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Title VI Program

July 2023

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I. Statement of Policy

Rural Community Transportation, Inc. (RCT), as a subrecipient of federal grant money through the Vermont Agency of Transportation, is required by the FTA to conform to Title VI of the Civil Rights Act of 1964 and its amendments. Title VI of the Civil Rights Act of 1964 requires that no person in the United States, on the grounds of race, color or national origin be excluded from, be denied the benefits of, or be subjected to discrimination, under any program or activity receiving federal financial assistance. Presidential Executive Order 12898 addresses environmental justice in minority and low-income populations. Presidential Executive Order 13166 addresses services to those individuals with limited English proficiency.

RCT is committed to enforcing the provisions of Title VI and protecting the rights and opportunities of all persons associated with RCT or affected by its programs. RCT's commitment includes vigorously enforcing all applicable laws and regulations that affect RCT and those organizations, both public and private, which participate and benefit through our programs.

RCT will take positive and realistic affirmative steps to ensure that all persons and/or firms wishing to participate in its programs are given an equal and equitable chance to participate. Any sub-recipients and contractors are required to prevent discrimination and ensure nondiscrimination in all of their programs, activities and services.

Any person(s) who feels that they have been discriminated against is encouraged to report such violations in writing to the RCT office as described in section III.

_____

Caleb Grant, Executive Director

II. Notice to the Public

Title VI of the Civil Rights Act – RCT operates its program and services without regard to race, color and national origin as stipulated in the Title VI of the Civil Rights Act of 1964. If you feel you have been discriminated against based on your race, color or national origin, you may file a complaint with the RCT Title VI Coordinator at (802) 748-8170. You also have the right to file a complaint with the Vermont Agency of Transportation's Title VI Coordinator at (802) 595-6959. If you would like more information about your Title VI rights, please visit https://vtrans.vermont.gov/civil-rights or call (802) 595-6959.

RCT posts its notice regarding civil rights on its website (www.riderct.org), at the public entrance to the agency's administrative office, on the back cover of its Bus Schedules and Service Guide, and on all of its vehicles.

III. Complaint Procedures

Receiving and Documenting Complaints:

Complaints via Phone Call: When a member of the public calls RCT and states that s/he wishes to file a Title VI complaint, the front desk will transfer the call to RCT's Title VI officer who will document the complaint using the Title VI Complaint Form (attached). Should the Title VI officer be unavailable to take the call, the front desk shall record the individual's contact information and state that the Title VI officer will call the person back. The Title VI officer shall call the individual back within five business days of the original phone call. If the Title VI officer will be out of the office longer than five business days, an interim Title VI officer shall be selected and s/he shall receive the Title VI complaints calls until the regular Title VI office returns.

In the event that an individual calls in a complaint but does not specifically state that s/he wishes to file a Title VI complaint and the call is forwarded to the Operations Department following normal (non-Title VI) complaint procedures, the person who takes the call shall follow the normal (non-Title VI) complaint documentation procedures. If after the call is taken, it becomes clear that the complaint involves Title VI, the Operations Department shall forward the person's contact information to the Title VI officer. The Title VI officer shall call the individual back and document the Title VI complaint using the Title VI Complaint Form.

Complaints via Email/Mail: When a member of the public submits a complaint via email or through the mail that is related to Title VI, it should be forwarded to the Title VI officer by whichever staff member receives it. If the emailed/mailed complaint does not include sufficient information to fill out the Title VI Complaint Form, the Title VI officer will contact the individual to obtain the needed information. In all cases, the Title VI officer will reply to the individual to confirm receipt of the complaint.

The Title VI officer shall reply to the email within five business days. If the Title VI officer will be out of the office longer than five business days, an interim Title VI officer shall be selected and he/she shall be forwarded the Title VI complaints emails until the permanent Title VI office returns.

Enter the Complaint into the RCT Title VI Complaint and Lawsuit Log:

Any Title VI complaint received by RCT shall be entered into the RCT Title VI Complaint and Lawsuit Log. The following information must be included in the log:

- Date the complaint was filed
- A summary of the allegations
- The status of the investigation
- Actions taken by the recipient in response

Internal Investigation of Title VI Complaints:

After a Title VI complaint is received and fully documented using the Title VI Complaint Form, the Title VI officer will initiate an internal investigation of the complaint. Such an investigation might include, but is not limited to, speaking with administrative staff and/or Operations Department staff (including bus drivers), reviewing company policies and procedures, and evaluating service characteristics and schedules. If requested by the complainant or warranted based on the investigation, the Title VI officer will contact the complainant at the conclusion of the investigation to report on any findings or potential changes as a result of the complaint. The internal investigation and resolution of the incident must be complete within 60 days of the initial complaint.

Notice shall include information regarding appeal rights of the complainant and instructions for initiating such an appeal. The first level of appeal is to the Executive Director of RCT. The Executive Director will review all of the facts of the case and the process of the internal investigation. If any aberrations from normal procedure are discovered or if new facts come to light, RCT will reconsider the determination.

If the complainant is still dissatisfied with the determination and/or resolution set forth by RCT, the result may be appealed to VTrans. Complainant will be advised to contact:

Vermont Agency of Transportation
Office of Civil Rights & Labor Compliance
219 North Main Street
Barre, VT 05641
Phone: (802) 595-6959

If the complainant is dissatisfied with the determination and/or resolution set forth by VTrans, the same complaint may be submitted to FTA for investigation. Complainant will be advised to contact the Federal Transit Administration, Office of Civil Rights, Transportation Center, Kendall Square, 55 Broadway, Suite 920, Cambridge, MA 02142-1093.

Update the RCT Title VI Complaint and Lawsuit Log:

After conducting the internal investigation, the Title VI officer must update the status of the complaint in the RCT Title VI Complaint and Lawsuit Log. The following information must be included in the log:

- Date the complaint was filed
- A summary of the allegations
- The status of the investigation
- Actions taken by the recipient in response

RCT TITLE VI COMPLAINT FORM

Date Complaint Received: _____

Name of Complainant: _____

Phone Number of Complainant: _____

Address of Complainant (if given): _____

_____

Email Address of Complainant (if given): _____

Date of Alleged Incident_____

Location of Alleged Incident_____

Name(s) of RCT Staff Involved_____

Summary of the Allegations/Nature of the Complaint: _____

_____

_____

_____

_____

_____

_____

_____

Update of Complaint Status:

Date	Status of the Complaint	Actions Taken, if any

IV. Record of Title VI Investigations, Complaints, Or Lawsuits

RCT has no active lawsuits at this time, and has received no Title VI complaints or lawsuits in the past three years.

V. Inclusive Public Participation

Public participation is an essential component of the planning process. From short-term service changes to long-range vision documents and investment strategies, input from the public about policies and services that affect them is critical to their successful implementation. RCT conducts public outreach efforts and public hearings on planning efforts and service changes. Prior to discussing the means of engaging minority and low income communities in these activities, a brief demographic profile of the RCT service area is presented.

Table 1 shows that the RCT service area is overwhelmingly white and native born, with only 6.1% of the population being either Hispanic or non-white, and only 3.0% of the population not born in the United States. People in poverty are much more common, with 11.1% of the service area population in households with incomes below the federal poverty threshold.

The percentages highlighted in red in the table represent "concentrations" of minorities, foreign-born individuals, or individuals in poverty, defined as a percentage higher than that of the service area as a whole. Only two tracts have concentrations in all three categories: Barton and Morristown. Tracts in Morristown and Cambridge have the highest numbers of non-white individuals, although the highest percentage is found in the tract covering Greensboro and Glover. Across the whole service area, there are about 1,600 Hispanic individuals and another 2,400 non-Hispanic individuals of two or more races. The next largest group, at 608, is African Americans.

The greatest concentrations of foreign-born individuals are located in the northern tier, including Derby, Newport and northern Essex County, likely reflecting people born in Quebec. Northern Orleans County generally has concentrations of foreign-born individuals.

The highest numbers of people in poverty occur in tracts in St. Johnsbury and Morristown. All of the three tracts in Essex County have concentrations of people in poverty as do the four tracts covering Lyndon and St. Johnsbury, but the highest concentrations are in western Newport and eastern St. Johnsbury.

As RCT carries out public involvement activities, the figures in Table 1 will inform staff about where additional outreach is needed to encourage minorities and low-income individuals to participate in the process.

Table 1: Demographic Characteristics of Four-County RCT Service Area

County	Tract	Town	Total Population	Non-White or Hispanic Population	Percent	Foreign Born	Percent	Below Poverty Line	Percent
Essex	9501	Northern Essex Cty	1,604	37	2.3%	78	4.9%	182	11.4%
Essex	9502	Brighton	1,119	69	6.2%	9	0.8%	140	12.5%
Essex	9505	Southern Essex Cty	3,249	236	7.3%	49	1.5%	555	17.1%
Orleans	9511	Charleston, Morgan, Holland	2,374	72	3.0%	54	2.3%	250	10.7%
Orleans	9512	Derby East	2,821	113	4.0%	192	6.8%	281	10.1%
Orleans	9513	Derby West	1,738	45	2.6%	100	5.8%	205	11.8%
Orleans	9514	Newport East	2,253	142	6.3%	47	2.1%	85	4.6%
Orleans	9515	Newport West	2,193	49	2.2%	80	3.6%	392	18.7%
Orleans	9516	Jay, Westfield, Troy, Newport Town	4,548	210	4.6%	138	3.0%	381	8.4%
Orleans	9517	Lowell, Irasburg, Albany, Craftsbury	4,198	288	6.9%	175	4.2%	285	7.0%
Orleans	9518	Barton	2,841	255	9.0%	127	4.5%	413	15.3%
Orleans	9519	Westmore, Brownington, Coventry	2,482	188	7.6%	54	2.2%	278	11.2%
Orleans	9520	Greensboro, Glover	1,869	192	10.3%	53	2.8%	166	9.3%
Lamoille	9530	Eden, Belvidere, Waterville	2,143	95	4.4%	13	0.6%	166	7.8%
Lamoille	9531	Cambridge	3,821	342	9.0%	101	2.6%	382	10.1%
Lamoille	9532	Johnson	3,552	255	7.2%	33	0.9%	510	16.5%
Lamoille	9533	Hyde Park	3,009	97	3.2%	82	2.7%	262	8.8%
Lamoille	9534	Wolcott, Elmore	2,784	48	1.7%	41	1.5%	226	8.2%
Lamoille	9535	Morristown	5,455	523	9.6%	223	4.1%	681	12.6%
Lamoille	9536	Stowe	5,156	275	5.3%	276	5.4%	420	8.1%
Caledonia	9570	Walden, Stannard, Wheelock, Sheffield, Sutton, Newark	4,250	283	6.7%	78	1.8%	447	10.6%
Caledonia	9571	Burke, Kirby	2,190	68	3.1%	46	2.1%	290	13.2%
Caledonia	9572	Lyndon East	2,333	144	6.2%	39	1.7%	257	11.3%
Caledonia	9573	Lyndon West	3,250	153	4.7%	154	4.7%	461	16.6%
Caledonia	9574	St. Johnsbury West	3,668	296	8.1%	103	2.8%	532	15.6%
Caledonia	9575	St. Johnsbury East	3,735	254	6.8%	102	2.7%	794	21.5%
Caledonia	9576	Danville	2,172	106	4.9%	48	2.2%	152	7.0%
Caledonia	9577	Hardwick	2,938	194	6.6%	40	1.4%	184	6.3%
Caledonia	9578	Ryegate, Groton, Peacham	3,009	166	5.5%	63	2.1%	342	11.5%
Caledonia	9579	Barnet, Waterford	2,857	233	8.2%	48	1.7%	259	9.1%
			89,611	5428	6.1%	2,646	3.0%	9,978	11.1%

Source: American Community Survey 2017-2021 Reports B03002, B05002, S1701

Measures to Ensure Minority, Low-Income and LEP Participation

As public transportation is perhaps disproportionately relevant to the daily lives of Title VI-protected groups and low-income Vermonters, RCT will ensure that groups that represent these populations are included in outreach efforts and that representatives of these organizations are invited to participate in project steering committees.

All public meetings held as part of this public involvement process will be properly noticed in accordance with the requirements of Title VI of the Civil Rights Act of 1964 and the Vermont public meeting law (Vermont Title 1, section 310 et seq., as annotated), including public announcement of all meetings at least 24 hours before the meeting. Notes are taken at all meetings so that members of the public are not required to submit written comments in order to have their opinions recorded.

RCT and the Northeastern Vermont Development Association maintain contact with organizations that represent the interests of low-income, immigrant, and minority groups and notify them of upcoming public outreach activities.

Meeting times and locations are designed to maximize accessibility for low-income and minority groups. A mix of daytime and early evening meetings are scheduled to allow working and non-working individuals to attend. In terms of meeting locations, St. Johnsbury and the Newport/Derby area, both of which are the focus of Title VI-protected groups, will always host public meetings/hearings in a series, but RCT will make efforts to hold additional meetings in Essex County and the Morrisville area, to make the meetings more accessible to the low-income residents of those areas.

Notices for public meetings include a statement in Spanish and French that translation services languages are available upon request and a telephone number for more information about the meeting. "I Speak" cards will be made available at all public meetings.

RCT will contact organizations that represent Title VI-protected groups in their service area one month in advance of any public meetings or hearings being held regarding service changes or any other planning efforts. RCT will discuss with these groups means of encouraging participation in these meetings and will offer accommodations when appropriate to facilitate participation.

Table 2 below lists public meetings and other outreach efforts that have taken place since the last Title VI Program was submitted in July 2020.

Table 2: Public Outreach Activities

Date	Activity	Location	Attendees/ Responses
1/18/23	Informational public meeting about Microtransit in Morrisville	Online (Zoom)	2
3/1/23	Community forum about Microtransit in Morrisville	River Arts – Morrisville	18
3/9/23	Community forum about Microtransit in Morrisville	Green Mtn. Technology & Career Center plus Zoom	20
4/12/23	Public meeting about grant funding for capital and non-capital projects, programs and services	Online (Zoom)	2
6/16/23	Public hearing about route changes to the Morrisville shopper and Jay Lyn and route cancellations of the 14/15. Twin City and Morrisville Loops	Online (Zoom)	4
6/23/23	Public hearing about route changes to the Morrisville shopper and Jay Lyn and route cancellations of the 14/15. Twin City and Morrisville Loops	Tegu Building – Morristown	5

VI. Access to Services by Persons with LEP

Introduction

On Aug. 11, 2000, President Clinton signed Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency, to clarify Title VI of the Civil Rights Act of 1964. The executive order was issued to ensure accessibility to programs and services to otherwise eligible individuals not proficient in the English language.

The executive order stated that individuals with a limited ability to read, write, speak and understand English are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit, or encounter. These individuals are referred to as being limited in their ability to speak, read, write, or understand English, hence the designation, "LEP," or Limited English Proficient.

The USDOT published "Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficiency" in the Dec. 14, 2005, Federal Register. The guidance explicitly identifies transit operations such as RCT as organizations required to follow Executive Order 13166.

> The guidance applies to all DOT funding recipients, which include state departments of transportation, state motor vehicle administrations, airport operators, metropolitan planning organizations, and regional, state, and local transit operators, among many others. Coverage extends to a recipient's entire program or activity; i.e., to all parts of a recipient's operations.

To meet Title VI and LEP requirements of the FTA, RCT will evaluate, on a continuing basis, activities that would be appropriate for compliance with LEP requirements.

Four Factor Analysis

The DOT guidance outlines four factors recipients should apply to the various kinds of contacts they have with the public to assess language needs and decide what reasonable steps they should take to ensure meaningful access for LEP persons:

1. The number and proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
2. The frequency with which LEP individuals come in contact with the program.
3. The nature and importance of the program, activity, or service provided by the recipient to the LEP community.
4. The resources available to RCT and overall cost.

Factor 1 – Prevalence of LEP Persons

According to the 2017-2021 American Community Survey, RCT's four-county service area has a total of 481 people who speak English "less than very well," representing 0.6% of the population. The analysis below will look at these numbers in more detail, but the LEP Guidance from DOT recommends that "[r]ecipients should first examine their prior experiences with LEP individuals and determine the breadth and scope of language services that are needed."

The forms of LEP interaction experienced by RCT include the following:

- Providing basic information on how to use public transit services in the area
- Making reservations on demand-response services such as Elders and Persons with Disabilities transportation, non-emergency medical transportation, and general public dial-a-ride
- Handling passenger complaints
- Gathering data such as on-board customer surveys.

The tables presented below illustrate where LEP individuals reside within the RCT service agea. Table 3 shows the number of individuals by tract and language who speak English "less than very well."

In 12 of the 30 Census tracts, there are fewer than ten people who are "linguistically isolated" (i.e. speaking English "less than very well"). In another 8 tracts, there are between 10 and 20 linguistically isolated individuals. The LEP guidance from DOT indicates lower requirements for recipients that serve "very few" LEP individuals, though this threshold is not defined. It is certainly reasonable to assume, however, that towns that have 20 or fewer LEP individuals will not generate a significant amount of needs for translation services. In the data set, there were only 10 tracts with more than 20 LEP individuals and only two more than 50. It is clear from the data, as well as from the experience of RCT staff, that LEP is not a widespread issue in its service area, other than French speakers in some of the northernmost towns along the Canadian border.

The percentages highlighted in red in Table 4 indicate tracts with a concentration of linguistically isolated (LI) individuals; that is, where the percentage of these individuals is higher than the service-area average. There are 13 tracts with concentrations, but only 4 of these have more than 30 LI individuals: northern Essex County, western Newport, Barton and Barnet/Waterford.

The next step in the analysis was to consider specific language groups and where there are concentrations of individuals who do not speak English very well. Because of the proximity of the border with Quebec, French speakers make up nearly half (47%) of all of those who speak English less than very well. Most of these individuals are in northern border towns in Orleans County plus Barton and Hyde Park.

It can be seen in the data that no language group comes close to 1,000 individuals even for the four-county service area as a whole. On Table 4, there is one tract where linguistic isolates exceed 2.5% of the population: Barton. These individuals are a mix of Spanish, French and "other" language speakers. According to the safe harbor provision in the federal guidance for LEP, oral translation services provided by RCT, the French schedule guide, as well as access to written translations when requested, are sufficient to meet the requirements for accommodations for LEP individuals.

Table 3: Number of Individuals Who Speak English Less than Very Well by Language and Census Tract

Tract	Towns	Total Population 5+	Spanish	French	Russian/Slavic	Other Indo-European	Korean	Chinese	Other Asian and Pacific Island	Other	Total Linguistic Isolates
9501	Northern Essex Cty	1,570	0	32	0	0	0	0	0	0	32
9502	Brighton	1,084	0	4	0	0	0	0	0	0	4
9505	Southern Essex Cty	3,076	7	9	0	0	0	7	0	0	23
9511	Charleston, Morgan, Holland	2,214	0	0	0	0	0	0	0	0	0
9512	Derby East	2,657	0	21	0	0	0	0	0	0	21
9513	Derby West	1,608	0	20	0	0	0	0	0	0	20
9514	Newport East	2,200	0	13	0	0	0	0	0	0	13
9515	Newport West	2,151	0	37	0	0	0	0	0	0	37
9516	Jay, Westfield, Troy, Newport Town	4,313	0	17	0	0	0	0	0	0	17
9517	Lowell, Irasburg, Albany, Craftsbury	4,010	0	4	0	0	0	0	0	0	4
9518	Barton	2,727	24	17	0	0	0	0	0	29	70
9519	Westmore, Brownington, Coventry	2,353	0	5	0	0	0	0	0	0	5
9520	Greensboro, Glover	1,781	0	3	0	0	0	0	0	0	3
9530	Eden, Belvidere, Waterville	2,066	0	0	4	0	0	0	0	0	4
9531	Cambridge	3,566	0	0	0	1	0	0	0	0	1
9532	Johnson	3,337	0	0	0	0	0	0	0	5	5
9533	Hyde Park	2,884	0	20	0	2	0	0	0	0	22
9534	Wolcott, Elmore	2,626	5	4	14	0	0	0	0	0	23
9535	Morristown	5,281	9	4	0	0	0	0	0	0	13
9536	Stowe	4,948	17	0	0	0	0	0	0	0	17
9570	Walden, Stannard, Wheelock, Sheffiel	4,067	7	12	3	0	0	4	0	0	26
9571	Burke, Kirby	2,065	0	2	0	0	0	0	0	0	2
9572	Lyndon East	2,214	0	0	0	0	0	0	0	0	0
9573	Lyndon West	3,059	0	0	0	13	0	0	0	0	13
9574	St. Johnsbury West	3,584	0	0	0	0	0	0	18	0	18
9575	St. Johnsbury East	3,518	0	0	0	0	0	0	0	0	0
9576	Danville	2,059	0	0	0	8	0	0	0	0	12
9577	Hardwick	2,797	0	0	0	0	0	0	0	0	0
9578	Ryegate, Groton, Peacham	2,928	16	0	0	0	7	0	1	0	24
9579	Barnet, Waterford	2,721	48	4	0	0	0	0	0	0	52
		85,464	133	228	21	24	7	11	19	34	481

Source: 2017-2021 American Community Survey Table C16001

Table 4: Percentage of Population that Speaks English Less than Very Well by Tract

Tract	Towns	Spanish	French	Russian/Slavic	Other Indo-European	Korean	Chinese	Other Asian and Pacific Island	Other	Total Linguistic Isolates
9501	Northern Essex Cty		2.0%							2.0%
9502	Brighton		0.4%							0.4%
9505	Southern Essex Cty	0.2%	0.3%				0.2%			0.7%
9511	Charleston, Morgan, Holland									0.0%
9512	Derby East		0.8%							0.8%
9513	Derby West		1.2%							1.2%
9514	Newport East		0.6%							0.6%
9515	Newport West		1.7%							1.7%
9516	Jay, Westfield, Troy, Newport Town		0.4%							0.4%
9517	Lowell, Irasburg, Albany, Craftsbury		0.1%							0.1%
9518	Barton	0.9%	0.6%						1.1%	2.6%
9519	Westmore, Brownington, Coventry		0.2%							0.2%
9520	Greensboro, Glover		0.2%							0.2%
9530	Eden, Belvidere, Waterville			0.2%						0.2%
9531	Cambridge				0.0%					0.0%
9532	Johnson								0.1%	0.1%
9533	Hyde Park		0.7%		0.1%					0.8%
9534	Wolcott, Elmore	0.2%	0.2%	0.5%						0.9%
9535	Morristown	0.2%	0.1%							0.2%
9536	Stowe	0.3%								0.3%
9570	Walden, Stannard, Wheelock, Sheffiel	0.2%	0.3%	0.1%			0.1%			0.6%
9571	Burke, Kirby		0.1%							0.1%
9572	Lyndon East									0.0%
9573	Lyndon West				0.4%					0.4%
9574	St. Johnsbury West							0.5%		0.5%
9575	St. Johnsbury East									0.0%
9576	Danville				0.4%					0.6%
9577	Hardwick									0.0%
9578	Ryegate, Groton, Peacham	0.5%				0.2%		0.0%		0.8%
9579	Barnet, Waterford	1.8%	0.1%							1.9%
		0.16%	0.27%	0.02%	0.03%	0.01%	0.01%	0.02%	0.04%	0.6%

Factor 2 – Frequency of Contact with LEP Persons

LEP individuals, in general, depend much more on public transportation than those who are English proficient, thus the need for LEP individuals to use RCT services on a daily basis is frequent. However, many of the linguistically isolated individuals in the RCT service area are residents of rural towns near the Canadian border. These individuals, many of whom have lived in these towns for years, are not necessarily more dependent on public transportation than other residents of the Northeast Kingdom.

Factor 3 – Importance to LEP Persons of Program, Activities and Services

The importance of providing transportation services to the LEP population is lower than providing some other services to this population, such as emergency medical services or legal services to a person who has been arrested. Nevertheless, providing public transportation access to LEP persons is critical. An LEP person's inability to effectively utilize public transportation may adversely affect his or her ability to obtain health care, education, or access to employment.

Denial or delay of access to RCT services to LEP individuals has never been a problem in the Northeast Kingdom. RCT's close working relationship with social service agencies and its ability to communicate with French-speaking residents allow LEP individuals to access whatever transportation services they need in a timely way.

Factor 4 – Resources Available and Cost

Because of the very low incidence of LEP persons in Vermont overall, the cost to accommodate them has not been burdensome. VTrans provides in-person and telephone translation services to VTrans subrecipients through a contract with Propio (formerly Telelanguage). Documents may also be translated through Google Translate at no cost. It's not expected that the resources available or the cost of translation services will hinder the accommodation of the needs of RCT's LEP population.

Translation of RCT's written materials and/or signs into languages other than French cannot be justified at this time, as the numbers of the potential benefactors are very small.

Fortunately, the services offered by many community-based organizations in the Northeast Kingdom have proved more than adequate in providing meaningful access to LEP persons utilizing RCT services.

Monitoring

RCT has described in previous sections that it is extensively aware of the demographics of of its four-county service area, and believes that through the services provided to LEP individuals that the public transportation needs of all individuals in its service area are being met without regard to ability to speak English. The data indicates that at this point in time, RCT does not need to take any further actions to assist LEP individuals.

DOT acknowledges that the implementation of a comprehensive system to serve LEP individuals is a process, and that a system will evolve over time as it is implemented and periodically reevaluated. Recipients are encouraged to document their efforts to provide LEP persons with meaningful access to federally assisted programs and activities.[1]

In light of this, RCT will continue to monitor its service population on an annual basis, and will be prepared to implement the appropriate services should that need be assessed. This annual monitoring process will include the following steps:

- Monitor current LEP populations in its service area,
- Ascertain whether existing procedures are meeting the needs of LEP persons,
- Continue to maintain awareness among management and staff of the regulations implementing Title VI of the Civil Rights Act of 1964, and
- Update the LEP assessment as necessary.

[1] DOT Docket OST-2001-8696: Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons (Federal Register: December 14, 2005 – Volume 670, Number 239), § VIII.

VII. Board Membership

The RCT board of directors consists of eleven members. Five of these members are municipal representatives appointed by towns that are part of the service area. The other members of the board are three "at-large representatives" who can represent a county, community organizations or the general public, a representative from the regional planning commission, and two alternates.

All of the members of the present board are Caucasian. Given that the non-white population of the RCT service area is only 6.1% of the total, the lack of minority representation is not unexpected. RCT will continue to seek minority representation on its board by working with community organizations.

RCT has no citizen input committees, planning boards or advisory councils.

VIII. Monitoring of Subrecipients

RCT has no subrecipients.

IX. Transit Facility

RCT has not constructed a facility, though it did purchase and remodel an existing facility in an industrial park in Lyndonville. This facility is far removed from residential areas, thus there was no impact on any Title VI protected groups. RCT is considering an expansion of its facility to allow for indoor garaging of vehicles. Prior to construction, RCT will consider if there are any Title VI implications, but given the industrial use of the surrounding area, there is not expected to be any impact.

X. Service Standards and Policies

RCT operates two modes of bus service: local bus and commuter bus. The following presents the service standards and policies for these modes of transportation:

1) Vehicle Load
   RCT has a load standard of 1.0 for all of its modes of transportation, including commuter bus, local shuttle, and demand response service. RCT always provides sufficient capacity to avoid standees on any transit vehicle trips.

2) Vehicle Headway
   The current headway standard for RCT's local shuttle services is 2 hours (120 minutes). RCT has a longer term goal of operating its shuttles with a headway of 1 hour (60 minutes), but it currently has insufficient funding to operate at that level. RCT only has two shuttle routes, and it would seek to upgrade them at the same time. RCT recently converted one of its shuttle services to on-demand microtransit.

   RCT's commuter services seek to operate two round-trips per peak period.

3) On-time Performance
   RCT seeks to complete all of its scheduled trips between zero and five minutes late according to the printed schedule. Its shuttle routes operate as route-deviation services, with buses permitted to deviate from the alignment up to 1/4 of a mile. Other trip requests beyond 1/4 mile are handled by demand-response service. A bus trip that includes a deviation is not considered late if it arrives at the destination terminal more than 5 minutes late. Acceptable on-time performance is defined as 90% of all non-deviated runs arriving within the zero-to-five-minutes-late window at the destination terminal.

4) Service Availability
   The majority of RCT's service is demand response, mostly provided by volunteer drivers. RCT's two local shuttle services and its commuter bus services operate in the only two portions of its service area that have sufficient population density to support such service. As mentioned above, these are route deviation services and have few fixed stops. Passengers may request a stop at any safe location along the route. RCT operates weekly or biweekly shopping shuttle routes to many of the towns in its service area, funded by the Elders and Persons with Disabilities Program. As a result of this service provision, all residents in the RCT service area have access to public transportation, though only those within the towns of St. Johnsbury, Lyndon, Derby and Newport have access to local shuttle service.

5) Distribution of Transit Amenities
As a very small rural system, RCT has very few transit amenities. The system as a whole has a handful of bus shelters, and these are located at the stops with the highest ridership.

RCT will continue to work with municipalities to provide passenger amenities wherever possible, and their placement will be determined to serve the greatest number of passengers.

6) Vehicle Assignment by Mode
RCT's policy of assigning vehicles to routes is based strictly on needed capacity to ensure there are no standees. RCT's fleet consists mostly of cutaway vans, with a small number of larger buses to serve the commuter and local shuttle routes. The largest vehicles are used for those runs that have the highest ridership. RCT has a continuously updated vehicle replacement plan to ensure that safe, comfortable, and reliable vehicles are available for all services.