

Title VI Program

Green Mountain Transit Authority

May 2020

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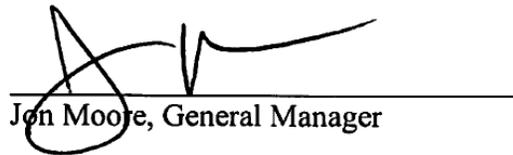
Note: In 2018, the Vermont Legislature officially changed the name of the Chittenden County Transportation Authority to the Green Mountain Transit Authority. Prior versions of the Title VI Program referred to CCTA as the official name of the authority and GMT as the public name. In this program, GMT is both the official and public name of the authority.

Statement of Policy

Green Mountain Transit Authority (GMT), as a federal grant recipient, is required by the Federal Transit Administration to conform to Title VI of the Civil Rights Act of 1964 and its amendments. Title VI of the Civil Rights Act of 1964 requires that no person in the United States, on the grounds of race, color or national origin be excluded from, be denied the benefits of, or be subjected to discrimination, under any program or activity receiving federal financial assistance. Presidential Executive Order 12898 addresses environmental justice in minority and low-income populations. Presidential Executive Order 13166 addresses services to those individuals with limited English proficiency.

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

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



Jon Moore, General Manager

Notice to the Public

GMT ensures that its passengers and the public receive notice of their Title VI rights, including 1) a statement that GMT operates without regard to race, color, and national origin, 2) instructions on how the public can file a Title VI complaint, and 3) information to the public about how to obtain more information about their Title VI rights and GMT's Title VI responsibilities. The notification to the public on the GMT website is located at <http://ridegmt.com/title-vi/> and is reproduced below.

GMT provides notice of Title VI rights to passengers and the public in the following ways:

- **GMT Facilities:** The above notice is posted in flyer format at the front desk at GMT's Administrative Facility at 101 Queen City Park Road, Burlington, Vermont, at the rural facility in Berlin, VT, and at the customer service kiosks at GMT's Downtown Transit Center on St. Paul Street in Burlington and at the Montpelier Transit Center. These locations are the primary areas where GMT passengers receive information about GMT's services.
- **Vehicles:** The notice on the website has been converted to a sticker format for placement on all GMT revenue vehicles.

Title VI (all regions)

Title VI– Chittenden County

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

For more information on GMT's civil rights program and the procedures to file a complaint, contact GMT at 802-864-2282 (VT Relay 800-253-0191), info@RideGMT.com, or at our administrative office at 15 Industrial Parkway, Burlington, VT 05401. For more information visit www.RideGMT.com

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

Title VI– Central Vermont | Franklin-Grand Isle

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

To file a Title VI complaint with GMT, call 802-864-2282 and state you would like to make a Title VI complaint or send an email to info@RideGMT.com.

If you would like more information about your Title VI rights or to file a complaint directly with the Vermont Agency of Transportation, Office of Civil Rights, call 802-249-9291.

[Title VI Complaint Procedures](#)

[Title VI Complaint Form](#)

- **GMT Bus Map & Guide:** GMT produces a Bus Map & Guide—which contains detailed route, schedule, and system information—at least three times a year. Separate booklets are prepared for the urban and rural portions of the service area. The Title VI notice is included in every Bus Map & Guide publication. The Bus Map & Guide is distributed for free on all GMT vehicles, at the two main customer service facilities, and throughout the service area at local businesses and municipal offices. The notifications in the Bus Map & Guide documents are shown below.

Title VI of the Civil Rights Act

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

For more information on GMT's civil rights program and the procedures to file a complaint, contact GMT at **802-540-2468** (VT Relay Number 800-253-0191), **info@RideGMT.com**, or at our administrative office at **101 Queen City Park Road, Burlington, VT 05401**. For information visit **RideGMT.com**.

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

Notification in
Urban BM&G

Title VI of the Civil Rights Act

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

To file a Title VI complaint with GMT, call 802-864-2282 and state you would like to make a Title VI complaint or send an e-mail to **info@RideGMT.com**.

If you would like more information about your Title VI rights or to file a complaint directly with the Vermont Agency of Transportation, Office of Civil Rights, call 802-828-5561.

Notification in
Rural BM&G

Title VI Complaint Procedures, Form, & Complaint Log

1) Receiving and Documenting Complaints:

a) Complaints via Phone Call

When a member of the public wishing to file a Title VI complaint calls GMT and states that he/she wishes to file a Title VI complaint, the front desk should transfer the call to GMT's Title VI officer who will document the complaint using the Title VI Complaint Form (follows below). Should the Title VI officer be unavailable to take the call, the front desk shall record the individual's contact information and state that the Title VI officer will call the person back. The Title VI officer shall call the individual back within five business days of receiving the message. If the Title VI officer will be out of the office longer than five business days, an interim Title VI office shall be selected and he/she shall receive the Title VI complaints calls until the permanent Title VI office returns.

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

b) Complaints via Email/Website

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

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

2) Enter the Complaint into the GMT Title VI Complaint and Lawsuit Log

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

- Date the complaint was filed
- A summary of the allegations
- The status of the investigation

- Actions taken by the recipient in response

3) Internal Investigation of Title VI Complaints

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

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

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

Vermont Agency of Transportation
Office of Civil Rights & Labor Compliance
219 North Main Street
Barre, VT 05641

Appeals may also be submitted by telephone or fax. Contact numbers are as follows:

Phone: (802) 249-9291

Fax: (802) 479-5506

As GMT is a direct recipient of federal funds, an appeal can also be made directly to the Federal Transit Administration. Complainant will be advised to contact:

Office of Civil Rights
Attn: Title VI Program Coordinator
East Building, 5th Floor-TCR
1200 New Jersey Ave, SE
Washington, DC 20590

4) Update the GMT Title VI Complaint and Lawsuit Log

After conducting the internal investigation, the Title VI officer must update the status of the complaint in the GMT Title VI Complaint and Lawsuit Log. This will include an explanation of any actions taken as a result of the complaint and/or internal investigation.

Section IV		
Have you previously filed a Title VI complaint with this agency?	Yes	No
Section V		
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?		
<input type="checkbox"/> Yes <input type="checkbox"/> No		
If yes, check all that apply:		
<input type="checkbox"/> Federal Agency: _____		
<input type="checkbox"/> Federal Court _____ <input type="checkbox"/> State Agency _____		
<input type="checkbox"/> State Court _____ <input type="checkbox"/> Local Agency _____		
Please provide information about a contact person at the agency/court where the complaint was filed.		
Name:		
Title:		
Agency:		
Address:		
Telephone:		
Section VI		
Name of agency complaint is against:		
Contact person:		
Title:		
Telephone number:		

Record of Title VI Investigations, Complaints, Or Lawsuits

Since the submission of the last Title VI Program in 2017, GMT received two complaints from passengers who felt that their civil rights had been violated. These complaints and their resolution status are summarized below.

Allegations	Status	Actions Taken
5/23/19		
<p>Operator 697 was driving bus 914 operating School Tripper route 47 with a scheduled 15:10 departure from Edmunds School. While on North Union Avenue the operator stopped the bus and required passengers who were violating the GMT code of conduct to depart the vehicle, including multiple passengers of color. The Operator also threatened to call law enforcement if the passengers did follow his instructions. As this was a School Tripper route all passengers were elementary and middle school aged.</p>	<p>Ruled as an unfounded Title VI complaint, pending a Vermont Human Rights Commission Complaint of Discrimination in a place of Public Accommodation. Initial unfounded determination based on multiple passengers of color and Caucasian descent were removed from the bus as well as multiple passengers of color and Caucasian descent allowed to remain on the bus. Passengers in the rear of the vehicle where the behavior issued occurred were required to exit the bus and passengers in the front of the bus were allowed to remain onboard.</p>	<p>The Operator was terminated from GMT on May 29, 2019 based on violating GMT policy of removing passengers without Management approval. GMT and the Burlington School District convened a working group to avoid future issues and GMT presented at the Edmunds School at the beginning of the 2019-20 school year.</p>
1/30/20		
<p>Operator 697 was driving bus 513 operating the 15:00 Essex Center departure from the Amtrak Station. The Operator refused to move the vehicle until the passenger, who did not pay the fare or show his school issued ID (per the GMT Fare Policy), exited the vehicle. The Operator requested a supervisor to call law enforcement when asked if he needed assistance prior to the passenger exiting.</p>	<p>Ruled as an unfounded Title VI complaint, pending a Vermont Human Rights Commission Complaint of Discrimination in a place of Public Accommodation. Initial unfounded determination based on the Operator adhering to the GMT Fare Policy when asking the passenger to exit the bus. The operator reported and on-board video confirms that he did require all passengers to meet the GMT Fare Policy and did not single out the African American passenger.</p>	<p>The Operator was issued progressive discipline for not following a management directive as a Supervisor directed the Operator to not adhere to the GMT Fare Policy on that trip when the Operator called the Supervisor for assistance. GMT also created a new Standard Operating Procedure (SOP) to simplify the Unlimited Access fare policy and scheduled Implicit Bias training for all staff.</p>

Language Assistance Plan

Introduction

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

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

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

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

A. Four Factor Analysis

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

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

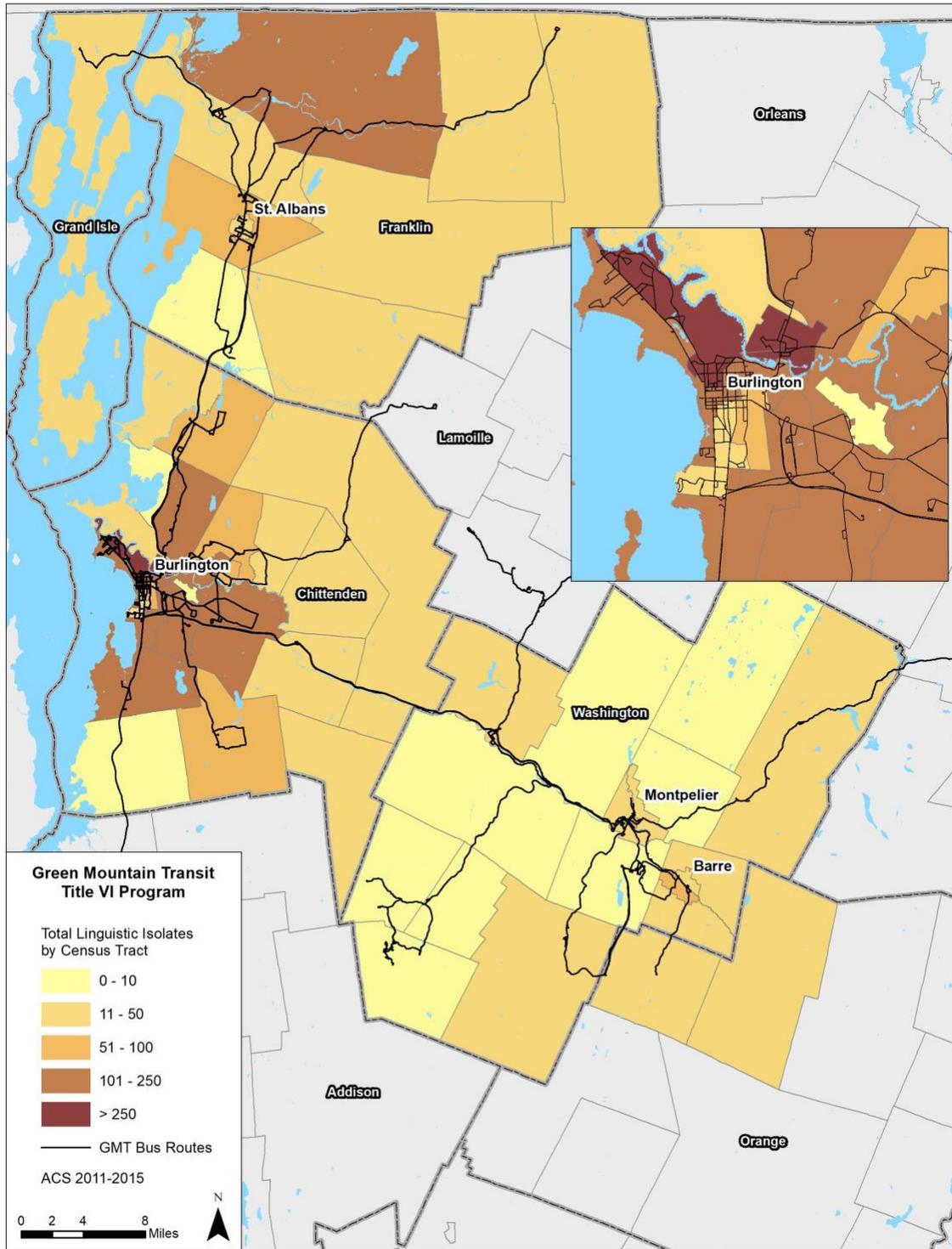
Factor 1 – Prevalence of LEP Persons

According to the 2011-2015 ACS, 5,487 residents of GMT’s four-county service area ages 5 or older spoke English less than “very well.”¹ This total number represents just 2.1% of the population ages 5 or older as of the 2015 Census population estimate.

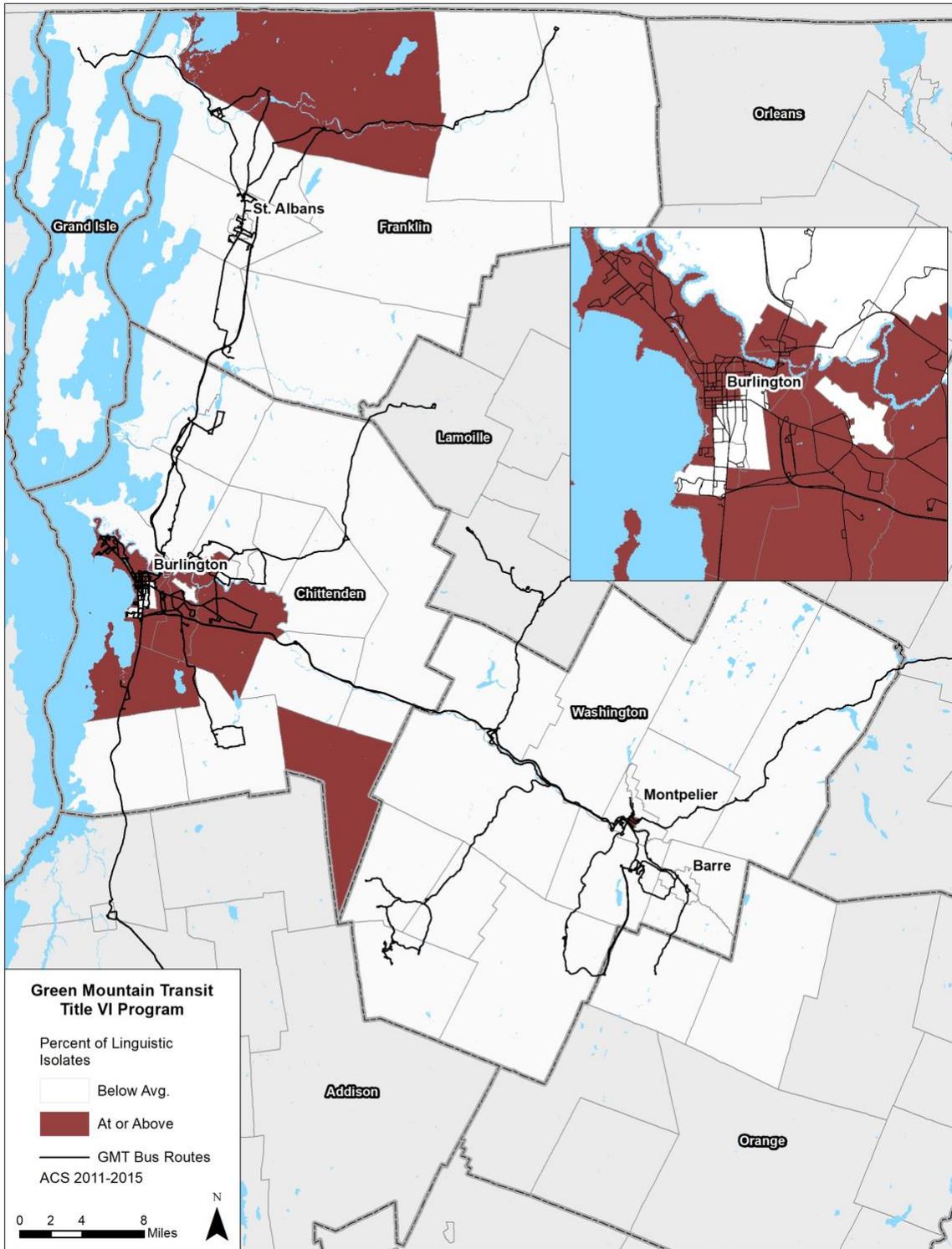
The maps presented below illustrate where LEP individuals reside within the GMT service area. The first map shows the number of individuals by tract who speak English less than “very well” for all languages combined. In 40 of the 66 Census tracts, there are fewer than 50 people who are

¹ Following the definition in the latest FTA guidance (FTA C 4702.1B), only those individuals who were identified in the 2011-2015 American Community Survey (ACS) 5-year data as having their ability to speak English as “less than very well” are being considered as LEP. The 2011-2015 data are the most recent available for this tabulation.

“linguistically isolated” (i.e. speaking English less than “very well”). In another 8 tracts, there are between 50 and 100 linguistically isolated individuals. The LEP guidance from DOT indicates lower requirements for recipients that serve LEP populations of 50 or fewer individuals. The tracts in the core communities served by GMT with local bus service all have more than 100 LEP individuals; tracts 1, 3 and 4, located on the north side of the City of Burlington, have the highest number of LEP individuals, with 359, 648 and 402, respectively.



The next map shows the concentration of linguistically isolated (LI) individuals; that is, tracts where the percentage of these individuals is higher than the service-area-wide average. In tracts 3 and 4, on the north side of Burlington, the percentage of LI individuals exceeds 12%. From both of these maps, it is clear that LEP efforts need to focus on the City of Burlington, particularly the New North End, and Winooski, with parts of South Burlington also important.



The next step in the analysis was to consider specific language groups and where there are concentrations of individuals who do not speak English well. The single largest group of individuals were speakers of Other Indic languages, with 936 people, reflecting the arrival of Bhutanese refugees in Burlington from 2008 to 2017. The next largest numbers of these LEP individuals (between 280 and 800) spoke French, Spanish, Vietnamese, Serbo-Croatian, Chinese, Other African languages, and Arabic. Other than French, Spanish, and Chinese, these populations all reflect refugee arrivals over the past quarter century. The table on the next page shows the sources of refugees each year that were settled in Vermont by the U.S. Committee for Refugees and Immigrants – Vermont (USCRI Vermont, formerly the Vermont Refugee Resettlement Program). It is also noteworthy that the influx of refugees to Vermont has slowed dramatically in the past three years to less than a third of what it was in 2015.

The maps on the pages following the table display the number of persons who speak English “less than very well” among each of these eight languages. Among all of these languages, the ones spoken by recent immigrants tend to be the most geographically concentrated, while French and Spanish speakers are the most widely distributed among the census tracts in the four-county service area. The most concentrated is the group of Other Indic Language speakers, the Bhutanese immigrants who, as shown in the first map, are located almost exclusively in the Intervale and Old North End portions of Burlington and in Winooski.

The City of Burlington has a long history of a local French-speaking population, with many French-language schools and churches thriving during the 20th Century. These are much less common now than they were decades ago, as there are fewer than 100 French speakers who speak English less than very well in Burlington. Rather, the highest numbers are in the western portion of South Burlington, Swanton and Highgate at the northern edge of Franklin County, as well as Williston, Barre Town and St. Albans Town.

Spanish speakers are concentrated in South Burlington, but there are moderate numbers in the tract containing Huntington and sparsely-populated Buels Gore. Washington County has relatively few Spanish speakers, but the northwestern corner of Franklin County has higher numbers. Many of the LEP individuals in those communities are farm workers.

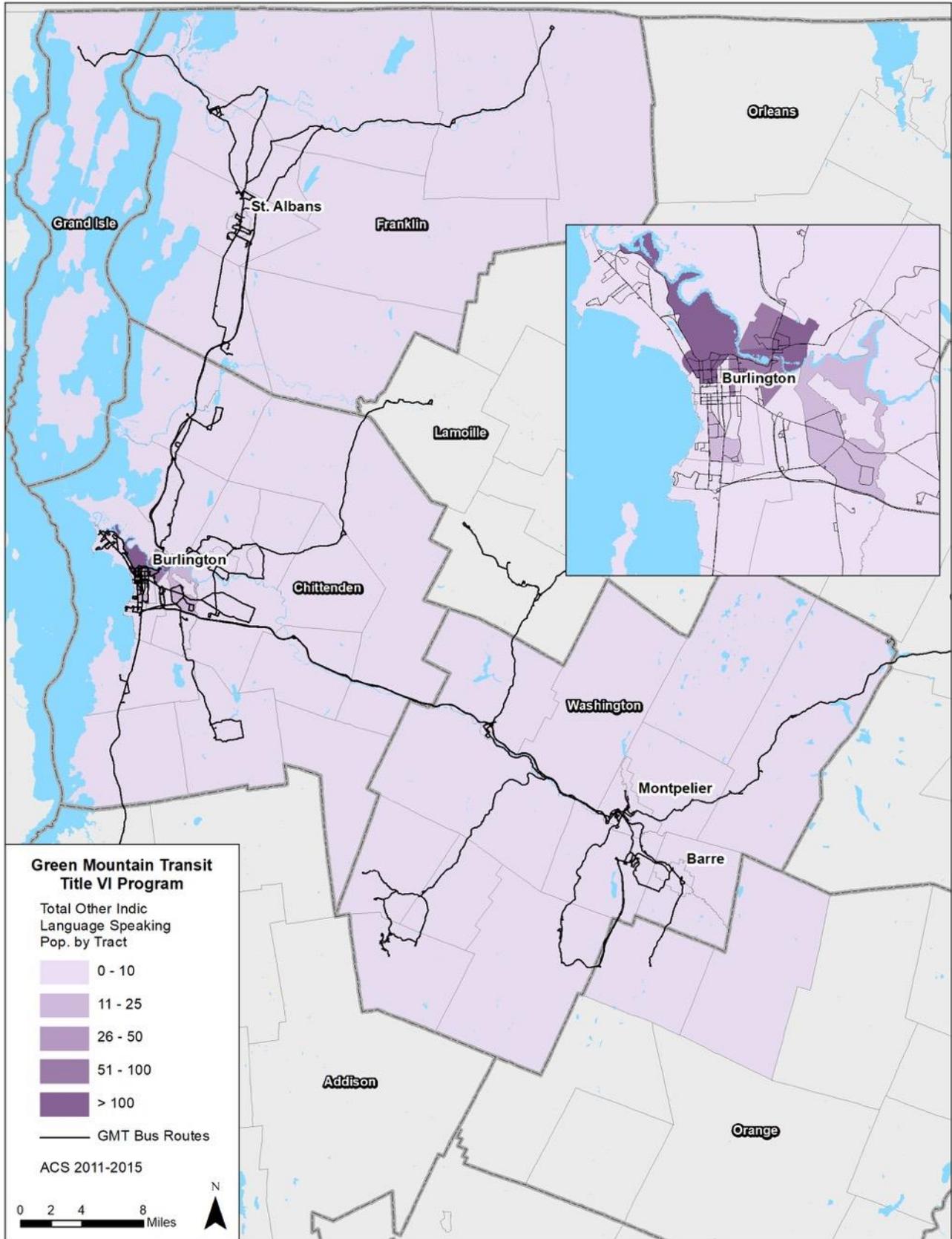
Vietnamese speakers who speak English less than very well are concentrated in the New North End of Burlington with some in Essex and Milton. Serbo-Croatian speakers are also concentrated in the New North End, with smaller numbers in Colchester and South Burlington. Most of the Chinese speakers are in Shelburne followed by South Burlington, Hinesburg and Milton.

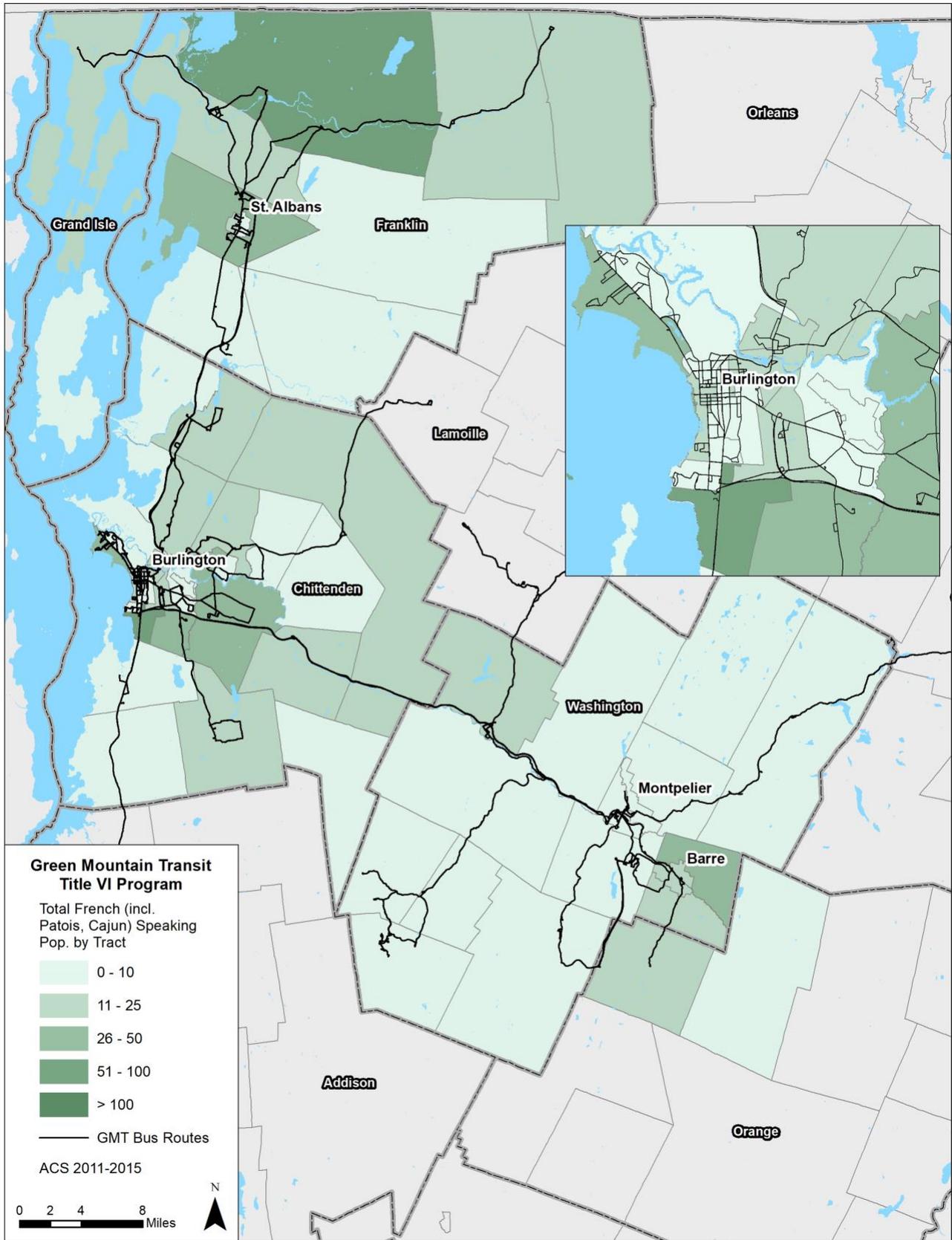
The final three maps show the locations of some of the newest arriving refugees (see table below). Speakers of “African languages” come from the Democratic Republic of Congo and Somalia and are concentrated in the eastern part of the New North End of Burlington and the area surrounding the airport in South Burlington. Finally, Arabic speakers (mainly from Iraq) live primarily in Winooski and Williston.

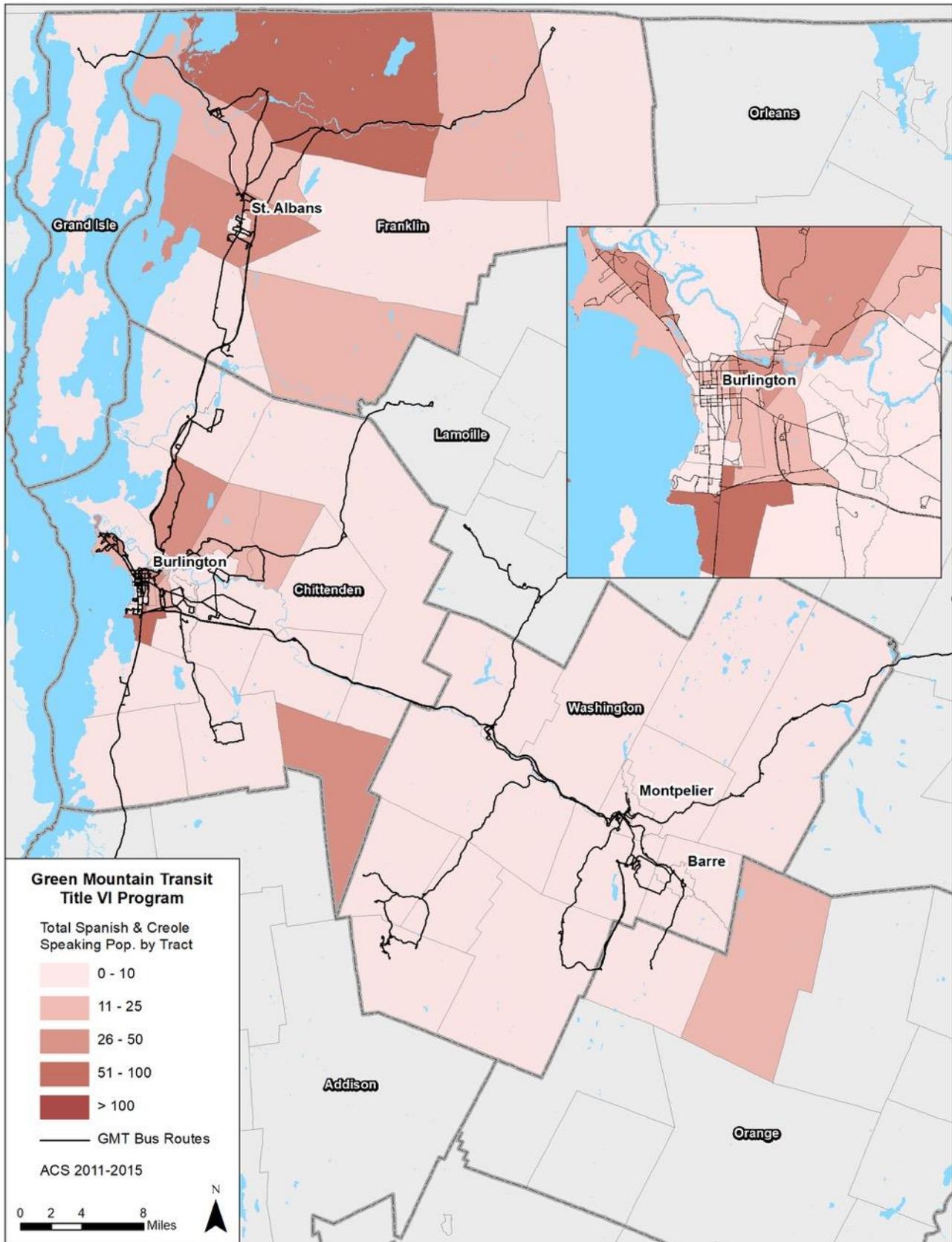
It can be seen in the data table that follows the maps that no language group surpasses 1,000 individuals for the entire service region and that no tract surpasses 650 individuals who cannot speak English very well for all languages combined. For individual languages, three tracts have percentages exceeding 5% of the population: Tract 3 for Other Asian languages, Tract 4 for Other Indic languages and Tract 24 for Arabic. GMT provides oral translation services to these populations on request. A map showing the tract numbers and how they relate to municipal boundaries is provided for reference just prior to the tables.

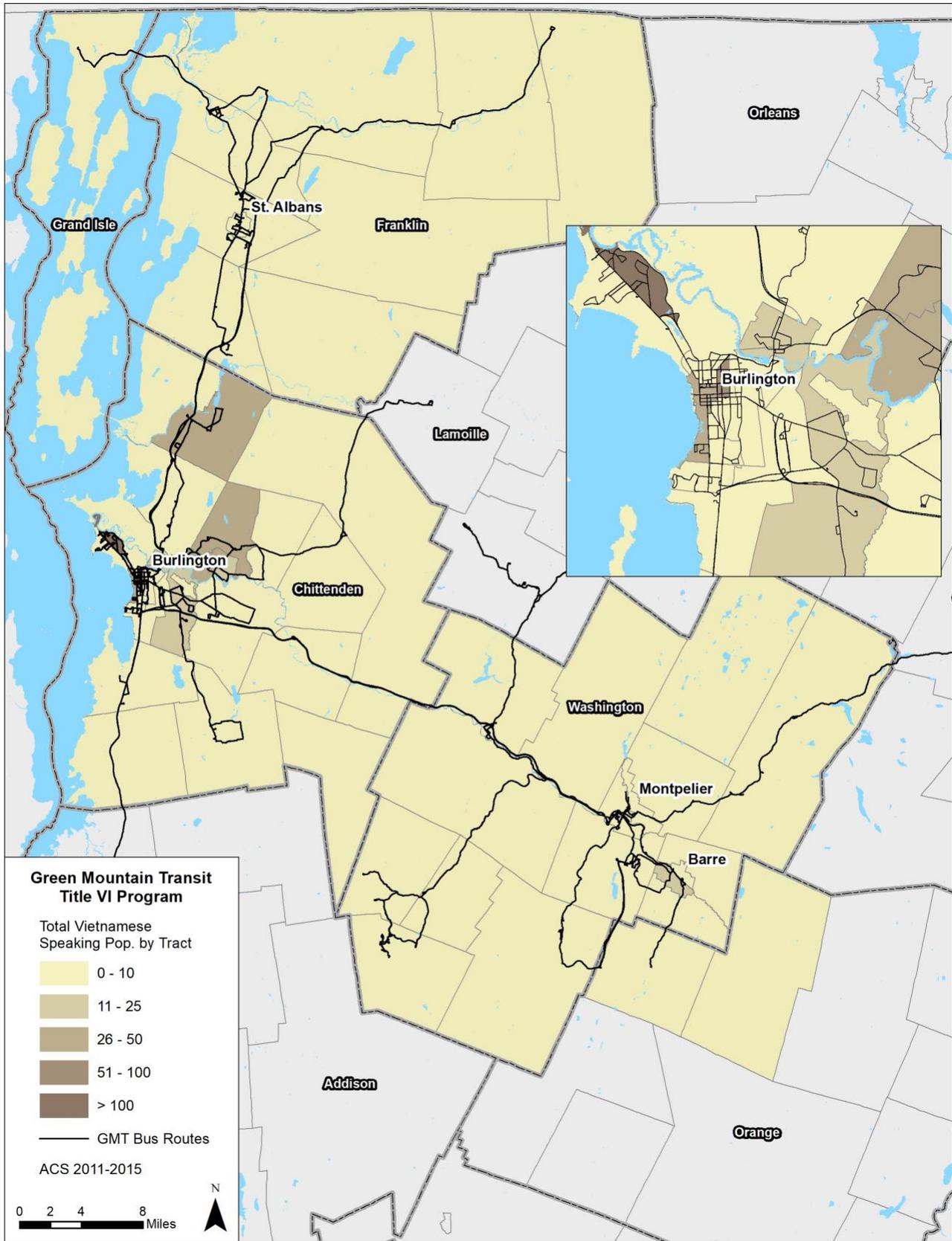
Refugees Resettled by US Committee for Refugees and Immigrants – Vermont (formerly Vermont Refugee Resettlement Program)

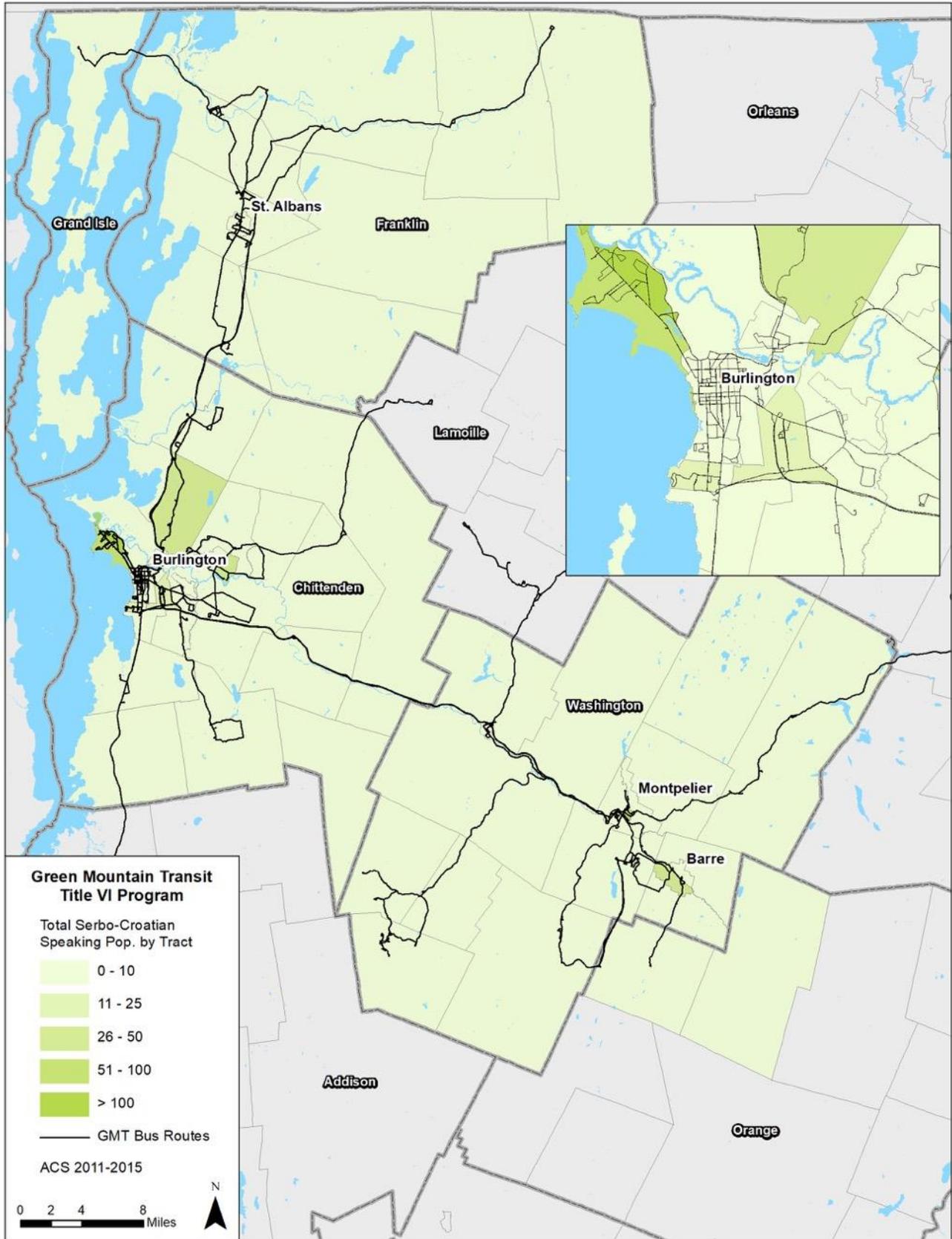
Nationality	FY-95	FY-96	FY-97	FY-98	FY-99	FY-00	FY-01	FY-02	FY-03	FY-04	FY-05	FY-06	FY-07	FY-08	FY-09	FY-10	FY-11	FY-12	FY-13	FY-14	FY-15	FY-16	FY-17	FY-18	FY-19	TOTAL	
Burundi			1							12	11		43	29	9						6	6			8	125	
Cameroon										1																1	
Central African Rep.										6	1															7	
Congo - Brazzaville						35	3	17	13	45	16	5	10													144	
Dem. Rep. of Congo													9	3	2	16	11			1	15	32	73	48	75	89	374
Eritrea																			1	1						2	
Ethiopia													3										2			5	
Kenya								6																		6	
Liberia												5	1													6	
Nigeria					2			1	1																	4	
Rwanda											8	1							1			1				11	
Somalia									19	143	129	95	58	16	86	27			25	47	55	80	59		1	840	
Sudan				5			39	1	8	26	18	24	6	10	2		1		3	10			1			154	
Togo							9		2	1	13				1											26	
Uganda												4														4	
AF Total	0	0	1	5	2	35	51	25	43	235	196	136	130	58	100	43	12	0	31	73	93	160	110	75	98	1,712	
China								1	1		4															6	
AS Total	0	1	1	0	4	0	6																				
Bosnia	124	161	238	318	272	198	162	83	26	9	4															1,595	
Kosovo					58																						58
Moldova								1	2	1			1													5	
EE Total	124	161	238	318	330	198	162	84	28	10	4	0	1	0	1,658												
Azerbaijan									18	15		1														34	
FSU	5	12	8																							25	
Georgia												6														6	
Kazakhstan												1														1	
Russia											26	42	26	5												99	
Uzbekistan											2	53														55	
FSU Total	5	12	8	0	0	0	0	0	18	15	28	103	26	5	0	220											
Afghanistan				8			11	10							1						1				1	32	
Iran				8																			3			11	
Iraq	28													60	28	17	4	10	19	56	20	1	19			262	
Syria																								14		14	
Turkey														6												6	
NE/SA Total	28	0	0	16	0	0	11	10	0	0	0	0	0	66	29	17	4	10	19	57	20	4	33	0	1	325	
Bhutan														129	158	189	311	298	256	173	192	218	88	54	1	2,067	
Sri Lanka												1			7											8	
Burma														71	40	55	34	42	17	24	7	4	5	3	15	317	
Vietnam	79	80	32	39	55	42	17	5			5															354	
SEA Total	79	80	32	39	55	42	17	5	0	0	5	1	0	200	205	244	345	340	273	197	199	222	93	57	16	2,746	
Grand Total	236	253	279	378	387	275	241	125	90	260	238	240	157	329	334	304	361	350	323	327	312	386	236	132	115	6,668	

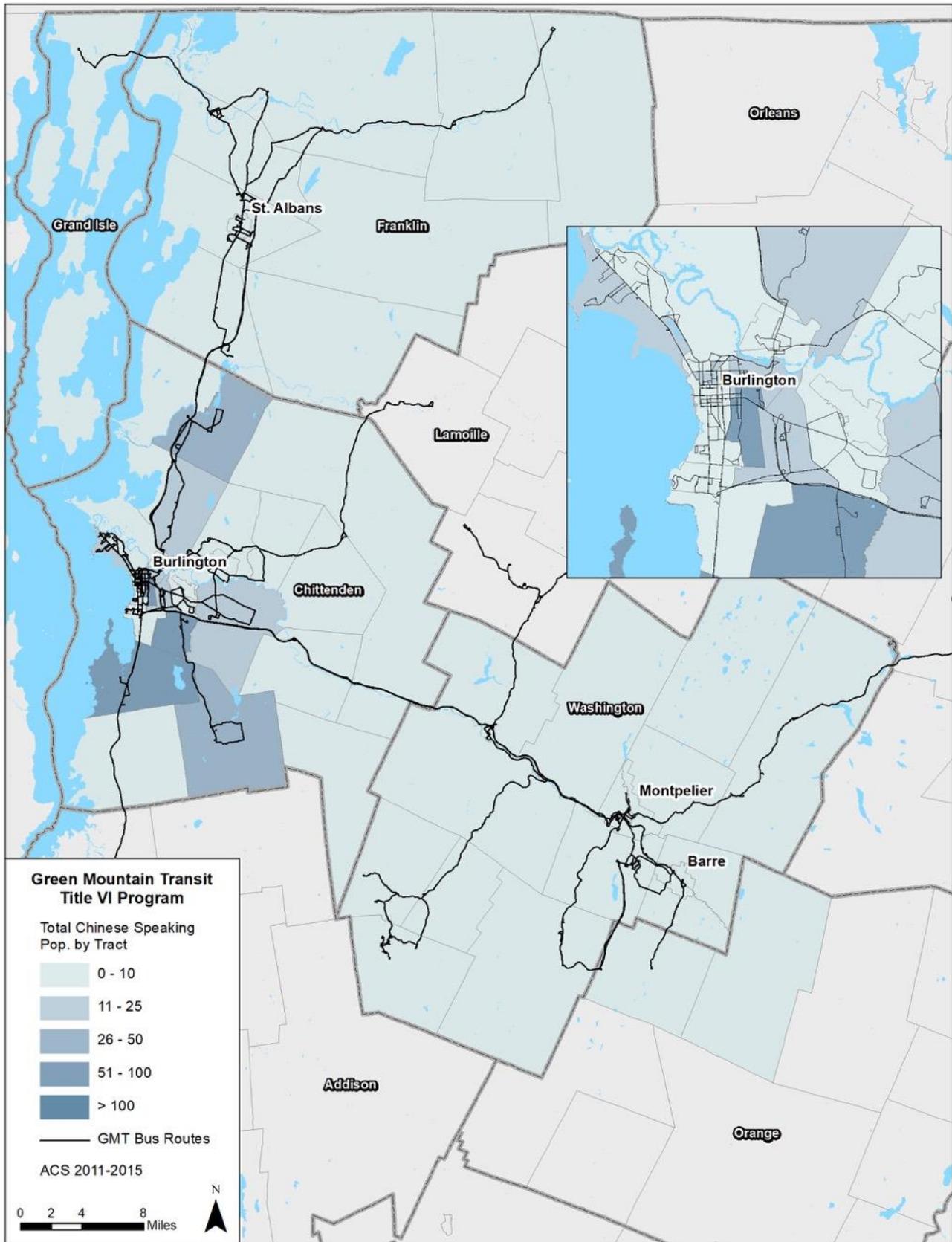


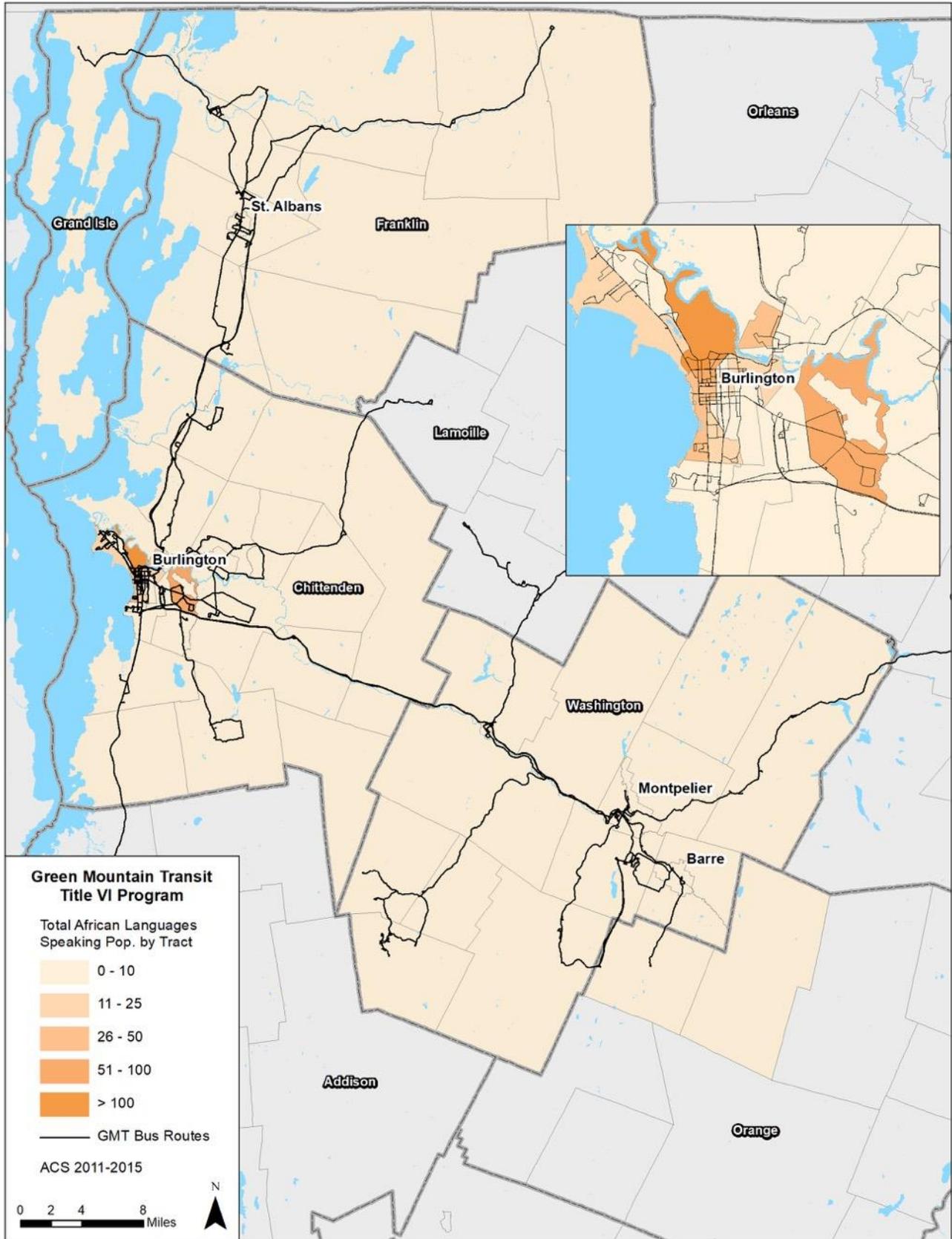


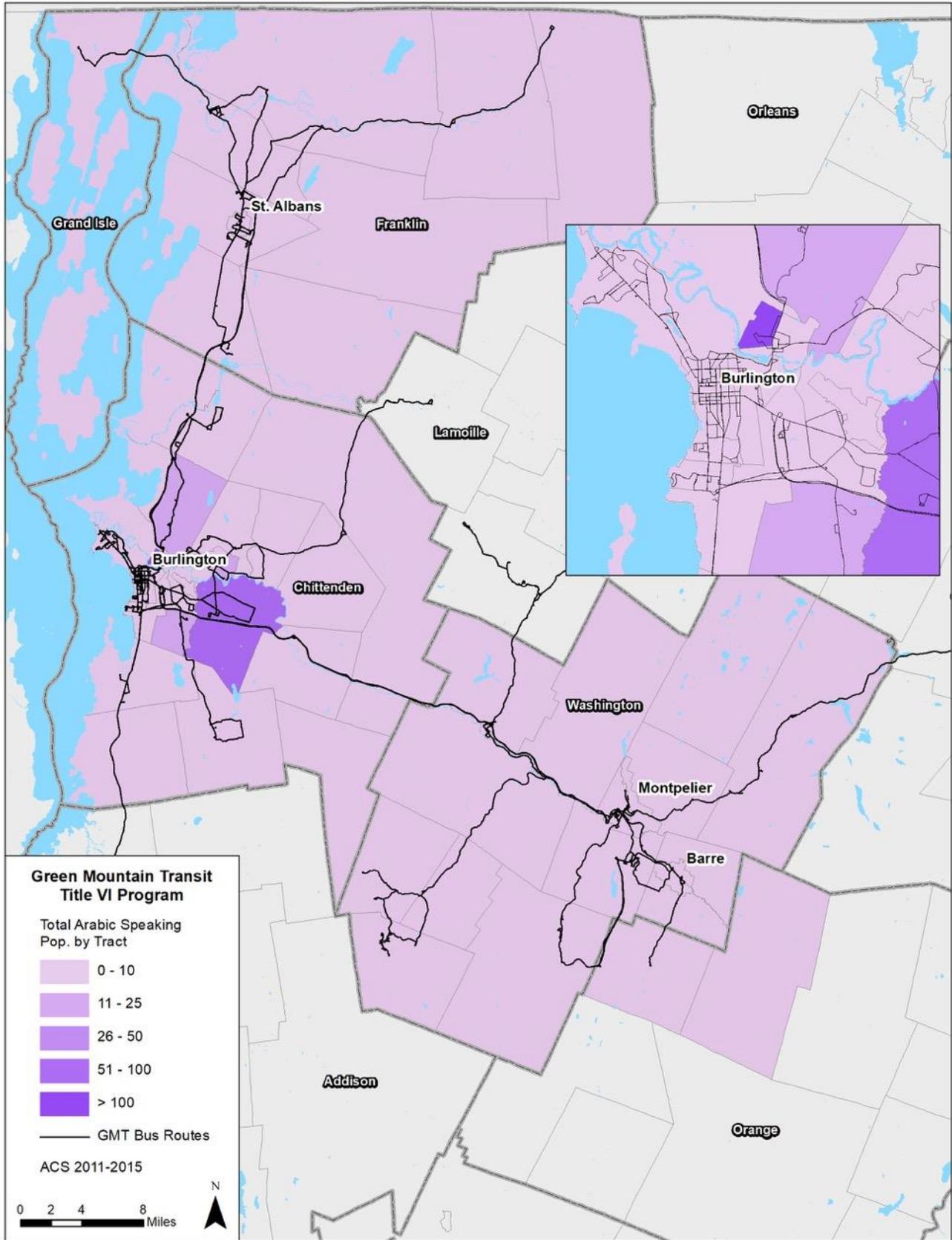


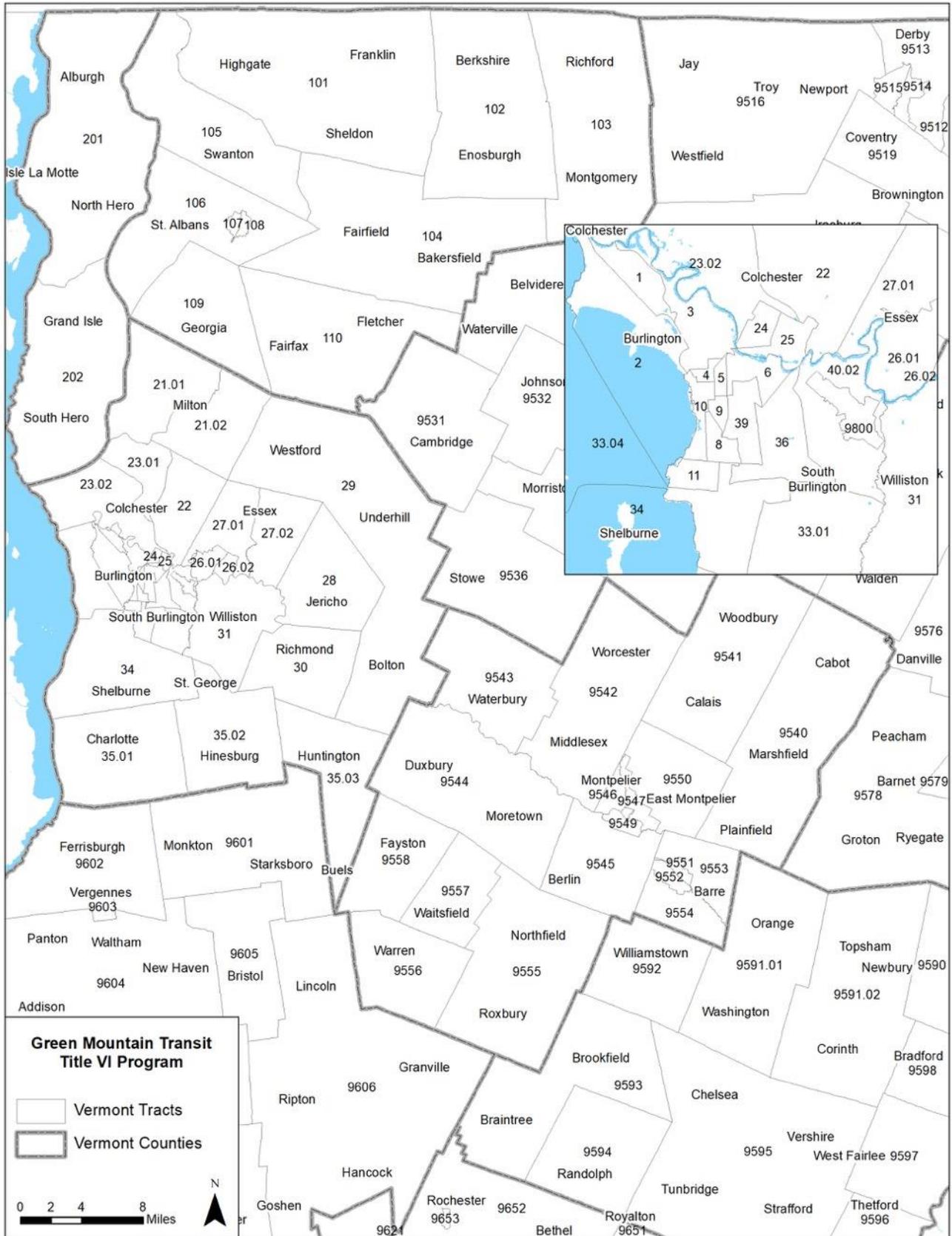












Number of Individuals Who Speak English Less than Very Well by Language and Tract

County	Tract	Total Population	Spanish	French	Italian	Portu- guese	German	Greek	Russian	Polish	Serbo- Croatian	Other Slavic languages	Persian	Hindi	Other Indic languages	Other Indo- European languages	Chinese	Japanese	Korean	Thai	Laotian	Vietnam- ese	Other Asian languages	Tagalog	Arabic	African languages	Total
Chittenden	1	4,032	33	0	0	0	0	0	0	0	160	0	0	0	0	0	0	0	0	0	0	166	0	0	0	0	359
Chittenden	2	5,360	14	38	0	14	0	0	17	0	69	0	0	0	0	38	11	0	0	0	0	0	15	0	0	21	237
Chittenden	3	3,429	0	0	0	0	0	0	0	0	0	0	0	0	372	0	0	0	0	0	0	0	175	0	0	101	648
Chittenden	4	3,264	24	4	0	0	0	24	0	0	0	0	0	0	217	0	16	0	0	0	22	8	21	0	6	60	402
Chittenden	5	4,437	25	5	0	0	0	0	0	0	0	0	0	0	0	0	9	0	0	0	0	63	0	0	0	0	102
Chittenden	6	4,947	31	15	18	0	0	0	0	7	0	0	0	0	56	0	20	0	17	29	0	0	0	0	0	24	217
Chittenden	8	2,582	0	0	0	0	0	0	0	0	0	0	0	0	13	0	0	0	0	0	0	0	0	0	0	14	27
Chittenden	9	2,569	2	8	0	0	0	0	16	0	0	0	0	0	0	0	0	0	3	0	0	0	0	0	0	0	29
Chittenden	10	2,280	0	14	12	0	0	0	30	0	0	0	0	0	0	0	4	0	0	0	0	33	0	0	0	28	121
Chittenden	11	2,049	1	0	0	0	0	0	0	0	13	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	14
Chittenden	21.01	2,570	7	8	0	0	8	0	0	18	0	0	0	0	0	0	0	0	8	0	0	0	0	0	0	0	49
Chittenden	21.02	7,309	0	16	0	0	0	0	0	0	0	0	0	0	0	0	30	0	0	0	0	27	0	0	0	0	73
Chittenden	22	7,949	27	13	0	0	0	0	0	0	49	0	0	0	0	1	24	0	0	1	0	0	0	0	14	0	129
Chittenden	23.01	2,186	0	0	0	0	0	0	1	0	0	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	10
Chittenden	23.02	6,324	0	0	0	0	0	0	33	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	33
Chittenden	24	2,829	0	19	0	0	0	0	0	0	9	0	0	0	74	0	0	0	0	0	0	22	0	0	164	43	331
Chittenden	25	3,835	16	21	0	0	0	0	0	0	0	0	0	0	183	0	0	0	0	0	11	20	0	0	4	0	255
Chittenden	26.01	5,066	0	30	0	0	0	0	0	0	0	0	0	27	0	0	0	0	0	0	0	48	0	0	6	0	111
Chittenden	26.02	4,089	0	0	0	0	0	0	0	0	28	0	0	0	0	0	0	0	0	0	0	22	0	0	11	8	69
Chittenden	27.01	5,439	11	13	0	0	0	0	0	0	10	0	0	0	0	0	0	0	0	0	0	47	0	0	0	0	81
Chittenden	27.02	4,753	17	0	0	0	0	0	11	0	0	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	39
Chittenden	28	4,742	5	8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	13
Chittenden	29	6,048	9	16	0	0	0	0	0	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	41
Chittenden	30	3,939	7	12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	19
Chittenden	31	8,493	4	43	0	0	20	0	18	0	0	0	0	0	0	0	18	0	0	35	0	0	0	27	66	0	231
Chittenden	33.01	3,584	0	33	0	0	0	0	21	0	0	0	21	0	0	0	78	0	0	0	0	18	0	0	11	0	182
Chittenden	33.04	5,759	55	70	0	0	0	0	16	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	141
Chittenden	34	7,241	0	4	17	42	0	0	0	0	0	0	15	0	0	0	86	0	0	0	0	0	0	0	0	0	164
Chittenden	35.01	3,646	0	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	10
Chittenden	35.02	4,874	4	17	0	0	0	0	0	0	0	0	0	0	0	0	26	0	0	0	0	0	46	0	0	0	93
Chittenden	35.03	1,810	45	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	48
Chittenden	36	3,970	13	12	0	0	0	0	0	0	11	0	0	0	0	50	20	0	0	0	0	0	0	0	0	0	106
Chittenden	39	6,242	11	0	0	0	4	0	3	0	0	0	0	0	0	0	65	0	0	0	0	4	0	0	0	0	87
Chittenden	40.02	4,251	0	0	0	0	13	0	0	12	0	0	0	0	21	0	0	0	0	19	0	20	0	0	0	52	137
Chittenden	9800	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

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Number of Individuals Who Speak English Less than Very Well by Language and Tract Continued

County	Tract	Total Population	Spanish	French	Italian	Portu- guese	German	Greek	Russian	Polish	Serbo- Croatian	Other Slavic languages	Persian	Hindi	Other Indic languages	Other Indo- European languages	Chinese	Japanese	Korean	Thai	Laotian	Vietnam- ese	Other Asian languages	Tagalog	Arabic	African languages	Total
Franklin	101	7,071	73	86	0	0	3	0	0	0	0	0	0	0	0	0	0	0	0	7	0	0	0	0	0	0	169
Franklin	102	4,233	19	19	0	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	41
Franklin	103	3,258	8	24	0	0	2	0	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	37
Franklin	104	2,934	8	8	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	19
Franklin	105	6,002	22	16	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	38
Franklin	106	5,886	34	26	0	0	0	0	0	0	0	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	63
Franklin	107	3,176	0	17	0	0	0	0	0	16	0	0	0	0	0	0	0	0	0	0	0	0	0	8	0	0	41
Franklin	108	3,187	0	7	0	0	0	0	0	0	0	0	0	0	0	0	6	0	0	0	0	0	0	0	0	0	13
Franklin	109	4,369	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Franklin	110	5,446	15	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	0	0	0	0	0	17
Grand Isle	201	3,070	0	19	0	0	5	0	1	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	27
Grand Isle	202	3,588	2	0	0	4	0	0	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	15
Washington	9540	4,149	0	0	0	0	3	0	0	0	0	0	0	0	0	0	7	0	0	0	0	0	0	3	0	0	13
Washington	9541	2,278	0	3	0	0	3	0	0	0	0	0	0	0	0	0	0	0	3	0	0	0	0	0	0	0	9
Washington	9542	2,625	0	0	0	0	4	0	0	3	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	10
Washington	9543	4,841	0	18	0	0	0	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	20
Washington	9544	2,974	0	0	0	0	0	0	0	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
Washington	9545	2,760	7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	7
Washington	9546	2,118	0	10	0	0	0	0	0	0	9	0	0	0	0	0	0	0	0	0	0	3	0	0	0	5	27
Washington	9547	1,371	6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3	0	0	0	0	15
Washington	9548	2,212	0	9	0	0	0	0	0	0	59	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	68
Washington	9549	1,565	0	4	0	0	4	0	0	0	0	0	9	0	0	0	0	0	0	0	0	0	0	0	0	0	17
Washington	9550	2,498	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4	0	0	0	0	0	0	0	0	0	4
Washington	9551	3,978	0	15	0	0	28	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	43
Washington	9552	4,414	0	18	0	0	0	0	0	0	43	0	0	0	0	0	0	0	0	0	0	12	0	0	0	0	73
Washington	9553	3,668	0	29	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	29
Washington	9554	3,785	0	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	25
Washington	9555	6,578	0	10	0	0	0	0	0	0	7	0	0	0	0	0	0	5	0	0	0	0	0	0	0	0	22
Washington	9556	1,511	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5
Washington	9557	1,666	0	3	0	0	0	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	6
Washington	9558	1,190	0	0	0	0	0	0	0	0	0	0	0	0	0	3	0	0	0	0	0	0	0	0	0	0	3
TOTAL		260,298	560	795	53	60	100	24	174	59	477	18	48	27	936	89	416	13	33	94	33	516	242	53	282	356	5487

Note: Languages with fewer than 10 individuals with LEP not shown

Source: 2011-2015 American Community Survey

Percentage of Population that Speaks English Less than Very Well by Language and Tract

County	Tract	Spanish	French	Italian	Portu- guese	German	Greek	Russian	Polish	Serbo- Croatian	Other Slavic languages	Persian	Hindi	Other Indic languages	Other Indo- European languages	Chinese	Japanese	Korean	Thai	Laotian	Vietnam- ese	Other Asian languages	Tagalog	Arabic	African languages
Chittenden	1	0.8%								4.0%											4.1%				
Chittenden	2	0.3%	0.7%		0.3%			0.3%		1.3%					0.7%	0.2%						0.3%			0.4%
Chittenden	3													10.8%								5.1%			2.9%
Chittenden	4	0.7%	0.1%				0.7%							6.6%		0.5%				0.7%	0.2%	0.6%		0.2%	1.8%
Chittenden	5	0.6%	0.1%													0.2%					1.4%				
Chittenden	6	0.6%	0.3%	0.4%					0.1%					1.1%		0.4%		0.3%	0.6%						0.5%
Chittenden	8													0.5%											0.5%
Chittenden	9	0.1%	0.3%					0.6%										0.1%							
Chittenden	10		0.6%	0.5%				1.3%								0.2%					1.4%				1.2%
Chittenden	11	0.0%								0.6%															
Chittenden	21.01	0.3%	0.3%			0.3%			0.7%									0.3%							
Chittenden	21.02		0.2%													0.4%					0.4%				
Chittenden	22	0.3%	0.2%							0.6%					0.0%	0.3%			0.0%					0.2%	
Chittenden	23.01							0.0%			0.2%														
Chittenden	23.02							0.5%																	
Chittenden	24		0.7%							0.3%				2.6%							0.8%			5.8%	1.5%
Chittenden	25	0.4%	0.5%											4.8%					0.3%		0.5%			0.1%	
Chittenden	26.01		0.6%										0.5%								0.9%			0.1%	
Chittenden	26.02									0.7%											0.5%			0.3%	0.2%
Chittenden	27.01	0.2%	0.2%							0.2%											0.9%				
Chittenden	27.02	0.4%					0.2%				0.2%														
Chittenden	28	0.1%	0.2%																						
Chittenden	29	0.1%	0.3%							0.0%															
Chittenden	30	0.2%	0.3%																						
Chittenden	31	0.0%	0.5%			0.2%		0.2%								0.2%			0.4%			0.3%	0.8%		
Chittenden	33.01		0.9%					0.6%				0.6%				2.2%					0.5%			0.3%	
Chittenden	33.04	1.0%	1.2%					0.3%																	
Chittenden	34		0.1%	0.2%	0.6%							0.2%				1.2%									
Chittenden	35.01		0.3%																						
Chittenden	35.02	0.1%	0.3%													0.5%						0.9%			
Chittenden	35.03	2.5%		0.2%																					
Chittenden	36	0.3%	0.3%							0.3%					1.3%	0.5%									
Chittenden	39	0.2%				0.1%		0.0%								1.0%					0.1%				
Chittenden	40.02					0.3%			0.3%					0.5%					0.4%		0.5%				1.2%

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Percentage of Population that Speaks English Less than Very Well by Language and Tract Continued

County	Tract	Spanish	French	Italian	Portu- guese	German	Greek	Russian	Polish	Serbo- Croatian	Other Slavic languages	Persian	Hindi	Other Indic languages	Other Indo- European languages	Chinese	Japanese	Korean	Thai	Laotian	Vietnam- ese	Other Asian languages	Tagalog	Arabic	African languages
Franklin	101	1.0%	1.2%			0.0%													0.1%						
Franklin	102	0.4%	0.4%			0.1%																			
Franklin	103	0.2%	0.7%			0.1%			0.1%																
Franklin	104	0.3%	0.3%	0.1%																					
Franklin	105	0.4%	0.3%																						
Franklin	106	0.6%	0.4%									0.1%													
Franklin	107		0.5%						0.5%														0.3%		
Franklin	108		0.2%													0.2%									
Franklin	109																								
Franklin	110	0.3%															0.0%								
Grand Isle	201		0.6%			0.2%		0.0%		0.1%															
Grand Isle	202	0.1%			0.1%			0.1%																	
Washington	9540					0.1%											0.2%						0.1%		
Washington	9541		0.1%			0.1%													0.1%						
Washington	9542					0.2%			0.1%		0.1%														
Washington	9543		0.4%																						
Washington	9544										0.1%														
Washington	9545	0.3%																							
Washington	9546		0.5%								0.4%										0.1%				0.2%
Washington	9547	0.4%																			0.2%				
Washington	9548		0.4%								2.7%														
Washington	9549		0.3%			0.3%						0.6%													
Washington	9550																0.2%								
Washington	9551		0.4%			0.7%																			
Washington	9552		0.4%								1.0%										0.3%				
Washington	9553		0.8%																						
Washington	9554		0.7%																						
Washington	9555		0.2%							0.1%								0.1%							
Washington	9556	0.3%																							
Washington	9557		0.2%					0.2%																	
Washington	9558															0.3%									

Note: Languages with fewer than 10 individuals with LEP not shown
 Source: 2011-2015 American Community Survey

Factor 2 – Frequency of Contact with LEP Persons

LEP individuals, in general, depend much more on public transportation than those who are English proficient, thus the need for LEP individuals to use GMT services on a daily basis is frequent. Many of the social service agencies that serve immigrants and refugees—who are most likely to be LEP—help LEP individuals and refugees in their navigation of GMT’s bus system.

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

- Providing basic information on how to use public transit services in the area
- Purchasing fare media
- Handling passenger complaints
- Gathering data such as on-board customer surveys.

GMT gauges the frequency of contact with LEP persons by periodically surveying its employees, including drivers, dispatchers, kiosk staff at the downtown transit station, and front desk and receptionist personnel at GMT offices. A survey taken in May 2020 included all of GMT’s front-line staff who interact with passengers most frequently (GMT front desk, customer service representative at the kiosk at the Downtown Transit Center, supervisors and trip planners) and operators from each of GMT’s divisions. There were a total of 25 responses. The survey found the following results:

- Only 16% of respondents said they rarely or never had interactions with LEP individuals while 44% had interactions at least once per day.
- Nearly every interaction involved questions about how to use the bus system and another 17% were questions regarding fares. About 20% were questions not related to the bus system.
- Almost half of respondents felt that they were able to convey the desired information very well or pretty well, while 20% felt they were unable to convey the information. The other respondents said that it varied, depending on the customer.
- Only 20% of respondents were aware of the availability of real-time translation services by telephone, but most of these said that using a telephone translation service would take too long.
- With regard to the trend in interactions with LEP individuals, 60% of respondents said that it seems like there are more people who don’t speak English well compared to a few years ago. Only 12% said it seemed like there were fewer interactions with LEP individuals, and 28% said it seemed about the same.

Given the indication that there are a substantial number of interactions with LEP individuals, and that these interactions seem to be stable or increasing, GMT will monitor these interactions and determine if further action is necessary. Next steps could include additional training for GMT staff, making sure that all staff is aware of real-time translations services, stocking the Downtown Transit Center kiosk and buses with cards that provide information, asking staff who interact with LEP persons to gather information about what languages those persons speak, and then providing translations of key information in the languages most frequently encountered. The kiosk already has an I Speak card with over 20 languages listed so that the customer service representative there can make use of telephone translation services effectively.

Factor 3 – Importance of GMT Activities and Services to LEP Persons

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

When refugees are resettled in Burlington through USCRI Vermont, for example, GMT works with the agency to assist the LEP individuals to learn the GMT bus system. Experience has shown that after just one or two rides, these individuals appear to have no further problems in getting to any desired location in the core of Chittenden County.

Denial or delay of access to GMT services to LEP individuals has never been a problem in its service area. GMT's urban system is designed with the Downtown Transit Center serving as the main hub. Almost all of GMT's fixed routes originate there. As mentioned above, GMT will consider providing training to staff at the kiosk at the DTC and materials in selected languages to provide important information about how to use the GMT system. GMT's rural services in Washington County are served by a new hub in downtown Montpelier; similar measures will be taken there as appropriate.

Factor 4 – Resources Available and Cost

Because of the very low incidence of LEP persons in Vermont overall, the cost to accommodate them has not been burdensome. VTrans provides in-person and telephone translation services to VTrans subrecipients as listed below. GMT has explicit access to the Telelanguage contract. It is not foreseen that the resources available or the cost of translation services will hinder the accommodation of the needs of GMT's LEP population.

Telelanguage

514 SW 6th Ave
Portland, OR 97204
Phone: 1-888-983-5352

Email: info@telelanguage.com

Web: telelanguage.com

Translation of all of GMT's written materials and/or signs into a variety of languages cannot be justified at this time, as not only are the numbers of the potential benefactors small, but the languages which would require translating into are often changing along with the origin of the refugees settling in its service area. Nonetheless, GMT has translated "How to Ride" guide for LEP populations participating in GMT's nascent travel training program and will continue to implement this upon request.

Fortunately, the services offered by many community-based organizations in the GMT service area have proved more than adequate in providing meaningful access to LEP persons utilizing GMT services. Where oral translation has been needed by various refugee populations, this has been provided by USCRI Vermont.

D. Monitoring

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

DOT acknowledges that the implementation of a comprehensive system to serve LEP individuals is a process, and that a system will evolve over time as it is implemented and periodically reevaluated. Recipients are encouraged to document their efforts to provide LEP persons with meaningful access to federally assisted programs and activities.²

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

- Monitor current LEP populations in its service area using Census data and outreach to USCRI Vermont,
- Survey its employees to determine the degree of interaction with LEP persons and whether this is increasing,
- Ascertain whether existing procedures are meeting the needs of LEP persons,
- Continue to maintain awareness among management and staff of the regulations implementing Title VI of the Civil Rights Act of 1964, and
- Update the LEP assessment as necessary.

² DOT Docket OST-2001-8696: Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons (Federal Register: December 14, 2005 – Volume 670, Number 239), § VIII.

Inclusive Public Participation Plan

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

Demographic Profile

Using the most recent available data from the American Community Survey (2013-2017), GMT produced the summary table below. For each municipality in the four-county region, the table shows the total population, the non-white/non-Hispanic population, the foreign-born population and the population with incomes below the poverty line.

Minorities

Burlington has, by far, the greatest number of minority individuals, at 7,341. It also has, by far, the highest level of bus service in Vermont. All other municipalities with at least 500 non-white persons are also served by GMT local bus routes, and all those with at least 250 minority individuals have at least some commuter bus service.

The concentrations of minority persons, towns with percentages higher than the regional average of 8.7%, can be found in the four communities with the highest level of bus service: Burlington, South Burlington, Winooski and Essex. St. Albans City, Highgate, Grand Isle and Plainfield also have concentrations of minority individuals, though the three latter towns have relatively small populations.

Non-American National Origin

The incidence of foreign-born individuals is similar to that seen among minorities. Again, Burlington has the most individuals in this class—at 5,459—though the gap to the next largest number is not as wide. Essex and South Burlington have roughly 1,900 non-native residents each, with the figures dropping to about 1,300 for Winooski and 1,000 for Colchester. Williston has 704 non-native residents.

Concentrations of non-American born residents are in the municipalities just listed, with the exception of Colchester, which is below the regional average of 6.4%. The more rural parts of the GMT service area have much lower percentages of foreign-born individuals, and the highest figure outside of Chittenden County is 324, in Barre City.

Low Income

As the only urban area in Vermont, even with the large amount of economic activity, there are significant numbers of low income individuals in Chittenden County. In the 2013-2017 American Community Survey data, five Chittenden County communities have more than 1,000 residents living in poverty. However, poverty is much more widespread throughout the GMT service area than minority status or being foreign born.

The highest number of low-income residents—again, by a large margin—live in Burlington (8,736). The next highest number is in Barre City at 2,357, followed by the other four most urbanized municipalities in Chittenden County. Several towns in Washington and Franklin County have more than 500 individuals living below the poverty line. All of the towns with more than 500 low-income people are served by the GMT bus system, though a few of them, such as Waterbury and Hinesburg, have only commuter bus service.

The percentage of low-income residents highlights the focus on Barre, Burlington and Winooski, where over 20% of residents live below the poverty line. A total of 14 communities have concentrations of low-income residents, with percentages higher than the 10.2% regional average.

Communities with a concentration of minorities, foreign-born, or low income residents are highlighted with red ink and shading.

Minority, Non-Native and Low Income Population by Municipality

County	Town	Total Population	Non-White or Hispanic Population	Percent	Foreign Born	Percent	Below Poverty Line	Percent
Chittenden	Bolton	1,353	35	2.6%	47	3.5%	33	2.4%
Chittenden	Buels Gore	37	6	16.2%	-	0.0%	-	0.0%
Chittenden	Burlington	42,453	7,341	17.3%	5,459	12.9%	8,736	20.6%
Chittenden	Charlotte	3,818	78	2.0%	197	5.2%	26	0.7%
Chittenden	Colchester	17,309	1,160	6.7%	998	5.8%	1,744	10.1%
Chittenden	Essex	20,901	2,279	10.9%	1,864	8.9%	1,127	5.4%
Chittenden	Hinesburg	4,509	181	4.0%	213	4.7%	677	15.0%
Chittenden	Huntington	1,914	30	1.6%	47	2.5%	93	4.9%
Chittenden	Jericho	5,055	155	3.1%	96	1.9%	225	4.5%
Chittenden	Milton	10,761	400	3.7%	442	4.1%	302	2.8%
Chittenden	Richmond	4,128	192	4.7%	122	3.0%	99	2.4%
Chittenden	St. George	681	36	5.3%	21	3.1%	120	17.6%
Chittenden	Shelburne	7,677	476	6.2%	429	5.6%	314	4.1%
Chittenden	South Burlington	18,773	2,482	13.2%	2,043	10.9%	1,054	5.6%
Chittenden	Underhill	3,053	119	3.9%	114	3.7%	26	0.9%
Chittenden	Westford	2,019	98	4.9%	67	3.3%	44	2.2%
Chittenden	Williston	9,341	732	7.8%	704	7.5%	625	6.7%
Chittenden	Winooski	7,203	1,528	21.2%	1,307	18.1%	1,812	25.2%
Franklin	Bakersfield	1,230	63	5.1%	60	4.9%	30	2.4%
Franklin	Berkshire	1,711	93	5.4%	91	5.3%	141	8.2%
Franklin	Enosburgh	2,758	186	6.7%	33	1.2%	351	12.7%
Franklin	Fairfax	4,574	106	2.3%	56	1.2%	100	2.2%
Franklin	Fairfield	1,899	50	2.6%	32	1.7%	57	3.0%
Franklin	Fletcher	1,424	20	1.4%	12	0.8%	87	6.1%

County	Town	Total Population	Non-White or Hispanic Population	Percent	Foreign Born	Percent	Below Poverty Line	Percent
Franklin	Franklin	1,414	47	3.3%	51	3.6%	67	4.7%
Franklin	Georgia	4,691	287	6.1%	59	1.3%	84	1.8%
Franklin	Highgate	3,627	410	11.3%	151	4.2%	263	7.3%
Franklin	Montgomery	998	57	5.7%	30	3.0%	79	7.9%
Franklin	Richford	2,458	114	4.6%	87	3.5%	400	16.3%
Franklin	St. Albans City	6,847	744	10.9%	316	4.6%	784	11.5%
Franklin	St. Albans Town	6,348	317	5.0%	162	2.6%	494	7.8%
Franklin	Sheldon	2,317	68	2.9%	106	4.6%	143	6.2%
Franklin	Swanton	6,520	268	4.1%	174	2.7%	799	12.3%
Grand Isle	Alburgh	1,648	58	3.5%	55	3.3%	132	8.0%
Grand Isle	Grand Isle	2,229	210	9.4%	84	3.8%	167	7.5%
Grand Isle	Isle La Motte	494	18	3.6%	15	3.0%	37	7.5%
Grand Isle	North Hero	968	77	8.0%	57	5.9%	70	7.2%
Grand Isle	South Hero	1,611	108	6.7%	51	3.2%	112	7.0%
Washington	Barre City	8,778	507	5.8%	324	3.7%	2,357	26.9%
Washington	Barre Town	7,787	365	4.7%	181	2.3%	684	8.8%
Washington	Berlin	2,832	121	4.3%	44	1.6%	243	8.6%
Washington	Cabot	1,322	101	7.6%	47	3.6%	239	18.1%
Washington	Calais	1,534	126	8.2%	69	4.5%	135	8.8%
Washington	Duxbury	1,260	32	2.5%	36	2.9%	75	6.0%
Washington	East Montpelier	2,596	161	6.2%	64	2.5%	143	5.5%
Washington	Fayston	1,298	51	3.9%	66	5.1%	81	6.2%
Washington	Marshfield	1,739	65	3.7%	31	1.8%	226	13.0%
Washington	Middlesex	1,672	77	4.6%	19	1.1%	119	7.1%
Washington	Montpelier	7,584	553	7.3%	290	3.8%	816	10.8%
Washington	Moretown	1,739	120	6.9%	26	1.5%	96	5.5%
Washington	Northfield	6,099	334	5.5%	194	3.2%	311	5.1%
Washington	Plainfield	1,392	124	8.9%	55	4.0%	138	9.9%
Washington	Roxbury	734	29	4.0%	26	3.5%	78	10.6%
Washington	Waitsfield	1,714	110	6.4%	72	4.2%	77	4.5%
Washington	Warren	1,716	38	2.2%	35	2.0%	123	7.2%
Washington	Waterbury	5,117	315	6.2%	229	4.5%	593	11.6%
Washington	Woodbury	878	45	5.1%	28	3.2%	49	5.6%
Washington	Worcester	900	30	3.3%	21	2.3%	75	8.3%
REGIONAL	TOTALS	275,442	23,933	8.7%	17,709	6.4%	28,112	10.2%

Source: American Community Survey 2013-2017 Reports B03002, B05002, and S1701

Measures to Ensure Minority, Low-Income and LEP Participation

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

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

GMT and the regional planning commissions in its service area maintain contact with organizations that represent the interests of low-income, immigrant, and minority groups and notify them of upcoming public outreach activities.

Meeting times and locations are designed to maximize accessibility for low-income and minority groups. A mix of daytime and early evening meetings are scheduled and transit access to the meeting is guaranteed, including an extension of service span, if necessary, to provide rides home at the end of the meeting. In terms of meeting locations, Burlington, as the focus of Title VI-protected groups, will always host one public meeting/hearing in a series, but GMT will make efforts to hold additional meetings in Winooski, St. Albans, Barre/Montpelier and other towns to make the meetings more accessible to low-income residents.

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

The following table lists all public meetings held since the last Title VI program was submitted.

Date	Purpose	Route(s) Affected	Location	Town	# of Attendees
9/5/17	Modifications to Seasonal Routes	Valley Floor and SnowCap Commuter	General Wait House	Waitsfield	3
9/7/17	Modifications to Seasonal Routes	Valley Floor and SnowCap Commuter	Montpelier City Hall	Montpelier	0
12/4/17	NextGen Service Plan	All Chittenden County Routes	Contois Auditorium	Burlington	13
12/11/17	NextGen Service Plan	Franklin County Routes	St. Albans City Hall	St. Albans	10
12/12/17	NextGen Service Plan	Franklin/Grand Isle Routes	North Hero Community Room	North Hero	4
12/13/17	NextGen Service Plan	Mad River Valley routes	Waitsfield Elementary School	Waitsfield	7
3/7/18	NextGen Service Plan	Capitol District Service Scenarios	Barre City Hall	Barre	7
9/12/18	Season Service Changes	All MRV Routes	General Wait House	Waitsfield	11

5/15/18	NextGen, Seasonal Service Chnages	Capitol District, Lamoile County, and Mad River Valley Routes	Waterbury Municipal Center	Waterbury	6
5/17/18	NextGen Service Plan	Franklin County Routes	Swanton Public Office	Swanton	2
5/23/18	NextGen Service Plan	Lamoille County Routes	LCPC	Morristown	4
6/4/18	NextGen Service Plan	All Chittenden County Routes	Department of Public Works	Burlington	7
6/5/18	NextGen Service Plan	All Chittenden County Routes	CCRPC	Winooski	14
2/5/19	US 2 Commuter and Barre LINK Express Changes	US 2 Commuter and Barre LINK Express	National Life	Montpelier	5
3/27/19	Urban NextGen Implementation	All Chittenden County routes	Shelburne Town Office	Shelburne	2
4/1/19	Urban NextGen Implementation	All Chittenden County routes	Williston Town Office	Williston	4
4/2/19	Urban NextGen Implementation	All Chittenden County routes	Winooski Town Hall	Winooski	4
4/4/19	Urban NextGen Implementation	All Chittenden County routes	South Burlintgon Police Department	South Burlington	10
4/8/19	Urban NextGen Implementation	All Chittenden County routes	Village of Essex Junction Municiple Offices	Essex Junction	32
4/9/19	Urban NextGen Implementation	All Chittenden County routes	Milton Public Library	Milton	2
4/10/19	Urban NextGen Implementation	All Chittenden County routes	Burlington City Hall	Burlington	20
7/2/19	Rural NextGen Service Changes & Complementary ADA	All Central VT Routes	CVMC	Berlin	10
7/3/19	Rural NextGen Service Changes & Complementary ADA	All Central VT Routes	Morristown Town Hall	Morristown	4
7/5/19	Rural NextGen Service Changes & Complementary ADA	All Central VT Routes	Stowe Town Hall	Stowe	6
7/9/19	Rural NextGen Service Changes & Complementary ADA	All Central VT Routes	Berlin Mall	Berlin	3
7/10/19	Rural NextGen Service Changes & Complementary ADA	All Central VT Routes	Hurger Mountain Coop	Montpelier	23
March 2020	Urban service changes	Red and Blue lines	Online videos posted for comment	n/a	n/a
March 2020	Rural service changes	US 2, all Lamoille routes, City Commuter, St. Albans Downtown Shuttle	Online videos posted for comment	n/a	n/a

Minority Representation on Planning and Advisory Bodies

GMT does not have any transit-related, non-elected planning boards, advisory councils or committees for which the membership is selected by GMT. Therefore, this Title VI reporting requirement is currently not applicable.

Assisting and Monitoring Subrecipient Compliance

GMT has one subrecipient: Champlain Islanders Developing Essential Resources, Inc., better known as CIDER. CIDER operates service for elderly and disabled (E&D) residents of Grand Isle County under contract to GMT using Section 5311 funds distributed by VTrans. The contract was not competitively procured, unlike the case with Special Services Transportation Agency, which operates ADA paratransit and E&D service within Chittenden County.

CIDER completed its first Title VI Program in March 2020 and submitted it to GMT to establish its compliance with Title VI requirements. VTrans provided technical assistance to CIDER to prepare the program through its retainer contract. GMT reviewed the program and checked to make sure that CIDER was fulfilling its commitments to the public in terms of notifications and procedures.

GMT will contact CIDER annually through this first round of Title VI compliance to ensure that all commitments are met. This includes monitoring the CIDER website to ensure that the Title VI notification and complaint procedures are easily accessible and spot-checking CIDER vehicles to ensure that the Title VI notification is posted properly. GMT will also request the Title VI complaint log on an annual basis.

Transit Facilities

In 2015, CCTA (the predecessor to GMT) purchased a building at 1 Industrial Parkway, which is immediately adjacent to its primary administrative/maintenance facility at 15 Industrial Parkway (now known as 101 Queen City Park Road). The building at 1 Industrial Parkway was originally the maintenance facility for CCTA over two decades ago, but it had been in private ownership since that time.

CCTA filed a Categorical Exclusion application to FTA in 2013 prior to the purchase of the building. In response to question L on the application form, CCTA documented that the tract containing 1 Industrial Parkway had a lower percentage of minorities and low-income residents than the City of Burlington as a whole.

The Categorical Exclusion was approved by FTA and thus no Title VI equity analysis was required.

Service Standards & Policies

GMT has set the following service standards and policies according to the service type.

GMT's service types are as follows:

Urban Trunk Routes – These are local routes that travel along major corridors and link several major trip generators to downtown locations. These routes include the Red Line (North Ave and Williston), Blue Line (Essex Junction and Shelburne Road), and Green Line (Pine Street and Riverside-Winooski).

Urban Local Community Routes – These are local routes that operate within a single community and primarily connect neighborhoods to activity centers. These routes include the Silver Loop (Essex Center), the Orange Line (Williston-Essex), Purple Line (College Street Shuttle), and Gold Loop (City Loop).

Rural Local Community Routes – These are local routes that operate in rural communities in Washington and Franklin counties. These include the City Commuter and Midday routes, the Hospital Hill services, St. Albans Downtown Shuttle and Shopper services in various communities.

Commuter Routes – These are longer distance routes that primarily operate during peak hours and connect Burlington, Waterbury and Montpelier to surrounding communities and counties. They have limited stops and in some cases, a higher fare is charged. These routes include the Jeffersonville Commuter, 116 Commuter, Milton Commuter, Waterbury Commuter, Northfield Commuter, Alburgh/Georgia Commuter, Richford/St. Albans Commuter, St. Albans LINK Express, Middlebury LINK Express, and Montpelier LINK Express.

Tourism Routes – These are routes operated in the Mad River Valley during ski season. These include the Valley Floor Shuttle, Access Road, Mt. Ellen, Mountain Condoes, and Valley Evening Service.

1) Vehicle Load

Service Type	Peak Hour Load Standard	Single Trip Max Load
Urban Trunk Routes	1.3	1.5
Urban Local Community Routes	1.0	1.5
Rural Local Community Routes	1.0	1.5
Commuter Routes	1.0	1.0
Tourism Routes	1.3	1.5

The local trunk route standard means that on a bus with 30 seats, an average of up to 39 passengers could be accommodated without a load violation during the peak hour and 45 passengers could be accommodated on single trips. For the local community and commuter routes, on a bus with 30 seats, an average of up to 30 passengers could be

accommodated without a load violation during the peak hour and 45 passengers could be accommodated on select trips.

2) Vehicle Headway

Headways in Minutes	Weekday		Weekend (when applicable)	
	Peak Period	Off-peak	Peak Period	Off-peak
Urban Trunk Routes	30	60	30	60
Urban Local Community Routes	30	60	60	60
Rural Local Community Routes	60	60	60	60
Commuter Routes	2 trips AM 2 trips PM	None	None	None
Tourism Routes	Demand based			

3) On-time Performance

For all service types, GMT’s goal is to operate 90% of trips within a window of no more than one minute early and no more than five minutes late at the route terminals. Commuter trips may arrive early at their destination as long as they depart no more than one minute early from the last stop in outlying areas. There will be no “missed trips” as defined by 15 or more minutes late, except when conditions make it impossible to maintain scheduled service.

4) Service Availability

To the extent funding is available, GMT will offer fixed-route bus service to at least 95% of areas within its four-county service areas that have more than 3 households per acre and are contiguous with other areas with equal or greater density. An area is considered served if it is within one half mile of the bus alignment.

5) Distribution of Transit Amenities

GMT will provide passenger amenities based on patronage levels at bus stops around the region. GMT will work with municipalities to provide passenger amenities wherever possible, and their placement will be guided by the goal to serve the greatest number of passengers and achieve geographic distribution of amenities.

6) Vehicle Assignment by Mode

GMT’s policy of assigning vehicles to routes is based on needed capacity and a goal of maximizing the longevity of the bus fleet. The largest vehicles are used for those runs that have the highest ridership. Maintenance staff works to equalize the mileage among buses in the fleet so that all of the vehicles can achieve their optimal life span.