

POLICY 8.0: TITLE VI PROGRAM

*Submitted September 10, 2024 and pending review from the FTA.

Section 601 of Title VI of the Civil Rights Act of 1964 states the following: "No person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance." GVT falls directly under this title, as it receives financial assistance from the Federal Transit Administration (FTA).

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

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

ARTICLE I: INCLUSIVE PUBLIC PARTICIPATION PLAN

Grand Valley Transit (GVT) has undertaken the following public outreach and involvement activities since the previous Title VI program submission in 2021: press releases, public open houses, legal ads, and Local Coordinating Council (LCC) meetings. The Mobility Manager position (added in 2019), has continued to enhance GVT's public engagement capabilities. This includes "Mobile Mesa County" social media accounts on Facebook and Instagram, which are used to promote GVT and Grand Valley Metropolitan Planning Organization (GVMPO) planning activities, among other local multimodal topics. In March 2024 the Mesa County RTPO, the umbrella organization for GVT, contracted with Language Line Services, Inc. Language Line provides real-time interpretation, in more than 240 languages, to allow GVT operations personnel to effectively communicate with LEP individuals. Video interpretation is also available for those who use ASL to communicate.

In 2020 GVT updated the Coordinated Transit and Human Services Transportation (CTHS) Plan as a part of the 2045 Grand Valley MPO Regional Transportation Plan (RTP). Outreach for these plans included flyers in English and Spanish, which were posted on buses, transfer facilities, among other locations. These plans also involved special engagement of the Local Coordination Council (LCC), which includes several organizations that serve the needs of minority and Limited English Proficiency (LEP) communities. The membership of the LCC is not selected by the GVMPO or Mesa County and therefore a table depicting the demographics of this council is not required. The CTHS plan will be updated in early 2025 as a part of the 2050 Grand Valley RTP

Communication with the public stayed elevated through the wind down the Coronavirus pandemic. Informational flyers regarding public health measures, temporary schedule changes, and other critical information were posted on buses, loading areas, and inside GVT facilities. These flyers included Spanish translations.

In 2021, GVT established a Public Participation Process which strives for an open exchange of information and ideas between the public and transit decision makers. Please see GVRTC Policy 2.0 for the complete Public Participation Process. To ensure that minority and low-income persons have meaningful access to GVT planning activities, the following measures are taken by GVT:

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

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

ARTICLE II: ACCESS TO SERVICES BY PERSONS WITH LEP

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

Based on the 2022 American Community Survey 5-year estimates, 5% of Mesa County residents speak Spanish at home, 1% speak other Indo-European languages and .5% speak Asian and Pacific Island languages. In addition, the 2022 American Community Survey 5-Year Estimates reflected 1.9% of Mesa County residents speak English less than "very well" with 7% who primarily speak a language other than English. With this information, GVT's system map is in both English and Spanish and GVT teams with bilingual professionals when interpreters are needed to assist with transit riders and to convert documents into Spanish. In addition, the GVT website has installed the Google Translate tool, which converts text into about 100 different languages. Figure 1 shows density of LEP households in the GVT service area.

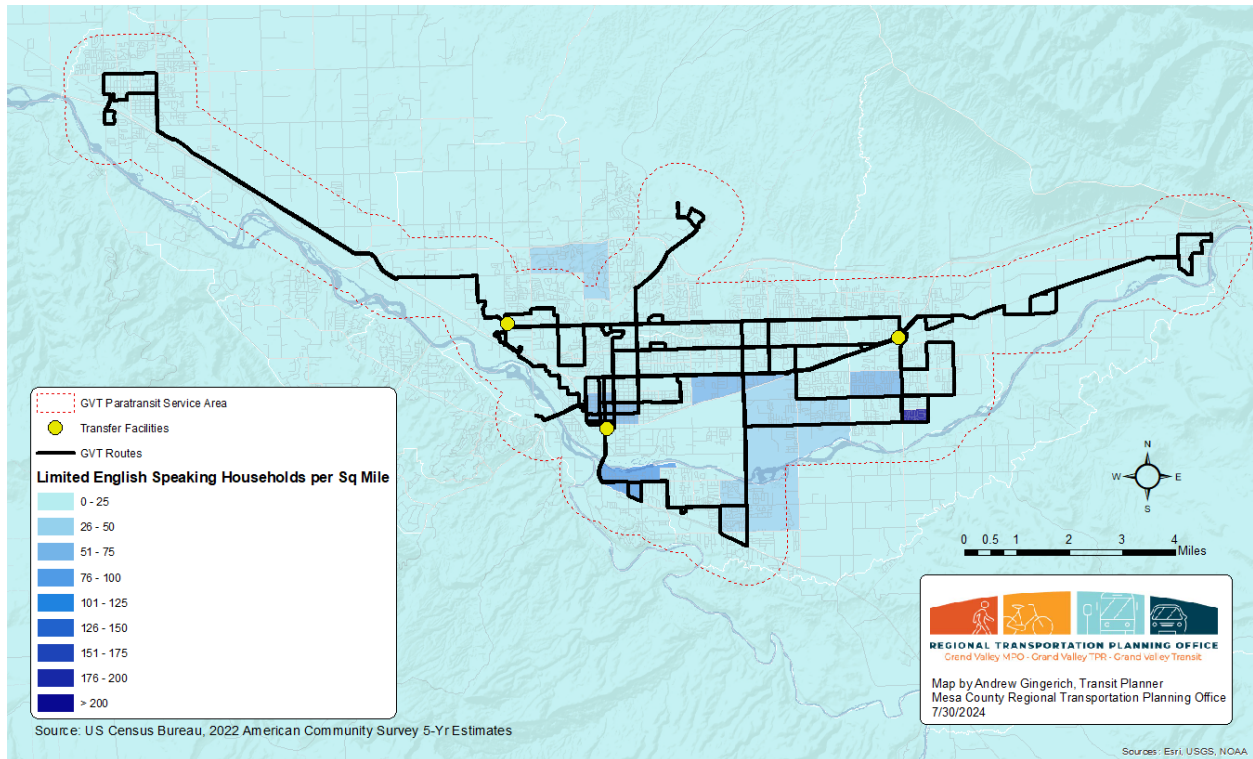


Figure 1: Limited English Proficiency by Census Block Group

Figure 1 shows that the highest concentration locations of LEP households (darkest blue areas) are in somewhat discrete areas, particularly the south Clifton area, and that these areas are generally well served by current transit service. GVT will be mindful of these locations when considering service changes, notifications, and public outreach efforts.

ARTICLE III: TITLE VI COMPLAINT PROCEDURES

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

ARTICLE IV: TITLE VI INVESTIGATIONS, COMPLAINTS, OR LAWSUITS

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

ARTICLE V: NOTIFYING BENEFICIARIES OF THEIR RIGHTS UNDER TITLE VI

Notification of Title VI rights are provided on GVT’s system maps which are available on all the buses as well as various businesses throughout the community including all

the GVT transfer facilities and administrative office. In addition, GVT has this notification on the agency website at <http://gvt.mesacounty.us>. The website was redesigned in 2021 in order to consolidate and streamline information. The "ADA & Non-Discrimination Policy" page is accessible from a link at the bottom of the home page, as well as the dropdown of the "Rider Information" tab at the top of the home page. These are features of the website template, meaning these links are available from any page of the GVT website.

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

"In accordance with the provisions of the Americans with Disabilities Act (ADA) and the Civil Rights Act of 1964, Grand Valley Transit (GVT) does not discriminate on the basis of disability, race, color, or national origin. In addition, GVT does not discriminate on the basis of age, gender, or sexual orientation. For more information about these statutes, or to file a complaint, contact GVT. Information in non-English alternative formats may be

obtained through GVT. Individuals will be permitted to use service animals as defined within ADA guidelines as necessary. GVT makes reasonable modifications in policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability or to provide program accessibility to their services. Please contact GVT at (970) 256-7433 or grandvalleytransit@mesacounty.us for more information and to place your request."

ARTICLE VI: SUBRECIPIENTS

Mesa County does not have any subrecipients.

ARTICLE VII: SYSTEM-WIDE SERVICE STANDARDS AND POLICIES

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

Effective Practices to Fulfill the Service Standard

Vehicle load

The average of all loads during the peak operating period should not exceed vehicles' achievable capacities, which are:

- 37 passengers for a 31' cutaway bus,
- 18 passengers for a 26' cutaway bus,
- 56 passengers on a 40' low floor bus (El Dorado Axess),
- 42 passengers for a 32' low floor bus (El Dorado EZ Rider), and
- 54 passengers for a 30' low floor bus (Gillig G31E).

Vehicle headway

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

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

On-time performance

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

Service availability

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

GVT will distribute transit service so that 90% of all residents in the service area are within a ½ mile walk of bus service and in densely populated areas, residents are within ¼ mile walk of bus service.

AND/OR

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

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

Effective Practices to Fulfill the Service Policy

(1) Distribution of transit amenities

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

Bus Shelters: As of February 2021, GVT owns and maintains most shelters serving the fixed route system. Some shelters are owned by other jurisdictions or government entities. Several factors help to determine whether a bus stop will receive a shelter. These factors include ridership volume, availability of physical space, and visual impact of the shelter for advertising purposes, the level of cooperation of the property owners adjacent to the site, the need for added protection from inclement weather, and local government land use regulations. Currently there are 44 shelters located along GVT routes.

Bus Benches: As of February 2021, GVT owns and maintains most benches serving the fixed route system. Some benches are owned by other jurisdictions or government entities. Several factors help to determine the placement of bus benches. These factors include ridership volume, availability of physical space, the level of cooperation of the property owner adjacent to the site and local government land use regulations. Currently there are 121 benches along GVT routes.

(2) Vehicle assignment

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

streets are operated with 30-foot rather than 40-foot buses.

ARTICLE VIII: FACILITY SITE EQUITY ANALYSIS

In February 2020, the 2045 Coordinated Transit & Human Services Transportation Plan was completed and identified a new transit fleet maintenance facility as a high priority as fleet maintenance has been an on-going problem for many years. In 2022 Mesa County RTPO received Federal funding for a Fleet Maintenance Facility. Prior to site selection the Mesa County RTPO conducted an equity analysis to ensure that site selection would have no disparate impact due to race, color, or national origin. An evaluation of the poverty rate, minority population rate, and LEP rate showed no disparate impact would occur, and the results of the analysis were confirmed through public and stakeholder engagement.

ARTICLE IV: REQUIREMENTS FOR METROPOLITAN TRANSPORTATION PLANNING ORGANIZATIONS

A demographic profile of the metropolitan area that includes identification of the locations of minority populations in the aggregate

Included below is Mesa County’s racial demographics compared to the state of Colorado taken from the 2022 American Community Survey 5 Year Estimates.

Race and Hispanic or Latino Origin (Percent of Total Population)		
	Mesa County	Colorado
White	86.9%	76.1%
Black or African American	0.7%	4.0%
American Indian and Alaska Native	0.8%	1.0%
Asian	1.0%	3.2%
Native Hawaiian and Other Pacific Islander	0.0%	0.1%
Some other race	4.9%	1.8%
Two or more races	8.7%	10.6%
Hispanic or Latino origin (of any race)	15.1%	22.1%

White alone, not Hispanic or Latino	84.90%	77.9%
Source: US Census Bureau, 2022 American Community Survey 5-Yr Estimates		

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

Drawing from the 2020 American Community Survey, the maps below identify the aggregate minority and non-minority populations, populations with no vehicle available and one vehicle available, and also populations in poverty in the GVT service area.

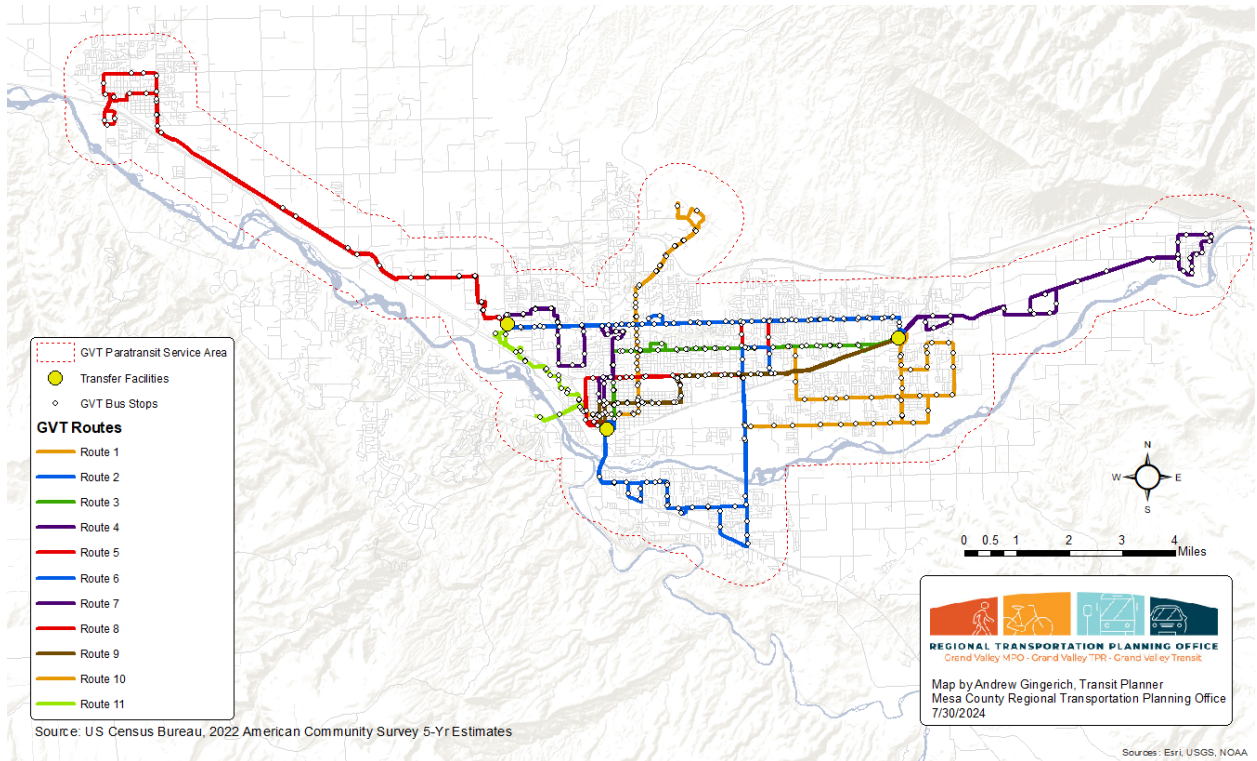


Figure 3: GVT Service Area

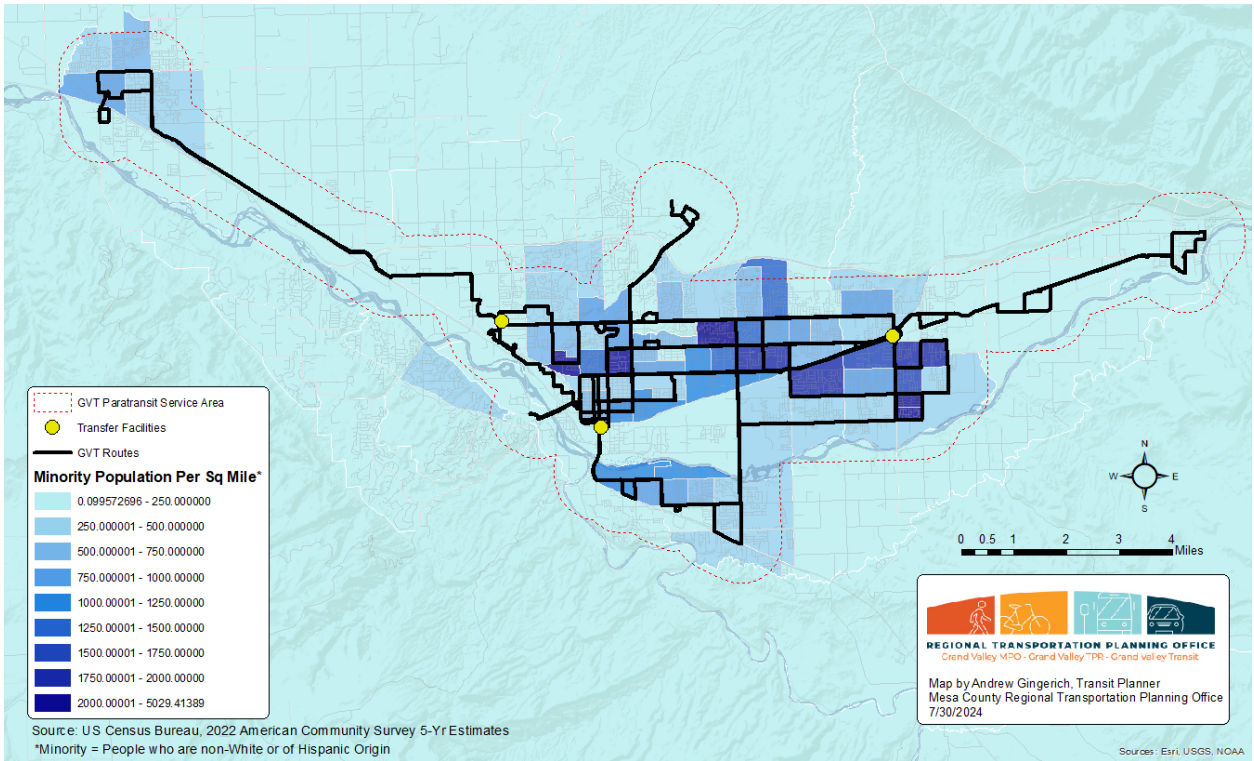


Figure 4: Minority Populations

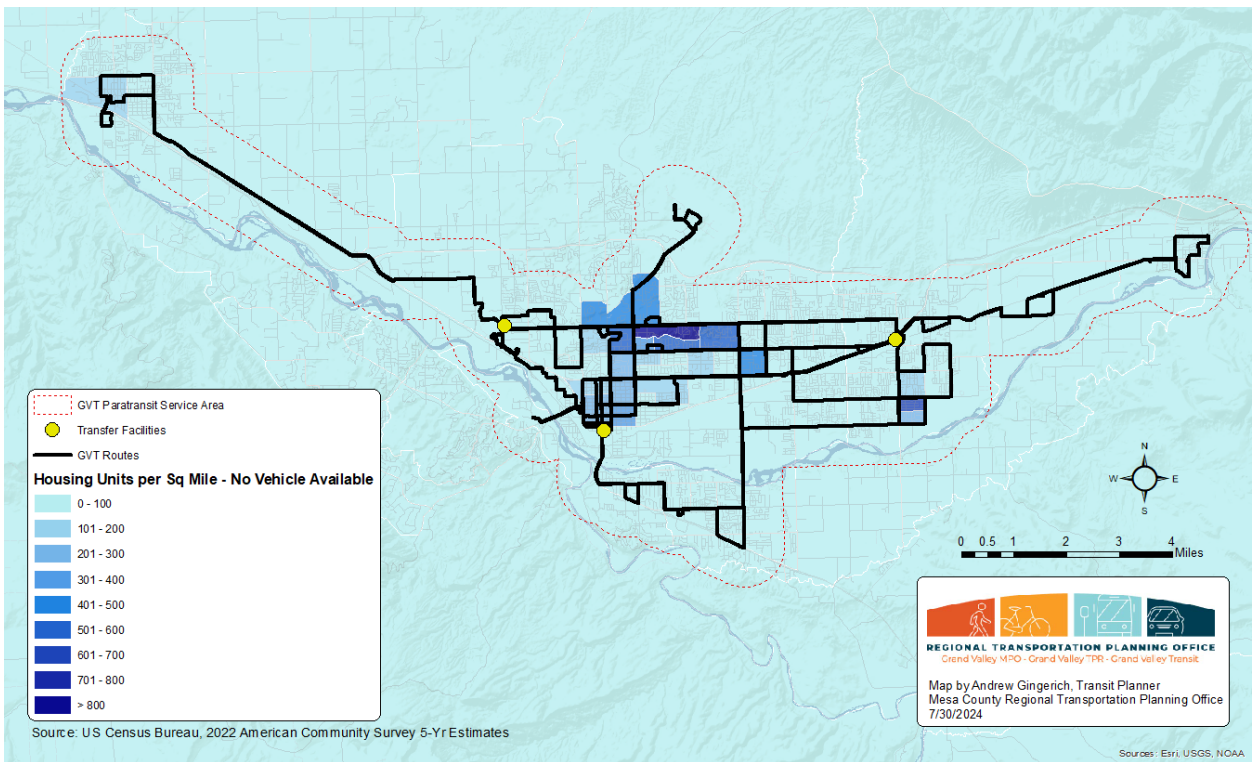


Figure 5: Housing Units without Vehicle Available

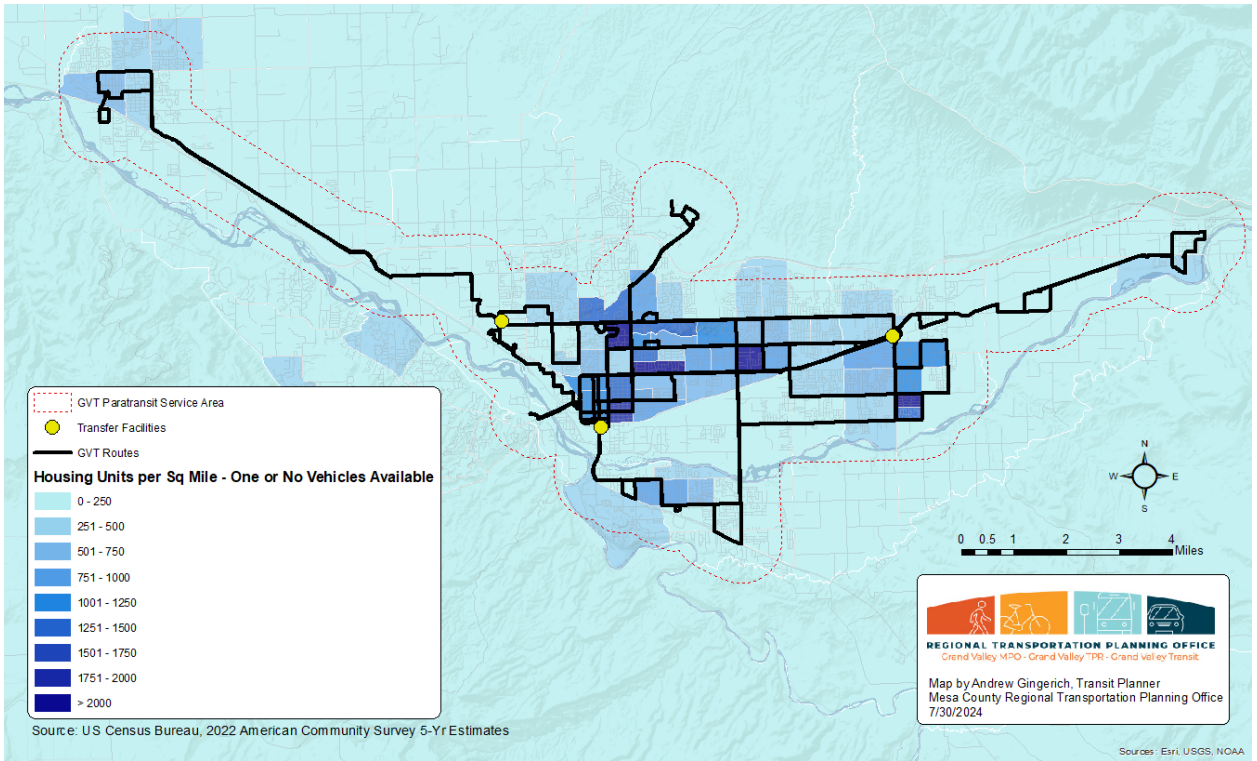


Figure 6: Housing Units with One or No Vehicles Available

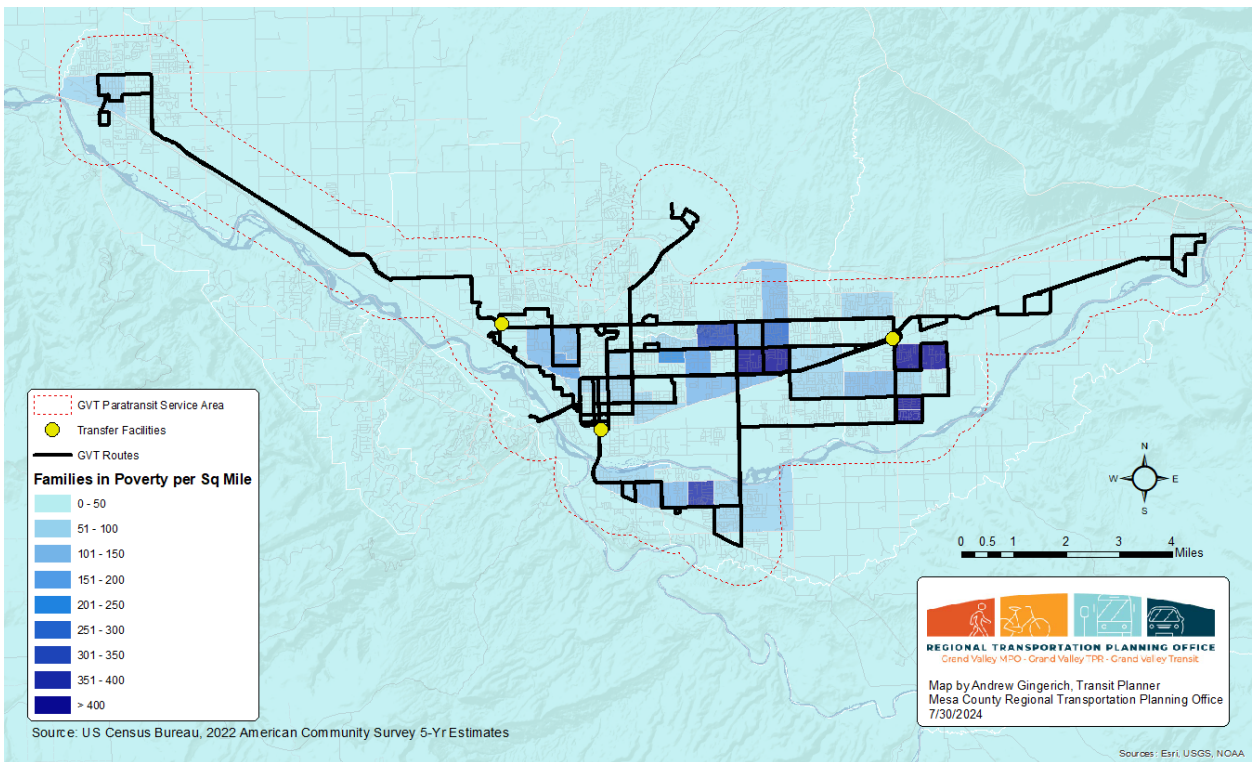


Figure 7: Families in Poverty

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

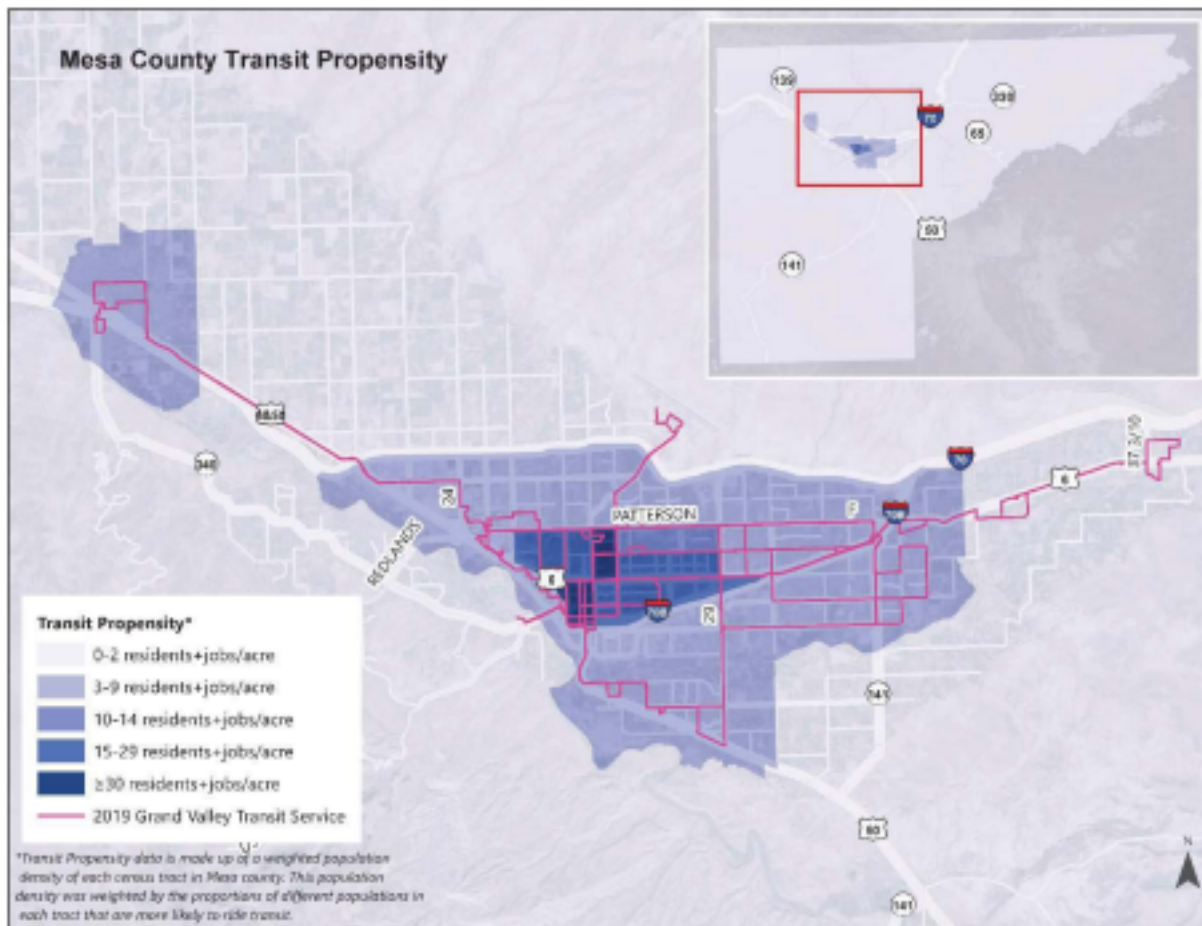


Figure 8: Mesa County Transit Propensity

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

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

vehicle areas, notices placed inside GVT buses are equally accessible to all populations. Please see GVRTC Policy 2.0 for the complete Public Participation Process.

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

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

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

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

POLICY 9.0: LIMITED ENGLISH PROFICIENCY (LEP) POLICY

ARTICLE I: INTRODUCTION

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

ARTICLE II: EXECUTIVE ORDER 13166

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

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

ARTICLE III: PLAN SUMMARY

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

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

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

ARTICLE IV: FOUR FACTOR ANALYSES

1. The number or proportion of LEP persons eligible in the GVT service area who may be served or likely to encounter a GVT program, activity, or service.

GVT examined data from the 2019 American Community Survey 5 Year Estimates., the most recent data available from the U.S. Census Bureau. GVT analyzed data for the geographies of the City of Grand Junction, City of Fruita, Town of Palisade and Mesa County.

Individuals Speaking English less than "Very Well"								
Data Category	City of Fruita		City of Grand Junction		Town of Palisade		Mesa County	
	Total	Percent	Total	Percent	Total	Percent	Total	Percent
Population Total	12772		62447		2433		147919	
Speak only English	11970	93.72%	58112	93.06%	2371	97.45%	138104	93.36%
Speak a language other than English	802	6.28%	4335	6.94%	62	2.55%	9815	6.64%
Spanish	716	5.61%	3031	4.85%	62	2.55%	7372	4.98%
Speak English less than "very well"	41	0.32%	1027	1.64%	19	0.78%	2269	1.53%
Indo-European languages	86	0.67%	917	1.47%	0	0.00%	1662	1.12%
Speak English less than "very well"	0	0.00%	94	0.15%	0	0.00%	249	0.17%
Asian and Pacific Island languages	0	0.00%	344	0.55%	0	0.00%	734	0.50%
Speak English less than "very well"	0	0.00%	112	0.18%	0	0.00%	277	0.19%
Other languages	0	0.00%	43	0.07%	0	0.00%	47	0.03%
Speak English less than "very well"	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total Speak English less than "very well"	41	0.32%	1123	1.80%	19	0.78%	2795	1.89%

Source: US Census Bureau, 2022 American Community Survey 5-Yr Estimates

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

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

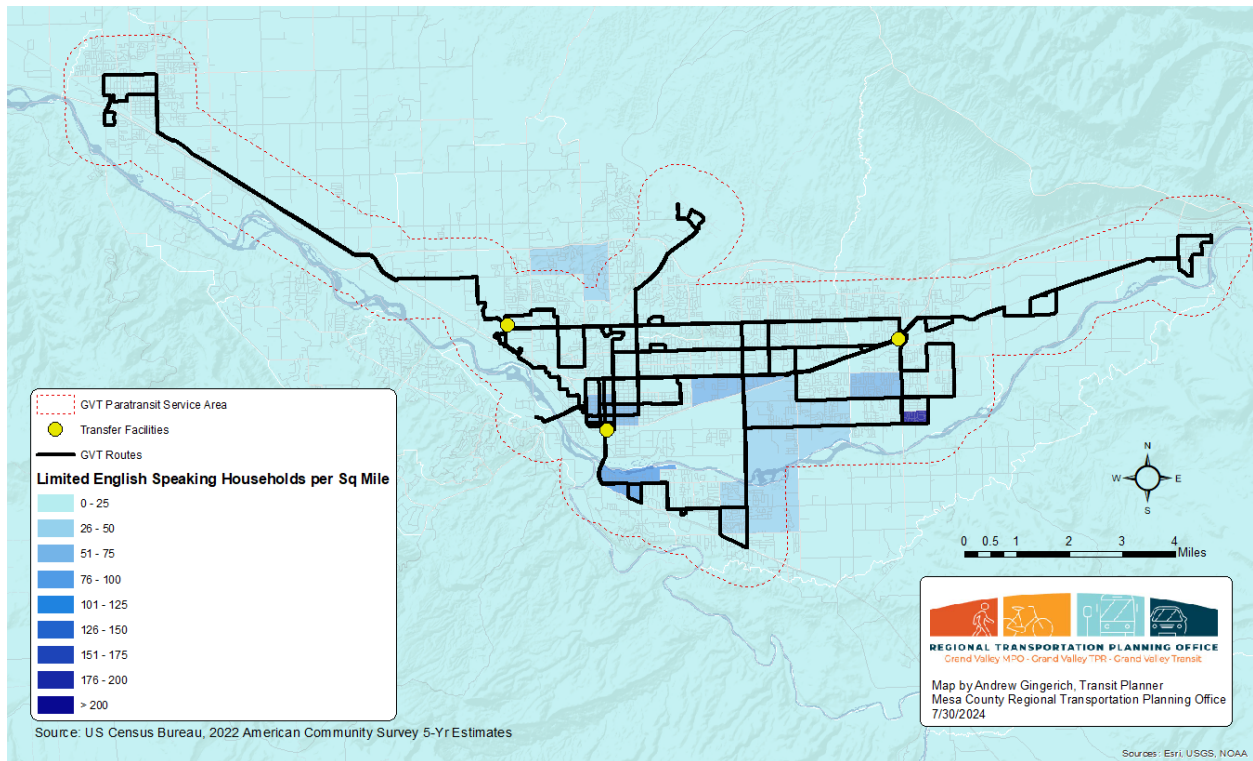


Figure 10: Limited English Proficiency by Census Block Group

Based on the 2022 American Community Survey 5-year estimates, 5% of Mesa County residents speak Spanish at home, 1% speak other Indo-European languages and .5% speak Asian and Pacific Island languages. In addition, the 2022 American Community Survey 5-Year Estimates reflected 1.9% of Mesa County residents speak English less than “very well” with 7% who primarily speak a language other than English. GVT conducted an onboard survey as well as a community online survey in 2023. Both surveys were available in Spanish. 9 out of 260 (3.4%) the onboard survey responses were in Spanish and 1 out of 88 (1.1%) the onboard survey responses were in Spanish, reasonably close to matching the estimated LEP Spanish-Speaking population in the County.

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

GVT assesses the frequency at which staff and drivers have or could possibly have contact with LEP persons. This may include the following: documenting phone inquiries, verbally surveying drivers and dispatchers, as well as on-board passenger surveys. In March 2024 GVT received a request for a system map in Mandarin. RTPO staff worked with Language Line and their translators to create the translated document. Besides the request for a GVT map in Mandarin, GVT has not had any other requests for translated GVT documents since the implementation of the previous LEP Plan. Recent interviews with operations staff indicated that, though there are limited encounters with LEP individuals, the system may be experiencing an increase of LEP

riders on fixed-route. According to drivers, many LEP individuals are able to navigate the bus system, oftentimes riding in groups with a person that can translate if needed. Some drivers report using GoogleTranslate on their phone for assistance. There are no known LEP individuals using the paratransit service.

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

The numbers and percentages of LEP persons in our service area are low but as a transportation provider we are sensitive to the current and potential need to service LEP individuals. Therefore, in recent years we have undertaken the following efforts: we have maintained our LEP policy and procedures; printed Grand Valley Transit’s system map in both English and Spanish; created a list of local Spanish interpreters; teamed with Mesa County Department of Human Services to convert other Grand Valley Transit informational flyers and pamphlets into Spanish when needed or requested. Grand Valley Transit also provided Basic Spanish for Transit Employees booklets for all drivers and office staff.

4. The resources available to GVT and overall costs

GVT assessed its available resources that could be used for providing LEP assistance, and contracted with Language Line to provide real-time translation. Furthermore, multiple RTPO staff speak Spanish and frequently translate written notices and postings into Spanish for GVT riders. Lastly, GVT has established a connection with the Center for Independence which has staff that sign using ASL.

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

ARTICLE V: LIMITED ENGLISH PROFICIENCY PLAN OUTLINE

1. How to Identify an LEP Person who Needs Language Assistance

Below are tools GVT may use to help identify persons who may need language assistance:

- Examine records requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings;
- When GVT sponsored workshops or conferences are held, set up a sign-in sheet table, have a staff member greet and briefly speak to each attendee. To informally gage the attendee’s ability to speak and understand English, ask a question that requires a full sentence reply;
- Have the Census Bureau’s “I Speak Cards” at the workshop or conference sign-in sheet table (contained herein as APPENDIX B). While staff may not be able to

provide translation assistance at this meeting, the cards are an excellent tool to identify language needs for future meetings. Also, have the cards available at the GVT Operations and Transfer Facilities; and

- Frequently survey drivers and other first line staff of any direct or indirect contact with LEP individuals.

2. Language Assistance Measures

GVT has or will implement the following LEP procedures. The creation of these steps are based on the very low percentage of persons speaking other languages or not speaking English at least “well” in GVT’s service area:

- The GVT website has the Google Translate tool, converting text into about 100 different languages;
- Review Census updates as they become available;
- Periodically review perceived LEP needs with drivers and other first-line staff;
- Periodically Consult the Local Coordinating Council and other community agencies that may know of LEP persons or groups;
- Census Bureau’s “I Speak Cards” are to be located at GVT’s Operations and Transfer Facilities;
- The computers located at GVT’s Operations and Transfer Facilities will have Google Translate added to the favorites listing for the translations of blocks of texts. This will aid GVT staff in the interpretation of services on a one-on-one basis for LEP individuals using GVT;
- When an interpreter is needed, in person or on the telephone, and GVT’s staff has exhausted the above options, staff will first attempt to determine what language is required. Staff can then use a telephone interpreter service such as Language Line Services at <http://www.language.com>
- Exploration of viability of onboard language assistance, such as adding Google Translate to driver tablets.

3. GVT Staff Training

All GVT staff will be provided with the LEP Plan and will be educated on procedures to follow. This information will also be part of GVT’s staff orientation process for new hires. Training topics are listed below:

- Understanding the Title VI policy and LEP responsibilities;
- What language assistance services GVT offers;
- Use of “I Speak Cards”;

- How to access Google Translate via the computer(s) in the GVT's Operations Facility;
- How to use the telephone interpreter and translation services;
- Documentation of language assistance requests;
- How to handle a Title VI and/or LEP complaint.

4. Outreach Efforts

Similarly, as the need arises, GVT will consider the following outreach efforts:

- Identify agencies in our area that may serve LEP populations and provide information on our services to them.
- If staff knows that they will be presenting a topic that could be of potential importance to an LEP person or if staff will be hosting a meeting or a workshop in a geographic location with a known concentration of LEP persons, meeting notices, fliers, advertisements, and agendas will be printed in an alternative language, based on known LEP population in the area.
- When running a general public meeting notice, staff will insert the clause, based on the LEP population and when relevant, that translates into "A (insert alternative Language) translator will be available". For example: "Un traductor del idioma español estará disponible" This means "A Spanish translator will be available".
- Key print materials, including but not limited to schedules and maps, will be translated and made available at GVT's Operations Facility, on board vehicles and in communities when a specific and concentrated LEP population is identified.

5. Monitoring and Updating the LEP Plan

This plan is designed to be flexible and is one that can be easily updated. At a minimum, GVT will follow the Title VI Program update schedule for the LEP Plan. Each update should examine all plan components such as:

- How many LEP persons were encountered?
- Were their needs met?
- What is the current LEP population in GVT's service area?
- Has there been a change in the types of languages where translation services are needed?
- Is there still a need for continued language assistance for previously identified GVT programs? Are there other programs that should be included?

- Have GVT's available resources, such as technology, staff, and financial costs changed?
- Has GVT fulfilled the goals of the LEP Plan?
- Were any complaints received?

6. Dissemination of GVT's Limited English Proficiency Plan

GVT includes the LEP Plan with its Title VI Policy and Complaint Procedures. GVT's Notice of Rights under Title VI to the public is posted on all system maps and on the GVT website.

- Any person, including social service, non-profit, and law enforcement agencies and other community partners with internet access will be able to access the plan.
- Copies of the LEP Plan will be provided, on request, to any person(s) requesting the document via phone, in person, by mail or email. LEP persons may obtain copies/translations of the plan upon request.
- Any questions or comments regarding this plan should be directed to the GVT's Title VI Coordinator.

GVT's Title VI Coordinator

Mesa County Regional Transportation Planning Office

Dept. 5093, PO Box 20,000

Grand Junction, CO 81502-5001

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POLICY 2.0 – PUBLIC PARTICIPATION PROCESS

ARTICLE I: PURPOSE

Federal Transit Administration (FTA) grantees are required to develop a local process to solicit and consider public comment prior to a fare increase or major service reduction. In addition, FTA grantees must solicit public input and consider public comment for the process of budgeting for transit services and capital purchases and for its Federal civil rights program (Title VI of the Civil Rights Act of 1964, Equal Employment Opportunity, Disadvantaged Business Enterprise, and Americans with Disabilities Act). Public meetings are not a mandatory requirement; however, an opportunity for a public hearing must be given in order to update these policies and programs. This Policy describes when an opportunity for a public hearing will be provided, how hearings will be conducted, and how the results of hearings will be considered in the decision-making process.

For the purpose of developing its FTA transportation plans, programs and projects, Grand Valley Transit will rely on the Public Participation Plan the Grand Valley Metropolitan Planning Organization (GVMPO), which is developed in coordination with GVT.

ARTICLE II: BACKGROUND

Mesa County’s contracted transit services overseen by the Regional Transportation Planning Office, henceforth referred to as the “Grand Valley Transit” (GVT), welcomes and encourages community members and stakeholder input into its service planning process and budget process. To achieve this end, GVT will strive for an open exchange of information and ideas between the public and transit decision-makers. The overall objective of GVT’s public participation process is that it be proactive; provide complete information, timely public notice, full public access to key decisions, and opportunities for early and continuing involvement. By doing so, GVT hopes to build support among the public who are stakeholders in the transportation investments that impact their community. These procedures will act as a conduit for information between the public, the GVT Advisory Board and the Mesa County administration.

ARTICLE III: FARE INCREASE AND MAJOR SERVICE CHANGES

For the purpose of this Policy, “a major service change” is defined as greater than a 10% change in either the service miles or the service hours of any established

fixed- route segment (service area or service hours for complementary paratransit service). In addition, a proposed “major service change” includes the removal of greater than 10% of the bus stops on any established fixed-route segment. (A “route segment” is defined in GVT’s annual National Transit Database submittal to the FTA.) Although the FTA only requires the opportunity for public participation for major service reductions, GVT will provide for a public hearing for either a major service increase or decrease.

The RTPO Staff may be authorized to temporarily change service levels to reflect emergency or other operating conditions without providing for public participation. Except in those situations where advanced notification is impractical, GVT will notify the public of the changes by posting notices in all GVT vehicles and other means designed to inform the public. These temporary adjustments and any resulting service implications will be explained fully in the monthly operations management report.

Experimental service may be established for up to six months without providing for public participation. Conversely, if the experimental service proves ineffective (poor ridership, too costly, or otherwise operationally ill-advised), it may be deleted during or at the end of the six-month trial period without providing for public participation. An opportunity for a public hearing will be provided before any experimental service is permanently adopted.

ARTICLE IV: PROGRAM OF PROJECTS

Each recipient of a grant shall have complied with the public participation requirements of Section 5307(c) (1) through (7). Each recipient is required to develop, publish, afford an opportunity for a public hearing on, and submit for approval a Program of Projects (POP). A consultative process to include interested parties in the development of the POP must be developed. Interested parties include community members, affected public agencies, and private transportation providers. As the GVT Program of Projects is included in the GVMPO Transportation Improvement Program (TIP), GVT will rely on the TIP Update or Amendment Process to meet these requirements. This is outlined in the GVMPO Public Participation Plan.

ARTICLE V: CIVIL RIGHTS PROGRAMS

GVT must provide for public participation in assuring compliance with Federal civil rights programs as mandated by the FTA. It is the responsibility of the RTPO Staff to assure compliance with these programs as each mandated threshold is surpassed. See **Attachment A** for current threshold levels. Please see GVRTC Policy 8.0 for more information on how GVT seeks inclusive public engagement under its Title VI Program.

ARTICLE VI: POLICIES AND PROCEDURES

GVT will refer to the GVMPO Public Participation Plan for guidance on public

engagement when updates to policies and programs described in Article I are to be considered at a public hearing. In some cases, scheduled GVRTC meetings will serve as the public hearing to obtain public input. In other cases, such as fare policy or service changes, additional public hearings are required or desirable. The following describes the policies and procedures for these additional public hearings.

Section 1 – Public Input

While written comments will be encouraged, GVT staff will also chronicle verbal comments. Within seven (7) calendar days following receipt of a public comment, the RTPO Staff will document his or her written response. If, due to extenuating circumstances, this seven (7) calendar day response period cannot be met, the RTPO Staff will forward an anticipated schedule to the Grand Valley Regional Transportation Committee (GVRTC) GVT staff are required to consider each suggestion made in the public participation process, though GVT is not required to implement each suggestion. Thus, if GVT staff does not think it appropriate to implement a suggestion, documentation will indicate the reason the suggestion should not be implemented.

GVT will provide forms for making written comments/suggestions on all buses and at the GVT offices. Nonetheless, these forms need not be used to submit a suggestion or comment. The RTPO Staff will furnish a copy of each comment received and their response to the GVRTC Board. All comments will be responded to in writing or by telephone; telephone responses will be documented by GVT staff. If requested, or if it appears desirable, a personal interview at the GVT offices may be arranged.

Section 2 – Public Notices

Each notice of an opportunity for a public hearing will be posted in all GVT buses, in the GVT Transit Center shelters at the transfer stations and at the Mesa County Offices at 525 S. 6th Street, 2nd Floor, Grand Junction, Colorado. In addition, a notice will be published for two days in local newspapers of general circulation. Direct-mail notices will be sent to those parties who are deemed by RTPO Staff to be directly affected by the proposed action. A period of not less than 14 calendar days will be allowed for a written public hearing request; the date of the offered public hearing will be seven (7) calendar days following the request deadline. See **Attachment B** for a sample Notice of Public Hearing. An information docket that outlines each item under consideration will be available upon request and at the public hearing. Included in this docket will be a description of the proposed action, its purpose, any information and data relevant thereto, and will contain other information that is deemed relevant.

Section 3 – Joint Hearing with Other County Departments or Other Public Agencies

For a public hearing which may involve GVT and other County Departments or other public agencies, GVT will provide for joint hearings with the affected

departments/agencies at a mutually agreeable time and place. For any such joint hearings, the affected departments/agencies will designate its representatives and advise GVT thereof.

Section 4 – Conduct of Public Hearing

Public hearings will be designed to provide a means by which GVT may inform the public of the basis for proposed actions, and the hearings will not be designed to be adversarial in nature. The public hearing will be conducted in an orderly manner under the control of the RTPO Staff. Minutes of the proceedings will be made and a copy of the minutes, written public testimony and a staff report will be available to the public for examination at GVT offices.

To assure that all who desire to speak may be heard, a list of speakers will be prepared at the outset of the hearing, allocating the available time. The RTPO Staff, or the assigned staff person, will determine the order of the speakers. The information docket relating to the proposed action will be made available for examination in the hearing room. GVT staff will be available at the hearing to provide information as requested. Written comments will be accepted for seven (7) calendar days following the public hearing, regardless of whether or not respondents participated in the public hearing.

Section 5 – Recommendation to the GVRTC

At the next meeting of the GVRTC, the RTPO Staff will present a recommended action to the committee. A summary of the comments received, and, if requested, a copy of the hearing tape will be furnished to each member of the committee. These same materials will be made available for public review at the GVT offices. The recommendation will be made, in writing, to the GVRTC, after considering the issues raised and the recommendation of the RTPO Staff.

APPENDIX A

GRAND VALLEY TRANSIT'S

TITLE VI PUBLIC NOTICE OF RIGHTS / COMPLAINT PROCESS

Public Notice of Rights

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

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

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

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

What is Title VI?

Title VI is a section of the Civil Rights Act of 1964 requiring that "No person in the United States shall on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

What is LEP?

As part of Title VI requirements, Grand Valley Transit has developed a Limited English

Proficiency (LEP) Plan to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to Grand Valley Transit services as required by Executive Order 13166 "Improving Access to Services for Persons With Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000). A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

GVT's Complaint and Investigation Procedures

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

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

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

- 1) A formal complaint must be filed within 180 calendar days of the alleged occurrence. Complaints shall be in writing and signed by the individual or his/her representative, and will include the complainant's name, address and telephone number; name of alleged discriminating official, basis of complaint (race, color, national origin), and the date of alleged act(s). A statement detailing the facts and circumstances of the alleged discrimination must accompany all complaints. Grand Valley Transit strongly encourages the use of the attached **Grand Valley Transit's Discrimination Complaint Form** when filing official complaints. The preferred method is to file your complaint in writing using **Grand Valley Transit's Discrimination Complaint Form**, and sending it to:

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

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

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

*1200 New Jersey Avenue, SE
Washington, DC 20590*

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