Title VI Program

City of High Point
Transit System
PO Box 230
211 S Hamilton St
High Point, NC 27261

Title VI Program

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I. Overview

A. Introduction and Purpose

This plan is designed to ensure fair and equitable distribution of transportation services and facilities under City of High Point Transit System purview. Its complimentary parts consist of Title VI (Environmental Justice) and the Public Involvement Process. Public participation is essential to the success of any public planning program or project. Without the involvement of local citizens, it is difficult to design a program that meets the needs of the public or to gauge the project's success. Effective public involvement not only provides transportation officials with new ideas, but it also alerts them to potential environmental justice concerns during the planning stage of a project. Perhaps the most important element of public participation is to engender a sense of ownership among the people who often feel they have no voice or efficient way to influence public policy.

These reasons, combined with a national history of discrimination against persons on the basis of race, color, ethnic origin, age, sex, disability, religion and economic status, has led federal and state governments to set requirements to endure equity of public involvement in federally funded agencies and their associated organizations. It is through the details of these individual programs that the equity and democracy that we embrace in this city is exercised.

For the purposes of this plan the City of High Point is the recipient of federal and state funding for the provision of public transportation services. The funding and services are administered by the transit division (High Point Transit System) of the City of High Point Department of Transportation. The transit division staff is charged with:

1. Making recommendations regarding transit service design and policy to improve the efficiency, effectiveness and level of coordination of the city's transportation program, particularly with respect to the transportation needs of the city's disabled, elderly and general public population; and

2. Developing and promoting needed transportation services and programs for city residents.

B. Objectives

The goal of the plan is to fulfill its purpose by meeting the following objectives:

1. Comply with the public involvement and environmental justice requirements of the Federal and State regulations;

2. Avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations;
3. Provide specific opportunities for High Point citizens and citizen-based organizations to discuss their views and provide input on the subject areas addressed in plans, projects or policies of;
4. Ensure full and fair participation by all potentially affected communities in the transportation decision-making process; and
5. Inform and educate citizens and other interested parties about ongoing transit planning activities in High Point, and their potential role in those activities.

II. PUBLIC OUTREACH

A. Responsibilities and Objectives

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

B. Public Meetings

All Public meetings will be held in convenient and accessible locations and facilities. Meeting materials will be available in a variety of formats upon request. Request shall be made at least 48 hours before the meeting. A variety of advertising means will be used to inform the media of public meetings. Assistance to persons with disabilities will be available upon previous request.

C. Notice to the Public

The City of High Point Transit System hereby gives public notice of its policy to uphold and assure full compliance with Title VI of the Civil Rights Act of 1964 and all related acts and statutes. Title VI and related statutes prohibiting discrimination in federally assisted programs require that no person in the United States of America shall, on the grounds of race, color, or national origin, be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal assistance.

Any person who believes they have been aggrieved by an unlawful discriminatory practice regarding High Point Transit System programs has a right to file a formal complaint with High Point Transit System. Any such complaint must be in writing

and submitted to the High Point Transit System Title VI Compliance Officer within one hundred eighty (180) days following the date of the alleged occurrence.

For more information regarding civil rights complaints, please contact:

Title VI Compliance Officer
High Point Transit System
716 West Kivett Drive
High Point, NC 27262
(336) 883-3424

Este aviso está disponible en Español.

Thông báo này là có sẵn bằng tiếng Việt.

High Point Transit System will provide notice to the public of our Title VI obligations in all transit revenue service vehicles, buildings and general transit information brochures which are disseminated to the public throughout our service area.

This notice is posted in the following locations:

- Inside all revenue service vehicles
- Front entrance to transit system administrative facility
- In the passenger waiting area of the Broad Ave Terminal

D. Public Involvement Process

The main objectives are to:

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

Experience has shown difficulty in reaching a diverse population and keeping them involved. Federal and State regulations require us to provide the public with information and to reach out and include traditionally under-served populations.

E. Outreach Tools

1. Public Relations

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

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

2. Public Involvement Tools

There are a broad variety of ways to educate and engage the public. In general, the earlier public involvement is sought, the better. It is also a better use of citizens' free time to participate in a process that will determine the direction of a project that may take years to complete. Citizens may get frustrated when they are invited to join late in the process - when the values and goals have already been decided and the details have been hammered out. The following tools are examples that will be used. The tool will be selected based upon the complexity and number of person impacted by the issue.

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

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

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

Public Hearings are held when a plan has been completed and public review is required before moving forward. As with all of these tools, care must be taken to ensure that the public is made fully aware of the hearing well in advance, and that the goals and values of the plan are clearly stated.

3. Direct Marketing and Education

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

F. Plan Monitoring and Evaluation

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

G. Tracking Efforts and Success

In order to measure the success of public participation efforts, it is necessary to record the efforts through the following means:

1. Keeping a log of the outreach activities;
2. Keeping copies of any print ads, and transcripts of any public service announcements; and

3. Preparing notes after meetings regarding the overall tone of the meeting and any ideas or observations made regarding the process.

H. Summary of Public Outreach and Involvement Activities

High Point Transit participated in the following events:

April 9, 2011	Triad Commute Challenge
August 2, 2011	Community Health Fair
January 23, 2012	Church Women United
March 10, 2012	Triad Commute Challenge
April 12, 2012	REAL World Expo
April 20, 2012	High Point University Earth Day Celebration
April 30, 2012	Building Integrated Communities Workshop
April 27, 2013	Hi Fest and Community Development Day Celebration
July 25 2013	Nepalese/Bhutanese Community Transit Workshop

Transit staff continues to work with the Human Relations Department to reach out to various communities throughout the city to provide information on the transit system and how to access the services.

III. LEP FOUR FACTOR ANALYSIS

A. PURPOSE

The purpose of this assessment is to ensure compliance with Title VI of the Civil Rights Act of 1964 and Section 2 of Executive Order 13166 with respect to persons with limited English proficiency (LEP). Title VI of the Civil Rights Act of 1964 prohibits discrimination based on the grounds of race, color or national origin by any entity receiving federal financial assistance. Administrative methods or procedures, which have the effect of subjecting individuals to discrimination or defeating the objectives of these regulations, are prohibited.

This assessment details the City of High Point Transit System self-assessment and community research and outreach to improve access to its federally conducted programs and activities by eligible individuals who are limited English proficient (LEP).

B. Demography

The City of High Point Transit System has developed a demographic profile of the population served or likely to be served. The following information is based on 2012 U.S. Census Bureau American Community Survey (ACS) Data.

The City of High Point had a population of 106,164 individuals. The race and ethnic breakout is as follows:

White	59,128	55.7%
African American	34,991	33.0%
American Indian/Alaskan Native	596	0.6%
Asian	7,069	6.7%
Native Hawaiian/Other Pacific Islander	0	0.0%
Other	2,272	2.1%
Two or more races	2,108	2.0%
Hispanic/Latino	9,217	8.7%

11.4% of the population of High Point is foreign born with 5.9% of those entering the City in 2010 or later and 95.2% entering prior to 2010. 61.1% of those foreign born individuals are not citizens. The rate of growth in the foreign born population has slowed, but the absolute numbers continue to increase.

Using the 2010 – 2012 Average ACS data we see the Region of Birth of Foreign Born Population is as follows:

Europe	8.0%
Asia	37.9%
Africa	9.1%
Oceania	0.0%
Latin America	43.7%
North America	1.4%

14.6% of the population 5 years of age or older in High Point speaks a language other than English at home and of that 7.6% speak English less than "very well."

Spanish	6.9%
Speak English less than "very well"	4.1%
Indo-European languages	3.5%
Speak English less than "very well"	1.5%
Asian & Pacific Island languages	3.5%
Speak English less than "very well"	1.8%
Other languages	.7%
Speak English less than "very well"	.3%

These figures have not remained static. Comparing the new 2012 estimates with 2000 Census Data, the data from the 2005 ACS, the 2009 ACS data, the 2010 ACS data we find that not only has the city's overall population grown to 106,641 individuals there has been significant growth in the foreign born and even though the number of individuals who speak English less than "very well" has declined since 2000 it is still a significant number.

	2000 Census Estimate	2005 ACS Estimate	2009 ACS Estimate	2010 ACS Estimate	2012 ACS Estimate
Total Population	85,839	101,852	103,921	104,371	106,641
Foreign born	6,465	9,189	11,229	11,750	12,073
	(7.5%)	(9.0%)	(10.8%)	(11.3%)	(11.3%)
Speak English less than "very well"	4,878	N[1]	6,787	6,712	7,498
	(75%)		(60%)	(57%)	(62%)

[1] N means that this information was not available from this dataset.

HOUSEHOLD LANGUAGE BY LINGUISTIC ISOLATION

Total:	42,965	
English only	37,440	
Spanish:	2,438	
Linguistically isolated	916	37.6%
Not linguistically isolated	1,520	
Other Indo-European languages:	1,108	
Linguistically isolated	211	19.0%
Not linguistically isolated	897	
Asian and Pacific Island languages:	1,635	
Linguistically isolated	536	32.8%
Not linguistically isolated	1,099	
Other languages:	346	
Linguistically isolated	94	27.2%
Not linguistically isolated	252	

The data available from the sample selection of 2012 American Community Survey data shows significant linguistically isolated households. The Spanish language has the greatest percentage of households that are linguistically isolated followed closely by the Asian and Pacific Island languages. Even though the category "other languages" shows that 27.2% of those households are linguistically isolated, the languages are not specified and detailed data is not available for the small sample size.

In using the above census data and working with the City of High Point's Human Relations Department and the Center for New North Carolinians[2], transit staff has been able to determine that the greatest non-English language need in the community is Spanish followed by Vietnamese. In working with World Relief, a non-profit organization that assists refugees, a wide variety of other languages have been identified in the High Point community and transit system service area. World Relief currently has either on staff or through volunteers or contractors resources to assist with translation and interpretation needs of the refugees.

Maps in Appendix A show the relationship between the transit system fixed routes and census block groups that meet or exceed identified thresholds in the Hispanic and Asian populations. The paratransit system serves the entire city, therefore the schedulers/dispatchers and operators could have interaction with individuals who speak English less than "very well" anywhere in the service area.

[2] http://cnnc.uncg.edu/immigrant-demographics-of-guilford-county/

C. Frequency of Contact

Over the past several years transit system staff has had regular contact with LEP persons who speak non-English languages. Many of the foreign born individuals who have settled in High Point are unable to drive and rely upon public transit. Individuals use the service on a daily basis to go to work or school, access medical care and social services, and access retail and commercial centers.

D. Importance

Public transportation has been considered the "to" in Welfare to Work, Access to Healthcare, and several other programs and/or services that often are utilized by the low-income, minorities, and LEP persons. Without access to public transportation many of these individuals would not be able to take advantage of other services that could potentially be life changing or life sustaining.

High Point Transit System has applications for several of its programs that could be used by LEP persons. The Dial-A-Lift transportation service provides door to door transportation for the elderly and disabled, and the Hi tran Reduced Fare program provides reduced fares for the elderly, disabled, and Medicare card holders.

Basic transit information such as rules, schedules, and "how to" information greatly impacts access to individuals who do not qualify for the special programs, but depend on public transportation as their means to access education, employment, healthcare, social services, and shopping.

It has become increasingly important for nearly all transit information to be available in a format that is accessible for LEP persons to prevent delays or denial of access to services.

E. Resources

Language Access Coordination

The Title VI Compliance Officer is the individual assigned to coordinate and ensure meaning access to services for LEP individuals.

Points of Contact

- Office staff answering transit information lines
- Information Specialists at Broad Avenue Terminal
- Vehicle Operators
- Transit Road Supervisors

Staff

Currently there are no transit staff persons who are bilingual. There is one individual who has some experience with sign language since he has a family member who has a hearing impairment. Two individuals have limited Spanish abilities.

Outside the transit system, but still within the City of High Point staff, there are at least two individuals, one in Customer Service and one in Human Relations, who are bilingual.

Outside the City of High Point organization, staff works with the Latino Family Center and World Relief which both have translators/interpreters available through staff, volunteers, or contractors.

As the availability of the in-house resources and even those of agencies the transit system is working with is often unpredictable, the transit system has contracted with private companies for website translation services and telephonic interpretation services to ensure that resources are readily available to meet the needs of the foreign born LEP. When possible and for non-personal information only, family members of the individual including minors may be used to assist in interpreting for LEP individuals.

Native born LEP individuals will be provided whatever assistance they require to access the services. These methods include but are not limited to reading instructions and applications to the individual, filling in the information they provide orally on necessary applications, and directing/assisting to the correct bus or van.

IV. LIMITED ENGLISH PROFICIENT LANGUAGE ASSISTANCE PLAN

A. PURPOSE

The purpose of this policy is to ensure compliance with Title VI of the Civil Rights Act of 1964 and Section 2 of Executive Order 13166 with respect to persons with limited English proficiency (LEP). Title VI of the Civil Rights Act of 1964 prohibits discrimination based on the ground of race, color or national origin by any entity receiving federal financial assistance. Administrative methods or procedures, which have the effect of subjecting individuals to discrimination or defeating the objectives of these regulations, are prohibited.

This Plan details City of High Point Transit System initiatives and plans to improve access to its federally conducted programs and activities by eligible individuals who are limited English proficient (LEP).

28 C.F.R., Part 39, Editorial Note, *Section 29.102 Application.* Neither Executive Order 13166 nor this Plan creates any new right(s), including the right to seek administrative or judicial enforcement, on the part of any person, including a person with limited English proficiency.

B. Scope of Policy

These requirements will apply to High Point Transit System including subcontractors, vendors, and subrecipients.

High Point Transit System will ensure that LEP individuals are provided meaningful access to benefits and services provided through contractors or service providers receiving federal funding from the City of High Point.

C. Definitions

A. Limited English Proficient (LEP) individual – Any prospective, potential, or actual recipient of services from High Point Transit System who cannot speak, read, write or understand the English language at a level that permits them to interact effectively with transit system staff.

B. Vital Documents – These forms include, but are not limited to, applications, consent forms, letters containing important information regarding participation in a program; notices pertaining to the reduction, denial, or termination of services, the right to appeal such actions, or that require a response from notices advising LEP persons of the availability of free language assistance, and other outreach materials.

C. Title VI Compliance Officer – The person responsible for compliance with Title VI policies.

D. Substantial number of LEP – 3% or 3,500 people, whichever is smaller, are potential applicants or recipients of service and speak a primary language other than English and have limited English proficiency.

D. Providing Notice to LEP Individuals

The transit system will take appropriate steps to inform all applicants, recipients, community organizations, and other interested persons, including those whose primary language is other than English, of the provisions of this policy. Such notification will also identify the name, office telephone number, and office address of the Title VI compliance officer.

Angela W. Wynes, Transit Manager
City of High Point Transit System
716 West Kivett Drive
High Point, NC 27262
(336) 883-3424
(336) 883-3425 (fax)
Angela.Wynes@highpointnc.gov

A. The transit system will post and maintain signs in regularly encountered languages other than English in reception/waiting areas and other initial points of contact. These signs will inform applicants and recipients of service of their rights to free language assistance services and invite them to identify themselves as persons needing such services.

   Areas where signs will be posted:
   - Inside all revenue service vehicles;
   - Front entrance to transit system administrative facility;
   - At the Broad Ave Terminal information booth; and
   - In the Broad Ave Terminal waiting area

B. The transit system will include statements of the right of free language assistance in Spanish and other regularly encountered languages in all outreach material that is routinely disseminated to the public (including electronic text).

C. The transit system will also disseminate information in the following manner:

   - A brochure is available that explains the right to free language assistance.
   - Displays and booths will include information on free language assistance.
   - Information will be posted on the transit system website at www.highpointnc.gov/hi-tran

E. Provision of Services to LEP Applicants/Recipients

A. Assessing Linguistic Needs of Potential Applicants and Recipients

1. The transit system will assess the language needs of the population to be served, by identifying:

   a. The language needs of each LEP applicant/recipient
   b. The points of contact where language assistance is needed; and
   c. The resources needed to provide effective language assistance, including location, availability and arrangements necessary for timely use.

2. Determining the Language Needs of the Population to be Served

   The transit system is responsible for assessing the needs of the population to be served. Such assessment will include, but not be limited to the following:

   a. The non-English languages that are likely to be encountered.
   b. An estimate of the number of people in the community for whom English is not the primary language used for communication will be completed and

updated annually. To identify the language and number of LEP individuals the transit system will review:

i. Census data
ii. Community agencies' data
iii. School system data
iv. Reports from federal, state, and local governments
v. Interviews with staff to determine frequency of contact with LEP individuals and what language was encountered

c. The points of contact in the transit system where language assistance is likely to be needed will be identified.

3. Determining the Language Needs of Each Applicant/Recipient

The transit system will determine the language needs of each applicant/recipient. Such assessment will include, but not be limited to the following:

a. At the first point of contact, each applicant/recipient will be assessed to determine the individual's primary language by using the following methods:
   i. Using applicant/recipient's statement "Hablo español" or another phrase indicating they do not speak English.
   ii. Applicant/recipient's request for an interpreter
   iii. Multi-language identification booklet.
b. If the LEP person does not speak or read any of these languages, the transit system will use a telephone interpreting service to identify the person's primary language.
c. Staff will not solely rely on their own assessment of the person's English proficiency in determining the need for an interpreter. If an individual requests an interpreter, an interpreter will be provided free of charge. A declaration of the person will be used to establish the person's primary language.
d. When staff place or receive a telephone call and cannot determine what language the other person on the line is speaking, a telephone interpreting service will be utilized in making the determination.

B. Provision of Bilingual/Interpretive Services

1. The transit system will ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English speaking population. The provision of bilingual/interpretive services will be prompt without undue delay.

2. The transit system will provide language assistance to LEP individuals in an office setting via person to person or telephone interactions using a telephone

interpreter service. Language assistance to LEP individuals at public meetings will be provided by contracting with an interpreter or using a volunteer interpreter. The transit system will not require the individual to pay for bilingual/interpretive services.

3. Interpreter Standards

    a. Those providing bilingual/interpretive services will meet the linguistic and cultural competency standards set forth below. The transit system will ensure that interpreters have been screened to ensure that the following standards are met before being used for interpreter services:

        i. Can fluently and effectively communicate in both English and the primary language of the LEP individual
        ii. Can accurately and impartially interpret to and from such languages and English
        iii. Has a basic knowledge of specialized terms and concepts used frequently in the provision of the system's services.
        iv. Demonstrates cultural competency
        v. Understands the obligation to maintain confidentiality when appropriate
        vi. Understands the roles of interpreters and the ethics associated with being an interpreter.

    b. The transit system will ensure the competency of interpreters using the following methods:

        i. Contracted interpreters
            1. Present resume or similar document showing years of experience, formal education in translation and interpretation, and accreditation from professionally recognized organizations.
            2. Present proof of continued education and any certifications.
            3. Have understanding of transportation, specifically transit, terminology.
        ii. Volunteer interpreters
            1. Native speakers
            2. Non-native speakers
                a. Present resume or similar document showing years of experience, formal education in translation and interpretation, and accreditation from professionally recognized organizations.
                b. Present proof of continued education and any certifications.
                c. Have understanding of transportation, specifically transit, terminology.

d. Be approved through other agencies whose services may impact the LEP population. (e.g. High Point-Thomasville Chapter of the American Red Cross International Service Committee has a bank of volunteer interpreters.)

C. Provision of Written Translations

1. The transit system will provide written materials in languages other than English where a substantial number or percentage of the population eligible or likely to be served by transit system programs/services needs services or information in a language other than English to communicate effectively.

2. If the primary language of an LEP individual is a language that does not meet the threshold for translation as defined in the paragraph VIIID, the LEP individual will be informed in their own language of the right to oral translation of written notices. The notification will include, in the primary language of the individual, the following: IMPORTANT: IF YOU NEED HELP IN READING THIS, ASK THE AGENCY FOR AN INTERPRETER TO HELP. AN INTERPRETER IS AVAILABLE FREE OF CHARGE.

D. Staff Development and Training

1. The transit system will provide staff training initially for all employees to notify them of the policy and their responsibilities, at new employee orientation and periodically as needed for refresher training or when updates occur in the plan. The training will include, but not be limited to:

   a. Language assistance policies and procedures, resources available to support such procedures, methods of effective use of interpreters, and familiarization with the discrimination complaint process.

   b. Cultural awareness information, including specific cultural characteristics of the group served by the agency to provide a better understanding of, and sensitivity to, the various cultural groups to ensure equal delivery of services.

2. The transit system will provide or ensure training is provided for bilingual staff and interpreters employed or utilized by the transit system. This includes the ethics of interpreting, including confidentiality; methods of interpreting; orientation to the organization; specialized terminology used by the transit system; and cultural competency.

3. The transit system will collect and maintain the following information about training provided to staff and volunteers: the date(s) of such training, the content of such training, and the names of each attendee at the training.

4. The transit system will ensure that applicable subrecipients and contractors are trained in the requirements of this policy by including applicable language in grant agreements, contracts, MOUs, or other documentation.

F. Monitoring

The transit system will complete an annual review of the LEP population and language groups to determine if any new documents, programs, services or activities need to be made accessible for LEP individuals. The transit system will consider at a minimum the following:

1. Current LEP populations in the service area
2. Frequency of encounters with LEP language groups
3. Nature and importance of activities to LEP persons
4. Availability of resources, including technological advances and sources of additional resources, and the costs imposed.
5. Whether existing assistance is meeting the needs of LEP persons
6. Whether staff knows and understands the LEP plan and how to implement it.
7. Whether identified sources for assistance are still available and viable.

G. Complaints of Discriminatory Treatment

A. Complaints

1. The transit system will provide assistance to LEP individuals who do not speak or write in English if they indicate that they would like to file a complaint. A complaint will be filed in writing, contain the name and address of the person filing it or his/her designee and briefly describe the alleged violation of this policy.

2. The transit system will maintain records of any complaints filed, the date of filing, actions taken and resolution.

3. The transit system will notify the appropriate agency(ies) of complaints filed, the date of filing, actions taken and resolution.

B. Investigation

1. The Title VI compliance officer will conduct an investigation of the allegations of the complaint. The investigation will afford all interested persons and their representatives, if any, an opportunity to submit evidence relevant to the complaint.

2. The investigation will not exceed 30 days, absent a 15-day extension for extenuating circumstances.

C. Resolution of Matters

1. If the investigation indicates a failure to comply with the Act, the Title VI compliance officer or his/her designee will inform the violator and the matter will be resolved by one of the following means within 45 days.

    a. Employee

        i. Retraining on the LEP Policy.
        ii. If necessary, appropriate disciplinary action will be taken per the City of High Point's Personnel Resolution.

    b. Volunteer, Contractor or Subrecipient

        i. Volunteer interpreter
            1. Written notice notifying volunteer of violation
            2. Retraining on the LEP Policy
            3. Future violations could result in discontinued use of volunteer

        ii. Contractor
            1. Written notice notifying contractor of non-compliance
            2. Retraining on the LEP Policy
            3. Future violations could result in termination of contract

        iii. Subrecipient
            1. Written notice notifying subrecipient of non-compliance
            2. Retraining on the LEP Policy
            3. Future violations could result in termination of federal funds

2. If the matter cannot be resolved by informal means, then the individual will be informed of his or her right to appeal further to the High Point Human Relations Commission.

    High Point Human Relations Commission
    211 South Hamilton Street, Room 117
    P. O. Box 230
    High Point, North Carolina
    (336) 883-3124

    This notice will be provided in the primary language of the LEP individual.

3. If not resolved by the Human Relations Commission, then the complaint will be forwarded to:

   Federal Transit Administration Office of Civil Rights
   Attention: Title VI Program Coordinator
   400 7th Street SW Room 9100
   Washington, DC 20590

V. TITLE VI COMPLAINT PROCESS

If you believe that you have received discriminatory treatment by High Point Transit System on the basis of your race, color or national origin, you have the right to file a complaint with the High Point Transit System Title VI Compliance Officer.

A. Complaints

1. A complaint must be filed in writing within 180 days of the alleged violation, contain the name and address of the person filing it or his/her designee and briefly describe the alleged violation of this policy. See form in Appendix B that may be used by complainant. The transit system will provide assistance to LEP individuals who do not speak or write in English if they indicate that they would like to file a complaint.

2. The transit system will maintain records of any complaints filed, the date of filing, actions taken and resolution. See attached complaint log.

3. The transit system will notify the appropriate agency(ies) of complaints filed, the date of filing, actions taken and resolution.

B. Investigation

1. The Title VI compliance officer will conduct an investigation of the allegations of the complaint. The investigation will afford all interested persons and their representatives, if any, an opportunity to submit evidence relevant to the complaint.

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1. If the investigation indicates a failure to comply with the Act, the Title VI compliance officer or his/her designee will inform the violator and the matter will be resolved by one of the following means within 45 days.

   a. Employee

      i. Retraining on the Title VI and/or LEP policies.
      ii. If necessary, appropriate disciplinary action will be taken per the City of High Point's Personnel Resolution.

   b. Volunteer, Contractor or Subrecipient

      i. Volunteer interpreter
         1. Written notice notifying volunteer of violation
         2. Retraining on the Title VI and/or LEP policies
         3. Future violations could result in discontinued use of volunteer

      ii. Contractor
         1. Written notice notifying contractor of non-compliance
         2. Retraining on the Title VI and/or LEP policies
         3. Future violations could result in termination of contract

      iii. Subrecipient
         1. Written notice notifying subrecipient of non-compliance
         2. Retraining on the Title VI and/or LEP policies
         3. Future violations could result in termination of federal funds

2. If the matter cannot be resolved by informal means, then the individual will be informed of his or her right to appeal further to the High Point Human Relations Commission. This notice will be provided in the primary language of an LEP individual.

3. If not resolved by the High Point Human Relations Commission, then the complaint will be forwarded to:

   Federal Transit Administration Office of Civil Rights
   Attention: Title VI Program Coordinator
   400 7th Street SW Room 9100
   Washington, DC 20590

VI. LIST OF TITLE VI COMPLAINTS

There are no active lawsuits or complaints against the City of High Point Transit System alleging discrimination on the basis of race, color, or national origin with respect to service or other transit benefits.

VII. NON-ELECTED COMMITTEES/BOARDS

Currently there are no transit-related non-elected committees or boards.

VIII. FACILITY CONSTRUCTION EQUITY ANALYSIS

There have been no facility construction projects.

IX. SERVICE POLICIES

A. Vehicle Assignment Policy

Vehicle assignment refers to the allocation of transit vehicles to ensure that all communities receive the same quality of rolling stock benefits. Benefits include the vehicle age and on-board amenities. Generally vehicles will be assigned to routes on a rotating basis to ensure that the mileage is evenly distributed.

Route	Peak Buses	Bus Length
10 N Main St	1.5	32'
11 S Main St	1.5	32'
12 W Green Dr	1	32'
13 Montlieu Ave	1	32'
14 Westchester Dr	1	32'
16 Leonard Ave	1	32'
17 Washington Dr	1	32'
18 E Green Dr	1	32'
19 English Rd	1	32'
20 Kearns Ave	1	32'
21 Industrial Park Special/ 25 Jamestown/GTCC	1	32' when school is out or 40' when school in session.
Total	**12**	

All City of High Point buses have the same features which include ramped, low-floor access, air conditioning, automated fareboxes, voice annunciation systems, electronic destination signs, and bicycle racks.

B. Transit Amenities Policy

Transit amenities refer to fixed items of comfort and convenience available to the general riding public such as bus stop benches, shelters, lighting and bike racks. Title VI requires that such amenities be distributed equitably among minority, non-minority, and low-income households. Shelters are installed at stops with at least 20 boardings and/or alightings per day or stops serving elderly and individuals with disabilities taking into account existing site conditions, public right-of-way availability, accessibility and safety issues, and pedestrian

infrastructure. Benches may be placed at any stop where accessibility is provided and placement does not compromise safety or accessibility.

X. SERVICE STANDARDS

A. Vehicle Load

The number of passengers, or load, carried per hour, measures the efficiency of service. The City of High Point's system-wide efficiency goal or Load Standard for buses is 25 passengers or more per hour. The Load Factor, measured as a percent of a fully seated load, varies with the type of vehicle. The average of all loads during peak operating period should not exceed the vehicles' achievable capacities as defined in the chart below.

	Average Passenger Capacity			
Vehicle Type	**Seated**	**Standing**	**Total**	**Max Load Factor**
32' Bus	27	19	46	1.70
40' Bus	39	35	74	1.90

B. Vehicle Headways

Scheduling involves the consideration of a number of factors including ridership, transit/pedestrian friendly streets, land-use connectivity, population density, and location of major trip generators. To provide cost efficient, yet effective transit service, the City of High Point generally operates 30 minute headways during peak and 60 minutes headways in off-peak. During off-peak 30 minute headways may be implemented on high-ridership, high-productivity services where justified by demand.

Weekday

Route	Peak	Off-Peak
10 N Main St	30	30
11 S Main St	30	30
12 W Green Dr	30	60
13 Montlieu Ave	30	60
14 Westchester Dr	30	60
16 Leonard Ave	30	30
17 Washington Dr	30	60
18 E Green Dr	30	60
19 English Rd	30	60
20 Kearns Ave	30	60

The following routes are express or commuter routes that operate limited trips with irregular headways.

Route	Trips
21 Industrial Park Special	2
25 Jamestown/GTCC	8

Saturday

Route	Off-Peak
10 N Main St	60
11 S Main St	60
13 Montlieu Ave	60
14 Westchester Dr	60
15 Oak Hollow Mall	60
16 Leonard Ave	60
17 Washington Dr	60
18 E Green Dr	60
19 English Rd	60
20 Kearns Ave	60

C. On-time Performance

90% of all trips will arrive on-time at the Broad Ave Terminal. On-time is defined as no earlier than 2 minutes before the scheduled time and no later than 4 minutes after the scheduled time.

D. Service Availability

Using the Levels of Service definitions from the Transit Capacity and Quality of Service Manual – 2nd Edition, based on current ridership and levels of funding, the City of High Point will provide service to approximately two-thirds of the transit-supportive areas of the city by having a bus service within .25 miles.

Local bus stop will be not more than 4 blocks apart. Commuter route stops will be one-half to three-quarters of a mile apart.

XI. MONITORING SUBRECIPIENTS

As a primary recipient of FTA funds, the City of High Point receives, administers, and allocates funds to subrecipients and is responsible for documenting compliance with Title VI. The City of High Point's responsibilities include monitoring subrecipient compliance with Title VI, collecting and reviewing Title VI documents, including subrecipient Title VI data to FTA, and providing assistance and support to subrecipients.

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.

Ongoing assistance is provided to subrecipients allowing them access to subject matter experts within the City of High Point to provide input, information, data, and guidance as needed.

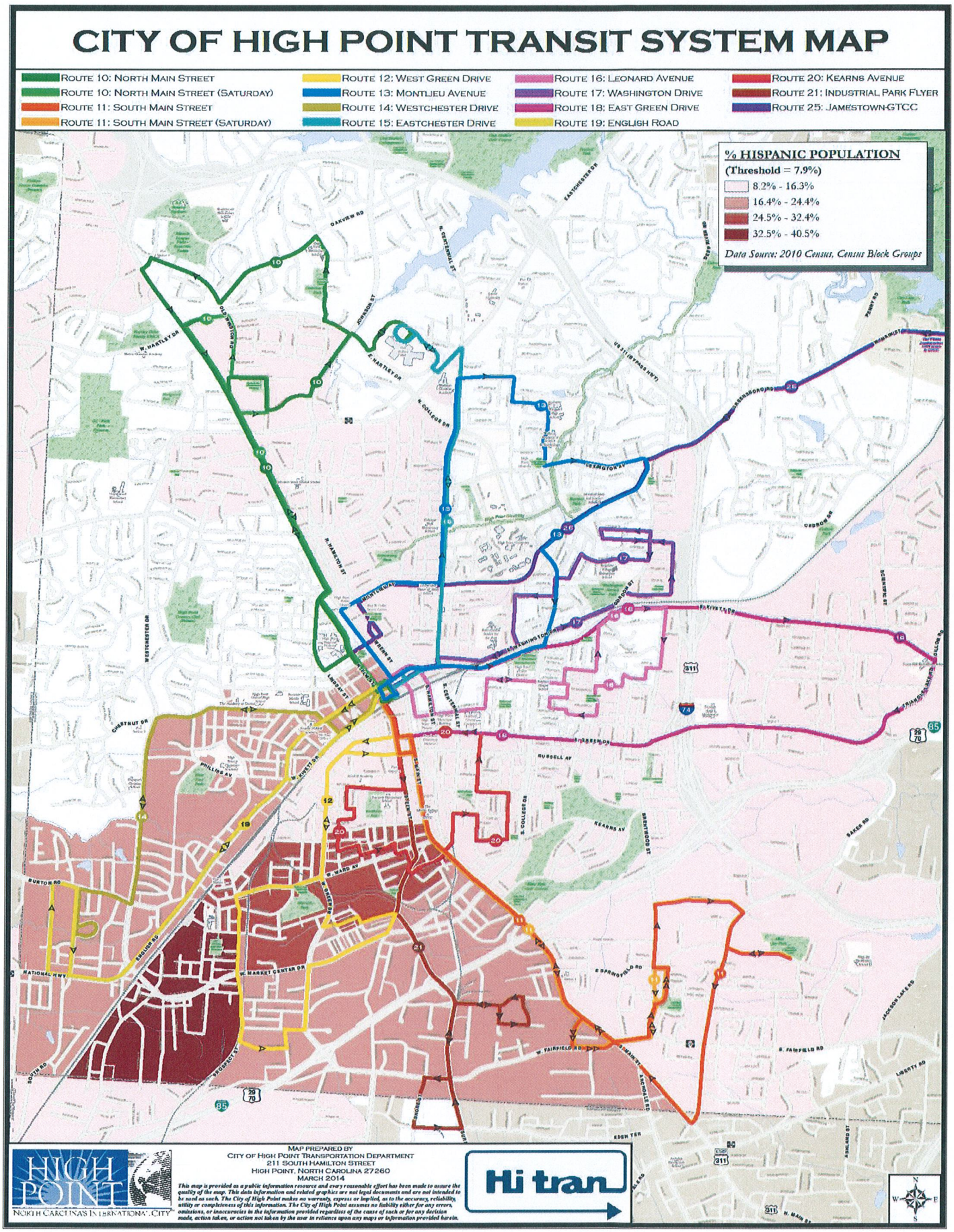
If a subrecipient is not in compliance with Title VI regulations the City will work with the subrecipient to ensure compliance. This includes providing data, information, guidance, and support for the full development and formal adoption of the subrecipient Title VI program components.

To track Title VI compliance the City:

- Documents subrecipient compliance with the general requirements.
- Collects and maintain subrecipient Title VI program documents on a designated schedule.
- Forwards subrecipient Title VI information as requested by the FTA.

Subrecipients must submit a Title VI Program to the City within 30 days of their grant award (grants awarded after September 1, 2013) and every three years after initial submission on March 30th. The City of High Point reviews all subrecipient Title VI Programs on a triennial basis.

Appendix A


CITY OF HIGH POINT TRANSIT SYSTEM MAP
ROUTE 10: NORTH MAIN STREET
ROUTE 10: NORTH MAIN STREET (SATURDAY)
ROUTE 11: SOUTH MAIN STREET
ROUTE 11: SOUTH MAIN STREET (SATURDAY)
ROUTE 12: WEST GREEN DRIVE
ROUTE 13: MONTLIEU AVENUE
ROUTE 14: WESTCHESTER DRIVE
ROUTE 15: EASTCHESTER DRIVE
ROUTE 16: LEONARD AVENUE
ROUTE 17: WASHINGTON DRIVE
ROUTE 18: EAST GREEN DRIVE
ROUTE 19: ENGLISH ROAD
ROUTE 20: KEARNS AVENUE
ROUTE 21: INDUSTRIAL PARK FLYER
ROUTE 25: JAMESTOWN-GTCC
% HISPANIC POPULATION
(Threshold = 7.9%)
8.2% - 16.3%
16.4% - 24.4%
24.5% - 32.4%
32.5% - 40.5%
Data Source: 2010 Census, Census Block Groups
MAP PREPARED BY
CITY OF HIGH POINT TRANSPORTATION DEPARTMENT
211 SOUTH HAMILTON STREET
HIGH POINT, NORTH CAROLINA 27260
MARCH 2014
This map is provided as a public information resource and every reasonable effort has been made to assure the quality of the map. This data information and related graphics are not legal documents and are not intended to be used as such. The City of High Point makes no warranty, express or implied, as to the accuracy, reliability, utility or completeness of this information. The City of High Point assumes no liability either for any errors, omissions, or inaccuracies in the information provided regardless of the cause of such or for any decision made, action taken, or action not taken by the user in reliance upon any maps or information provided herein.
HIGH POINT
NORTH CAROLINA'S INTERNATIONAL CITY
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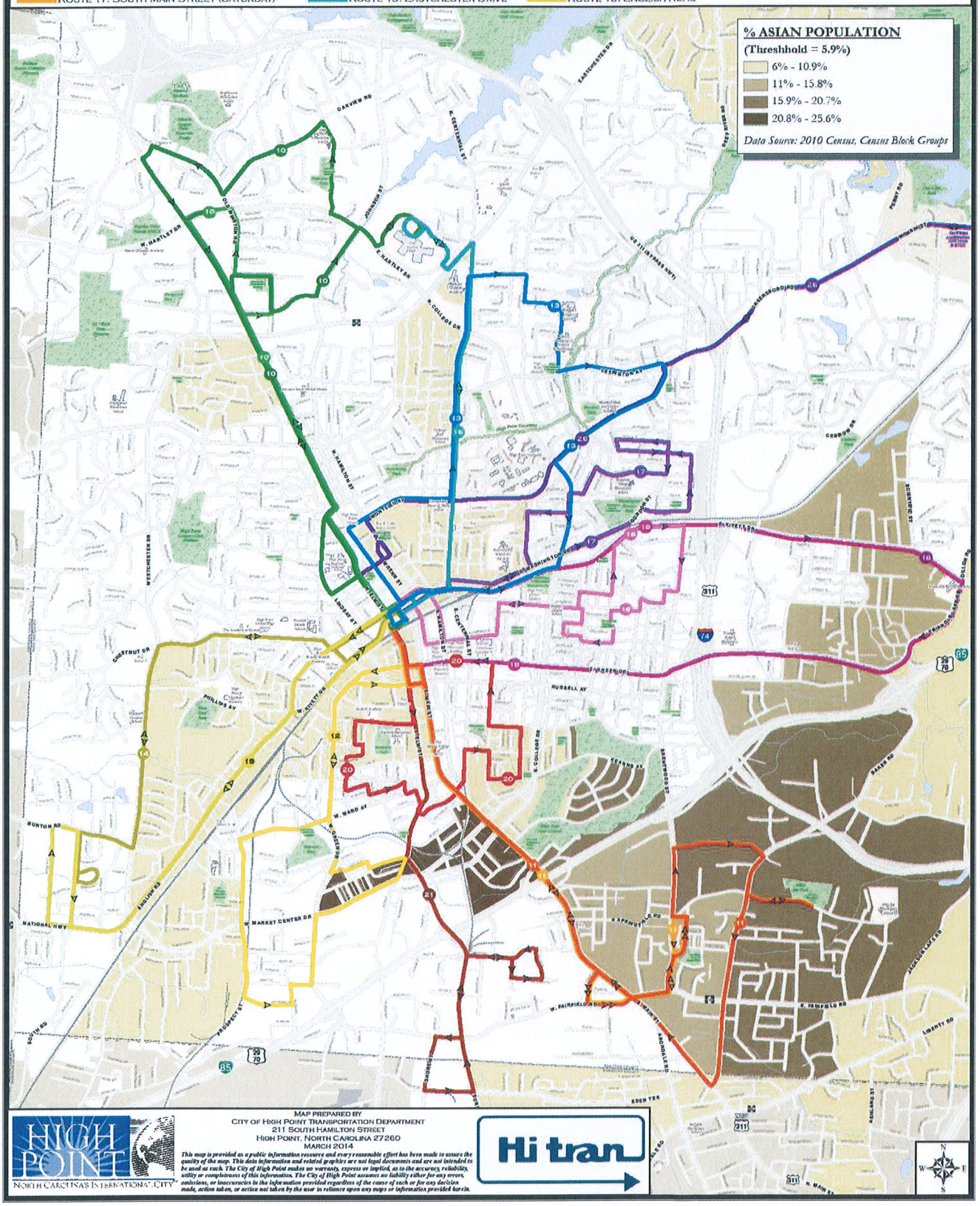
CITY OF HIGH POINT TRANSIT SYSTEM MAP

- Route 10: North Main Street
- Route 10: North Main Street (Saturday)
- Route 11: South Main Street
- Route 11: South Main Street (Saturday)
- Route 12: West Green Drive
- Route 13: Montlieu Avenue
- Route 14: Westchester Drive
- Route 15: Eastchester Drive
- Route 16: Leonard Avenue
- Route 17: Washington Drive
- Route 18: East Green Drive
- Route 19: English Road
- Route 20: Kearns Avenue
- Route 21: Industrial Park Flyer
- Route 25: Jamestown-GTCC



HIGH POINT
NORTH CAROLINA'S INTERNATIONAL CITY

MAP PREPARED BY
CITY OF HIGH POINT TRANSPORTATION DEPARTMENT
211 SOUTH HAMILTON STREET
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Discrimination Complaint Form

Last Name:	First Name:	☐ Male ☐ Female

Mailing Address:	City:	State:	Zip:

Home Telephone: ( )	Work Telephone: ( )	E-mail Address:

Identify the Category of Discrimination:

☐ RACE ☐ COLOR ☐ NATIONAL ORIGIN ☐ AGE

☐ RELIGION ☐ DISABILITY ☐ SEX/GENDER ☐ INCOME STATUS

Identify the Race of the Complainant

☐ Black ☐ White ☐ Hispanic ☐ Asian American

☐ American Indian ☐ Alaskan Native ☐ Pacific Islander ☐ Other _____

Date and place of alleged discriminatory action(s). Please include earliest date of discrimination and most recent date of discrimination.

How were you discriminated against? Describe the nature of the action, decision, or conditions of the alleged discrimination. Explain as clearly as possible what happened and why you believe your protected status (basis) was a factor in the discrimination. Include how other persons were treated differently from you. (Attach additional page(s), if necessary)

The law prohibits intimidation or retaliation against anyone because he/she has either taken action, or participated in action to secure rights protected by these laws. If you feel that you have been retaliated against, separate from the discrimination alleged above, please explain the circumstances below. Explain what action you took which you believe was the cause for the alleged retaliation.

Names of individuals responsible for the discriminatory action(s):

Names of persons (witnesses, fellow employees, supervisors, or others) whom we may contact for additional information to support or clarify your complaint: (Attach additional page(s), if necessary)

Name	Address	Telephone
1.		
2.		
3.		
4.		

Have you filed, or intend to file, a complaint regarding the matter raised with any of the following? If yes, please provide the filing dates. Check all that apply.

☐ US Equal Employment Opportunity Commission	Date:
☐ Federal Highway Administration	Date:
☐ Federal Transit Administration	Date:
☐ Federal or State Court	Date:
☐ Other	Date:

Have you discussed the complaint with any High Point Transit System representative? If yes, provide the name, position, and date of discussion.

Please provide any additional information that you believe would assist with an investigation.

Briefly explain what remedy, or action, you are seeking for the alleged discrimination.

****WE CANNOT ACCEPT AN UNSIGNED COMPLAINT. PLEASE SIGN AND DATE THE COMPLAINT FORM BELOW.**

_____	_____
COMPLAINANT'S SIGNATURE	**DATE**

MAIL COMPLAINT FORM TO:

High Point Transit System

Mailing:
PO Box 230
High Point, NC 27261

Location:
716 West Kivett Drive
High Point, NC 27262

FOR MORE INFORMATION VISIT THE WEB SITE:
www.highpointnc.gov/hi-tran/title_6.cfm
or call
336-883-3424

FOR OFFICE USE ONLY

Date Complaint Received: _____

Processed by: _____

Case #: _____

Referred to: ☐High Point HRC ☐FTA ☐FHWA ☐DOJ Date Referred: _____

RESOLUTION
APPROVAL OF THE TITLE VI PLAN FOR THE CITY OF HIGH POINT

WHEREAS, discrimination on the basis of race, color, and national origin is prohibited in programs and activities receiving federal financial assistance by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, the Federal Aid Highway Act of 1973, Age Discrimination Act of 1975, the Americans with Disabilities Act of 1990, Section 504 of the Rehabilitation Act of 1973, Executive Order 12898 and Executive Order 13166; and

WHEREAS, as a condition of federal grants received by the City, the City must have a "Title VI Program" to implement the requirements of Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, the Federal Aid Highway Act of 1973, Age Discrimination Act of 1975, the Americans with Disabilities Act of 1990, Section 504 of the Rehabilitation Act of 1973, Executive Order 12898 and Executive Order 13166; and

WHEREAS, the City has prepared a program which provides for the collection of data regarding persons most impacted by transit projects; establishes a complaint process for those believed to be discriminated against under the provisions of Title VI; ensures enhanced public outreach of Title VI provisions and procedures; ensures monitoring and compliance of Title VI requirements; and requires updates to the Title VI Plan every three years;

NOW, THEREFORE, be it resolved the City Council for the City of High Point fully approves the Title VI Program.

A motion was made by Council Member Moore and seconded by Council Member Davis for adoption of the above resolution, and upon being put to a vote was duly adopted.

I, **Lisa Vierling, City Clerk** do hereby certify that the above is a true and correct copy of an excerpt for the minutes of a meeting of the **City of High Point** duly held on the **21st** day of **April, 2014.**

Lisa B. Vierling
Signature of Certifying Official