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Petersburg AreaTransit

## **TITLE VI PROGRAM UPDATE**

REVISED  
January 30, 2020

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## INTRODUCTION

Petersburg Area Transit, hereafter called PAT, hereby certifies that, as a condition of receiving Federal Financial Assistance under the Urban Mass Transportation Act of 1964, as amended, PAT will ensure its compliance to the Title VI Program outlined by Code of Federal Regulations.

PAT acknowledges that, at the discretion of the FTA, information other than that which is required by FTA C4702.1B, may be requested in writing of PAT to investigate complaints of discrimination or to resolve concerns about possible noncompliance with Title VI.

### PAT ASSURANCES TO THE TITLE VI PROGRAM

PAT shall submit on an annual basis, their Title VI Assurance, as part of their annual Certification and Assurance submission to the FTA.

PAT will compile, maintain and submit in a timely manner, Title VI information required by FTA Circular 4702.1B and in compliance with the Department of Transportation's Title VI regulation, 49 CFR Part 21.7.

PAT will as a commitment to civil rights ensure that "No person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance."

- None shall, on the basis of race, color or national origin is to be subjected to discrimination in the level and quality of transportation services and transit-related benefits provided by PAT.
- PAT will make it known to the public that those persons alleging discrimination on the basis of race, color or national origin as it relates to the provision of transportation services and transit-related benefits may file a complaint with the Federal Transit Administration, the U. S. Department of Transportation and the City of Petersburg as described in Section II.

PAT does not pass FTA funds thru sub-recipients.

PAT as a recipient of federal funding will examine its services and identify any need for services to those with limited English proficiency, and develop and implement systems to provide services so LEP persons can have meaningful access to these services. Section IV of this plan explains and identifies action of PAT.

## Timely Submission

PAT acknowledges that, at the discretion of the FTA, information other than that which is required by FTA C 4702.1B, may be required in writing of the FTA, to investigate complaints of discrimination or to resolve concerns about possible noncompliance with Title VI.

- A summary of public outreach and involvement activities undertaken since the last submission and a description of steps taken to ensure that minority and low-income people had meaningful access to these activities;
- PAT process for persons with Limited English Proficiency (LEP);
- Title VI Complaint and Tracking procedures;
- A list of any Title VI investigations, complaints or lawsuits filed since the last submission; and
- A copy of PAT public notice regarding Title VI compliance and public access and instructions to PAT Title VI complaint procedures.

Portions of the Plan which have not changed since the last submission will not be resubmitted, however, PAT shall include a statement to this effect in lieu of copies of the original documents in order to eliminate redundancy in resubmissions.

The person, whose signature appears below, are authorized to sign on behalf of the grant applicant or recipient.

Date: January 30, 2020

Charles L. Koonce, Jr.

Charles Koonce Jr.  
Director of Mass Transit

## TITLE VI COMPLIANCE HISTORY

PAT has no issues of noncompliance and makes necessary corrections when identified:

- There are no outstanding lawsuits or complaints naming PAT which allege discrimination on the basis of race, color or national origin with respect to service or other transit benefits.
- There are no pending applications for Federal Financial Assistance and there is no Federal financial assistance currently being provided to PAT other than that being supplied by the Federal Transit Administration (FTA). Currently, PAT is applying for Section 5307 and 5317 funding through the FTA.
- During the course of the last three (3) years, there have not been any civil rights compliance review activities conducted with respect to PAT and, to the best of our knowledge, there are not presently any ongoing civil rights compliance review activities being conducted with respect to PAT.
- There are currently no pending construction projects which would negatively impact minority communities being performed by PAT.

## GENERAL REQUIREMENTS

### Notice to the Public

Petersburg Area Transit (PAT or "Recipient") HEREBY AGREES THAT as a condition to receiving any Federal financial assistance from the Department of Transportation will comply with the Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U. S. C. 2000d- 42 U. S. C. 2000d-4 U.S.C. 2000d-4 (hereinafter reference as the "Act"), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary , Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation

– Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to the "Regulations") and other pertinent directives, to the end and that in accordance with the Act of 1964, Regulations, and other pertinent directives.

PAT will thereby maintain notice to the public identifying this compliance using all available manners of address from the design of its program, training of its staff and providing notice using available media reinforcing the assurances stated on page 3.

More specifically and without limiting the above general assurance, the Recipient hereby gives the following specific assurances with respect to its Federal Transit Administration Program:

- That the Recipient agrees that each "program" and each "facility" as defined in sub 21.23(a) and 21.23 (b) of the Regulations, will be (with regard to a "program") conducted, or will be (with regard to a "facility") operated in compliance with all requires imposed by, or pursuant to, the Regulations.
- That the Recipient shall insert the following notification in all solicitations for bids for work or material subject to the Regulations and made in connection will all Federal Transit Administration Programs and, in adapted form in all proposals or negotiated agreements:

*Petersburg Area Transit, in accordance with the Title VI of the Civil Rights Act of 1964, 78 Stat., 252 U. S. C. 2000d to 2000d-4 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federal-Assisted Programs of the Department of Transportation issued pursuant to such Act, hereby notifies all bidders/proposers that it will affirmatively insure that in any contract entered into pursuant to this advertisement, minority business enterprises will be afforded full opportunity to submit bids in response to the invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award.*

- That the Recipient shall insert the clauses contained herein every contract

subject to this Act and the Regulations.

- That the Recipient shall insert the clauses contained herein as a covenant running with the land, in any deed from the United States affecting a transfer of real property, structures or improvements thereon, or interest herein.
- That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the assurance shall extend to the entire facility and facilities operated in connection therewith.
- That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the assurance shall extend to rights to space on, over or under such property.
- That the Recipient shall include the appropriate clauses contained herein as a covenant running with the land, in any future deeds, leases, permits, licenses, and similar agreements entered into by the Recipient with other parties:
  - ✓ for the subsequent transfer of real property acquired or improved under the Federal Transit Administration Programs; and
  - ✓ for the construction or use of or access to, space on, over, or under real property acquired, or improved under the Federal Transit Administration Programs.
- That this assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property or interest therein or structures or improvements thereon, in which case the assurance obligates the Recipient or any transferee for the longer of the following periods:
  - ✓ the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or
  - ✓ The period during which the Recipient retains ownership or possession of the property.
- The Recipient shall provide for such methods of administration for program as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the

Regulations and this assurance.

- The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Act, the Regulations and this assurance.
- The Recipient assures that the level and quality of transit service and related benefits are provided in a manner consistent with Title VI of the Civil Rights Act of 1964.

THESE ASSURANCES are given in consideration of, and for the purpose of, obtaining any and all Federal grants, loans, contracts, property, discounts or other Federal financial assistance extended after the date hereof to the Recipient by the Department of Transportation under the Federal Transit Administration and is binding on it, other recipients, sub-grantees, contractors, subcontractors, transferees, successors in interest and other participants in the Federal Transit Administration Programs.

DISCRIMINATION COMPLAINT FORM and PROCESS



TITLE VI COMPLAINT FORM  
Petersburg Area Transit (PAT)

PAT is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. The following information is necessary to assist us in processing your complaint. If you require any assistance in completing this form, please contact the Title VI Coordinator, by calling (804) 733-2452. The completed form must be returned to PAT Customer Service Office, Title VI Coordinator, 100 West Washington Street, Petersburg, Virginia 23803

<b>Section I:</b>	
Name:	
Address:	
Telephone (Home):	Telephone (Work):
Electronic Mail Address:	
<b>Section II:</b>	
Are you filing this complaint on your	Yes* (if yes, go to Section III) <input type="checkbox"/> No
If not, please supply the name and relationship of the person for who you are filing the complaint	
Please explain why you have filed for a third-party:	
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third- party.	Yes <input type="checkbox"/> No
<b>Section III:</b>	
I believe the discrimination I experienced was based on (check all that apply):	
<b>Race</b> <input type="checkbox"/> <b>Color</b> <input type="checkbox"/> <b>National Origin</b> <input type="checkbox"/> <b>American Disabilities Act</b> <input type="checkbox"/>	
Date of the Alleged Discrimination (Month, Day, Year):	Time of Day:
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person (s) who discriminated against you (if known) as well as names and contact information for any witnesses. If more space is needed, please use the back of this form.	

<b>Section IV:</b>	
Have you previously filed a Title VI complaint with this agency? Please explain.	Yes <input type="checkbox"/> No
<b>Section V:</b>	
Have you filed this complaint with any other Federal, State, or local agency or with any	Yes <input type="checkbox"/> No
If you have filed this complaint with another entity, please provide the information below:	
Agency:	Contact Name:
Address:	Telephone Number:
Agency:	Contact Name:
Address:	Telephone Number:

You may attach any written material or other information that you think is relevant to your complaint. I affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

Complainant's Signature \_\_\_\_\_ Date \_\_\_\_\_

Please submit this complaint form to:  
 PAT Customer Service Office, Title VI Coordinator, 100 West Washington Street,  
 Petersburg, Virginia 23803

**INSTRUCTIONS FOR COMPLETING COMPLAINT FORM**

You may either type your complaint or hand write it so long as it can be easily read. If needed, attach additional sheets of paper to provide additional information and indicate that you have done so on the complaint form.

- Section 1 – Provide personal identifying information as requested.
- Section 2 – Advise if you are the complainant or assisting the complainant. If assisting, identify yourself in section 2 or go to section 3 if you are the complainant.
- Section 3 – Identify the basis for discrimination; provide date and time of the incident, then explain the circumstances with as much detail as you can.

Remember to add sheets if needed as state in the section if attachments have been included.

- Section 4 – please advise if there has been any previous complaint with Petersburg Area Transit or the City of Petersburg.
- Section 5 – Advise if you have previous complaints with any other Federal, State, or local agency or with any Federal or State court. Identify any other representatives or third parties subject to you complaint by name of Agency, contact name, address and phone number.
- Your signature and the date of completion is required on the form as indicated by the statement that the complaint is true to the best of knowledge.

A complaint must meet the following criteria for acceptance:

- The Complaint must be filled within 180 days of alleged occurrence;
- You must sign the complaint. You may not sign for anyone else.
- Mail or provide your completed complaint to:

Petersburg Area Transit  
100 West Washington Street  
Petersburg, Virginia 23803  
Attention: Transit Program Administration Manager

## Title VI Public Notice of Rights/Complaint Process

### Public Notice of Rights

The following statement shall be posted on site at both PAT office locations, on the PAT website ([www.petersburg-va.gov](http://www.petersburg-va.gov)), permanently displayed on public transit vehicles; and other appropriate materials made available to the public. (Documents will be translated into languages other than English, upon request.)

### Non-Discrimination - Your Rights under Title VI of the Civil Rights Act of 1964

*"No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in , be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.,,*

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

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

### What is Title VI?

Title VI of the Civil Rights Act of 1964, is the Federal Law that protects individuals from discrimination on the basis of their race, color or national origin in programs that receive Federal Financial Assistance.

Petersburg Area Transit supports this law and posts this information on its Transit Buses, City owned website, and at the Transit Station offices where patrons may be notified. The following statement and instructions are provided:

- *"No person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality of transportation service furnished by PAT on the basis of race, color, or national origin. Frequency of service, age and quality of vehicles assigned to routes, quality of stations serving different routes, and location of routes may not be determined on the basis of race, color or national origin"*

### How can I file a discrimination complaint?

Any person who believes that they have, individually, or as a member of any specific class of persons, been subjected to discrimination on the basis of race, color, or national origin may file a complaint with PAT, Queenie Byrd, Transit Program Administration Manager at (804)733-2452.

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 PAT 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:

- A formal complaint must be filed within 180 days of the alleged occurrence.

Complaints shall be in writing and signed by the individual of his/her representative, and will include the complainant's name, address and telephone number; number 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.

Petersburg Area Transit strongly encourages the use of the attached PAT Title VI Complaint Form when filing official complaints.

The preferred method is to file your complaint in writing using the PAT Title VI Complaint Form and send it to:

Title VI Coordinator  
Petersburg Area Transit  
100 West Washington Street  
Petersburg, Virginia 23803

- In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to PAT Title VI Coordinator. Under these circumstances, the complainant will be interviewed, and the PAT Title VI Coordinator will assist the Complainant in converting the verbal allegations to writing.
- When a complaint is received, the Title VI Coordinator will provide written acknowledgment to the Complainant, within ten (10) days by registered mail.
- If a complaint is deemed incomplete, additional information will be requested, and the Complainant will be provided sixty (60) business days to submit the required information. Failure to do so may be considered good cause for a determination of no investigative merit.
- Within fifteen (15) business days from receipt of a complete complaint, PAT will determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant investigation. Within five (5) days of this decision, the Transit Administrative Manager 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 PAT jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and

assisting the investigator.

- When PAT does not have sufficient jurisdiction, the Transit Administrative Manager or his/her authorized designee will refer the complaint to the appropriate State or Federal agency holding such jurisdiction.
- If the complaint has investigative merit, the Transit Administrative Manager or his/her 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 Transit Administrative Manager within sixty (60) 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 when appropriate. If the investigation is delayed for any reason, the Title VI Coordinator will notify the appropriate authorities, and an extension will be requested.
- The Transit Administration Program Manager or his/her authorized designee will issue letters of finding to the Complainant and Respondent within ninety (90) days from receipt of the complaint.
- If the Complainant is dissatisfied with PAT's resolution of the complaint, he/she has the right to file a complaint with

Office of Civil Rights  
ATTN: Title VI Program Coordinator  
East Building, 5th Floor – TCR,  
1200 New Jersey Avenue, SE  
Washington, D.C. 20590

## PUBLIC PARTICIPATION PLAN

### KEY PRINCIPLES and GOALS

To improve public participation resulting in a more effective program under Title VI, PAT shall establish a plan for public participation under the following key principles:

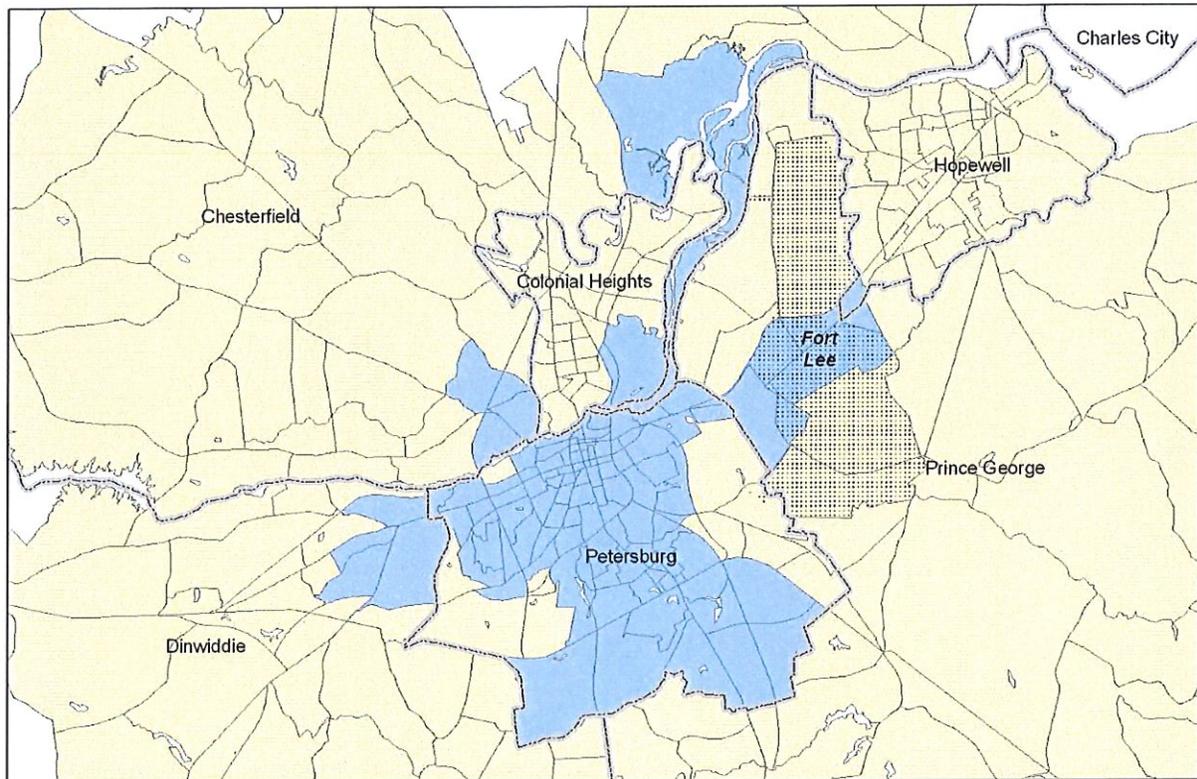
- Coordination with individuals, institutions, or organizations and implementing community-based public involvement strategies to reach out to members in the affected minority and/or low-income communities;
- Provision of opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments.
- Utilization of locations, facilities and meeting times that are convenient and accessible to low-income and minority communities;
- Utilization of different meeting sizes or formats, or varying the type and number of news media used to announce public participation opportunities; and
- Implementation of DOT's policy guidance regarding PAT responsibilities to LEP persons.

### DECISION MAKING BODIES

PAT engages three decision making bodies to support its role in city government, operational efficiency, and public participation. These bodies are necessary to maintain sound programs for all Title VI requirements. These bodies are:

- The City of Petersburg's Mayor and City Council sets policies for the city. The City Manager (Aretha R. Ferrell-Benavides, implements polices set by the council and manages the daily operations of the city.
- While PAT doesn't have a formal Board, City Council currently acts as the Board. We are still working on a process of putting together a Committee. The PAT Committee will include, the City Manager, Director of Mass Transit , and the Lead Purchasing Agent this Committee will engage, review and approve all PAT contracting and operational actions.

## Service Area Geography and Demographic Data



### PETERSBURG AREA TRANSIT SERVICE AREA

PETERSBURG AREA TRANSIT SERVICE AREA includes primary routes servicing the cities of Petersburg, Colonial Heights, Hopewell and Fort Lee (Army installation). Limited service to City of Richmond is available for employment related travel.

The level of service provided to all areas is based on operating factors that provide ridership based on populations, area employment, popular destinations and other economic factors. PAT participates in many area organizations, such as the Metropolitans Planning Organization and city and civic meetings to ensure meeting the needs of the service area.

Census data and other civic information help shape the levels of service. Demographic data identifies population and race.

<b>Demographic Characteristics</b>	<b>Population Estimate</b>	<b>% by Jurisdiction</b>
White	4,640	14.7% Petersburg
Black	24,528	77.7% Petersburg
American Indian/Alaska Native	347	1.1% Petersburg
Asian	410	1.3% Petersburg
Hispanic	1,642	5.2% Petersburg
Total City Population	31,567	100% Petersburg
White	11,027	48.8% Hopewell
Black	9,174	40.6% Hopewell
American Indian/Alaska Native	451	2.0% Hopewell
Asian	294	1.3% Hopewell
Hispanic	1650	7.3% Hopewell
Total City Population	22,596	100% Hopewell

White	13,250	74.3% Colonial Heights
Black	2,372	13.3% Colonial Heights
American Indian/Alaska Native	553	3.1% Colonial Heights
Asian	677	3.8% Colonial Heights
Hispanic	981	5.5% Colonial Heights
Total City Population	17,833	100% Colonial Heights
Grand Total Population	71,996	

## SERVICE STANDARDS AND POLICIES

### ➤ Vehicle Load

*Measure: Provides service levels to prevent overcrowding and standees.*

PAT system-wide goal is to have an average maximum load factor for local service not to exceed 1.0, as measured by a ratio of total passengers to seats on board the vehicles. This equates to a maximum of approximately 1 standee on a 21'-29' vehicle.

PAT works closely with its Para-transit section to ensure passengers are not left behind due to overcrowding or overloads. Overcrowding is monitored on all routes; no route in PAT system is overcrowded or overloaded.

Buses in PAT's fleet currently used have seating capacities of:

Type Vehicle	Make	Model	Seats	Standing	Total
21' Mini Bus	Ford	450	9	0	9
24' Mini Bus		450	21	0	21
29' Low Floor Bus	Gillig	Low Floors	29	0	29
35' Standard Bus	Gillig BRT	Low Floors	32	0	32
30' Trolley	Hometown	Villager	32	0	32
28' Transit Bus	Chevy	ARBOC	22	0	22

### ➤ Vehicle Headway

*Measure: Provides adequate service frequency based on the corridor of operation and ridership demand.*

PAT's system-wide goal is to provide service every 30 and 60 minutes during the peak and off-peak times along all primary transportation corridors in the Petersburg Transit Service Areas. As some routes provide overlapping service within a given corridor, corridor frequencies are typically the same. The vehicle headway standard is designed to

ensure that passengers have equitable wait times for transit vehicles. Vehicle headways are measured as the amount of time between the departure of two subsequent buses along the same route or service corridor.

PAT differentiates between three types of bus service as defined below:

Service Type	Bus Routes
Petersburg Service Area	NA
South Park Mall (City of Colonial Heights)	NA
Etrick's Chesterfield County	NA
Demand Responsive	CSH/SVTC

➤ On-time Performance

*Measure: Provides accessible and reliable transit services to the service area*

To ensure reliable services, PAT aims to have a 95% on-time performance target at major stops and transfer station and an 85% on-time performance target at minor time-point stops for fixed route operations. In addition, PAT's standard is less than 1% of fixed-route trips missed or removed from the daily schedule. For Para transit services, the standard for on-time performance is at least 90% of all Para-transit trips arriving within the thirty-minute pick-up window.

➤ Service Availability

*Measure: Provides accessible and reliable transit services to City of Petersburg, City of Colonial Heights, City of Hopewell and Dinwiddie County.*

PAT's goal is to provide transit service to major origins within the Petersburg Area Transit Service Area and surrounding localities. This goal includes

providing transit within 1/4 mile of 90% all City of Petersburg residents by census, 90% of major employers and other large trip generators, and 95% of large multifamily housing developments as well as ensuring that 75% and 75% of middle and high schools are within 1/2 mile and 1/2 mile, respectively, of transit service.

➤ Distribution of Transit Amenities for Each Mode

The transit amenities policy is designed to provide the framework for the distribution of bus stop amenities equitably throughout the system. When resources allow for improvements at multiple stop locations, PAT will prioritize resources based on passenger activity and transfer opportunities. PAT will also recognize the amount of observed boarding versus alighting activity when siting amenities such as shelters, benches, and real-time.

In situations where PAT has the authority and available resources to site new amenities at multiple bus stops, amenities will be programmed for placement at those stops based on need and ridership. Amenities may include, but are not limited to, shelters, seating, trash receptacles, and transit information displays. Amenities are based on passenger boarding's, transfer opportunities, and access to major activity connection areas. While PAT will use need and ridership to program the installation of amenities, external factors (e.g., site limitations, regulations of local jurisdictions, etc.) may dictate that amenities be installed out of order or not at all. Maintenance and replacement of existing amenities will not be subject to.

#### ➤ Vehicle Assignment for Each Mode

The vehicle assignment policy is designed to provide the framework for the distribution of buses in an equitable fashion throughout the system. All vehicles used in transit service will be ADA accessible and accommodate at least two wheelchairs and two bicycles.

Vehicle size and capacity will be assigned based on demand and passenger load factors. Those routes or one route with the lowest passenger demand will be assigned a 21'-24' mini-bus, those with medium demand will be assigned a 29' vehicle and those with the highest demand will be assigned a 35' vehicle.

## PUBLIC PARTICIPATION PROCESS

Processes and actions developed to address public participation are set to provide reinforcement of the Title VI objectives. These efforts include:

- Meetings will be held in locations which are fully accessible and welcoming to all area residents, including, but not limited to, low-income and minority members of the public and in locations relevant to the topics being presented and discussed.
- Meetings when considering fare changes, elimination, addition, or modifications to routes and schedule and other transit planning projects are held as formal public city council sessions.
- Schedule meetings that are convenient to patrons, minority and LEP communities that permit roundtable discussion and enhance participation, such as recent held open house to acclimate patrons to services; participation in Hispanic community awareness event to help identify support to LEP persons and open forums to initiate development of patron passenger advisory group.
- Coordinate with community organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities through

churches, nearby university leadership, clubs and other civic organizations.

- Uses media and signage to support the process as follows:
  - ✓ Print- Newspapers and other periodicals
  - ✓ Outdoor -Advertising onboard buses (interior/exterior) and in bus shelters
  - ✓ Website - PAT has assembled a comprehensive website with the City of Petersburg.
  - ✓ On Board – PAT provides riders with details of service changes, schedules of public meetings and notifications including Title VI requirements.
  - ✓ On-board scrolling messages - PAT buses provide messages of pertinent and relevant data.
  - ✓ Interterminal address system used to provide transit information

#### SUMMARY OF PUBLIC PARTICIPATION ACTIVITIES

PAT public outreach is primarily accomplished through City Council meetings. Meetings are generally held twice a month and are open to the public. Dates, times, agendas, and minutes for City Council meetings are posted on the City of Petersburg website. PAT service and policy changes, such as changes to routes or fares, are discussed at these meetings and public comment is welcomed. The City of Petersburg website and social media are another additional platform from which PAT and the City Council communicate PAT service and policy changes with the public. Additionally, a survey was conducted to gain insight into the demographic characteristics and travel behaviors of riders and non-riders as well as gather feedback from the community on the existing impressions of the service and desired improvements. Responses collected through the survey are summarized in the following sections and this data was used to inform the service and capital improvement plan. The survey was developed using MetroQuest, a web-based platform specializing in public engagement. The survey was made available online via a link on the City of Petersburg's website and was accessible from both computers and mobile devices. In addition, a paper version of the survey was also distributed and collected at PAT's transfer center. The survey was available from October 5, 2018 to November 15, 2018. A total of 96 people participated in the survey, including 53 respondents via web or mobile device and 43 respondents via paper surveys. To understand the needs of the community and rider market, survey respondents were asked if they ride the bus frequently, ride the bus less frequently than they previously had, or do not ride the bus. The survey responses were organized by respondents' identification of themselves as a "Frequent Rider", "Less Frequent Rider", or "Non-Rider" and the results for these three categories were summarized. The survey also asked all respondents (riders and non-riders) to indicate origins and destinations of

frequent trips, as well as how they would prioritize investments to the transit system. PAT also post Public Notices regarding Title VI compliance and public access.

## LANGUAGE ASSISTANCE PLAN

The demographics for Petersburg, Virginia as provided by the U.S. Census indicate that the city is 78 percent Black or African American, 15 percent White, 5 percent Hispanic and 2.4 percent other. This make-up supports that the Hispanic community is its largest minority. Several programs (Appendix B and C) to support this community along with concerns of limited English proficiency have been instituted to make Petersburg Area Transit inclusive to all.

- Improving Access for People with Limited English Proficiency (LEP)

PAT shall take steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP). PAT will assist persons with Limited English Proficiency to participate in the transportation planning process. PAT Staff will make every effort to provide translators and document translation, where feasible, upon request. PAT Limited English Proficiency (LEP) Plan is contained herein as Appendix B.

- ACTIONS AND TOOLS SUPPORTING RIDERS WITH LEP

To support the Title VI program, PAT has completed many actions and tools to accommodate the LEP population. Actions taken include

- ✓ Establishment of new transit routes to support the community where a predominance of LEP persons reside.
- ✓ The use of multi-lingual signage on transit vehicles and websites.
- ✓ PAT administrative offices have established multi-lingual telephone information access.
- ✓ Work is completed for the translation of other documents to support Title VI progress.

The City of Petersburg has several offices including Social Services, Police, Fire and Rescue that offer multilingual personnel to assist when issues arise. The City of Petersburg's website (which includes Transit data) is multilingual into many languages using Microsoft Translator.

## Limited English Proficiency Plan (LEP)

- 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, 42 U.S.C. 2000d, et seq., and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance, and;

- 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 LRP 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 Petersburg Area Transit (PAT), and governments, private and non-profit entities, and sub-recipients.

- PLAN SUMMARY

PAT has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to PAT services are 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, and reviewing the City of Petersburg's statistic, PAT determine the extent of obligation to provide LEP services. PAT used a U.S. Department of Transportation four factor LEP analysis which considers the following:

- ✓ The number or proportion of LEP persons eligible in PAT's service area who may be served or likely to encounter a PAT program, activity, or service;
- ✓ The frequency with which LEP individuals come in contact with PAT services
- ✓ The nature and importance of the program, activity or service provided by PAT to the LEP population;
- ✓ The resources available to PAT and overall cost to provide LEP assistance. A brief description of these considerations is provided in the next section.

#### FOUR FACTOR ANALYSIS

The number or proportion of LEP persons eligible in the PAT service area who may be served or likely to encounter a PAT program, activity or service are 99.9% Hispanic.

The Crater Planning District Commission staff has reviewed 2010 Census data on the number of individuals in its service area that have LEP, as follows:

Language Use and English-Speaking Ability for the Population by Speaking other than English at home.		
Total Population 5 years and older	30,246	100%
Speak English at home	28,857	90.3
Total population non-English	1389	4.5
# of population not speaking English well or not at all	120	0.4
English ability very well	1101	3.6
English ability well	166	0.5
English ability not well	75	0.1
English ability not at all	45	0.1

PAT assessed the frequency at which staff and drivers have or could possibly have a contact with LEP persons. This includes documenting phone inquiries, on-board surveys, service personnel, and community outreach. As a result, PAT established

an office to bridge the language barrier, increase routes to support residential locations, enhanced signage and telephone information data. The majority of LEP persons are Hispanic. Many have mastered the English language, but **at least weekly**, there are persons who require the assistance of family members and/or drivers.

In the PAT service area, the overwhelming majority of the population (95.4%) speaks English only, however because the LEP community is concentrated, PAT established a route that assist the LEP community with access to hospital and medical offices, work locations, banking, and food and other shopping. Other programs provide training on ridership for shopping and work-related travel, such as social services, health and wellness centers, and local employment commission. Based on these actions ridership by LEP persons should increase. Use of telephone translation can be used to address crisis situations and multilingual signage satisfies most scenarios. These actions and resources are important to allow LEP persons equal opportunity to mainstream living.

PAT assessed its available resources that could be used for providing LEP assistance. This included identifying translation companies for signage, news media to provide route information and hired staff to perform liaison duty. These resources help make ridership easier for LEP persons and include Spanish subtitles in brochures, working with groups representing these populations and what level of staff training is needed. After analyzing these four areas, PAT developed the plan outlined in the following section for assisting persons of limited English proficiency.

#### LIMITED ENGLISH PROFICIENCY PLAN OUTLINE

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

- ✓ When dialing PAT customer service, information is available in Spanish.
- ✓ All transit vehicles carry Title VI notification signage in Spanish.
- ✓ A PAT Office is located in the area of concentration to enhance community outreach.
- ✓ Dual language staff is available.
- ✓ PAT website provides translation in many languages using Microsoft Translator.
- ✓ Conduct necessary meetings to support LEP community, i.e., continued participation in cultural fairs and information sharing meetings.

## Language Assistance Measures

PAT employs many language assistance measures to assist local and traveling persons as mentioned above in the LEP proficiency plan.

## PAT Staff Training

All PAT staff will be provided with the LEP Plan and educated on procedures to follow. This information will also be part of the PAT staff orientation process for new hires.

Training topics primarily identify our translation capabilities.

## Outreach Techniques

PAT employs outreach techniques using the following options when and/or if the need arises for LEP outreach:

- ✓ If staff knows that they will present a topic that could be of potential importance to an LEP person or its' 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 holding a public meeting, staff will insert the clause, based on the LEP population and when relevant, translates into an alternative Language, a translator will be available.
- ✓ Key print materials, including bus limited to schedules and maps will be translated and made available at Petersburg Station, on board vehicles and in communities when a specific and concentrated LEP population is identified or a request is made.

## Monitoring and Updating the LEP Plan

This plan is designed to be flexible and is one that can be easily updated. At a minimum, PAT will follow the Title VI Program update schedule for the LEP Plan. However, major updates most likely will not occur until the next Census 2020 results are released or when socio-political actions bring change to our attention.

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 PAT 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 PAT programs? Are there other programs that should be included?
- ✓ Have the PAT available resources, such as technology, staff and financial costs covered?
- ✓ Has PAT fulfilled the goals of the LEP Plan? and
- ✓ Were any complaints received?

#### Dissemination of the PAT Limited English Proficiency Plan

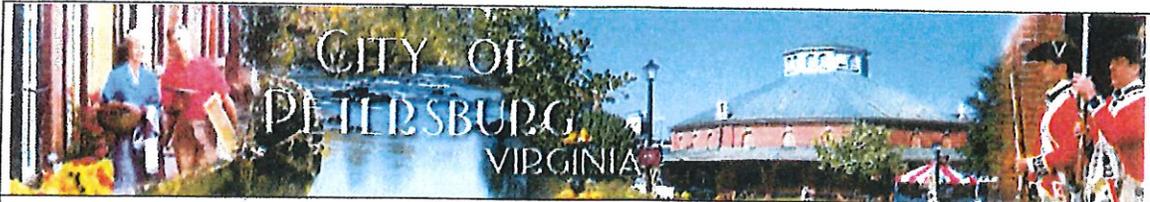
PAT includes the LEP Plan with its Title VI Policy and Complaint Procedures. PAT's Notice of Rights under Title VI to the public is posted in both PAT offices, on the website at [www.petersburgva.gov](http://www.petersburgva.gov) and on all vehicles.

Any person, including social service, non-profit, and law enforcement agencies along with other community partners with internet access will be able to access the plan.

Copies of the LEP Plan will be provided upon request, to any person(s) requesting the document via telephone, 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 PAT Title VI Coordinator.

Transit Administration Program Manager  
100 West Washington Street  
Petersburg, Virginia 23803  
Telephone - 804.733.2452 Fax - 804.733.2468  
Email: [qbyrd@petersburg-va.org](mailto:qbyrd@petersburg-va.org)



Charles Koonce Jr.

Director of Mass Transit

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Notifying the Public of Rights Under Title VI

THE CITY OF PETERSBURG, VIRGINIA

The City of Petersburg, Virginia operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City of Petersburg, Virginia.

For more information on the City of Petersburg, Virginia civil rights program, and the procedures to file a complaint, contact Queenie Byrd Transit Administrative Manager at (804) 733-2452, email [qbyrd@petersburg-va.org](mailto:qbyrd@petersburg-va.org) or visit our administrative office at 100 West Washington Street, Petersburg, Virginia 23803.

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590





Charles Koonce Jr.

director de

transporte público

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Notificación de los derechos del público bajo el Título VI

## LA CIUDAD DE PETERSBURG, VIRGINIA

• La ciudad de Petersburg, Virginia opera sus programas y servicios sin importar raza, color y origen nacional de acuerdo al Título VI del Acto de Derecho Civil. Cualquier persona que crea que el o ella ha sido agraviada por alguna práctica ilegal discriminatoria bajo el Título VI puede llenar una queja a la Ciudad de Petersburg, Virginia.

• Para mas información del programa de los Derechos Civiles de la Ciudad de Petersburg y los procedimientos de llenar quejas, contacte a Queenie Byrd Gerente Administrativo de Tránsito al (804) 733-2452, email [qbyrd@petersburg-va.org](mailto:qbyrd@petersburg-va.org) o visite nuestra oficina administrativa en 100 West Washington Street, Petersburg, Virginia 23803.

• Una queja puede ser llenada directamente con la Administración Federal de Tránsito, llenando la queja con la oficina de derechos Civiles,Atencion: Coordinator del Programa del Título VI, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

