

Title VI Program – 2014 submittal
City of Asheville Transit
Asheville, North Carolina



Revision – 5-22-14

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I. NON DISCRIMINATION POLICY

1. **City of Asheville Transit service Non Discrimination Policy** (Posted on-line, in administrative offices, at Transit Center and on buses)
 - A. Title VI of the Civil Rights Act of 1964 states that 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. (42 USC Section 200d).
 - B. The City of Asheville transit services are committed to practicing non-discrimination. If you believe you have been subjected to discrimination, you may file a complaint with the City of Asheville transit services office or the Federal Transit Administration.
 - C. For more information visit us at www.ridetheart.com, call (828) 232-4531, email iride@ashevillenc.gov or visit our office at the Transportation Department at City Hall.
2. Política de no-discriminación del Transporte Público de la Ciudad de Asheville
 - A. El Titulo VI - Title VI – de los Derechos Civiles de 1964 establece que ninguna persona en los Estados Unidos de América puede, basado en la raza, color o nacionalidad, ser excluida de participar o serle negados los beneficios, o ser sujeta a discriminación bajo ninguno de los programas o actividades que reciban asistencia financiera del gobierno federal. (42 USC Section 200d).
 - B. El Transporte Público de la ciudad de Asheville está comprometido a no discriminar a nadie. Si usted cree que ha sido objeto de discriminación puede presentar una queja con la oficina de Transporte de la Ciudad o con la Administración de Transito Federal (Federal Transit Administration – FTA).
 - C. Para mas información visítenos en la pagina web www.ridetheart.com, o llame al teléfono (828) 232-4531, o envíe un correo electrónico a iride@ashevillenc.gov o visite nuestra oficina en el Departamento de Transporte en City Hall.

II. GENERAL REQUIREMENTS AND GUIDELINES

1. **Title VI Certification and Assurances**
 - A. The City of Asheville has submitted and is up to date for the Title VI certification and assurance in TEAM (Attachment I).
2. **Submit a Title VI Program**
 - A. In order to ensure compliance with 49 CFR Section 21.9(b) the City of Asheville staff will write/update the Title VI Program, seek approval from the City Council Appointed Multimodal Transportation Commission and, finally submit a Title VI Program to FTA's regional civil rights officer once every three years as laid out in FTA C 4702.1B. This current "Title VI

Program– 2014 submittal” will be reviewed by the MMTC on May 28th 2014 at Public Meeting.

- B. The City of Asheville’s Title VI Program will include the following:
- i. A copy of the City of Asheville’s Title VI notice to the public, including list of locations where notice is posted. See Public Participation Plan Exhibit III
 - ii. City of Asheville Title VI Complaint Form and Procedures, See Attachment II. The COA has not received any Title VI complaints nor conducted any investigations since the time of the last submission.
 - iii. The COA public participation plan including 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 and other underserved people had meaningful access to the COA transit activities is detailed as part of our Public Participation Plan, Attachment III.
 - iv. Language Implementation Plan. Attachment IV
 - v. A narrative detailing the efforts of the City to ensure Henderson County’s compliance with Title VI along with the subrecipients Title VI submission schedule.
 - vi. No facilities have been or are being constructed neither at the City nor with our subrecipients.
 - vii. Finally, a set of system wide standards and policies as, the City operated a fixed route serve with less than 50 route vehicles,
3. Notify Beneficiaries of Protection Under Title VI
- A. City of Asheville works to notify beneficiaries of protection under Title VI by posting on-line, in administrative offices, at ART Station and on buses; 1) our Title VI obligations; 2) policy of non-discrimination, 3) where to get more information and 4) procedure for complaints. (See Public Participation Plan Exhibit III).
 - B. The City of Asheville has translated our Title VI Non-discrimination policy and complaint procedures into Spanish. The City plans to also translate the Title VI Non-discrimination policy into Russian.
4. Complaint Procedures & Record Keeping of Investigations
- A. This section outlines the Title VI complaint procedures related to federally funded programs, services, and benefits. However, it does not deny the complainant the right to file formal complaints with the Federal Transit Administration, or to seek private counsel for complaints alleging discrimination, intimidation or retaliation of any kind that is prohibited by law.
 - B. Title VI of the Civil Rights Act of 1964 states that 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.

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- C. Any person who believes that he or she individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin as noted below may file a written complaint with the City of Asheville, Transportation Department, 70 Court Plaza, Asheville 28801. Title VI Complaint Form can be obtained in person, at the ART Station, at the Transit Garage or at City Hall in the Transportation Department or at www.ridetheart.com. Complainants have the right to complain at any point in the process directly to the Federal Transit Administration, Office of Civil Rights Region IV, 230 Peachtree, NW, Suite 800, Atlanta, GA 30303, telephone (404) 865-5600. Every effort will be made to obtain early resolution of complaints. The option of informal meeting(s) between the affected parties and the Title VI manager, Transportation Planning Manager, may be utilized for resolutions.
- D. Procedure:
- i. The complaint must meet the following requirements:
 - Complaint shall be in writing and signed by the complainant(s). In cases where Complainant is unable or incapable of providing a written statement, a verbal complaint may be made. The Transportation Planning Manager will interview the Complainant and assist the person in converting verbal complaints to writing. All complaints must, however, be signed by the Complainant or his/her representative.
 - Include the date of the alleged act of discrimination or the date when the Complainant(s) became aware of the alleged act of discrimination. Also include the date on which the conduct was discontinued or the latest instance of the discriminatory conduct.
 - Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complaint.
 - Federal and state law require complaints be filed within 180 calendar days of the alleged incident.
 - ii. A complaint must meet the following criteria for acceptance:
 - The Complaint must be filed within 180 days of the alleged occurrence.
 - The allegation must pertain to a protected class: race, color or national origin.
 - The allegation must involve a COA service of a Federal aid recipient, sub-recipient or contractor.
 - iii. A complaint may be dismissed for the following reasons:
 - The Complainant requests the withdrawal of the complaint.
 - The Complainant fails to respond to repeated requests for additional information needed to process the complaint within 45 days of request.
 - The Complainant cannot be located after reasonable attempts.
 - iv. Upon receipt of the complaint, the Transportation Planning Manager will determine its jurisdiction, acceptability, and need for additional information, and will investigate the merit of the complaint.

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- v. The Complainant will be provided with a written acknowledgement informing her/him whether the complaint will be investigated by the City of Asheville.
 - vi. In cases where COA assumes the investigation of the complaint, within 90 calendar days of the acceptance of the complaint, the Transportation Planning Manager will prepare an investigative report for review by the Transportation Department Director. The report shall include a narrative description of the incident, identification of persons interviewed, findings and recommendations for disposition.
 - vii. The investigative report and its findings will be reviewed by the Transportation Department Director and in some cases the investigative report and findings will be reviewed by the COA Legal Department. The report will be modified as needed.
 - viii. The Transportation Department Director will make a determination on the disposition of the complaint.
 - ix. A letter of Director's determination will be mailed to the Complainant either as a closure letter or a letter of finding (LOF)
 - A Closure letter will summarize the allegations and states that there was not a Title VI violation and that the case will be closed.
 - An LOF summarized the allegation and the interviews regarding the alleged incident and explains whether any disciplinary action, additional training or other action will occur.
 - Notice shall include information regarding appeal rights of Complainant and instructions for initiating such an appeal. Notices of appeals are as follows:
 - The COA Legal Department will reconsider this determination if new facts, come to light.
 - Complainant may submit their complaints to FTA for investigation at any point in the process. Including when/if dissatisfied with the determination and/or resolution set forth by the COA. Complainant will be advised to contact the Federal Transit Administration, Office of Civil Rights Region IV, 230 Peachtree, NW, Suite 800, Atlanta, GA 30303, telephone (404) 865-5600.
 - E. A summary of the complaint and its resolution will be included as part of the Title VI updates every three years to the FTA.
 - F. Recordkeeping requirement
 - i. The Transportation Planning Manager will ensure that all records relating to COA's Title VI Complaint Process are maintained with department records. Records will be available for compliance review audits.
5. Promoting Inclusive Public Participation
- A. In order to integrate the viewpoints of minority, low-income, and LEP populations into community outreach activities, City of Asheville seeks out these groups when conducting public outreach and involvement activities.

The City does periodic surveys to better understand the demographics of our ridership. The most recent survey was conducted in 2013.

- B. City of Asheville shall offer early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions. This is accomplished by conducting meetings in an open and welcoming manner. Meetings are held in transit accessible locations during transit operations hours, with notices circulated in paper of general circulation. Meetings are also published in minority papers, at the Transit Station and on the transit vehicle. COA also coordinates with institutions and organizations that serve or represent low income and minority individuals, in order to better reach out to members in the affected minority and low income communities.
 - C. Multiple methods of communication are offered to our customers and the general public. Transit staff is accessible by telephone, e-mail, and in person. Our contact information is published on the website, transit vehicle interior, and route schedules.
 - D. For further details regarding our Public Participation Plan see Attachment III; for details on our outreach to LEP persons see Attachment IV– Language Assistance Implementation Plan.
6. Meaningful Access to LEP Persons
- A. LANGUAGE ASSISTANCE IMPLEMENTATION PLAN (Attachment IV) has been developed in accordance with Executive Order 13166. The LEP Plan ensures meaningful access to our services for the LEP population within our service area. The COA Transit followed the four factor analysis laid out in the USDOT FTA’s *Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons* from April 13, 2007.
 - B. Based on the assessment of 2008-2012 American Community Survey, the City of Asheville service area’s two most significant limited English proficient language groups are Spanish and Indo – European.
 - C. The City of Asheville Transit service area population for Spanish and Indo - European speaking LEP persons is above the Safe Harbor LEP threshold.
7. Representation on Planning and Advisory Bodies
- A. The City of Asheville has a transit related non-elected advisory commission, the Multimodal Transportation Commission (MMTC), whose members are selected by Asheville City Council. Additionally, the MMTC appoints members to the Transit Subcommittee (TC) that focuses on transit related matters. Below is a racial breakdown of both the MMTC and the TC.

Body	White alone, not Hispanic or Latino	Black or African American alone	Hispanic or Latino	Asian alone	Am. Indian, Alaska Native, Native Hawaiian and Other Pacific Islander alone
City of Asheville 2010 Demographics	76%	13%	7%	1%	1%
Multimodal Transportation Commission	89%	11%	0%	0%	0%
Transit Committee	78%	22%	0%	0%	0%

- B. When there are openings on either the MMTC or the TC the City encourages the participation of minorities and on these committees by;
 - i. Publishing notices in minority local newspapers,
 - ii. Posting notices at the Transit Station, on the transit vehicle, via email list serve and on the transit website and by
 - iii. Communicating with institutions and organizations that serve or represent low income and minority individuals and the LEP population.
- 8. Providing Assistance to Subrecipients
 - A. The formula to allocate the funds was developed by both parties and with participation of the French Broad River Metropolitan Planning Organization (MPO).
 - B. The city will work through the MPO, the agreements and formula allocation for any potential subrecipients, to ensure allocation of funding is made in a non-discriminatory manner. To date there are no new requests to allocate funding to other subrecipients
 - i. The City will assist and guide Henderson County and JARC recipients, the only subrecipients, in preparing their Title VI program. The City provides subrecipients with;
 - Guidance on completing Title VI updates Sample Notices to the public informing beneficiaries of their rights under Title VI,
 - Sample Procedures on filing a Title VI complaint,
 - Sample Title VI complaint form,
 - Guidance on tracking and investigate Title VI complaints, and
 - Guidance on demographic information gathering.
- 9. Monitoring Subrecipients
 - i. Henderson County is an eligible recipient for public transit funding under the Urbanized Area formula, 49 U.S.C. 5307; the City and County have signed a subrecipient’s agreement that specifies compliance with federal regulations, including Title VI. To ensure Henderson County is complying with Title VI, thus insuring the City’s compliance, the City will monitor Henderson County’s compliance by undertaking the following activities;
 - Ensuring Annual Certification and Assurances is completed,
 - Requiring notification to the City of Asheville of any Title VI complaints,

- Document bi-yearly site visits to Henderson County transit facilities and vehicles and ensure compliance with Title VI requirements for operations of less than 50 fixed route vehicles.
- Ensuring Analysis for Site or Location of facilities.
- Annually ensuring their notification to Beneficiaries of Protection under Title.
 - This will be verified by;
 - Reviewing their web-site, their administrative offices and their transit vehicles to insure public access to:
 - Title VI obligations;
 - Title VI Non-discrimination Policy
 - Public notices describing where to get more information on Title VI and
 - Public access to procedure for complaints under Title VI.
- Ensure documentation is in order showing, at the request of FTA in response to a complaint of discrimination, that level and quality of service is provided on an equitable basis.
- Collect and review for compliance their Title VI program every three years and store it electronically.
- Require notification to the City’s Transportation Planning Manager immediately (within 48 hours) of any Title VI complaints received.
- Receive updated Title VI Plans for approval by the City of Asheville. Revisions by sub- recipients will be required every three years when FTA requires the City to update its Title VI program.
 - Subrecipients Title VI submission schedule.
 - Notification of submittal date as soon as City is aware
 - Reminds subcontractor two months before FTA submittal date
 - Requires subrecipients to submit Final Draft of updated Title VI one month in advance of FTA submittal date.
 - Corresponds with subrecipients as necessary regarding Title VI program corrections
 - Corresponds with subrecipients once Title VI is submitted to FTA and as necessary

10. Determination of Site or Location of Facilities

- A. In determining the site or location of facilities, the City accomplish the objectives of the Title 49 CFR part 21, Appendix C, Section (3)(iv) provides. This applies to facilities including but not limited to, storage facilities, maintenance facilities, operations centers, etc. This includes
 - i. A Title VI equity analysis at the planning stage,
 - ii. Evaluation of cumulative adverse impacts;
- B. The City of Asheville nor Henderson County have begun the planning stages of a storage facilities, maintenance facilities, operations centers, or any other facility that this section would apply too.

III. REQUIREMENTS AND GUIDELINES FOR FIXED ROUTE TRANSIT PROVIDERS

A. The City of Asheville is a fixed route transit provider with less than 50 fixed route peak service vehicles. The City will develop system wide service standards and policies in order to ensure that we meet 49 CFR. , which states that “[n]o person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality of service of transportation service furnished as a part of the project 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.”

1. System-wide Service Standards and Policies

A. The City of Asheville only operates one mode of service; fixed bus service. In order to effectively fulfill the service standard requirements of Title VI, FTA requires all fixed route transit providers to develop quantitative standards of operation for the following indicators: vehicle load, vehicle headway, on-time performance and service availability. In order to effective fulfill the service policy requirements of Title VI, FTA requires fixed route transit providers to develop the following policies; distribution of transit amenities and vehicle assignment.

B. Vehicle Load

i. Standard for COA Transit

- The average of all loads during the peak operating period should not exceed vehicles’ achievable capacities. The City has two 35’ Gillig buses, which have a capacity of 48 passengers. Additionally the City has twenty-one 30’ vehicles which have a capacity of;
 - 35-passengers for the 2010 Gillig Hybrids buses,
 - 39-passengers for the 2012 & 2014 Gillig buses , and
 - 43-passengers for the 2006 Orions buses.

Vehicle Type	# in fleet	Average Passenger Capacities			
		seated	standing	total	Max. load factor
30’ 2010 Gillig Hybrids	5	23	12	35	1.52
30’ 2012 & 2014 Gillig	11	26	13	39	1.50
30’ 2006 Orions	5	29	14	43	1.48
35’ Gillig	2	32	16	48	1.50

C. Vehicle Headways:

i. Standard for COA Transit

- The goal for headways standards is; route headway of one hour or better and 30 minutes or better frequency on the five (5) primary corridors from morning peak to evening peak, six days a week.
- On weekdays and Saturdays on the primary corridors 30 minute or better service should begin no later 7:00 a.m. and continue until 6:00 p.m.

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- The Transit Master Plan recommends providing Sunday service for 9 hours on the most productive routes.
 - 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 Transit Master Plan, relationship to major transportation developments, and land use connectivity.
- ii. Description of current service. COA Transit operates sixteen (16) routes with only one route providing an increased peak service headway.; eleven (11) routes operate on one hour headways, two (2) routes operate on half-hour headways, one (1) route operates on an 1.25 hour headway and one (1) route operates on a hour and half headway. Though routes may operate with one hour headway, the five (5) primary corridors have two routes coordinated to provide half hour frequency. Holiday service currently provided for six holidays throughout the calendar year. No Sunday service provided at this time.
- D. On-time performance: A vehicle is considered on time if it departs a scheduled time point no more than 1minute early and no more than 5 minutes late. The City of Asheville’s on-time performance objective is 75% or greater. The City of Asheville continuously monitors on time performance and system results are reported to operations management, as part of the departmental business plan and presented to the Transit Committee. On-time performance is a measure of runs completed as scheduled. A trip that left a minute early or 6 minutes late would not be on time. A running percentage of times that vehicles on a particular route or line complete runs within this standard is then measured. On-time is measured at all-time points, not just the first and last time points.
- E. Service Availability Standards: Transit access is an important component of usability of the transit system. The City has worked diligently to increase coverage in all areas of the city. The goal is to have 80% of all residences in the service area within one-quarter mile of a transit route. To date, the number of residences in the city that are within one quarter mile of a transit route is at 73.4%. In those areas with a density of over 4,000 persons per square mile, 99.9% are within a quarter mile of a transit route.
- F. Vehicle Assignment Policy
- i. All vehicles have low-floor buses, temperature control (heat/cool), ADA lifts, and automated vehicle annunciation (AVA) system. Eleven (11) of the twenty-three (23) buses have automatic passenger counting (APC) systems and all of them have real-time passenger information system
 - ii. Bus assignments take into account the operating characteristics of buses which are matched to the operating characteristics of the route. Height of buses, route length and passenger loads are the primary driving forces that determine which bus is assigned to a route. Routes with

higher ridership will be assigned the 35-foot buses. Also operations seek to try to keep mileage averages within the fleet similar in order to program preventative maintenance.

- iii. Vehicles are assigned in order to ensure even APC sampling using the Deployment Plan.

G. Transit amenities: Transit amenities enhance the convenience and comfort of transit customers. City of Asheville has one transfer center, as well as many shelters and benches along the routes. Shelters and benches are installed based on the following attributes:

- i. High frequency of boardings.
- ii. ROW or easement and other space constraints.
- iii. Sidewalk & ADA infrastructure available.
- iv. Transfer point from other routes.
- v. Number of passengers needing ADA infrastructure.
- vi. Cost.
- vii. Request for improvements - local or neighborhood.
- viii. How many routes service the stop?
- ix. What is the potential waiting time?
- x. Is there an existing shelter nearby?
- xi. Bus stops are installed following the guidance provided by TCRP RPT 19 and Bus Stop Accessibility & Safety - EASTER SEALS- Complete Toolkit. All transit vehicles are equipped with lift devices.

Attachment I - Title VI certification and assurance in TEAM

View / Modify Recipient (CITY OF ASHEVILLE) - Windows Internet Explorer

https://ftateamweb.fta.dot.gov/teamweb/Recipients/ModifyRecipient/ViewRecip.asp?grantee_id=1057&GUID=PRODL

View / Modify Recipient

General | **Contact Persons** | Cert's & Assurances | Codes | Payment Codes | Civil Rights

Organization: 1057 CITY OF ASHEVILLE

Cat	Description	Applicable	N/A	Cert Date	Text
01	REQUIRED FOR EACH APPLICANT	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2/6/2014	
02	LOBBYING	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2/6/2014	
03	PROCUREMENT AND PROCUREMENT SYSTEMS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2/6/2014	
04	PRIVATE SECTOR PROTECTIONS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2/6/2014	
05	ROLLING STOCK REPAIRS AND BUS TESTING	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2/6/2014	

Affirmation of Certifications and Assurances

FEDERAL FISCAL YEAR 2014 FTA CERTIFICATIONS AND ASSURANCES SIGNATURE PAGE
(Required of all Applicants for FTA funding and all FTA Grantees with an active Capital or Formula Project)

AFFIRMATION OF APPLICANT

Name of the Applicant: CITY OF ASHEVILLE

Name and Relationship of the Authorized Representative: Esther E Manheimer

Official's Name: Esther E Manheimer PIN: **CERTIFY**

Attorney's Name: Martha W McGlohon

Attachment II - Title VI Complaint Form (English & Spanish)



Title VI Complaint Form

City of Asheville

Transit Services

Do you think you have been discriminated against by Asheville Transit on the grounds of race, color or national origin?

The City of Asheville 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 US law (Title VI of the Civil Rights Act of 1964, as amended).

Complaints under the Title VI law must be filed within 180 days from the date of the alleged discrimination. Please complete the information below to file your complaint. If you need help completing this form, call the City of Asheville Transportation Department at (828) 232-4531 or email iride@ashevillenc.gov.

Your Name: _____ Street Address _____

City, State & Zip Code: _____ E-mail: _____

Phone number: _____ Other phone: _____

Who was discriminated against? (Please circle) You? Someone Else?

If someone else, their:

Name(s): _____ Street Address _____

City State & Zip Code: _____

Was the discrimination based on? (Circle all that apply)

- Race
- Color
- National Origin (Limited English Proficiency)

Date of Incident: _____

Please describe the alleged discrimination incident. If possible, provide the names and titles of all City Of Asheville transit employees involved. Explained what happened and who you believe was responsible. Please use the back of this form if additional space is required.

Incident description continued:

Have you filed a complaint with any other federal, state or local agencies? (Circle one)

Yes / No

If so, list agency or agencies and contact information below:

Agency:	Contact Name:
Street Address, City, State & Zip Code:	Phone:
Agency:	Contact Name:
Street Address, City, State & Zip Code:	Phone:

I affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

Complainants Signature:

Date:

**Please return the completed and signed form to:
City of Asheville (COA), Transportation Department, Transportation Planning
Management Division, 70 Court Plaza, Asheville 28801.**

**Complainants have the right to submit their complaint at any point in the process
directly to: FTA (Federal Transit Administration), Office of Civil Rights Region IV,
230 Peachtree, NW, Suite 800, Atlanta, GA 30303, telephone (404) 865-5600.**

City of Asheville Use Only:
Print or Type Name of Complainant
Date Received:
Received By:



Titulo VI – Title VI – Planilla de Quejas Transporte Publico de la Ciudad de Asheville

Usted piensa que ha sido discriminado por el personal de Asheville Transit debido a su raza, color o nacionalidad?

La Ciudad de Asheville esta comprometida a asegurar que ninguna persona sea excluida de participar o le sean negados los beneficios de sus servicios basado en su raza, color o nacionalidad, como ha sido establecido por la ley de los Estados Unidos de América (Titulo VI - Title VI - de los Derechos Civiles de 1964, corregida).

Quejas relativas al Titulo VI deben ser introducidas en los 180 días siguientes a la fecha en que sucedió el incidente. Por favor complete la información que sigue a continuación para presentar la queja. Si necesita ayuda para completar esta forma, llame al Departamento de Transporte de la Ciudad de Asheville al (828) 232-4531 o envíe un correo electrónico iride@ashevillenc.gov.

Nombre: _____ Dirección _____

Ciudad, Estado, Código Postal: _____

Correo electrónico: _____

Número de teléfono: _____ Alternativo: _____

Quien fue la persona discriminada? (Encierre en un circulo) Usted?
Otra persona?

Si fue otra persona, por favor provea la siguiente información:

Nombre(s): _____ Dirección _____

Ciudad, Estado, Código Postal: _____

Cual fue la causa de la discriminación? (Seleccione todas las que aplican)

- Raza
- Color
- Nacionalidad

Fecha en que ocurrió el incidente: _____

Por favor describa el incidente. Si es posible, provea los nombres y posición de los empleados de transporte público de la Ciudad de Asheville implicados. Explique que

paso y quien usted cree fue responsable. Por favor use el reverso de esta forma si necesita espacio adicional.

Descripción del incidente:

Ha presentado usted otra queja con otra agencia federal, estatal, o local? (Encierre en un circulo)

Si / No

De ser así por favor liste la agencia o agencias y provea la información de contacto:

Agencia:	Nombre del contacto:
Dirección, Ciudad, Estado, Código Postal:	Teléfono:
Agencia:	Nombre del contacto:
Dirección, Ciudad, Estado, Código Postal:	Teléfono:

Afirmo que he leído la información provista y que es verdadera en la medida de mi conocimiento, información y creencia.

Firma:

Fecha:

Por favor retorne la forma completa y firmada a la siguiente dirección: City of Asheville (COA), Transportaion Department, Attn: Transportation Planning Management Division, 70 Court Plaza, Asheville 28801.

Todos los ciudadanos tienen el derecho de presentar sus quejas en cualquier momento durante el proceso directamente a: Administración del Transporte Público Federal (Federal Transit Administration – FTA), Oficina de Derechos Civiles (Office of Civil Rights) Región IV, 230 Peachtree, NW., Suite 800, Atlanta, GA., 30303, teléfono (404) 865-5600

City of Asheville Use Only:
Print or Type Name of Complainant
Date Received:
Received By:

Attachment III

Public Participation Plan

I. Purpose:

The purpose of this Public Participation Plan (PPP) is to establish procedures that allow for, encourage, and monitor participation of all citizens in the City of Asheville's Transit System service area, including but not limited to minority individuals and limited English proficiency. The intent of this effort is to take reasonable actions throughout the planning process to provide opportunities for historically under-served populations to participate in accordance with Circular FTA C 4702.1A Chapter IV.

This document will lay out procedures to provide opportunities for all area citizens to participate in the development of the COA transit services.

II. General Public Outreach and Involvement Activities

Asheville Redefines Transit (ART) is a service managed by the Transportation Department of the City of Asheville (COA) in North Carolina. The COA Transportation Department is responsible for planning transit services and contracts with First Transit, Inc, a third party contractor to operate the system. Public outreach efforts are the responsibility of the Transportation Department's, Transportation Planning Management staff in coordination with the COA Public Information Officer. The public outreach activities provide the public the ability to be involved in decisions concerning COA transit services.

City Government

The COA Council is responsible for adopting, by ordinance, COA's budget, major changes in transit service, and fare changes. COA is governed by a council-manager form of government; the City Manager, an elected Mayor and six City Council members. The Mayor and City Council are elected at large.

Public Involvement

Multimodal Transportation Commission

COA's Unified Development Ordinance (UDO) established the Multimodal Commission (MMTC) (Code of Ordinances II, Chapter 2, Article III, Division 9) "to uphold the sustainability and continued development of multimodal transportation as a means for reducing traffic congestion, improving air and water quality, supporting economic development, providing access to jobs, promoting public health, and improving and creating opportunities for active recreation."¹

MMTC consists of nine members. Nine are appointed by City Council and must be city residents. Members will be chosen from those serving on the Transit Committee, Greenways Committee or Bike Pedestrian Task Force. Three non-voting members are

¹ (Code of Ordinances II, Chapter 2, Article III, Division 9),
<https://library.municode.com/index.aspx?clientId=12499>

appointed from the neighborhood advisory board, the sustainability advisory committee and the Planning and Zoning Commission. In addition, once City Council member acts as a liaison and attends MMTC meetings regularly.

COA is “deemed a public body, and meetings of the commission shall be subject to applicable open meetings laws.”² MMTC functions as an advisory board to the Transportation Department staff on matters affecting the all transportation related issues. The Transit subcommittee functions as an advisory board to transit staff on transit issues. Continuous citizen input and advice into transit services are facilitated though the MMTC and its’ transit subcommittee.

MMTC’s duties and responsibilities, per the Code of Ordnances are listed as:

- Recommend policies for the development/integration of multimodal transportation planning and education to the city;
- Assist with the development of a multimodal transportation system;
- Assist the city with the implementation of best management practices for educating the public on the benefits on multimodal transportation;
- Assist in the sustainability, development and implementation of the multimodal transportation plan;
- Assist in the prioritization of the capital improvements plan as it relates to multimodal transportation projects; and
- Establish and appoint members to a transit subcommittee and a greenway sub-committee. Proposed budget and plan of operations;

Community Transportation Advisory Board (CTAB)

The COA’s current paratransit contractor is Buncombe County’s Mountain Mobility (MM). MM was established in 1989 to help reduce duplication of transportation services needed by human service agencies and increase the level of transportation services available to Buncombe County citizens. MM currently provides transportation services to clients of human service agencies, departments of local governments, including paratransit services for COA transit, and general public transportation services for persons residing outside of the COA. MM is administered by the Land-of-Sky Regional Council and operated by a third party contractor, McDonald Transit Associates, Inc.

The Buncombe County Community Transportation Advisory Board (CTAB) serves as an advisory board to Buncombe County staff and the Board of Commissioners and is actively involved in the planning and operation of the system. CTAB voting member include representatives from human service agencies, the Chamber of Commerce, disability advocacy and senior advocacy organizations, ATS and individual riders.

Paratransit issues are address by CTAB and the MMTC.

² (PCOA II, Chapter 2, Article III, Division 6),
<http://library.municode.com/index.aspx?clientID=12499&stateID=33&statename=North%20Carolina>

Neighborhood Organizations

When COA is considering major service changes, it complements the public meetings and advertising by notifying the neighborhood organizations who would be most affected by the changes. Neighborhood organizations are contacted by the COA Neighborhood Coordinator who sets up meetings, and bring the stakeholders to the process. The neighborhood can use this opportunity to review plans, provide public feedback, and make advisory recommendations. A neighborhood membership usually reflects the demographics of the neighborhood.

III. Outreach Techniques

Outreach to the General Public

In addition to MMTC, CTAB, and neighborhood organizations, COA conducts broad outreach to the general riding and non-riding public on specific proposals. COA develops proposals for new transit service, and changes to existing service, fares, etc. (as of October 2009, in accordance with the Transit Master Plan). When developing major service changes, planning staff solicits input from a wide range of stakeholders such as the following:

- Riders of affected routes
- Residents of areas around affected routes
- Community and neighborhood organizations
- Staff and elected officials from local jurisdictions
- Major institutions and organizations
- Employers/Businesses
- Partner transit agencies

COA Planning Staff gathers the information and input provided by stakeholders to develop service proposals that respond to the stakeholders' expressed needs. Service proposals often include alternatives to coverage, frequency and span.

COA planning staff solicits input from the public through methods such as: online-request (using Public stuff), e-mails, phone calls, in person comments, surveys, news releases, advertisements, meetings with the general public, and meetings with stakeholder. COA distributes surveys to riders at transit facilities, via email (using iride list), via institutional and stakeholder contacts, on-line and on board surveys. COA sends news releases to major daily and community newspapers and news blogs. Notices of all proposed COA service and fare-changes Public Hearings are publicized two weeks before in the Asheville Citizen Times, the Mountain Express, La Voz (local Spanish language paper) and the Urban News (Gateway to the Multicultural Community).

COA planning staff uses the input provided by the public (this includes LEP, low-income, disability and minorities individuals/advocacy groups), CTAB and neighborhood organizations in developing final recommended service proposals. COA planning staff then brings these recommendations to the Transit subcommittee which makes recommendations to the MMTC. With support from the Transit subcommittee, staff

along with the Transportation Department Director, may further modify the proposal before implementing operational changes. City Council action is needed for either service proposals having a budgetary impact and for all fare changes. In this case the Department Director will bring the proposal to City Council's, which may further modify the proposal based on public input, prior to acting on it and taking a final vote for either approval or denial by the full City Council. A transit fare-change proposal may be reviewed by both the Finance Committee, which would offer opportunities for public input before they take action and send the proposal to the City Council for final approval.

Outreach to the LEP population

COA's public involvement process includes outreach to members of the public whose primary languages are not English. COA completed a four-factor analysis, based on data and community organization outreach, to ensure the agency is conducting outreach efforts around programs, activities or services important to the LEP population. The Language Assistance Implementation Plan (Title VI Program – 2014 submittal Attachment IV) details COA's outreach to the LEP population.

Outreach to People with Disabilities

ART provides discounted fares to individuals with disabilities that use the fixed route. For those unable to use the fixed route the city offers paratransit service. No disparities in levels or quality of service between regular transit service and paratransit service were identified during the past three years.

COA contracts paratransit services to serve people for whom regular fixed-route service may not provide adequate mobility.

The COA's contract with Buncombe County's Mountain Mobility complies with eligibility criteria and minimum service requirements contained in 49 CFR Part 37, Subpart F, as amended. To be eligible, a person must live in the COA or be within $\frac{3}{4}$ of a mile of an ART route, and have a disability that prevents him or her from using accessible, fixed-route bus service some or all of the time. As of June 2013, there are 370 individuals registered for the paratransit program.

COA requires that the service contractors not discriminate nor tolerate harassment on the basis or the presence of any sensory, mental, or physical disability in the employment or application for employment or in the administration or delivery of services or any other benefits.

The primary form of outreach for this service is via either COA transit operations dispatch services or Mountain Mobility dispatch services. The individual has to be eligible according to processes established by COA and MM staff, which involves individual contact with all applicants.

COA planning staff and MM staff (Exhibit I) conducted outreach activities to provide ADA paratransit program information to community groups. Outreach with Disability advocacy organizations is conducted through participation in CTAB meetings, hosting transit informational events with disability groups, networking with disability community groups, providing vision or hearing assistance services for events or for one-on-one

needs, providing assistance for document access, e-mailing Low Vision Mailing List Members and training for operations staff on disability needs and customer service.

Mountain Mobility and transit operations staff track customer comments, complaints and customer service areas. COA planning staff review the database frequently to proactively identify emerging issues and any need for additional training, as well as to evaluate individual complaints.

MM also offers Medicaid services and Senior Bus Pass Program. This provides a mobility option for eligible seniors age 65 or over who are willing and able to use ART's fixed route bus services to meet their transportation needs. The program provides a monthly bus pass to eligible seniors at no cost to them. Transportation assistance will help seniors maintain independent living and enhance their quality of life.

Outreach to People with Low Incomes

ART seeks to serve low-income within COA transit's service area COA's City Council Strategic Operating Plan for 2013-2014 commits to "Seek to ensure a sustainable future for Asheville through a standard of living that is affordable and attainable for people of all incomes, life stages and abilities".

COA conducts outreach and public involvement programs to support this objective. The COA transit staff will work to provide affordable services. This will primarily be conducted through:

1. Title VI analysis of agency services and proposed changes,
2. outreach and networking with low-income advocacy organizations (Exhibit II),
3. hosting transit informational events and
4. Customer service training of transit operations staff.

Agency ticket booklets and passes discount

The Homeless Agency Ticket & Pass Discount reflects the commitment of the 2011-2012 City of Asheville's Strategic Operating Plan, which states in part that the City of Asheville will offer a standard of living that is affordable and attainable for people of all incomes, life stages, and abilities.

By providing the Ticket & Pass Discount ART is able to fill unused capacity on existing bus routes and meet the City of Asheville strategic goals. The Ticket & Pass Discount allows agencies to support more clients who are actively engaged in a plan to stabilize their housing and who need to get to places like medical offices, potential employers, day care, and legal offices.

This discount, approved by Asheville City Council in February 2011, provides agencies that serve people who are homeless or at risk of homelessness the opportunity to purchase 11 ticket books, monthly passes and annual passes at a discounted rate and give them to their clients for free. Over the last year, about fifteen agencies have been eligible to purchase tickets through the Homeless Agency Ticket & Pass Discount and purchased a total of \$73,472 in tickets and passes, with \$36,736 of that amount subsidized by the City of Asheville.

Outreach to the Minority Community

Minority persons make up about 22% of the population within COA transit's service area, with 'Black or African American' minorities making up about 13% of the service area minority persons.

The City of Asheville transit service is committed to practicing non-discrimination as specified in our Non-Discrimination Policy and in accordance with Title VI of the Civil Rights Act of 1964 (42 USC Section 200d). The outreach to minority persons within the COA transit service area will primarily be conducted through:

1. Title VI analysis of agency services and proposed changes,
2. outreach and networking with minority advocacy organizations (Exhibit II),
3. hosting transit informational events and
4. Customer service training for transit operations staff.

Monitoring of Outreach Activities and Staff Training

Operations supervisors and planning staff will seek out additional training tools (i.e. webinars, community organization trainings, etc.) to meet the needs of and improved customer service for disabled, low-income, and minority individuals.

Planning staff and Operations supervisors will discuss bi-annual efforts for disabled, low-income, and minority individuals, according to the following:

- If assistance measures are effective in meeting the needs of disabled, low-income, and minority individuals.
- Review frequency of encounters with disabled, low-income, and minority individuals and the nature of the encounters.
- Review any complaints specifically associated with disability, low-income, or minority persons needs.
- Review and discuss disability, low-income, and minority related trainings that occurred.
- Make incremental improvements to outreach efforts, access to information and/or staff training related to disabled, low-income, and minority persons needs
- Discuss budgetary implications of any proposed disability, low-income, and minority related improvements.
- Work with riders and community groups (Exhibit II) to determine whether disability, low-income, and minority measures and staff training programs are effective and appropriate. If feasible (cost and competency) community groups may be able to providing trainings.
- Develop other monitoring techniques as needed. Such as: the "secret shopper" technique, where monitors pose as riders and observe how agency staff responds to their requests. This may be conducted on the phone, at the Transit Center and/or on random transit routes. This type of monitoring may also provide insight into how the agency can improve the effectiveness of its services.

IV. Outreach Effort 2011-present

General

COA planning staff reviews and complaints associated to the needs of disabled, low-income, and minority individuals. COA planning staff continues to seek further training to assisted COA in meeting the needs of the disability, low-income, and minority population.

In addition, COA planning staff improved access to information for disabled persons with the procurement and activation of a new real-time passenger information system in spring 2014.

Transit Master Plan

Over the past three years, the majority of COA public outreach and resources have been focused on implementing the first year Transit Master Planning (TMP) recommendations and funding future year TMP recommendations.

COA's outreach goals have been to provide area residents a voice in the process. The citizens engaged in the process through public meetings/input sessions, on-board surveys distributed to bus riders, on-line surveys and one-on-one meetings with individuals, institutions, organizations and business that either requested the meetings or who were identified by planning staff as being affected by the changes being proposed. Planning staff and Transit Committee members attended many one-on-one meetings with individuals, institutions, organizations and business.

Implementation of the TMP no-cost components occurred in May 2012. These included: improved on-time performance, increase frequency on major corridors, combination of night and day services and marketing improvements. These changes constituted the "Phase I Transit Master Plan Route Performance and Improvement Changes". These changes were followed by some small route improvements in August 2012 (routes E1, S4, N1 and bus-stop location adjustments) November 2012 (Route C and N adjustments), January 2013 (Holiday service added, E1, C, S4 and N adjustments), then finally in January 2014 (C, N, N3, E1, E2, S2, S4, W3 and W4 adjustments).

Prior to these route adjustments notices were posted, emails were sent to transit list serves which including partner organizations, notices were placed on the website and route maps schedules were updated. In addition, LEP, disabled, low-income, and minority organizations were notified.

V. Conclusion

The COA is cognizant of Title VI of the Civil Rights Act of 1964. Section 601 states:

"No persons 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."³

³United States Department of Justice. (1964). Title VI of the Civil Rights Act of 1964. Retrieved December 5, 2008, from the United States Department of Justice: Civil Rights Division

COA's responsibility is to guarantee that all transit services, and access to its facilities, are equitably distributed and provided without regard to race, color, or national origin. The city's public participation plan ensures equal opportunities to all individuals to participate in all city transit planning and decision making processes.

Exhibit I

Summary of public outreach and involvement activities undertaken by COA transit April 2011 to May 2014			
Date	Type of Event/Notice	Title of Event	List of activities to advertise event
7/5/11	commission meeting	Transit Commission	COA Website
7/19/11	Committee meeting	CTAB	n/a - other org. meeting
8/2/11	commission meeting	Transit Commission	COA Website
8/18/11	Committee meeting	CTAB	n/a - other org. meeting
9/6/11	commission meeting	Transit Commission	COA Website
10/4/11	commission meeting	Transit Commission	COA Website
11/1/11	commission meeting	Transit Commission	COA Website
12/6/11	commission meeting	Transit Commission	COA Website
1/3/12	commission meeting	Transit Commission	COA Website
2/7/12	commission meeting	Transit Commission	COA Website
3/8/12	commission meeting	Transit Commission	COA Website
3/28/12	Public meeting	route changes	ads in La Voz, Urban News, Mt X and ACT, postings on buses, COA website
4/3/12	commission meeting	Transit Commission	COA Website
4/30/12	Public meeting	TMP IMPLEMENTATION	ads in La Voz, Urban News, Mt X and ACT, postings on buses, COA website
5/1/12	Tabling	Transit Master Plan Launch	At Transit Station
5/2/12	commission meeting	Transit Commission	COA Website
5/7/12	Public meeting	Shiloh Community Center	Route changes
5/15/12	Public meeting	GRACE EPISOPAL CHURCH	Route changes
5/21/12	Public meeting	RIDE FREE FOR THREE WEEKS.	PUBLIC NOTICE FROM BRIAN POSTELLE
6/5/12	commission meeting	Transit Commission	COA Website
7/13/12	commission meeting	Transit Commission	COA Website
8/7/12	commission meeting	Transit Commission	COA Website
10/16/12	commission meeting	Transit Commission Retreat	COA Website
11/1/12	Public meeting	FOR ADDITIONAL Holiday SERVICE	ads in La Voz, Urban News, Mt X and ACT, postings on buses, COA website
11/2/12	low income partner meeting	Children First/Communities In Schools of Buncombe County	n/a - other org. meeting
12/4/12	commission meeting	Transit Commission	COA Website
January 2013	commission meeting	Transit Commission Annual Report 2012	COA Website
1/15/13	Committee meeting	CTAB	n/a - other org. meeting
3/5/13	commission meeting	Transit Commission	COA Website
4/2/13	commission meeting	Transit Commission	COA Website
5/7/13	commission meeting	Transit Commission	COA Website
6/4/13	commission meeting	Transit Commission	COA Website
7/1/13	Public Notices	DBE Program Updates	ads in La Voz, Urban News, Mt X and ACT, postings on buses, COA website
7/16/13	Committee meeting	CTAB	n/a - other org. meeting
8/7/13	tabling for LEP partner	Catholic Charities Diocese of Charlotte	n/a - other org. meeting
8/14/13	tabling for LEP partner	Catholic Charities Diocese of Charlotte	n/a - other org. meeting
8/21/13	tabling for LEP partner	Catholic Charities Diocese of Charlotte	n/a - other org. meeting
8/22/13	tabling for senior partner	Council on Aging of Buncombe County	n/a - other org. meeting
8/28/13	commission meeting	Multimodal Transportation Commission	COA Website
8/28/13	tabling for LEP partner	Catholic Charities Diocese of Charlotte	n/a - other org. meeting
8/29/13	tabling for Community College partner		n/a - other org. meeting
9/20/13	tabling for senior partner	Council on Aging of Buncombe County	n/a - other org. meeting
9/20/13	tabling for senior partner	Council on Aging of Buncombe County	n/a - other org. meeting
9/25/13	commission meeting	Multimodal Transportation Commission	COA Website
10/1/13	subcommittee meeting	Transit Committee	COA Website
10/4/13	low income partner meeting	Just Economics	n/a - other org. meeting
10/23/13	commission meeting	Multimodal Transportation Commission	COA Website
May - Nov. 2013	surveys	City of Asheville in partnership with Just Economics	postings, emails and one-one contact
11/1/13	Surveys	Holidays service	handbills, posters, emailing
11/5/13	subcommittee meeting	Transit Committee	COA Website
11/6/13	commission meeting	Transit Commission	COA Website
12/3/13	subcommittee meeting	Transit Committee	COA Website
1/14/14	subcommittee meeting	Transit Committee	COA Website
1/21/14	Committee meeting	CTAB	n/a - other org. meeting
1/23/14	low income partner meeting	Just Economics	n/a - other org. meeting
1/23/14	transit training for partners	English as Second Language advocates - AB Tech	n/a - other org. meeting
2/4/14	subcommittee meeting	Transit Committee	COA Website
2/7/14	Disability advocate meeting	Disability Partners	n/a - other org. meeting
2/26/14	commission meeting	Multimodal Transportation Commission	COA Website
3/4/14	subcommittee meeting	Transit Committee	COA Website
3/13/14	low income partner meeting	Just Economics	n/a - other org. meeting
3/25/14	subcommittee meeting	Transit Master Plan - sub committee of TC	via Transit Committee meeting
3/26/14	commission meeting	Multimodal Transportation Commission	COA Website
3/28/14	subcommittee meeting	Improving Riders Experience - sub committee of TC	via Transit Committee meeting
4/1/14	subcommittee meeting	Transit Committee	COA Website
4/23/14	commission meeting	Multimodal Transportation Commission	COA Website
5/13/14	low income partner meeting	Children First/Communities In Schools of Buncombe County	n/a - other org. meeting
5/14/14	Public meeting	EASHEVILLE COMM CENTER	Route changes
Jan.-March 2014	Commission openings	Transit Commission and MMTC	adds in paper, postings on buses, COA website

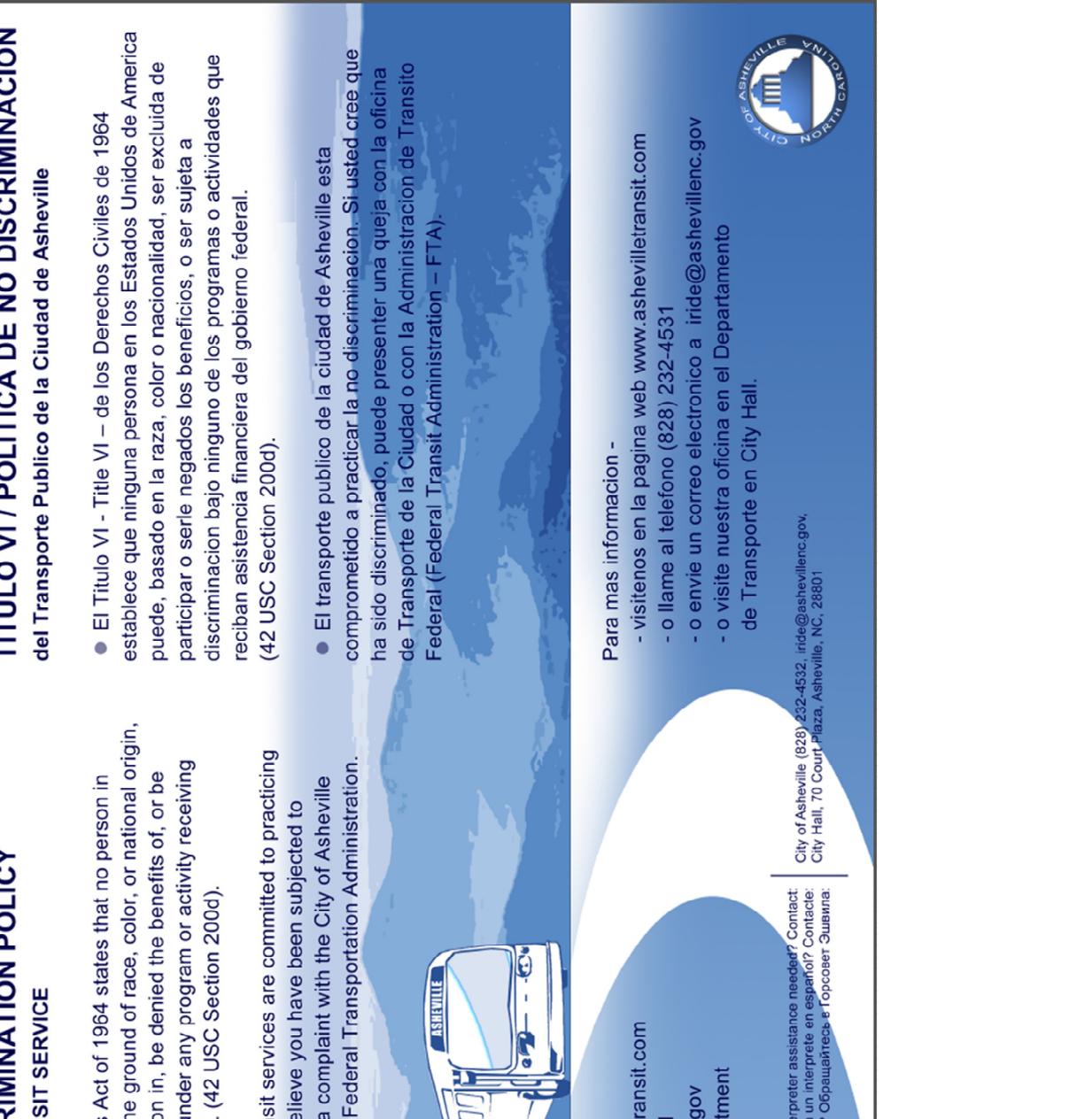
Exhibit II

Minority Advocates	Disability Advocates	Low-income Advocates	Your name:	Your organization:	Your e-mail:	Your phone number:	Your organization web-site:
x		x	Jeff Staudinger	Affordable Housing Advisory Committee	jstaudinger@ashevillenc.gov	828-259-5723	http://www.ashevillenc.gov/Departments/CityClerk/BoardsCommissions/AffordableHousingAdvisoryCommittee.aspx
x		x	Vivian Conley or Safi Mahaba	Burton Street Neighborhood Association	burtonstreetfair@gmail.com	828.707.1691 or 828.301.0166	http://burtonstreet.org/
x		x	David Nash	Housing Authority of the City of Asheville	dnash@haca.org	(828) 257-2653	http://www.haca.org/
x		x	Ceretha (Bubbles) Griffin	Just Folks		828-676-9433	
x		x	Jim Barrett	Pisgah Legal Service	jim@pisgahlegal.org	828-210-3408	www.pisgahlegal.org/
x		x	Rebecca Byrn	WEED & SEED PROGRAM		(828) 123-4567	no contact identified
x				Asheville-Buncombe Community Relations Council	info@abccr.org		http://www.ashevillencombcommunityrelationscouncil.org/
x				Building Bridges	rev.aubralove@buildingbridges-ashevillenc.org	(828) 777-4585	http://www.buildingbridges-ashevillenc.org/
x			Deborah Miles	Center for Diversity Education	dmiles@unca.edu		http://www.diversityed.org
x			Stephanie S. Twitty	Eagle Market Street Development Corporation	Stephanie@eaglemarketst.net	828.281.1227	http://eaglemarketstreets.org/about_us.html
x			Dan Leroy	Green Opportunities	dan@greenopportunities.org	828-398-4158	http://www.greenopportunities.org/
x			Belinda Grant	Mount Zion Development Corporation	mzcd@cs.com	828-350-9821	http://www.mtzionasheville.org/mt_zion_cdc
x			Norma Baynes, Marsha Stickford	Shiloh Community Association	norma11@charter.net; mstickford@ashevillenc.gov	277-9654	
		x	Scott Rogers	ABCCM	srogers@abccm.org	(828) 259-5300.	www.abccm.org/
		x	Phillippe R	Eblen Charities	prosse@eblencharities.org	(828) 255-3066	www.eblencharities.org/
		x	Valerie Collins	Helpmate	vcollins@helpmateonline.org	(828) 254-2968	www.helpmateonline.org
		x	Heather Dillashaw	Homeless Coalition	hdillashaw@ashevillenc.gov	259-5851	
		x	Heather Dillashaw	Homeless Initiative Advisory Council	hdillashaw@ashevillenc.gov	259-5851	http://www.ashevillenc.gov/Departments/CommunityDevelopment/CurrentInitiatives/HomelessInitiative.aspx
		x	Emily Ball	Homeward Bound	emily@hbfa.org	x258	http://www.hbfa.org/
		x	Celeste Collins	On Track Financial Services	celestec@ontrackwnc.org	828-255-5166	http://www.ontrackwnc.org
	x		Eva Reynolds	Disability Partners	ereynolds@disabilitypartners.org	(828) 298-1977	http://disabilitypartners.org/
	x		Karen Harrington & Bart Floyd	Mayor's Committee for Citizens with Disabilities	karen.harrington@bianc.net; bfloyd@westernalliance.org	(828) 277-4868 or (828) 298-1977	http://www.ashevillenc.gov/CityCouncil/MayorsOffice/MayorsCommitteeForCitizenswithDisabilities.aspx
	x		Chris Winebrenner	Western North Carolina AIDS Project	wncapvolunteer@wncap.org	828-252-7489	www.wncap.org
	x	x	Turkessa Baten	Council on Aging of Buncombe C o.	TurkessaB@coabc.org	(828) 253-8024	
x		x	Vicki Meath	Executive Director, Just Economics WNC	vicki@justeconomicswnc.org	office: 828-505-7466 cel: 828-	www.justeconomicswnc.org

Exhibit III

Public Notice regarding Title VI obligations

(Posting on-line, in administrative offices, at Transit Station and on buses)



TITLE VI NON DISCRIMINATION POLICY
City of ASHEVILLE / TRANSIT SERVICE

- Title VI of the Civil Rights Act of 1964 states that 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. (42 USC Section 2000d).
- The City of Asheville transit services are committed to practicing non-discrimination. If you believe you have been subjected to discrimination, you may file a complaint with the City of Asheville transit services office or the Federal Transportation Administration.

TITULO VI / POLITICA DE NO DISCRIMINACION
del Transporte Publico de la Ciudad de Asheville

- El Titulo VI - Title VI – de los Derechos Civiles de 1964 establece que ninguna persona en los Estados Unidos de America puede, basado en la raza, color o nacionalidad, ser excluida de participar o serle negados los beneficios, o ser sujeta a discriminacion bajo ninguno de los programas o actividades que reciban asistencia financiera del gobierno federal. (42 USC Section 2000d).
- El transporte publico de la ciudad de Asheville esta comprometido a practicar la no discriminacion. Si usted cree que ha sido discriminado, puede presentar una queja con la oficina de Transporte de la Ciudad o con la Administracion de Transporte Federal (Federal Transit Administration – FTA).

For more information -

- Website www.AshevilleTransit.com
- Telephone 828-232-4531
- Email iride@ashevillenc.gov
- or visit the Transit Department offices in City Hall

Para mas informacion -

- visitenos en la pagina web www.ashevillentransit.com
- o llame al telefono (828) 232-4531
- o envíe un correo electronico a iride@ashevillenc.gov
- o visite nuestra oficina en el Departamento de Transporte en City Hall.

Interpreter assistance needed? Contact:
Necesita un interprete en español? Contacte:
Нуждается в услугах переводчика? Обращайтесь в Горсовет Asheville.

City of Asheville (828) 232-4532, iride@ashevillenc.gov,
City Hall, 70 Court Plaza, Asheville, NC, 28801



Attachment IV**LANGUAGE ASSISTANCE IMPLEMENTATION PLAN**

This *Language Assistance Implementation Plan* has been prepared to address City of Asheville's (COA) Transit responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with Limited English Proficiency (LEP) language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

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

I. PLAN SUMMARY

COA has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided. As defined in executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, the COA used the four-factor LEP analysis which considers the following factors:

1. Number and proportion of LEP persons served in the service area,
2. Frequency with which LEP persons come into contact with Asheville Redefines Transit (ART) programs, activities and services.
3. Importance to LEP persons of services provided by ART.
4. Resources available to ART and overall cost to provide LEP assistance.

The 2010 Census marked the first time the COA service area has a LEP population (Spanish and Indo- European speaking LEP) above the Safe Harbor Threshold. Based on these new findings, COA Services developed a LEP Plan in 2011 and worked to provide improved access to critical documents especially for Spanish and Indo-European speaking LEP persons. LEP services maybe limited due to budget impacts each year. Additional LEP services will be investigated and effectively implemented each budget year.

Conclusion: COA's completion of the four-factor analysis has assisted the agency in developing new priorities (based on data and community organization outreach) in providing language assistant services. COA has determined that within our service area the Spanish Speaking and Indo European LEP population is above Safe Harbor LEP threshold. Our plan

will improve access to our services by providing improved language translation and interpretation services as listed in the LEP Plan. In addition our agency will continue to gather data through: 1) the documentation of the LEP population seeking specific transit services, and 2) outreach with community organizations and LEP individuals. In addition through the budgetary process our agency will be able to dedicate resources to improve language assistance.

II. FOUR-FACTOR ANALYSIS

1. Number or proportion of LEP persons served in the service area

Prior Experience with LEP individuals: COA needs to improve our documentation of contact with LEP persons. As part of this analysis, Transit Operations Supervisors have been asked to survey their staff regarding contact with LEP persons. To date Operations has not been able to produce documentation regarding contact with LEP persons

1. Data from the US Census: COA staff reviewed the 2008-2012 American Community Survey and determined that 4.13% of the total population of the transit service area speaks English less than “very well”, this is considered the LEP population. The LEP chart (LEP-Attachment I) highlights the census tracts where the proportion of Spanish and Indo European LEP persons exceeds the proportion of LEP persons in the service area as a whole. Within the COA service area, 4266 persons or 3.03 % of the population are Spanish speaking LEP persons, 1197 persons or .85% of the populations are Indo – European speaking LEP persons, 398 persons or 0.28% of the populations are Asian and Pacific Island speaking persons. In summary the COA service area only has Spanish and Indo-European Speaking LEP populations that are above the Safe Harbor LEP threshold.

Identifying concentrations of LEP persons: Census Tract 22.03, served by ART Route S3, has the highest population of LEP persons (924 persons; 837 Spanish speaking LEP and Asian and Pacific Island LEP 79 persons) within our service area, the highest number of Spanish and Asian/Pacific Island LEP persons within COA service area. The census tract 14, served by ART Routes C, W3 and W4, has the second highest LEP population (800 persons: 561 Spanish speaking and 223 Indo-European speaking). Census Tract 20, served by ART Routes S3, S1 and C, has the largest Indo European LEP population (6.36% or 329 persons).

Since the 2005-2009 ACS the LEP population in the ART service area has changed in the following ways;

- Increase of total Spanish speaking LEP’s by 1141 persons.
- Decrease of total Indo-European LEP’s by 361 persons.
- Census Tract 14 had the largest increase in both Spanish and Indo-European LEP populations. Additionally, Census tracts 23.03, 25.06, 31.03 experience significant LEP population changes, partly as a result of newly draw census tracts.

LEP-Attachment I identifies the remainder of census tracts where the proportion of LEP persons exceed the proportion of LEP persons in the service area as a whole.

2. Data from State Department of Education: LEP-Attachment II details data collected from public elementary and secondary schools within the COA service area; Asheville City Schools, Buncombe County Schools, Henderson County Schools and four charter

schools. This data, from 2011, is significant even though the school district areas are larger than the transit service area. This data shows that the largest LEP population is in the Henderson County and Buncombe County School districts. This data supports the data from the 2008-2012 American Community Survey found in LEP-Attachment I, identifying Spanish speaking LEP population as the largest in our service area.

Data from the Department of Labor: Website not operational at time of submittal.
www.doleta.gov/reports/CensusData/.

3. The COA Services will focus outreach on the Spanish and Indo-European speaking LEP population. As part of this four factor analysis in 2011, the COA staff solicited community organizations advice in developing a comprehensive list of community organizations within our service area that work with the Spanish speaking LEP populations (See list of organizations survey in LEP-Attachment III). The COA staff has maintained contact with these organizations and continues to seek their advice in out reaching to the LEP population. In 2011, COA staff developed a survey and then requested organizations to complete it. (See list of survey questions LEP-Attachment IV. Survey results are available upon request.) The survey provides COA services with further insight into the specific population attributes as well as the specific needs that our agency can provide to the Spanish speaking LEP population and the support that community organizations can provide. (See LEP-Attachment V for an example of survey results.) Part of the implementation of this update plan will be to continue outreaching to community organizations within our service area that work with Indo-European speaking LEP populations to better understand the population's primary language and transit needs.

The contacts with community organizations will be the basis for future outreach (face-to-face meetings or surveys with LEP persons), assessment and service improvements in order to meet the needs of the LEP population in our service area.

2. Frequency with which LEP persons come into contact with ART services.

1. COA will work to improve documentation of when LEP persons come into contact with our Supervisors, Vehicle Operators, Dispatchers (phones and Transit Center front desk), Operations Center, website, community meetings, public hearings and para-transit system contractor (applications, reservations or communications with drivers).
2. COA interviewed community organizations in 2011 to identify which transit services they consider most important for the Spanish Speaking LEP population and to identify specific locations. COA better identify which transit services are most important for the Indo-European speaking LEP population, by continuing to outreach with community organizations.
3. COA will partner with community organizations to survey or hold face-to-face interactions with LEP persons as needed in order to better assess our agencies critical services used by the LEP population.

3. Importance to LEP persons of services provided by ART.

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1. Since the COA has reached the Safe Harbor LEP threshold after the 2011 census, the city will begin to better understand the nature and importance of individual services for LEP populations. By reviewing data collected through community organizations, request for service with our agency, whether through City staff, supervisors, dispatchers or drivers, the COA will better understand which transit service are used most frequently used by the LEP population and the geography of these requests. Our agency will identify what services could have serious consequence to individuals if not translated. COA will seek to understand what the potential impact a delay of implementation could have on the agency and for an individual's safety.
4. **Resources available to ART and overall cost to provide LEP assistance.**
 1. Currently, the COA provides the following language assistance:
 - i. Phone system offers limited Spanish and Russian language options. **Cost:** Staff time to update information.
 - ii. COA offices currently have employees that speak both Spanish and Russian available to respond to written communications or other critical language needs. **Cost: staff time.**
 - iii. COA Title VI Non-Discrimination Policy and Complaint Form (Title VI Program and Attachment II) are also available in Spanish and the primary Indo-European language as identified by future outreach with community organizations. **Cost: Staff time.**
 - iv. Other documents can be translated upon request. **Cost: staff time.**
 - v. Fare costs are translated and posted on all buses. **Cost: \$350.00/printing**
 - vi. Mountain Mobility Riders Guide (Para-transit contractor) – Spanish Translation. **Cost: staff time.**
 - vii. Press releases are sent to Spanish Language media. **Cost: staff time.**
 - viii. Spanish Language Ads in Spanish Language media. Cost: \$60/add.
 - ix. Had a secret shopper call in to the Transit Station to see if customer service staff could use language assistance service.
 2. COA has determined, based on demographic data and contact with Community Organizations, that there is a Spanish speaking LEP population within the service area which is above the Safe Harbor threshold and therefore additional measures are needed to provide meaningful access to our services. Many of the below services are currently provided in English, providing these additional services (Prioritized by community organizations in LEP-Attachment III) will be the COA's strategy for improving LEP services. COA will meet with community organizations regarding the Indo- European Speaking LEP population to provide meaningful access to our services.
 - i. System maps and timetables.
 - ii. Pictographs in stations and in vehicles.
 - iii. "How to ride" brochures for ART.
 - iv. Safety and security announcements.
 - v. Translate information on agency websites.
 - vi. Translate newspaper advertisements and advertisements in ethnic media.
 - vii. Fare payment Options.
 - viii. Service change announcements (on vehicles and at Transit Center).
 - ix. Public service announcements.

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- x. Para-transit information (applications, reservations or communications with drivers.
 - xi. Telephone messaging.
 - xii. Notices pertaining to upcoming events.
 - xiii. Complaint/commendation forms.
3. Community organizations within Asheville have prioritized and are able to provide the following services. A survey will be distributed to community organizations serving the Indo-European Speaking LEP population. In the survey, LEP-Attachment III and IV, these community organizations indicated that they are willing to assist the COA in providing these services to the Spanish speaking LEP populations:
 - i. Outreach to Spanish speaking LEP population.
 - ii. Hosting transit informational events.
 - iii. Translators/interpreters for events or one-on-one needs.
 - iv. Translation services for documents.
 - v. Training for transit staff on LEP customer service.
 4. COA services will also look into the feasibility of the following measures to improve meaningful access to services.
 - i. "I Speak" cards to be used by drivers and Transit Center Attendants.
 - ii. Contracting for interpreters on an "as needed" basis.
 - iii. Using bilingual staff to interpret information on an "as needed" basis.
 5. Budgetary analysis and cost effective practices for providing language services were considered.
 - i. COA services will further develop cost effective language services for the Spanish and Indo- European speaking LEP populations. Our agency has limited resources and continues to seek additional resources to improve our LEP services. The city will continue to budget in order to transition to providing more Spanish and Indo-European language service assistance.
 - ii. The COA will continue to be make resources available to translate critical documents as prioritized by our community organizations. In addition, the city will work with qualified community groups and/or volunteers to determine competency and define the roles these groups or individuals can play in providing language services. ART has a telephone messaging translations/interpretation services.

III. IMPLEMENTATION PLAN ON LANGUAGE ASSISTANCE

1. Identifying LEP individuals who need language assistance

1. The COA has identified the number, proportion, frequency of encounter and geographic details of LEP individuals eligible to be served in section I of the Four-Factor Analysis. This analysis includes;
 - i. US Census, state and local data.
 - ii. Information gathering from community organizations.
 - iii. A plan to gather information for LEP persons via face-to-face contact or via a survey.
 - iv. Information gathering from agency staff regarding their contact with LEP persons.
 - v. A plan to document future interactions with LEP persons by agency.

2. Language Assistance Measures

1. **List of Language services:** The COA has provided a list of written and oral language assistance currently available in section II.4.A. of the LEP Plan. The agency will begin documenting staff trainings.

Phone message system currently in use has a Spanish and Russian speaking option that provides basic information in Spanish and Russian. In addition, COA dispatchers are instructed to contact a supervisor anytime a person with LEP needs calls ART. Additionally, COA has contracting Spanish and Indo-European speaking telephone services.

2. **Written communication** from the public will be sent to existing bilingual staff to respond to the public in a timely manner.
3. **Face-to-face contact with the LEP persons** (drivers and Transit Station attendants) requires that COA staff contact a supervisor. Drivers are instructed to seek assistance from the public (other riders) if there are any directly available. The supervisor will seek to answer the LEP person's questions using existing bilingual staff and document the contact. Additionally, COA has contracting Spanish and Indo-European speaking telephone services. COA continues to look into the feasibility of supplying "I Speak" cards to drivers and Transit Station Attendants.
4. **Hosting a meeting or event and advanced public notice of events** are published in English and Spanish in media serving both English and Spanish populations. There are no Indo-European media publications that COA is aware of at this time, but outreach to community organizations may provide further insight. In the future, notices will include an option to have a translator or interpreter present if requested in advance. Additionally, a sign-in form for Spanish and Indo-European speaking LEP persons will be provided at the event.
5. **COA services will work with our Community Organizations to ensure competency of interpretation and translation services.** In addition the agency will require interpreters and translators to document their credentials. In order to provide quality information to our LEP customers the agency will work with interpreters and translation

services and personnel to ensure they have a clear understanding of the specialized terms and concepts associated with the COA's policies and services. The agency will work to define the role the interpreter or translator should fill and ask that they not deviate into a role of a counselor, legal advisor, or any other role aside from interpreting or translation.

3. Staff training

1. **Who:** COA has identified agency staff that is likely to come into contact with LEP persons; these include all Operations supervisors, planning staff, drivers, and dispatchers. Operations supervisors will provide the training to drivers and dispatchers.
2. **When:** LEP training will be provided during new employee orientation. Operations supervisors, drivers and dispatchers will be re-oriented with LEP services provide by the agency at least once a year during standard periodic trainings and as needed.
3. Operations supervisors and planning staff will seek out additional training tools (i.e. webinars, community organization trainings, etc.) to improve customer service and LEP services. Finally, COA will work with community organizations to determine the feasibility (cost and competency) of them providing LEP related trainings to planning and operations staff.
4. Operations supervisors and planning staff, working in conjunction with community organizations will develop a standard presentation detailing the agencies responsibilities to LEP persons. The presentation will include:
 - i. A summary of the transit agency's responsibilities under the Title VI and LEP.
 - ii. A summary of the agency's LEP plan.
 - iii. A summary of the number and proportion of LEP persons in the agency's service area, the frequency of contact between the LEP population and the agency's services and the importance of the transit service to the population.
 - iv. A description of the type of language assistance that the agency is currently providing and instructions on how agency staff can access these LEP assistant services; and
 - v. A description of how to document contact with a LEP person.
 - vi. A description of the agency's cultural sensitivity policies and practices.
 - vii. A description of how to handle a potential Title VI/LEP complaint.

4. Implementation

1. An inventory of existing LEP service and community outreach efforts currently performed by COA can be found within section II.4.A. and section III.2.
2. The COA will start adding the following language to NEW documents that are not currently available in languages other than English; "translation of this document is available upon request". This will be written in English, Spanish and Russian. In order to provide notice of language assistance on a regular basis and in order to reach the greatest number of potential riders, COA will start adding the following statement in English, Spanish and Russian to all agency notices:

Interpreter assistance needed? Contact: Necesita un interprete en español? Contacte: Нуждаются в услугах переводчика? Обращайтесь в Горсовет Эшвила.

City of Asheville (828) 232-4532, iride@ashevillenc.gov, City Hall, 70 Court Plaza, Asheville, NC, 28801

3. Once the COA develops its' new Spanish and Indo-European LEP assistance service, additional outreach documents will be created to inform Spanish and Indo-European speaking persons of these services. In addition, COA will conduct community outreach to Spanish and Indo-European speaking LEP persons through the assistance of community organizations (LEP-Attachment III).

5. Monitoring

1. **Monitoring and Updating the LEP Plan** – COA will update and monitor the LEP Plan in the following ways:
 - i. Along with the rest of the Title VI Program once every three (3) years as laid out in FTA C 4702.1A. At this time, service area LEP populations will be analyzed using census and state data. The agency will analyze census or state data if new data becomes available which could provide new details on the LEP population or its concentrations.
 - ii. Agency staff will work to stay informed and consider the use of technological advance and source of additional resources and the cost of these resources.
 - iii. Planning staff and Operations supervisors will discuss bi-yearly the LEP Plans to;
 - Determine whether the written and oral assistance measures are effective in meeting the needs of LEP persons.
 - Review internal documentation showing the frequency of encounters and the nature and importance of LEP requests.
 - Review any LEP related complaints.
 - Review and discuss LEP trainings that occurred.
 - Make incremental improvement to the LEP plan, written and oral language assistance, and/or staff training.
 - Discussion budgetary implications of the LEP Plan and any proposed improvements.
 - iv. The Agency will meet with our sub-recipient, Henderson County, bi-annually to ensure the implementation and improvements to their LEP Plan.
 - v. The agency will correspond (either via email, phone or in-person) with community organizations regularly.
 - vi. The agency will coordinate with community organizations to conduct surveys or face-to-face meetings with Spanish and Indo-European speaking LEP persons annually (The LEP Survey questions provided on page 36 of the FTA's Guidance

Concerning LEP persons will be used as a reference). This annual outreach will assist the agency in:

- Determining if there have been any noticeable changes in the demographics of the LEP population in their service area.
- Receiving input on whether our language assistance measures and efforts to inform the LEP community of the availability of language assistance are working.
- Continuing outreach of new or updated LEP language assistance services.
- Working with riders and community groups to determine whether LEP language assistance measures and staff training programs are effective and appropriate.
- Developing other monitoring techniques such as: the “secret shopper” technique, where monitors pose as riders and observe how agency staff responds to their requests. This may be conducted on the phone, at the Transit Station and/or on random transit routes. (The LEP Monitoring Checklist provided on page 39 of the FTA’s Guidance Concerning LEP persons will be used as a reference). This type of monitoring may also provide insight into how the agency can improve the effectiveness of its services or even portions of the LEP Plan.

LEP ATTACHMENT I

Limited English Proficient (LEP) Populations - COA Service Area											
2008-2012 American Community Survey 5-Year Estimates											
Geography Name	Total Population 5 years and over	Spanish LEP	%Spanish LEP	Indo Euro LEP	%Indo Euro LEP	Asian Pacific LEP	%Asian Pacific LEP	Other Lang LEP	%Other Lang LEP	Total LEP	% LEP
Census Tract 1, Buncombe County, North Carolina	1,381	21	1.52%	10	0.70%	0	0.00%	0	0.00%	31	2.22%
Census Tract 2, Buncombe County, North Carolina	1,526	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Census Tract 3, Buncombe County, North Carolina	2,083	105	5.04%	0	0.00%	0	0.00%	0	0.00%	105	5.04%
Census Tract 4, Buncombe County, North Carolina	3,872	42	1.08%	7	0.18%	43	1.10%	0	0.00%	91	2.36%
Census Tract 5, Buncombe County, North Carolina	3,243	34	1.05%	21	0.66%	13	0.40%	0	0.00%	68	2.11%
Census Tract 6, Buncombe County, North Carolina	1,863	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Census Tract 7, Buncombe County, North Carolina	1,189		0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Census Tract 8, Buncombe County, North Carolina	2,929	10	0.34%	39	1.33%	11	0.38%	0	0.00%	60	2.05%
Census Tract 9, Buncombe County, North Carolina	3,046	36	1.18%	12	0.39%		0.00%	0	0.00%	48	1.58%
Census Tract 10, Buncombe County, North Carolina	3,974		0.00%	17	0.43%	13	0.33%	0	0.00%	30	0.75%
Census Tract 11, Buncombe County, North Carolina	4,445	26	0.58%	0	0.00%	9	0.20%	0	0.00%	35	0.79%
Census Tract 12, Buncombe County, North Carolina	4,366	26	0.60%	0	0.00%	23	0.53%	0	0.00%	49	1.12%
Census Tract 13, Buncombe County, North Carolina	3,521	311	8.83%	132	3.75%	11	0.31%	0	0.00%	454	12.89%
Census Tract 14, Buncombe County, North Carolina	6,367	561	8.81%	223	3.50%	16	0.25%	0	0.00%	800	12.56%
Census Tract 15, Buncombe County, North Carolina	2,266	214	9.44%	0	0.00%	39	1.72%	0	0.00%	253	11.17%
Census Tract 16, Buncombe County, North Carolina	5,634	195	3.46%	50	0.89%	0	0.00%	0	0.00%	245	4.35%
Census Tract 17, Buncombe County, North Carolina	2,349	19	0.81%	0	0.00%	0	0.00%	0	0.00%	19	0.81%
Census Tract 18.01, Buncombe County, North Carolina	3677	45	1.22%	15	0.41%	0	0.00%	0	0.00%	60	1.63%
Census Tract 18.02, Buncombe County, North Carolina	4269	7	0.16%	0	0.00%	0	0.00%	0	0.00%	7	0.16%
Census Tract 19, Buncombe County, North Carolina	2,822		0.00%	25	0.89%	0	0.00%	0	0.00%	25	0.89%
Census Tract 20, Buncombe County, North Carolina	5,170	59	1.14%	329	6.36%	0	0.00%	0	0.00%	388	7.50%
Census Tract 21.01, Buncombe County, North Carolina	1,383	4	0.29%	7	0.51%	0	0.00%	0	0.00%	11	0.80%
Census Tract 21.02, Buncombe County, North Carolina	5,162	353	6.84%	11	0.21%	36	0.70%	0	0.00%	400	7.75%
Census Tract 22.03, Buncombe County, North Carolina	4,902	837	17.07%	8	0.16%	79	1.61%	0	0.00%	924	18.85%
Census Tract 22.04, Buncombe County, North Carolina	7,272	159	2.19%	18	0.25%	18	0.25%	0	0.00%	195	2.68%
Census Tract 22.05, Buncombe County, North Carolina	6,280	43	0.68%	0	0.00%	5	0.08%	12	0.19%	60	0.96%
Census Tract 22.06, Buncombe County, North Carolina	4,396	10	0.23%	0	0.00%	0	0.00%	0	0.00%	10	0.23%
Census Tract 23.02, Buncombe County, North Carolina	6,894	133	1.93%	196	2.84%	21	0.30%	0	0.00%	350	5.08%
Census Tract 25.06, Buncombe County, North Carolina	3,156	321	10.17%	36	1.14%	0	0.00%	0	0.00%	357	11.31%
Census Tract 26.05, Buncombe County, North Carolina	4,721	72	1.53%	0	0.00%	0	0.00%	0	0.00%	72	1.53%
Census Tract 30.01, Buncombe County, North Carolina	7,889	17	0.22%	0	0.00%	2	0.03%	0	0.00%	19	0.24%
Census Tract 30.02, Buncombe County, North Carolina	6,809	388	5.70%	9	0.13%	11	0.16%	0	0.00%	408	5.99%
Census Tract 31.03, Buncombe County, North Carolina	1,899	0	0.00%	19	1.00%	18	0.95%	0	0.00%	37	1.95%
Census Tract 31.04, Buncombe County, North Carolina	5,436	165	3.04%	13	0.24%	16	0.29%	0	0.00%	194	3.57%
Census Tract 9306, Henderson County, North Carolina	4,372	53	1.21%	0	0.00%	14	0.32%	0	0.00%	67	1.53%
	140563	4266	3.03%	1197	0.85%	398	0.28%	12	0.01%	5805	4.13%

Highlighted cells indicate Census Tracts with percentages higher than the service area average for LEP populations above the Safe Harbor Threshold.

LEP (Limited English Proficiency): Individuals who speak English less than "very well".

Source: US Census Bureau, 2008-2012 American Community Survey 5-Year Estimates

EP ATTACHMENT II

District	State	NCES ID	Black	American Indian/AK Native	Asian	Hispanic	Hawaiian /Pacific Islander	White	2 or more races	LEP population
ARTSPACE CHARTER	NC	3700117	1.08	1.08	1.08	3.52	0	88.89	4.34	0
ASHEVILLE CITY SCHOOLS	NC	3700270	28.83	0.34	1.25	6.2	0.05	56.58	6.75	2.4
BUNCOMBE COUNTY SCHOOLS	NC	3700450	6.09	0.41	1.49	12.06	0.21	75.44	4.31	7.21
EVERGREEN COMMUNITY CHARTER	NC	3700078	0.98	0.49	1.71	5.38	0	86.8	4.65	0.49
FRANCINE DELANY NEW SCHOOL	NC	3700017	22.7	1.23	4.29	4.29	0	63.19	4.29	0
HENDERSON COUNTY SCHOOLS	NC	3702100	3.84	0.35	1.29	18.13	0.35	72.2	3.84	9.03
THE MOUNTAIN COMMUNITY SCH	NC	3700085	1.32	0	1.32	4.61	0	91.45	1.32	0

Values shown as percentages (except Total Enrollment.)2011 Survey year data downloaded from <http://ocrdata.ed.gov/>.

LEP ATTACHMENT III

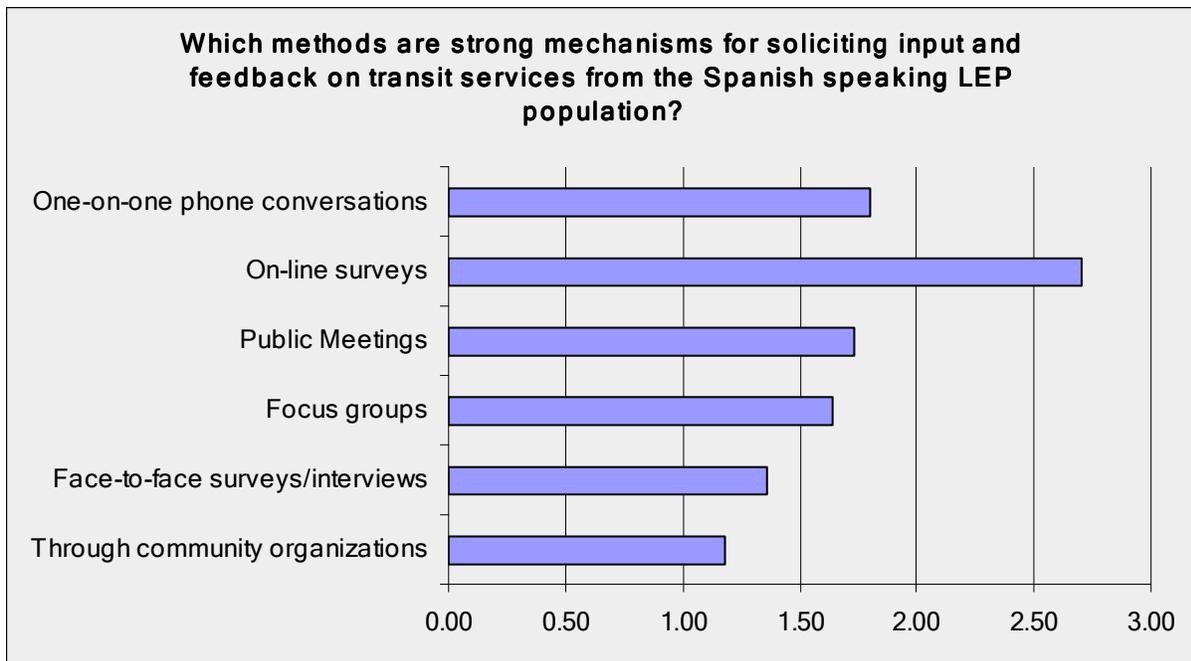
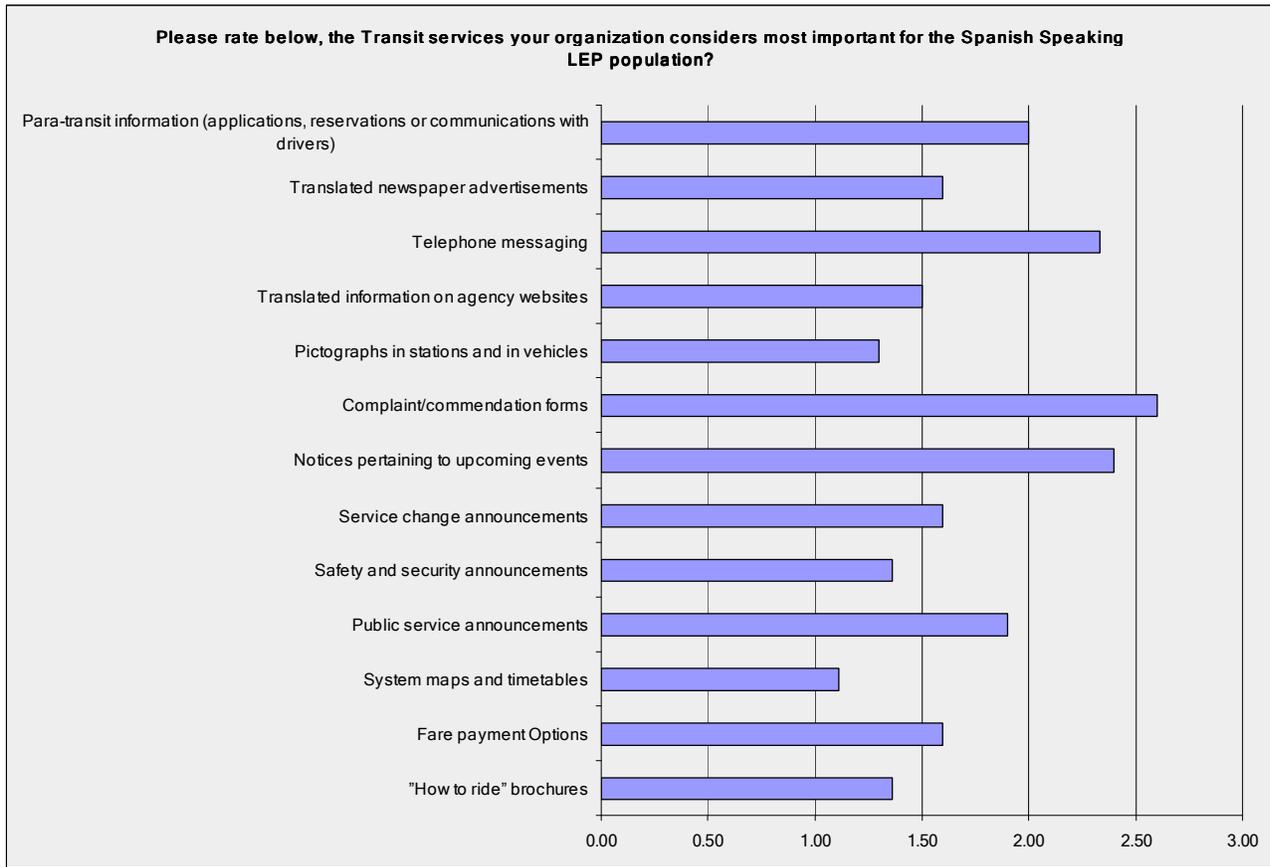
Your name:	Are you a good contact at your organization for future collaborations with ART?	Your organization:	Your e-mail:	Your phone number:
Jennifer Nehlsen	Yes	Latino Steering Committee	avllsc@yahoogroups.com; Jennifer.E.Nehlsen@nccourts.org; thalia@pisgahlegal.org	
Amelia	No	Community Action Opportunities	ameliagarcia81@yahoo.com	828-280-1095
Marina Gundorin	Yes	Catholic Charities Diocese of Charlotte, NC	mvgundorin@charlottediocese.org	828-255-0146
Michelle Bedard	Yes	WNC Workers Center	wncworkerscenter@gmail.com	828-320-2312
Victoria Lyall	Yes	Intercambios Interpreting Service	victorialyall@hotmail.com	828-216-3330
ecampos	Yes		ednacampos@att.net	828-273-2333
Norma Duran Brown	Yes	Children First/CIS of Buncombe County	normab@childrenfirstbc.org	828-252-4810
	Yes	Latino Advocacy Coalition		(828)693-1981
Linda Block	Yes	Lead Poisoning Prevention Program	LeadPrevention@yahoo.com	8286838433
Jennifer Hill	Yes	Asheville-Buncombe Technical Community College	jhill@abtech.edu	828-254-1921 x 132
Linda Brinkley	Yes	United Way's 2-1-1 of Western North Carolina	linda.brinkley@unitedwayabc.org	239-1034
Sarah Regala	Yes	Access Family Services	sregala@accessfamilyservices.com	(828)670-7723x232
Jane Hatley	Yes	Self-Help Credit Union	jane.hatley@self-help.org	(828) 676-2196 x 3473
Andrea Golden	Yes	Center for Participatory Change	agolden@cpcwnc.org	

LEP ATTACHMENT IV**Survey Questions for Community Organizations**

1. Does your population come from an urban or rural back ground?
2. What is the age of the population your organization serves?
3. What is the predominant gender of the population your organization serves?
4. What is the education and literacy level of the population you serve?
5. What service does your organization provide to the [Spanish or Indo-European] speaking population?
6. Has the size of the population you serve increased, stayed the same, or decreased over the past five years?
7. Are there specific language dialects spoken by the [Spanish or Indo-European] speaking LEP populations in the City of Asheville, Buncombe County area or Henderson County area, if any?
8. Are there specific countries of origin/nationalities within the [Spanish or Indo-European] speaking LEP populations in the City of Asheville, Buncombe County or Henderson County area, if any?
9. Are there any current population trends that your organization is aware of? (ex. specific areas within Buncombe County that [Spanish or Indo-European] LEP live or are moving away from, new trends regarding county of origin where LEP are from, specific employment centers in our area, or any other trends)
10. What services are most frequently sought out by the [Spanish or Indo-European] speaking LEP populations from your organization?
11. How many [Spanish or Indo-European] speaking LEP persons do you estimate that your organization serves per year?
12. Has the [Spanish or Indo-European] LEP population inquired about how to access public transportation or expressed a need for public transportation service?
13. What are the three most frequently traveled destinations within the City of Asheville for the [Spanish or Indo-European] speaking LEP population you serve (Please provide address of location if possible)?
14. Are there locations that the [Spanish or Indo-European] LEP population has expressed difficulty accessing via the public transportation system?
15. Would your organization collaborate with ART to improve the [Spanish or Indo-European] speaking LEP population's access to our services?
16. What services does your organization provide that you think could improve the [Spanish or Indo-European] speaking LEP population's access to ART?

Survey results are available upon request

LEP ATTACHMENT V
Example of Community Organizations Survey results



Attachment V – Multimodal Transportation Committee Resolution