
Subrecipient Title VI Oversight	12
Governing-Body Approval of Title VI Plan	13
Limited English Proficiency Plan	13
Community Outreach Plan	18
Equity Analysis (New Facility Projects)	20
System-Wide Service Standards and Policies	20
<b>Attachments</b>	<b>34</b>
A. Title VI Annual Employee Education Policy Form	35
B. Employee Acknowledgement of Receipt of Title VI Policy	36
C. Civil Rights Discrimination Complaint Form – English	37
D. Civil Rights Discrimination Complaint Form – Spanish	39
E. Acknowledgment Letter of Receipt of Title VI Complaint	41
F. Notification to Complainant that the Title VI Complaint is Substantiated	42
G. Notification to Complainant that the Title VI Complaint is Not Substantiated	43
H. Governing Body Approval of Title VI Plan	44
I. CAT Staff Survey: Frequency of Contact by LEP Persons with CAT Services	45

## Introduction

Charlottesville Area Transit (hereafter referred to as “CAT”) provides fixed-route public transportation for the City of Charlottesville, Virginia, and a very limited portion of surrounding Albemarle County. CAT is a department of the City of Charlottesville. The aggregate square miles which CAT serves in Albemarle County’s urban ring is 13 square miles out of a total area of 726 square miles, or 1.8% of the total county. CAT is a “small transit” system with 13 transit routes and 36 revenue vehicles. CAT serves a population of 62,500.

As a direct recipient of Federal Transit Administration (FTA) funds, CAT is required to submit a Title VI Program to FTA Region II, Regional Civil Rights Officer every three years. The Title VI Program plan highlights CAT’s compliance with Title VI of the Civil Rights Act of 1964 that prohibits discrimination on the basis of race, color, or national origin in programs or activities receiving federal financial assistance. Title VI also directs CAT to assist persons who have Limited English Proficiency to access the transit system.

CAT wholeheartedly adopts Title VI requirements into its programs, activities, and services. CAT is committed to achieving full compliance and expects every manager, supervisor, employee, and the subrecipient JAUNT, to be aware of and apply the intent of Title VI and related nondiscrimination statutes in performing assignments.

The Title VI Program objectives, are to:

- Ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner,
- Promote full and fair participation in public transportation decision making without regard to race, color, or national origin, and
- Ensure meaningful access to transit related programs and activities by persons with limited English proficiency.

In accordance with 49 Code of Federal Regulations (CFR), Section 21.7(a), CAT submits annual Certifications and Assurances with every application for financial assistance from FTA, signed by Charlottesville’s City Attorney, committing that CAT will carry out its activities and programs in compliance with Title VI obligations.

CAT has one subrecipient of FTA 5307 funds. JAUNT provides Americans with Disability Act (ADA) Complimentary Paratransit Services on behalf of CAT. JAUNT is also required to comply with the FTA mandated rules and regulations, including Title VI. CAT monitors JAUNT to properly satisfy the FTA Civil Rights obligation of compliance.

**Upon request, alternative formats of this document will be produced upon request. Please call (434) 970-3313 or TTY 711 (RELAY) or email [herringb@charlottesville.gov](mailto:herringb@charlottesville.gov)**

# **Authorities**

## **STATUTORY AUTHORITY**

Section 601 of Title VI of the Civil Rights Act of 1964 states the following: “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”.

## **REGULATORY AUTHORITY**

The U.S. Department of Justice (“DOJ”) Title VI regulations can be found at 28 CFR § 42.401 et seq., and 28 CFR § 50.3. The U.S. Department of Transportation (“DOT”) Title VI implementing regulations can be found at 49 CFR 21. All programs receiving financial assistance from FTA are subject to Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and DOT’s implementing regulations.

# **Title VI Policy Statement**

Charlottesville Area Transit is committed to full compliance with Title VI of the Civil Rights act of 1964, and related statutes and regulations in all programs and activities. CAT will ensure that “no person 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 CAT sponsored program or activity.

Every effort will be made to prevent discrimination of CAT’s programs, policies and activities on minority and low-income populations. CAT will take all reasonable steps to provide meaningful access to services for persons with limited English proficiency and disabilities.

The City Manager of the City of Charlottesville has delegated the authority to implement the Title VI program to the CAT Title VI Coordinator. The Title VI Coordinator is designated to oversee and monitor the Title VI Program and that the services are provided in a non-discriminatory and equitable manner.

CAT is committed to ensuring full and fair participation to all persons who reside, work, travel and participate in CAT’s programs and services.

*/Original Signed/*

Michael Rogers Interim City Manager  
City of Charlottesville

# Notification & Disseminations of CAT's Title VI Obligations

CAT takes the following steps to notify the public and CAT employees of the obligations to Title VI.

## ***Title VI Public Notice***

CAT actively provides information regarding its Title VI obligations to promote non-discrimination against any person, regardless of their race, color, or national origin, with respect to any transit program or service. The Title VI Plan and complaint procedures are available on the website. The Title VI notice is posted on the website, on transit vehicles, route guides, CAT offices and at the Downtown Transit Station in both English and Spanish.

## ***Employee Information and Training***

Title VI information is disseminated to CAT employees annually via the Employee Education form (***Attachment A***) which are hand-delivered by Transit Operations Supervisors before the beginning of each Federal Fiscal Year. All employees are provided a copy of the Title VI Policy Statement and are required to sign the Employee Acknowledgement of Receipt (***Attachment B***). This form reminds employees of CAT's Title VI policy, and of their responsibilities in their daily work and duties.

During New Employee Orientation, CAT employees are informed of the provisions of Title VI. Following the training, employees will sign an acknowledgment that that they have read and understand the Title VI requirements.

## ***Subrecipient, Contractors and Vendors***

The subrecipient project agreement, with JAUNT, contains the required federal Civil Rights clauses. Contractors and vendors who receive payments from CAT where funding originates from any federal assistance are subject to the provisions of Title VI of the Civil Rights Act of 1964. Written contract provisions shall contain the federal Civil Rights clauses, including Title VI, which becomes an associated component of the contract.

***The Title VI Notice as shown below is posted in English and Spanish on CAT's website, buses, route guides (abridged), CAT offices, and in the Downtown Transit Station.***

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

### **Notifying the Public of Rights under Title VI City of Charlottesville Charlottesville Area Transit**

**Charlottesville Area Transit (CAT) operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964. Any person who believes he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with CAT.**

**For information and procedures to file a complaint, contact Barry Herring, CAT Title VI Coordinator, at 434-970-3313 (TTY dial 711); email [herringb@charlottesville.gov](mailto:herringb@charlottesville.gov); or visit CAT's administrative office at 1545 Avon Street, Ext, Charlottesville, VA 22902. For more information on all of CAT's civil rights programs and to view CAT's Title VI Plan, visit [www.CatchTheCat.org](http://www.CatchTheCat.org).**

**A complaint may also be filed directly with the Federal Transit Administration's 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 or format, contact Barry Herring at 434-970-3313.**

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

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### **Notificación Pública de los derechos Bajo el Título VI Ciudad de Charlottesville Area Transit**

Charlottesville Area Transit (CAT por su siglas en inglés) opera sus programas y servicios, sin distinción de raza, color u origen nacional, de conformidad con el Título VI de la Ley de Derechos Civiles de 1964. Cualquier persona que cree que ha sido perjudicada por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja en el CAT.

Para más información y los procedimientos para presentar una queja, póngase en contacto con Barry Herring, CAT Coordinador del Título VI, al 434-970- 3313 (TTY Marque 711); al correo electrónico [herringb@charlottesville.gov](mailto:herringb@charlottesville.gov); o visite la oficina administrativa de CAT ubicada en la 1545 Avon Street, Ext, Charlottesville, VA 22902. Para más información sobre todos los programas de derechos civiles de CAT y ver el plan del Título VI del CAT, visite [www.CatchTheCat.org](http://www.CatchTheCat.org).

Una queja también puede ser presentada directamente en la Oficina de la Administración Federal de Tránsito de los Derechos Civiles, Atención: Coordinador del Programa Título VI, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

Si necesita información en otro idioma o formato, póngase en contacto con Barry Herring a (434) 970-3313.

# Title VI Complaint Procedures

Everyone is granted equal access to CAT's transit services. Any person who believes that they have been excluded from participation in, been denied the benefits of, or otherwise subjected to unlawful discrimination under any CAT program or activity, and believes the discrimination is based upon race, color or national origin may file a complaint with CAT.

Title VI information and complaint procedures are posted on buses, the website, the Downtown Transit Station, CAT's Administration office, Operations and Maintenance departments.

A complaint must be filed within *180 calendar days* of the alleged discriminatory act. To submit a complaint by mail or in person, customers may fill out the Title VI complaint form from CAT's website and mail/email/deliver to:

CAT Title VI Coordinator  
1545 Avon St., Ext.  
Charlottesville, VA 22902  
Email: [herringb@charlottesville.gov](mailto:herringb@charlottesville.gov)

The public may also leave a complaint on the Customer Complaint Line. The complaint is recorded verbally 24 hours a day, 7-days a week at (434) 970-3649, option 2.

CAT will provide appropriate assistance to complainants, including to persons with disabilities, or who are limited in their ability to communicate in English, on filing a complaint. CAT's Discrimination Complaint form is available in English and Spanish (**Attachments C & D**).

For customers who are hard of hearing, or have difficulty speaking to communicate, CAT utilizes the Virginia Relay to facilitate calls. The Virginia Relay enables people who are Deaf, Hard of Hearing, DeafBlind, or have difficulty speaking to communicate by TTY (text telephone) or another assistive telephone device with anyone who uses a standard phone. The Virginia Relay is available by dialing 711.

CAT has *30 calendar days* to investigate a Title VI complaint. A letter/email acknowledging receipt of a complaint will be mailed to the complainant within *10 calendar days* (**Attachment E**). If more information is needed to investigate or resolve the case, CAT may contact the complainant. The complainant has *15 calendar days* from the date of the letter to send requested information. A complainant's failure to provide the facts and requested information may result in the administrative closure of the complaint. A case can be administratively closed if a complainant no longer wishes to pursue the complaint.

Upon completion of an investigation, the Title VI Coordinator will send one of two written response letters to the complainant regarding whether the complaint was or was not a Title VI violation (**Attachments F & G**). In any letter notifying a complainant of the investigation results,

the complainant is also advised of their right to 1) appeal the determination within *15 calendar days* of receipt of the written decision, and 2) information on how to file a complaint externally with the FTA.

## **Title VI Investigations, Complaints, & Lawsuits**

In order to comply with the reporting requirements of 49 CFR Section 21.9(b), FTA requires CAT to 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 entities other than FTA; lawsuits; and complaints naming the recipient. This list shall include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by CAT/City of Charlottesville in response, or final findings related to, the investigation, lawsuit, or complaint.

The CAT Title VI Coordinator/City of Charlottesville Attorney's Office (if filed with EEOC) maintains permanent records, which include, but are not limited to, copies all Title VI complaints and/or lawsuits and related documentation, and records of correspondence to and from complainants, and Title VI investigations. CAT has not received a Title VI complaint, an investigation or lawsuit, since the last Title VI submission.

## **Public Participation Plan**

A Public Participation Plan is a guide for CAT's ongoing public participation endeavors. Its purpose is to ensure that CAT 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.

CAT's objective is to encourage the public to express their transit needs so that transit decisions better reflect community values, and interests. Early and on-going education of stakeholders on transit decisions relative to the CAT service area is at the forefront of CAT's public outreach objectives. The public participation objectives include:

- Ensure that minority and low-income communities, people with limited English proficiency and individuals with disabilities are included in the public participation and engagement process for CAT projects, programs, and initiatives.
- Schedule meetings at times and locations that are convenient and accessible to transit users to with special emphasis to minority, LEP and low-income communities.
- Use different meeting sizes or formats to announce public participation

opportunities, so that communications are tailored to the particular community or population.

- Coordinate 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, LEP and low-income communities.
- Provide opportunities for public participation through means other than written communication, such as personal interviews or may use of audio or video recording devices to capture oral comments.
- Provide virtual platforms for public meetings, video conferences and webinars, where practical. CAT provides project updates, through newsletters and/or announcements; Vimeo Channel Cville TV10, and CAT's social media platforms (Facebook and Twitter).
- Place printed materials on buses: interior cards, flyers, and / or comment cards describing the proposed changes.
- Post information and press releases on the website.
- Provide presentations using various illustrative visualization techniques to convey the information, including, but not limited to, charts, graphs, photos, and maps.
- Disseminate the public information in another language upon request.

During the COVID-19 Pandemic that began in March 2020, CAT modified its methods to engage in public participation through the use of virtual platforms (webinars, tele-conferences, social media). With health and safety in the forefront, CAT will continue virtual platforms as necessary and may return to in-person public participation meetings, where practical.

CAT publishes notices of all transit-related public meetings in the Regional Newspaper, the Daily Progress. Although Charlottesville does not have an LEP group that meets the Safe Harbor threshold of five percent (5%) or 1,000 persons of the total population, CAT has resolved to voluntarily publish notices of these meetings in Nuevas Raices, the region's only Spanish news publication.

CAT actively engages in the use of printed and social media in order to expand its public outreach efforts. CAT includes information on its website regarding transit activities, meetings, route changes and the Title VI Plan. CAT can supply most documents, upon request, from the public, in a variety of alternative formats.

### **Past Public Participation Efforts**

The following list identifies public participation events held by CAT during the period of August 2019 through August 2022.

<b>Date</b>	<b>Event and Purpose</b>	<b>Outcome</b>
August 2019	30-day public comment period. To obtain comments on the proposed 2020-2022 1.7% DBE goal and methodology	No comments received.
March 2020	Notice on Fare Free as a result of COVID-19 Pandemic	Notice the public on the fare free rides during the pandemic.
June 2021	FY 22 Service Proposals – Initial notice on the transit service proposal on bus system service	Notice on the proposed return of service to pre-COVID and route changes.
July 2021	Held 2 public participation session in July on the FY 22 Service Proposals	Proposed return of service to pre-COVID and route changes.
August 2021	Bus Shelter Project – To obtain comments on the bus shelter design(s)	Public comments received on design concepts.
December 2021	CAT announces Fare Free for next 4 years	Public announcement on free bus fare.
July 2022	Public Meeting on Proposed Route Changes	Virtual meeting to discuss proposed service adjustments to the CAT system.

## **Transit Advisory Board**

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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.”

CAT established a CAT Advisory Board. The CAT Advisory Board is appointed by City Council and is charged with recommending service enhancement changes and the appropriate procedure for implementing CAT plans realizing that CAT is a public transportation system. The CAT Advisory Board makes recommendations to City Council annually on the public transportation budget for the succeeding fiscal year in accordance with the City’s annual budget process. The CAT Advisory Board may also make recommendations on other revenue sources such as grants,

fares, and advertising policies.

The CAT Advisory Board is authorized seven (7) non-elected members who are transit riders from the community. The Board is currently composed of four (4) public members and a CAT staff member.

A breakdown of CAT’s Advisory Board by race and gender are noted.

<b>Name</b>	<b>Represents</b>	<b>Race/Ethnicity/Gender</b>
<b>Ethan Heil</b>	<b>University of VA – CAT Rider</b>	<b>White/ Male</b>
<b>Jonathan Kropko</b>	<b>City CAT Rider</b>	<b>White/ Male</b>
<b>Connor Kurtz</b>	<b>City CAT Rider</b>	<b>White/ Male</b>
<b>Anson Parker</b>	<b>University of VA CAT Rider</b>	<b>White/ Male</b>
<b>Garland Williams</b>	<b>CAT Director of Transit</b>	<b>Black / Male</b>

CAT is recruiting minority representation on the Board by advertising for minority board members on the website, social media and in the regional Spanish-speaking newspaper.

## **Subrecipient Title VI Oversight**

Title 49 CFR Section 21.9(b) states that if “a primary recipient extends Federal financial assistance to any other recipient, such other recipient shall also submit such compliance reports to the primary recipient as may be necessary to enable the primary recipient to carry out its obligations under this part.” JAUNT is the City of Charlottesville’s demand-response paratransit service provider and is a subrecipient of FTA 5307 Operating Assistance funds through CAT.

As a requirement of the financial agreement, JAUNT understands they must be fully compliant with FTA Circular 4702.1B, *Title VI Requirements and Guidelines for Federal Transit Administration Recipients*.

The Title VI Coordinator has primary responsibility to monitor JAUNT’s compliance with Title VI by means of completing an on-site and desk review of JAUNT to ensure general reporting requirements of Circular 4702.1B. The Title VI Coordinator, Accountant, Assistant Director of Transit for Maintenance and Director of Transit all take part in the oversight monitoring and CAT maintains records of JAUNT’s Title VI Plan as a standard practice. Lack of compliance with the Title VI program or the submittal schedule will delay or halt disbursement of the FTA 5307 funds.

The oversight review includes:

- Receive and review JAUNT's Title VI Plan, to include:
  - Title VI Notice
  - Public Participation Plan
  - Title VI complaint procedures and form
  - Records of any Title VI investigations, complaints, or lawsuits
  - Written procedures for investigating and tracking Title VI complaint
- Ensure Civil Rights clauses in contracts
- Check that the Title VI Notice is in JAUNT's facility, website and on vehicles
- Review the Title VI employee training

JAUNT is required to update its Title VI Plan every three years.

## **Governing-Body Approval of Title VI Plan**

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Charlottesville is governed by an Elected City Council, but day to day operations and governance of the City is overseen by the Charlottesville Interim City Manager, Michael Rogers. Mr. Rogers has read and approved CAT's Title VI Plan. (***Attachment H***).

## **Limited English Proficiency Plan**

Executive order 13166, *Improving Access to Services for Persons with Limited English Proficiency*, indicates that differing treatment based upon a person's inability to speak, read, write, or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds.

The following *Language Assistance Plan (LAP)* incorporates the assessment of the *Limited English Proficiency (LEP)* to address CAT's obligations as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The LAP is prepared in accordance with Title VI of the Civil Rights Act of 1964 and the FTA Circular 4702.1B, which states that the level and quality of transportation service shall be provided without regard to race, color, or national origin.

The LAP outlines how to identify Charlottesville's LEP population who access CAT services; how to provide reasonable steps for providing language assistance to the LEP population and

identifies methods in which language assistance may be provided. The LAP includes a required Four-Factor Analysis.

### **Four- Factor Analysis**

In order to prepare the LAP, the Title VI Coordinator undertook the four-factor LEP analysis which considers the following factors in establishing a LAP:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a CAT program, activity, or service.
2. The frequency with which LEP persons come in contact with CAT programs, activities, or services.
3. The nature and importance of programs, activities or services provided by CAT to the LEP population.
4. The resources available to CAT and overall cost to provide LEP assistance.

The four-factor analysis results are:

#### **Factor 1 - The number and proportion of LEP persons eligible to be served or likely to be encountered in the service area**

The geographic boundaries within which CAT provides service include the City of Charlottesville and 13 square miles of Albemarle County. CAT examined proportion of LEP persons by using the U.S. Census data as defined by “Languages Spoken in the Home” for ages five (5) years and older for the City of Charlottesville.

*The U.S. Census’s 2020 American Community Survey 5-Year Estimates (ACS) estimates that 38,196 (85.4%) of the City of Charlottesville population’s predominant language is English only.*

Following the English language, the next predominant non-English languages spoken in the City of Charlottesville are Spanish, Other Indo European, Chinese, and Arabic. Of the 2,018 people who speak Spanish in Charlottesville, 838 (1.9% of the total population) are estimated to speak English “*less than very well.*” Of the 785 persons who speak Chinese in Charlottesville, 199 (0.44% of total population) are estimated to speak English “*less than very well.*”

Based on the language survey chart below, no one language meets the threshold that constitutes five percent (5%) or 1,000 persons of the population that requires CAT to implement a formal LAP. The data does support the guidance to implement the *Safe Harbor* provisions for language assistance to LEP persons.

<b>Charlottesville, Virginia LANGUAGE SPOKEN AT HOME</b>	<b>Estimate</b>	<b>Percent of total population</b>
<b>Population 5 years old and over</b>	<b>44,737</b>	
<b>Speak English only</b>	<b>38,196</b>	<b>85.4 %</b>
<b>Spanish or Spanish Creole</b>	<b>2,018</b>	
<b>Speak English less than "very well"</b>	<b>838</b>	<b>1.9%</b>
<b>Other Indo-European</b>	<b>1,373</b>	
<b>Speak English less than "very well"</b>	<b>387</b>	<b>0.9%</b>
<b>Chinese</b>	<b>785</b>	
<b>Speak English less than "very well"</b>	<b>199</b>	<b>0.44%</b>
<b>Arabic</b>	<b>322</b>	
<b>Speak English less than "very well"</b>	<b>127</b>	<b>2.8%</b>

## **Factor 2 - Frequency of Contact by LEP Persons with CAT Services**

CAT's Title VI Coordinator conducted and reviewed (non-scientific) survey responses from CAT customer service representatives, bus drivers and other staff which focused on the frequency and type of LEP languages that they may encounter (**Attachment I**). Of the 97 staff that responded, they reported that contact with LEP persons occurred as follows:

Predominant languages that CAT staff reported coming into contact with are:

- # 1 Spanish
- # 2 Arabic
- # 3 Asian-Pacific

Number of employees who encountered LEP persons per month:

- Never have contact - 12
- 1-4 times per month – 35
- 5-10 times per month – 15
- 11-20 times per month – 6
- Every Day – 29

The employees commented that the frequency of contacts with LEP persons is based on coming into contact with the same rider(s) on the bus route or at the customer call center. This explains why an employee encounters a LEP person every day. The respondents stated they normally are able to communicate and answer questions of LEP

persons through use of other passengers on the bus, or by using hand signals and the CAT Rider's Guide. No respondent reported having translation services requested.

### **Factor 3 - The nature and importance of programs, activities or services provided by CAT to the LEP Population**

Federal law provides a "Safe Harbor Provision," which outlines circumstances that can provide a "safe harbor" (FTA Circular 4702.1B) for recipients regarding translation of written materials for LEP populations. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations.

The predominant non-English language likely to need language assistance is Spanish. CAT provides route information, Title VI policy information and complaint procedures in Spanish. CAT's website uses Google Translate to assist all non-English speaking individuals to obtain CAT service in multiple languages. Further, CAT publishes its Title VI policy in the only Spanish newspaper in the region, Nuevas Raices.

### **Factor 4 - The resources available to CAT and overall cost to provide LEP assistance**

CAT reviewed its available resources that could be used for providing language assistance. Based on the results of Factor 1, there is no one group that meets the threshold that constitutes five percent (5%) or 1,000 persons of the population that requires CAT to implement a formal LAP. The data does support the guidance to implement the safe harbor provisions for some language assistance to LEP persons. Due to the relatively low LEP population, CAT does not have a specific budget of resources for the LAP. Following the safe harbor guidance to provide language assistance, as practical, CAT has determined the vital documents for Spanish translation are the Title VI Notice, Title VI complaint procedures and complaint form. The website also has Google Translation for all non-English speaking customers to access the services in their language. CAT has a Customer Service employee that speaks Spanish fluently, and CAT has several bus drivers who speak Spanish and Arabic languages. In the previously noted internal LEP Survey, staff were asked, what other languages they spoke fluently and if they would be willing to assist CAT with interpretation services for customers. The staff response was positive, and CAT has LEP interpretation resources on staff not previously available. The employee survey showed that requests for translation services are almost non-existent, but if requested or required, CAT would utilize the International Rescue Committee (IRC) or the University of Virginia's international student programs for written translations.

The City of Charlottesville is fortunate to have a chapter of the IRC based in the City. The IRC responds to humanitarian crisis around the world and, in part, assists with the relocation of displaced global refugees into US Communities, Charlottesville being one of them. CAT and the IRC have coordinated efforts and resources for several years in order for CAT to make presentations at the IRC to refugees who have been relocated to Charlottesville. These presentations occur as needed and specifically focuses on teaching newly arrived refugees how to understand and navigate CAT's transit system, including routes, maps, customer service, CAT Apps, online resources, as well as the use of timetables and the fare system. IRC staff arrange for interpreters to be present for each language represented at any given presentation.

To enhance the resources, CAT will provide:

### **1. Staff Training**

The following training will be provided to CAT staff:

- To new employees on CAT's Title VI Policy and LEP responsibilities.
- How to use of the *Language Identification Flashcards*.
- Information on how to document language assistance requests.
- Information on how to handle a potential Title VI/LEP complaint.
- Every three years to all employees

### **2. Translation of Vital Documents**

CAT currently has its Title VI Notice, complaint procedures and complaint form translated into Spanish. The website uses Google Translate for all other language needs. The website pages translate into the choice language. Key items that may be translated are Title VI notice, complaint procedures and form, public meeting notices, riders guide, routes and schedules, public service announcements, major services changes, including fare changes, and more.

### **3. Interpreter Service**

When necessary to provide meaningful access to LEP clients, CAT will use existing staff to provide interpretation upon request and at no charge to the requester. CAT will further solicit the assistance of IRC staff to arrange for interpreters to be present for each language represented at any given presentation.

Informal Interpreters:

- Informal interpreters may include the family members, friends, legal guardians, service representatives or advocates of the LEP client. CAT will discourage children from providing interpretation for the requester because the child may not adequately interpret the communication and or there may be issues of confidentiality, competency, or conflict of interest. In this situation CAT will pursue a staff person or use IRC staff.

- An LEP person may use an informal interpreter of his or her own choosing and at their expense, either in place of or as a supplement to the free language assistance offered by the CAT.
- If an LEP client prefers an informal interpreter, after CAT has offered free interpreter services, the informal interpreter may interpret. In these cases, CAT and the interpreter will sign a waiver of free interpreter services.
- If a LEP client wants to use his or her own informal interpreter, CAT reserves the right to also have an informal interpreter present.

#### **4. Safe Harbor Provision**

Federal law provides a “Safe Harbor Provision,” which outlines circumstances that can provide a “safe harbor” (FTA Circular 4702.1B) for recipients regarding translation of written materials for LEP populations. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient’s written translation obligations.

#### **Monitoring and Updating the LEP Plan**

Monitoring the success of CAT’s LAP is an ongoing process, and the plan will be adjusted as demographic and language fluctuations occur in the transit service area.

- CAT will update the LEP and LAP prior to the submission of the updated Title VI plan.
- CAT will survey CAT drivers and customer service staff to collect current data of how often front-line staff comes into contact with LEP persons as well as determining language resources requested.
- CAT will collaborate with the IRC to keep track of new LEP groups settling in Charlottesville.

## **Community Outreach Plan**

Community Outreach is a requirement of Title VI. Recipients and subrecipients shall seek out and consider the viewpoints of minority and low-income populations in the course of conducting public outreach. Recipients have wide latitude to determine what specific measures are most appropriate and should make this determination based on the composition of the affected population, the public involvement process, and the resources of the recipient.

As an agency receiving federal financial assistance, CAT has made the following community outreach efforts:

***Board Meetings:***

*The MPO Policy Board* meets bi-monthly, and the public is invited to attend and comment.

***CAT Advisory Board*** Meetings are opened to the Public and the Press and meetings schedules are posted on the CAT's website.

***ADA Advisory Committee***

CAT staff shall attend and participate at regular quarterly meetings of the City's ADA Advisory Committee. Citizens and committee members are given the opportunity to advise on CAT compliance with required accessibility standards. CAT makes necessary adjustments to maintain equitable service to all persons.

***Transit Improvement Plan (TIP)***

The TIP is facilitated by the Virginia Department of Transportation. The TIP addresses transportation and transit projects and programs. The TIP process includes public hearings and public comment periods. CAT annually files its Program of Projects with Charlottesville Neighborhood Development Office for public review and comment.

***Public Meetings***

When significantly new or altered service is proposed, information is disseminated via media release to the neighborhoods affected and public meetings are offered. All meetings are held either in locations accessible by public transportation or through a virtual method.

***Customer Complaint Process***

Citizens have several methods with which to contact CAT to make a complaint. All complaints are confidential.

***Customer Outreach Assistance***

CAT provides Spanish-speaking guests with information on public transit services in Spanish. Customer Service staff have provided "on the bus" transit orientation training to LEP individuals and refugee populations in the past and are available to so upon request. CAT's transit system information is presented as needed.

## Equity Analysis (New Facility Projects)

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Since the last Title VI submission, CAT has not engaged in any project requiring land acquisition and/or displacement of persons from their residences or businesses during this reporting period, nor has any plans to do so. As standard policy, CAT integrates environmental justice analysis into any NEPA documentation required in connection with any construction projects. Those involving categorical exclusions are submitted to the FTA Region III and include a section on community disruption and environmental justice. CAT policy and reporting integrates the following into environmental assessments or equity analysis impact statements:

- Description of low-income and minority population within the area affected by the project, and description of the method used to identify the population;
- Discussion of adverse effects of the project during and after construction;
- Discussion of positive effects;
- Description of mitigation and environmental enhancement actions incorporated into the project to address any adverse effects of a construction project;
- Discussion of remaining effects and, if any, why further mitigation is not proposed;
- A comparison of mitigation and environmental enhancement actions that affect predominately low-income and minority areas with mitigation implemented in predominately low-income and minority areas.

## CAT Systemwide Service Standards

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### ***Purpose of Transit Guidelines and Standards***

Many public transit agencies implement guidelines and standards to guide transit service development, design, and provision. Service design guidelines identify methods, procedures, and criteria for designing, evaluating, and adjusting the performance of fixed-route public transit services. They act as tools for maximizing the overall usefulness of the public transportation system for customers, ensuring consistency of the route structure, and providing consistent criteria for establishment of service levels.

### ***Charlottesville Area Transit Service Availability:***

Span of Service – CAT operate thirteen (13) routes and provides transit services Monday through Saturday to all routes. Routes are surveyed and evaluated annually to determine the necessity of service expansions and adjustments to schedules are made accordingly based upon these evaluations.

Route	Route Type	Service Days	Service Hours
1	Local	Monday – Friday	6:15AM – 10:30PM
2	Key	Monday – Saturday	6:35AM – 10:30PM
3	Local	Monday – Saturday	6:00AM – 10:30PM
4	Local	Monday – Friday Saturday	6:25AM – 10:30PM 6:30AM – 10:30PM
5	Local	Monday – Saturday	6:30AM – 10:30PM
6	Local	Monday – Saturday	6:30AM – 10:30PM
7	Key	Monday – Saturday	6:20AM – 10:30PM
8	Local	Monday – Saturday	6:30AM – 6:30PM
9	Local	Monday – Saturday	&:00AM – 6:30PM
10	Local	Monday – Saturday	6:30AM – 10:30PM
11	Lifeline	Monday – Saturday	6:00AM – 10:30PM
Trolley	Key	Monday – Saturday	6:40AM – 10:30PM

***Charlottesville Area Transit Vehicle Assignment:***

Fleet vehicle assignment is based upon CAT’s established Route structure, as follows:

1. Key Routes, which include the Free Trolley and Route 7 utilize 35-foot coaches and a 35- foot Trolley;
2. Local Routes use 30-foot coaches or 26-foot cutaways, depending upon conditions and time of day; and
3. Lifeline Routes, at this time only Route 11, uses 30-foot coaches.

***Service Standards and Shelter Guidelines***

There are certain guidelines that CAT uses regularly, and which affect various aspects of CAT’s service design, delivery, and system management investments. Some guidelines suggest best practices for service design, methods of evaluating

service quality or to identify thresholds at which service or facility investments should be made. For example:

- *Service Quality – Overloads*: A route is defined as overloaded when it is at or above 1.3 times seated capacity or at 1.2 times seated capacity with passengers standing for 20 minutes or longer
- *Service Quality – Schedule adherence*: A route is defined as on-time if it is up to 5 minutes late or 1 minute early. CAT targets to achieve a 90 percent on-time rate.
- *Service Design – Deviation*: Routings should only deviate from a more direct pathway where the number of riders boarding/alighting on deviation offsets the number of minutes lost for through riders.
- *Facility Investment – Threshold for installation of a shelter*: 50 or more riders per day in Charlottesville, 35 or more outside of Charlottesville.

General Service planning principles and samples of service guidelines to help document the basis for decision-making is included in Appendix A.

### ***Service Evaluation Guidelines***

CAT has established service evaluation guidelines for regular assessment of the performance of all routes. The evaluation process is intended to provide clear, consistent information about the performance of individual transit services to aid planners and decision-makers in developing service changes. The intent of the process is to identify very successful services as well as unsuccessful ones, utilize simple evaluation criteria to improve the consistency of use, and define performance thresholds that reflect unique performance aspects of different markets and types of service.

The service evaluation guidelines are applied in the System Optimization Report, which assesses service performance of all regular service. Performance assessment is based on comparison to other members of the same group of routes and routes are grouped by subarea and time period for similarity in operating conditions. Thresholds for “strong” and “below average” performance are determined for each subarea and time-period group, based on average route performance in each group.

The Route Performance report focuses on four measures: riders per revenue hour, fare revenue to operating expense ratio, passenger miles per revenue hour and passenger miles divided by platform miles.

### ***Guidelines and Measures for Developing New Service and Evaluating Existing Service***

General principles identified as part of CAT’s service evaluation update process

state that guidelines should:

- 1) Be simple to use and understand by a wide audience;
- 2) Rely on criteria that are measurable and methods that are quantifiable to ensure consistent application over time;
- 3) Require all services to meet minimum expectations at some point so that limited public resources can be responsibly and efficiently targeted;
- 4) Clearly delineate actions stemming from both poor and strong performance;
- 5) Provide more than one chance for a service to demonstrate performance but limit the amount of time a service has to perform before resources are reallocated (i.e., poor performers cannot continue forever).

During the Transit Study, CAT developed the following Service Design and Scheduling Guidelines:

- Adjust service frequencies and spans to better match demand
- Adjust Saturday schedules and discontinue some poorly utilized routes on Saturdays.

### ***Overview of Factors Addressed For Service and Facility Guidelines***

Service and facility guidelines play a role in helping an agency meet its goals and objectives by providing flexible performance targets. Therefore, it is important that an agency select guidelines that correspond with their performance goals and targets.

### ***Land Use***

CAT serves a mix of areas including neighborhoods, University grounds, and commercial centers. Residential densities in Eastern and Southern neighborhoods in the City are on average higher than those of the Northern neighborhoods, especially when compared to the highest density neighborhoods of Charlottesville. These differences offer unique challenges to transit service that affects decisions made about service frequency and service coverage. Land use and development patterns also affect accessibility to transit. To make transit service more attractive and to enhance service levels, areas served with transit service must also provide accessibility to pedestrians.

### ***Access to Transit***

Access to a transit stop or transit center is a critical point in connecting citizens with transit service. Best practices suggest that a quarter mile is the farthest

transit agencies should expect passengers to walk to buses. CAT attempts to locate bus stops so that customers walk no more than a quarter of a mile to access a bus stop. There are multiple components to transit accessibility that include not only walking distance, but factors such as street design and pedestrian pathways.

Street designs, pedestrian crossings, weather, and topography also affect pedestrian accessibility and willingness to walk. When streets are designed to provide more direct access for pedestrians to transit routes and neighborhood amenities, this may encourage more people to travel via alternative modes. Wide and busy streets can discourage pedestrian travel, so the provision of signalized crossings in such areas makes pedestrian travel friendlier. The difficulty pedestrians have crossing the street can be expressed by the amount of delay they experience when crossing the street. Pedestrians become impatient when their wait exceeds 30 seconds and display risk-taking behaviors such as jay-walking or running across the street. For transit providers, locating transit stops where there are designated pedestrian crossings and adequate pedestrian amenities can help encourage further use of the transit system. TCRP's *Manual* suggests pedestrian access be measured through pedestrian level of service (LOS), which could be measured by determining traffic volumes, facility type, and amount of separation between pedestrians and traffic in the vicinity of a transit stop.

### ***Service Quality Factors***

Aside from factors that affect actual service provision, there are additional components of service that impact service quality and ultimately, transit system performance. These areas including service frequency, on-time performance and travel time can serve as both performance measurements and service guideline areas for transit agencies to consider.

### ***Service Frequency***

Service frequency is important to attracting more transit riders. Service frequency determines how often a user can access the transit mode available, provided it is during the time and destined for the place the user wishes to travel. TCRP Report 100 identifies average headway was the commonly used service measure for frequency. With more frequent service, transit users have more flexibility in selecting travel times and shorter waits when a bus is missed, or the schedule is unknown. Increased service frequencies can make transit a more attractive form of travel. Many transit agencies have implemented policy headways, which specify the frequency in minutes that a type of transit service operates. Policy headways are considered a guideline that provides a minimum requirement for different types of service including express, local and commuter services.

### **On-Time Performance**

On-time performance is the commonly used measure for service reliability, which is tied to service frequency. CAT employs on-time performance as a measure to manage transit route performance. A route is defined as on-time if it is up to 5 minutes late or 1 minute early. CAT targets to achieve a 90 percent on-time rate.

#### **On-time performance for each route (7/1/2021-6/30/2022)**

<b>Route Name</b>	<b>Early (%)</b>	<b>On-Time (%)</b>	<b>Late (%)</b>	<b>Early (count)</b>	<b>On-Time (count)</b>	<b>Late (count)</b>	<b>Total (count)</b>
1 PVCC/Riverside	8.8	86.4	4.8	2446	24131	1343	27920
2 5th St/Avon	1.8	93.7	4.4	716	36887	1747	39350
3 Southwood Belmont	3	68.2	28.8	974	22082	9342	32398
4 UVA Health Willoughby	2.1	84.6	13.3	587	23432	3682	27701
5 BRSC / Walmart	2	93.3	4.7	785	37057	1862	39704
6 UVA Health Willoughby	4.4	92.6	3	913	19073	613	20599
7 UVA Health BRSC/FSQ	3.8	89.2	7	2596	61686	4862	69144
8 Preston Stonefield	1.6	88.7	9.7	325	17746	1936	20007
9 UVA Health YMCA/CHS	7.1	70.5	22.5	2397	23920	7621	33938
10 Pantops Martha Jefferson	4.7	94.1	1.2	1289	25927	334	27550
11 Locust/FSQ	0.4	98.7	0.9	50	13985	132	14167
T FREE Trolley	10.2	78	11.8	2861	21843	3293	27997

The on-time performance for July 1, 2021, through June 30, 2022, was not to our ultimate satisfaction. The report data was during the Pandemic and as such, CAT had difficulty running the schedule as designed due to lack of drivers available for the routes. Route 3, had a long term detour (Southwood area was being redeveloped) that added minutes to the route, making it difficult to stay on schedule. Route 9, was a 70 minute loop pre-pandemic, but became a 60 minute loop during the pandemic when less traffic was on the road. Route 9 is still a 60-minute loop with increased traffic and also increased utilization of K12 students due to school bus driver shortage. Other routes would have exceeded the 90% goal once we account for some of the early departure percentages due to the General Transit Feed Schedule (GTFS) feed schedule. The GTFS would note the arrival time at the end point of a leg of a trip to be the same as the departure time of the next leg. The feed schedule caused too many early trips affecting the route, and leaving no room for layovers.

CAT anticipates the on-time performance will improve in the coming years as drivers are hired and the GTFS is adjusted to allow for acceptable layovers.

**Passenger Loads**

Transit can become less attractive for passengers when they encounter crowded vehicles. Crowded transit vehicles can deter users while also slowing down transit operations. The degree of passenger crowding can be measured by load factor. CAT regularly monitors the load factor on route trips through available data and with a load factor of 1.0, meaning that there are an equal number of seats and passengers on that trip at its maximum load point. Passenger loads and service frequencies interact, with higher boarding volumes and higher frequency, passengers can be assured that their waiting time will be minimal for the next bus.

**Charlottesville Area Transit operates only a single mode – Bus:**

LOAD FACTORS	Capacity	Load Factor	Standees
26-Foot Body on Chassis Small Bus	20	1.0	0
30-Foot HD Transit Coach	28	1.3	8*
35-Foot HD Transit Coach	32	1.3	9*

\*CAT Policy: Service Quality – Overloads: A route is defined as overloaded when it is at or above 1.3 times seated capacity or at 1.2 times seated capacity with passengers standing for 20 minutes or longer.

## Guidelines for Transit Service Design

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The following guidelines for transit service design represent some common service planning principles used by CAT. They have been adapted from CAT’s documents, national industry research and service guidelines used by other transit agencies.

**Coverage**

The closeness of a transit route to a person’s origin or destination is a key factor in choosing to use transit. A suggested standard for bus route spacing is approximately every 800 feet in urban, higher density areas, and every 0.25 mile in lower density areas. Closer spacing may be justified where the nature of the terrain discourages pedestrian travel. Adequate and well-maintained sidewalks along with good street lighting encourage transit use. One-quarter mile (1,320 feet) in flat terrain is the accepted standard for walking access to

bus transit; some studies suggest pedestrians will walk greater distances to access more frequent service. CAT strives to design service so that 90% of City residents are within a one-quarter mile walk to a CAT bus stop.

***Route travel time***

Both absolute travel time and transit travel time in relation to competing modes are factors that influence the choice to use transit. Total transit travel time is influenced by route length, route spacing, service frequency and distance between stops, posted speed limits, traffic congestion, signal timing, and the fare-collection system. Transit routes should be designed to be as short as possible to serve their markets. A maximum travel time of 60 minutes per one-way trip is highly desirable to maximize productivity and maintain acceptable schedule reliability in mixed-traffic conditions.

***Headway:***

***Route travel time*** - Both absolute travel time and transit travel time in relation to competing modes are factors that influence the choice to use transit. Total transit travel time is influenced by route length, route spacing, service frequency and distance between stops, posted speed limits, traffic congestion, signal timing, and the fare-collection system. Transit routes should be designed to be as short as possible to serve their markets. A **maximum travel time** of 60 minutes per one-way trip is highly desirable to maximize productivity and maintain acceptable schedule reliability in mixed-traffic conditions.

***Level of service*** - The level of service for a bus route can be defined in terms of either the number of trips per hour past a given point, or the frequency in minutes (also called headway”) between bus trips. CAT develops route services with minimum frequencies of every 30 minutes during weekday rush hours and every 60 minutes during other times. Two major routes on the system, Route 7 serving the northern commercial corridor and the Free Trolley serving the University Grounds, operate on 20-minute peak hour headways.

**Vehicle headway (current Lifeline service)**

- 60 minutes headway routes
  - 1
  - 2
  - 3
  - 6
  - 8
  - 10

- 11
- 25-minute headway routes
  - Trolley
- 30-minute headway routes
  - 4 (during AM peak. 60 minutes rest of day)
  - 5
  - 7
  - 9 (during AM peak. 60 minutes rest of day)

**Charlottesville Area Transit Vehicle Assignment:** Load standards are thresholds of the ratio of passengers on board to seats available. Historically, CAT's guidelines provided everyone a seat during nonpeak periods and tolerated standees for no longer than 20 minutes during weekday peak hours.

CAT's identified *Transportation Service Guidelines* gave the highest priority to alleviating peak loads greater than 1.30, load factors between 1.20 and 1.30 where passengers are standing 20 minutes or longer and loads between 1.0 and 1.20 during non-peak periods. Peak trips with load factors between 1.0 and 1.20 are the second priority. A full seated load would have a load factor of 1.0. Today, CAT attempts to address any load where passengers are standing 20 minutes or longer, and any passenger load exceeding a 1.20 average load factor.

Fleet vehicle assignment is based upon CAT's established Route schedule, as follows:

1. Key Routes including the Free Trolley, Route 2, and Route 7, utilize 35-foot coaches and 35-foot Trolleys;
2. Local Routes, 30-foot coaches or 26-foot body-on-chassis coaches, depending upon road and weather conditions and time of day;
3. Lifeline Route, Route 11 only, 30-foot coaches.

**Vehicle load factor per type of bus**

- 35 ft Low Floor Bus
  - x16 buses with 32 seats.
  - X5 buses with 31 seats.
- 29ft Low Floor Bus: 11 buses with 26 seats.
- Trolley: 4 trolleys with 16 seats

**Charlottesville Area Transit Bus Stop Policy**

It is CAT policy to encourage the city, county, and developers to coordinate with CAT on the location of bus stops. Decisions regarding bus stop spacing and

location call for a careful analysis of passenger service requirements (demand, convenience, and safety), the type of bus service provided – local routes, key routes, or lifeline routes - and the interaction of stopped buses with general traffic flow.

### ***Bus Stop Spacing***

Bus stops are the locations where bus passengers access the CAT system. Bus stops must therefore be convenient to the places where passengers wish to go. Convenience and speed must be balanced in determining appropriate bus stop placement, as too many stops can slow down travel times. In most areas CAT generally seeks to have bus stops 800 to 1,000 feet apart. This target has been set with the goal of increasing travel speed for CAT buses. Passenger usage of bus stops is also an important factor when considering bus stop placements or removals.

Bus stops should be close enough that passengers can walk to them easily, but far enough apart to help buses move quickly. The matrix that follows serves as a general guideline for bus stop spacing. Some discretion may be applied when balancing CAT's interest in improving service and expediting traffic flow with consideration of passenger's safety, interests, and needs.

The matrix below lists CAT's bus stop spacing for the three different service types. It is CAT's intent to use the maximum bus stop spacing unless superseded by other determining factors such as topography (hills), limited access areas (freeways or bridges), traffic / pedestrian safety factors, surrounding attractors, and transfer points.

**Bus Stop Spacing Guidelines:**

Service Type	Spacing (feet)	Explanation
<b>Local</b> <b>(Routes 1, 3, 4, 5, 6, 8, 9, &amp; 10)</b>	800 - 1,300 feet	Stops may be located more closely than listed based on trip attractors, stop activity or demand, transfer points or other land uses that may warrant it.
<b>Key</b> <b>(Routes 2, 7, &amp; Trolley)</b>	1,000 - 1,300 feet	Stops may be located more closely than listed based on trip attractors, stop activity or demand, transfer points or other land uses that may warrant it provided that the increased stops do not cause operational delays.
<b>Lifeline</b> <b>(Route 11)*</b>	1,000 - 1,300 feet	Stops may be located more closely than listed based on trip attractors, stop activity or demand, or transfer points. Service may use local stops where necessary to provide geographic coverage.

*\*Where there is no underlying local service, Lifeline service can act as a local service and use stop spacing criteria for local service.*

**Bus Stop Location**

Bus stops on the street are usually located along the street curb for direct, safe, passenger access to and from the sidewalk, waiting, and walking areas. Stops may be located either in the intersection exit (far – side), the intersection approach (near – side), or at mid-block.

- Far – side stops are the preferable choice for service in general because they reduce conflicts between right-turning vehicles and stopped buses, eliminate site distance deficiencies on approaches to an intersection, and encourage pedestrian crossing at the rear of the bus.
- Near – side stops are acceptable when a far – side stop is deemed unsafe or impractical.
- Mid – block stops are considered special case stops and are to be used only when no other alternative is available and only upon approval of the CAT manager and the jurisdiction where the bus stop will be located.

When bus stops are initiated or relocated, bus stop locations shall be chosen such that, to the maximum extent practical, the areas where lifts or ramps are to be deployed comply with the Americans with Disabilities Act Accessibility Guidelines (ADAAG).

### ***Bus Stop Enforcement***

Local law enforcement agencies shall enforce all state laws, local ordinances and regulations governing bus stops.

### ***Bus Stop Installation or Removal***

All bus stop locations must be approved by the appropriate local jurisdiction (City or County staff). CAT staff will also coordinate with appropriate local staff (NDS in Charlottesville or Community Development in the County and at times private property owners) to consider traffic patterns, street design, traffic safety issues, and impacts to adjacent properties. Upon receipt of a letter of approval from the city traffic engineer, and after any improvements to the street, if required, have been completed by the municipality (i.e., paving, striping, or painting curbs), CAT will install the bus stop. In the event that CAT receives a request to remove or relocate a bus stop, CAT staff will first analyze requests, and, if necessary, consult *with the appropriate jurisdiction's staff*.

## **CAT Distribution of Transit Amenities**

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Transit amenities for the CAT system include, but are not limited to, bus stops, benches, shelters, bike racks, transit centers, schedules, system maps, intelligent transportation systems, and language proficiency measures. CAT has a fixed bus stop program.

### ***Bus Stops***

CAT's service standard is to provide, at a minimum, landing pads at all bus stops. Where funding and right-of-way allow, CAT will also improve sidewalks and pedestrian ramps. CAT conducted an analysis of all current bus stops using the following factors to prioritize which bus stops should receive enhancements and to determine what enhancements to implement.

- 1) Stop usage
- 2) Number of routes serving a stop
- 3) Existing condition of stop
- 4) Need to acquire right-of-way (ROW) to make necessary improvements
- 5) Improvements already planned by local and state jurisdictions
- 6) Density of elderly population in area
- 7) Density of low-income population in area

- 8) Density of minority population in area
- 9) Nearby destinations
- 10) Walkability to the bus stop
- 11) Pedestrian safety concerns

Stops serving elderly, low income and minority origins and destinations were weighted higher, therefore they received higher priority. With the completion of the study, CAT has been implementing the suggested modifications to the transit amenities at the fixed stops. CAT will use its ongoing federal transit enhancement funds to continue this work.

### ***Benches***

The CAT service standard is to have a bench at every stop that has enough right-of-way (ROW) to allow for a bench. If a specific need is identified by drivers or customer comments, based on the stop usage or demographics of the population using a stop, CAT may install a bench at a particular stop. The locations will be compared against the minority/nonminority and low income/ non-low-income routes.

### ***Shelters***

The CAT service standard for shelters is to have a minimum of 50 passengers daily boarding or off boarding at that location. The number of passengers using each stop comes from the NTD survey sampling conducted by CAT on an ongoing basis. CAT currently has shelters at 39 of its 321 stops and has funding and plans to install new and replacement shelters at additional existing bus stops. CAT will continue to use its ongoing federal capital enhancement funding to place shelters at qualifying stops.

### ***Bike Racks***

The CAT service standard is to have two-capacity bike racks on all buses. CAT currently has bike racks on all route buses. As the bus stop system goes through future enhancements, CAT will conduct an analysis of which bus stops warrant and have room for bike racks.

### ***Schedule***

The CAT service standard is to provide schedules on buses, at City owned buildings and other high-volume locations throughout the service area. Outlets are selected based on the location and availability of the facility to the general public. There is no charge for the schedules. CAT posts all schedule information, including maps and times, on its website. The CAT service standard also calls for providing the schedule information in large type on the website, in formats that can be accessed by text readers, and providing translation services upon request. Detailed routing information, including left/rights, is also provided on the website.

***System Map***

The CAT service standard is to provide a system map and customer service number on all bus shelters and major transfer locations.

***Service Availability***

CAT's uses the ratio of 70% of its service based on ridership and demand and 30% of its service based on serving the transit dependent population as a guideline for establishing service availability. CAT uses the industry standard of ¼-mile walking distance when assessing what area that a route serves and how far customers can travel to a bus stop. Initial stop locations on all route services are identified using the ¼-mile walking standard. Exact stop placement may be adjusted from this target location based on destinations, passenger safety, bus safety, vehicle safety or site restrictions. Within downtown areas, the service standard is to have stops every two blocks.

# ATTACHMENTS

A. Title VI Employee Annual Education Policy Form
B. Employee Acknowledgement of Receipt of Title VI Policy
C. Civil Rights Discrimination Complaint Form – English
D. Civil Rights Discrimination Complaint Form – Spanish
E. Acknowledgment Letter of Receipt of Title VI Complaint
F. Notification to Complainant that the Title VI Complaint is Substantiated
G. Notification to Complainant that the Title VI Complaint is Not Substantiated
H. Governing Body Approval of Title VI Plan
I. CAT Staff Survey: Frequency of Contact by LEP Persons with CAT Services

## **Attachment A: Title VI Employee Annual Education Policy Form**

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### **Title VI Employee Annual Education Policy Form**

#### **FOR FEDERAL FISCAL YEAR – 20XX**

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color, and national origin in programs and activities receiving federal financial assistance. The Federal Transit Administration works to ensure nondiscriminatory transportation in support of their mission to enhance the social and economic quality of life for all Americans. The FTA Office of Civil Rights is responsible for monitoring FTA recipients' Title VI programs and ensuring their compliance with Title VI requirements.

Charlottesville Area Transit Title VI Policy:

No person shall, on the grounds of race, color, or national origin, be excluded from participating in, be denied the benefits of, or be subject to discrimination under any Charlottesville Area Transit program or activity.

All CAT employees are expected to consider, respect, and observe this policy in their daily work and duties. If a citizen approaches you with a question or complaint regarding their Civil Rights, please direct him or her to the Title VI Coordinator for CAT.

In all dealings with citizens, use courtesy titles (i.e., Mr., Mrs., or Ms.) to address the public with respect.



**Employee Acknowledgement of Receipt of Title VI Policy**

**FOR FEDERAL FISCAL YEAR -- 20XX**

I hereby acknowledge the receipt of the Charlottesville Area Transit Title VI Policy. I have read and understand the policy and am committed to ensuring that no person is excluded from participation in or denied the benefits of Charlottesville Area Transit's services on the basis of race, color, or national origin, as protected by Title VI of the Civil Rights Act of 1964.

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date



**CAT Discrimination Complaint Form (Page 1 of 2)**

If you think you have been discriminated against on the basis of race, color, or national origin or that you were excluded or denied service by CAT due to a disability, please fill out this form and send or email it to: CAT ADA/Title VI Coordinator, 1545 Avon St. Charlottesville VA 22902 or email [herringb@charlottesville.org](mailto:herringb@charlottesville.org)



Name (Complainant):		Phone:	Home address (St #, city state, zip):
Email Address:			
Date of Incident:	Route #:	Bus #:	
Time of incident:	Location of incident:	Driver Name/Description:	
Discrimination based on:		<input type="checkbox"/> <b>ADA Accessibility</b> <i>If your complaint is regarding Bus or Bus Stop Accessibility, please fill out your contact information on this page and then move to <b>PAGE 2</b></i>	
<b>TITLE VI:</b> <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin  <b>ADA:</b> <input type="checkbox"/> Disability <input type="checkbox"/> ADA Accessibility (see blue bo			
Please describe the alleged discrimination incident. You may attach a separate sheet of paper if necessary. You should include all specific details that might assist in investigating the allegation. Please also provide any other documentation that is relevant to this complaint.			
11. Please list below an person(s) we may contact for additional information to support or clarify your complaint (witnesses, fellow employees, supervisors, others):			
Name:		Relationship:	Contact Information:
Signature: <b>(complainant must sign and date)</b>			Date:

## ADA Accessibility Complaint Form (Page 2 of 2)

Your ADA accessibility complaint/concern is regarding: <i>(check one)</i>	
<input type="checkbox"/> <b>Bus Stop</b> <input type="checkbox"/> <b>Landing Area</b> <input type="checkbox"/> <b>Bus Shelter</b> <input type="checkbox"/> <b>Bus</b> <input type="checkbox"/> <b>Other</b>	
<b>Bus Stop Location:</b>	
What is the bus stop number?	
What route(s) or destination(s) does the bus stop serve?	
What is the direction of bus travel on that street? <i>(Northbound, Southbound, Eastbound, Westbound)</i>	
Please include any other information that will help CAT locate the bus stop.	
<b>Landing Area Issues: (An area for a lift/ramp to deploy, when getting on or off the bus)</b>	
Is there a landing area that can accommodate a customer using a mobility device?	<input type="checkbox"/> YES <input type="checkbox"/> NO
If so, are there problems with the landing area surface? <i>Please describe the problem(s).</i>	
Describe any obstacles that would limit the mobility of a wheelchair user? (i.e., trash receptacle, newspaper boxes, landscaping, etc.)	
Is the sidewalk or pathway leading to the bus stop accessible for a person using a wheelchair or mobility device?	
<b>Passenger Shelter Issues:</b>	
Please describe the issue if your complaint/concern is regarding Passenger Shelter accessibility.	
<b>Bus Accessibility Issues:</b>	
Bus Number (if applicable)	
Please describe any accessibility issues you may have experienced <i>(inoperable lift, securement apparatus, etc)</i>	
<b>Other:</b>	
If your complaint or concern is something other than what is listed here, please explain:	



## ADA Formulario de Queja de Accesibilidad (Página 2 de 2)

ADA su queja de accesibilidad /preocupación está relacionado: (Marque uno):	
<input type="checkbox"/> Parada de Autobús <input type="checkbox"/> Área de Aterrizaje <input type="checkbox"/> Refugio de Autobús <input type="checkbox"/> Autobús <input type="checkbox"/> Otros	
<b>Ubicación de la Parada de Autobús:</b>	
¿Cuál es el número de la parada de autobús?	
¿Qué rutas o destinos sirve la parada de autobús?	
¿Cuál es la dirección del recorrido del autobús en esa calle? (Hacia el norte, hacia el sur, hacia el este, hacia el oeste)	
Por favor incluya cualquier otra información que ayudará a CAT a localizar la parada de autobús.	
<b>Temas del área de aterrizaje: (Una zona para una ascensor/rampa implementar, cuando subir o bajar del autobús)</b>	
¿Hay una zona de aterrizaje que puede acomodar a un cliente que usa un dispositivo de movilidad?	<input type="checkbox"/> SI <input type="checkbox"/> NO
Si es así, ¿hay problemas con la superficie de la zona de aterrizaje? Por favor, describa el problema (s).	
¿Describir cualquier obstáculo que limite la movilidad de un usuario de silla de ruedas? (es decir, basura de receptáculo, periódico, cajas, jardinería, etc.)	
¿La acera o camino que lleva a la parada de autobús accesible para una persona que usa una silla de ruedas o movilidad dispositivo?	
<b>Temas de Refugio de Pasajeros</b>	
Por favor describa el problema si su queja/preocupación es sobre accesibilidad del refugio de pasajeros.	
<b>Problemas de Accesibilidad del Autobús</b>	
Numero de Autobús (si corresponde)	
Por favor describa cualquier problemas de accesibilidad que puede haber experimentado (elevación inoperable, aparato de aseguramiento, etc.)	
<b>Otros</b>	
Si su queja o preocupación es algo distinto de lo que se encuentra listado aquí, por favor explique:	

FILE LOCATION: J Drive: PWTRANSIT: Charlottesville Area Transit: Planning: Civil Rights

**Attachment E: Acknowledgment Letter of Receipt of Title VI Complaint**

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**Acknowledgment Letter of Receipt of Title VI Complaint**

Today's Date

Ms. Jo Doe 1234  
Main Street.  
City, VA 22902

Dear Ms. Doe:

This letter is to acknowledge receipt of your Title VI complaint against Charlottesville Area Transit alleging \_\_\_\_\_.

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by the following methods:

Telephone: 434-970- 3313  
Email: [Herringb@charlottesville.org](mailto:Herringb@charlottesville.org)  
Mail: Title VI Coordinator  
1545 Avon Street  
Charlottesville, VA 22902

Sincerely,

Title VI Coordinator  
Charlottesville Area Transit

**Attachment F: Notification to Complainant that Title VI Complaint Is Substantiated**

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**Notification to Complainant that Complaint Is Substantiated**

Today's Date

Ms. Jo Doe  
123 Main St.  
City, VA 22902

Dear Ms. Doe:

The matter referenced in your letter of \_\_\_\_\_(date) against Charlottesville Area Transit alleging a Title VI violation has been investigated.

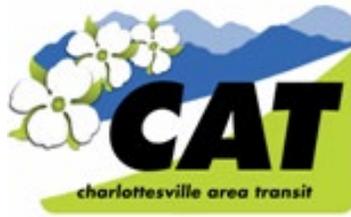
(An/Several) apparent violation(s) of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

Thank you for calling this important matter to our attention. You were extremely helpful during our review of the program.

(If a hearing is requested, the following sentence may be appropriate.) You may be hearing from this office, or from federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

Name  
Title VI Coordinator



**Notification to Complainant that the Title VI Complaint Is Not Substantiated**

Today's Date

Ms. Jo Doe  
123 Main St.  
City, VA 22902

Dear Ms. Doe:

The matter referenced in your complaint of \_\_\_\_\_(date) against the Charlottesville Area Transit alleging \_\_\_\_\_ has been investigated.

CAT's Title VI Coordinator has analyzed all available materials and facts pertaining to your case for evidence of CAT's failure to comply with any of the civil rights laws. The results of the investigation did not indicate that the provisions of Title VI of the Civil Rights Act of 1964 were violated in this case. As you know, Title VI prohibits discrimination based on race, color, or national origin in any program receiving federal financial assistance.

I therefore advise you that your complaint has not been substantiated, and that I am closing this matter in our files as of the date of this letter. You have the right to 1) appeal the decision with CAT within *15 calendar days* of receipt of this letter and/or 2) file a complaint externally with the Federal Transit Administration at:

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

Thank you for taking the time to contact us. If I can be of assistance to you in the future, do not hesitate to call me.

Sincerely,

Name  
Title VI Coordinator

CITY OF CHARLOTTESVILLE

*"A World Class City"*

Office of The City Manager

P.O. Box 911 • Charlottesville, Virginia 22902

Telephone 434-970-3101

Fax 434-970-3890

[www.charlottesville.org](http://www.charlottesville.org)



October 18, 2016

Lynn A. Bailey  
Civil Rights Officer, Region III  
Federal Transit Administration  
U.S. Department of Transportation  
1760 Market Street, Suite 500  
Philadelphia, PA 19103

Dear Ms. Bailey,

In conjunction with the 2016 Title VI program update submitted by the City of Charlottesville (Charlottesville Area Transit), I hereby report that I have read and approved the 2016 Title VI Plan for Charlottesville Area Transit.

You may contact Christina Downey at (434) 970-3849 or at [downeyc@charlottesville.org](mailto:downeyc@charlottesville.org) with any questions or issues.

Sincerely,

A handwritten signature in cursive script that reads 'Maurice Jones'.

Maurice Jones  
City Manager  
City of Charlottesville



# Limited English Proficiency Employee Questionnaire

Employee Name: \_\_\_\_\_

It is a requirement of Title VI of the Civil Rights Act of 1964 that CAT provide meaningful access to people with **Limited English Proficiency** (LEP). Treatment based upon a person's inability to speak, read, write, or understand English is a type of national origin discrimination. CAT would like to determine the frequency with which CAT staff comes into contact customers who do not speak English very well or at all. Please fill out the brief questionnaire below regarding your interaction with LEP customers.

1. **What is your position at CAT?**     Bus Driver     DTS Customer Service Representative
- Dispatch Supervisor     Administration     Maintenance

2. In a **ONE MONTH** period, how often do think you come into contact with Non-English speaking CAT customers (include phone contact if you have it).

- Never                       1-4 times a month                       5-10 times a month                       11-20 times a month
- 20+ times a month     Every day                       other

\_\_\_\_\_

3. In a **ONE MONTH** period, how often do you get a request for translation services (include phone contact if you have it).

- Never                       1-4 times a month                       5-10 times a month                       11-20 times a month
- 20+ times a month     Every day                       Other \_\_\_\_\_

4. **Which language (besides English) do you come into contact with most often? (check one)**

- Spanish                       Asian Pacific Languages                       French
- Arabic                       Other \_\_\_\_\_

5. **Are you familiar with the "I Speak" cards available for non-English speaking riders?**     Yes     No

6. **Is English your primary language?**     Yes     No

7. **Do you speak any language besides English?**     Yes     No    If yes, which? \_\_\_\_\_

8. **Would you be interested in assisting with CAT interpretation services?**     Yes     No     N/A

9. **How do you assist LEP persons who seek assistance?** \_\_\_\_\_

10. **Can you recommend ways in which CAT could improve your ability to communicate with members of the public who do not speak English very well or at all?** \_\_\_\_\_