

City of Fayetteville
Fayetteville Area System of Transit

Title VI Plan

Effective: August 1, 2021



TABLE OF CONTENTS

Table of Contents

BACKGROUND AND INTRODUCTION	4
BACKGROUND	4
ABOUT FAST	4
ORGANIZATIONAL STRUCTURE	4
INTRODUCTION	6
GENERAL REQUIREMENTS AND GUIDELINES	7
Annual Title VI Certification	6
Notification to Beneficiaries	6
City Council's Resolution Approving Updated Title VI Program	9
Provision of Additional Information to FTA	9
Discrimination Complaint Procedure	9
Recording, Investigations, Complaints & Lawsuits	12
PUBLIC PARTICIPATION	14
Opportunities for Public Participation	13
Transit Enhancements	14
Capital Planning	14
Public Outreach Efforts - Service & Fare Changes	14
Public Outreach - Community Engagement	15
Next Steps	15
LANGUAGE ASSISTANCE PLAN	17
Improving Access for People with Limited English Proficiency	17
FOUR FACTOR ANALYSIS	18
Overview of Service Area	18
Safe Harbor Provisions	20
Vital Documents	21
Employees as a Resource	22
Community Partners	23
OUTCOMES	27
Language Assistance Measures	27
Monitoring & Updating the LEP Plan & Public Participation Process	27

Proving Notice to LEP Persons.....28

Employee Training.....28

Decision Making Bodies29

SYSTEM-WIDE SERVICE STANDARDS AND POLICIES 32

PROGRAM SPECIFIC REQUIREMENTS.....36

ENVIRONMENTAL JUSTICE.....37

CONCLUSION.....38

CONTACT.....39

BOARD ADOPTION OF POLICY.....40

APPENDIX A - DEFINITIONS.....43

APPENDIX B - FAST's SERVICE AREA MAP.....46

BACKGROUND and INTRODUCTION

Background

About FAST

FAST was formed in 1976 as a department of the City of Fayetteville, North Carolina. FAST directly operates all transit service for the City of Fayetteville, with the City as the designated recipient. The City of Fayetteville has a population of 211,657, according to the U.S. Census Bureau (as of July 2019).

The FAST Transit Center opened in November 2017. FAST operates a network of 18 fixed routes. Service is provided seven days a week: Monday - Friday from 5:30 a.m. to 10:30 p.m.; Saturdays from 7:30 a.m. to 10:30 p.m.; and Sundays from 9:00 a.m. to 7:15 p.m. The grantee's complementary paratransit service, known as FAST *TRAC!* operates during the same days and hours of service as the fixed routes.

The basic adult fare for bus service is \$1.25. A reduced fare of \$0.50 is offered to persons age 65 and older, persons with a qualifying disability, persons with a Veteran Affairs (VA) Service Connect card, and persons with a Medicare Card during all service hours. The fare for ADA paratransit service is \$2.00. Free fares are provided to the following customer categories: a) Children, 42 inches tall and shorter when with a fare paying adult; b) Public safety employees, when in uniform; c) Active duty and reserve military, when in uniform; d) FAST employees with identification e) City of Fayetteville employees with identification. Free fares are also offered to personal care attendants (PCA) that are traveling with a FAST *TRAC!* client.

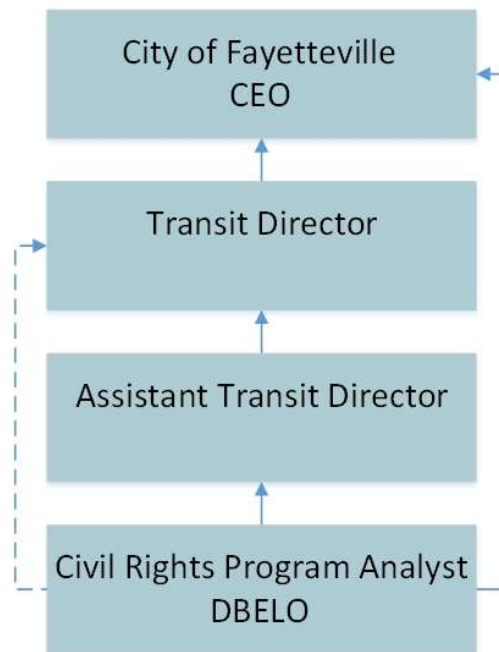
FAST operates a fleet of 30 buses for fixed-route service. Its bus fleet consists of standard 25-, 28-, 35-, and 40-foot transit coaches and light transit vehicles (LTVs). The current peak requirement is for 23 vehicles. FAST also has a fleet of 19 LTVs and three (3) minivans for its ADA complementary paratransit service.

Organizational Structure

FAST's Civil Rights Program Analyst/DBELO (Program Analyst) is responsible for the overall Title VI Program and its implementation. The Program Analyst is appointed by the Transit Director and reports to the Assistant Transit Director. Staff, in other City program areas, may assist the Program Analyst with program implementation and resolution of Title VI issues. The Program Analyst will also serve as the Limited English Proficiency (LEP) Coordinator for FAST.

The Program Analyst reports to the Assistant Transit Director; however, has direct and independent access to the City Manager on Title VI matters and policies. Below is an organizational chart of the reporting structure of the Civil Rights Program Analyst/DBELO.

Figure 1. Organizational Structure and Role of Civil Rights Program Analyst/DBELO



Introduction

Fayetteville Area System of Transit (FAST) has updated its Title VI Program as required by the Federal Transit Administration (FTA) which issued new guidance in the Title VI Circular 4702.1B, effective October 1, 2012, to help recipients of FTA grant funding better understand and comply with federal civil rights requirements.

The new guidance, in the form of a revised circular, helps funding recipients to comply with Title VI of the Civil Rights Act of 1964, which states:

“No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” (42 U.S.C. 2000d)

FAST's objectives, as a recipient of federal financial assistance, will ensure full compliance with Title VI of the Civil Rights Act of 1964, as amended and related statutes and regulations in all FAST programs and activities, without regard to race, color, or national origin to:

- 1) ensure FAST provides transit services and programs that are available and equitable
- 2) promote equal and quality transit services sufficient to allow equal access and accessibility for all persons; full and fair participation of all affected populations in transportation decision making
- 3) provide fair and equal decisions on the locations of transit services (to include transit amenities) and facilities
- 4) prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations
- 5) ensure meaningful access to programs and activities by persons with limited English proficiency

These objectives are the focal point for FAST's 2021 Title VI program. This program will outline the updates in conformance with FTA C 4702.1B (October 1, 2012). The guidance in this circular integrates the responsibilities to Limited English Proficient (LEP) Persons into the programs and activities developed under the Title VI regulations (49 CFR Part 21) to recipients of federal financial assistance.

FAST's 2021 Title VI Program contains all elements required of a transit provider operating in an urbanized area of 200,000 or more in population and operating less than fifty vehicles in peak service. This program supersedes FAST's Title VI Program of 2018, is effective as of August 1, 2021, and has been prepared using data from the U.S. Census 2015 American Community 5-Year survey estimates, report B16h001: "Language Spoken at Home by Ability to Speak English".

GENERAL REQUIREMENTS and GUIDELINES

Annual Title VI Certifications and Assurances

FAST submits its annual Certifications and Assurances to the FTA each year in accordance with the requirement to do so within 90 days from the date of the publication of the notice in the Federal Register or with the first grant application, whichever comes first. The new submission will be August 1, 2021. Updated Certifications and Assurances will be submitted each year.

Notification to Beneficiaries of Protection Under Title VI

In compliance with 49 CFR Section 21.9 (d), FAST has provided information to the public regarding its Title VI obligations and apprises the public of the protection against discrimination afforded to them by Title VI on an on-going basis.

This statement of nondiscrimination on the basis of race, color and national origin is made available on/at:

- 1) FAST's Transit Center and Administrative Office's main reception / lobby area (see Figure 2)
- 2) FAST's website, <https://www.RideFAST.net> (see Figure 3)
- 3) Notification Banners in all fixed route and paratransit fleet (see Figure 4)

The Title VI notice includes contact information for requesting details about FAST's Title VI obligations and complaint procedure. The dissemination of Title VI notifications, in both English and Spanish, began in 2010. Information regarding Title VI and bus information is primarily offered through the FAST website as well as printed brochures and materials.

Your Civil Rights

In accordance with Title VI of the Civil Rights Act of 1964, FAST operates its services without regard to race, color and national origin. Any person who believes he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with FAST.

For more information on FAST's obligations under Title VI or the procedures to file a complaint, visit FAST's website (www.RideFAST.net), stop by FAST's Transit Center located at 505 Franklin Street, Fayetteville, NC or contact the Civil Rights Program Analyst at (910) 433-1747.

Figure 2: FAST Transit Center & Administrative Office - Title VI posting at reception/lobby area



Figure 3: FAST's website screenshot of Title VI page - www. RideFAST.net

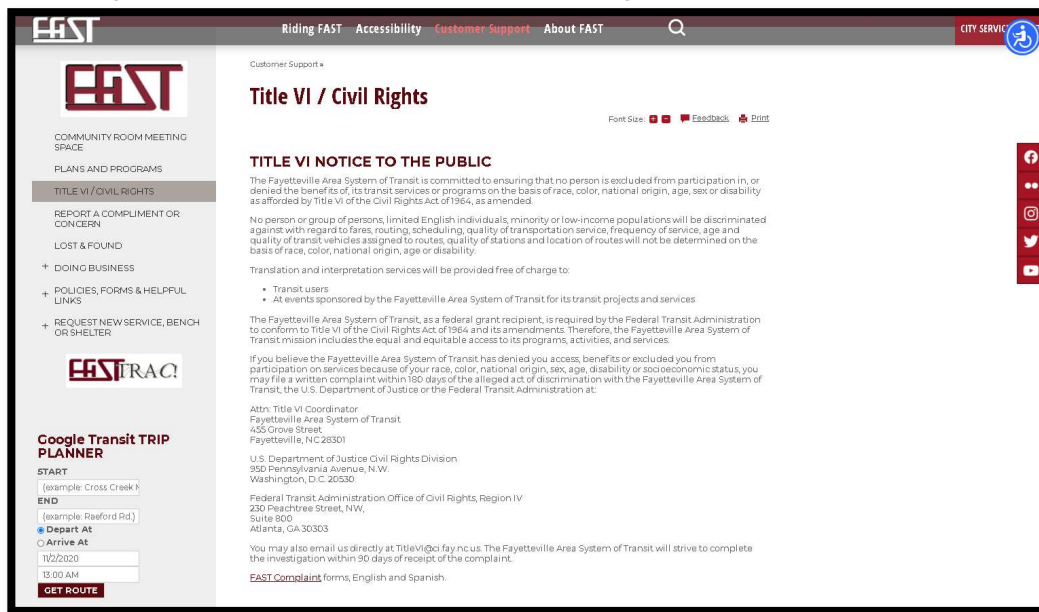


Figure 4: Notification Banners - located on all Fixed Route and Paratransit fleet



Figure 5: FAST's Bus Route Guide (English & Spanish)

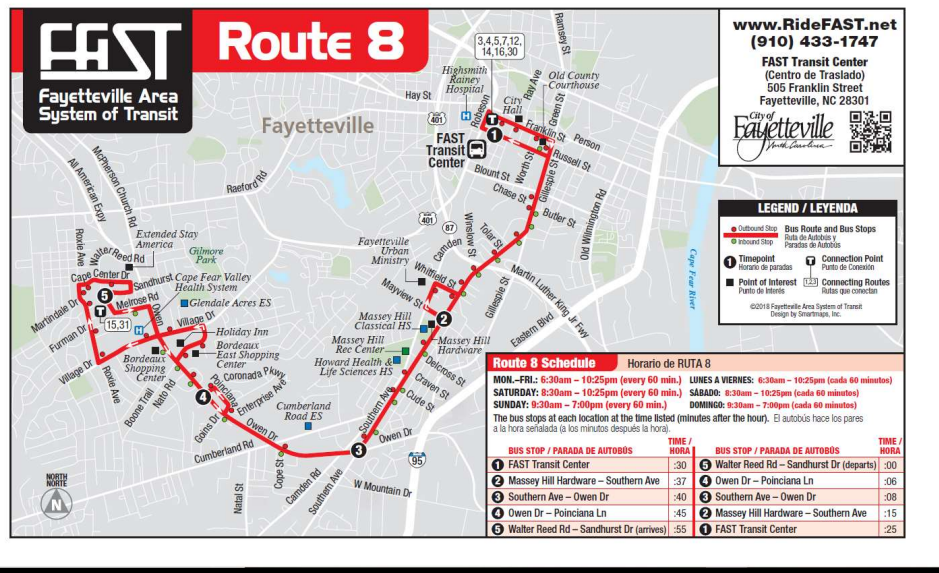


Figure 6: FAST's Know Your Rights - Title VI Brochure (English & Spanish)

ENVIRONMENTAL JUSTICE
A local governmental agency is not deemed every local agency; make Environmental Justice part of the mission by identifying and addressing the effects of all programs and services on low-income populations.

KNOW YOUR RIGHTS
Title VI
* Limited English Proficiency (LEP)
* Environmental Justice

FAST
FAYETTEVILLE AREA SYSTEM OF TRANSIT

Title VI - Know Your Rights

WHAT IS TITLE VI?
Title VI is a statute provision of the Civil Rights Act of 1964.

WHAT DOES THIS MEAN?
Fayetteville Area System of Transit (FAST) cannot discriminate on the basis of race, color, or national origin, in any program or activity that receives federal financial assistance.

ARE YOUR RIGHTS BEING VIOLATED?
If you believe FAST has denied you access, benefits, or services, you may file a complaint with the Title VI Coordinator.

FAST
FAYETTEVILLE AREA SYSTEM OF TRANSIT

JUSTICIA AMBIENTAL
Una agencia gubernamental local no se considera una agencia local; hacer de la Justicia Ambiental parte de la misión al identificar y abordar los efectos de todos los programas y servicios en las poblaciones de bajos ingresos.

CONOZCA SUS DERECHOS
Título VI
* Dominio limitado del inglés (LEP, por sus siglas en inglés)
* Justicia ambiental

FAST
FAYETTEVILLE AREA SYSTEM OF TRANSIT

Título VI - Conozca sus derechos

¿QUÉ ES EL TÍTULO VI?
El Título VI es una disposición o reglamento de la Ley de Derechos Civiles de 1964.

¿QUÉ SIGNIFICA ESTO?
El Sistema de Tránsito del Área de Fayetteville (FAST) no puede discriminar en ningún programa o actividad que reciba asistencia financiera federal.

¿SUS DERECHOS SE ESTÁN VIOLANDO?
Si usted cree que FAST le ha denegado acceso, beneficios o servicios, puede presentar una queja con el Coordinador del Título VI.

FAST
FAYETTEVILLE AREA SYSTEM OF TRANSIT

City Council's Resolution Approving Updated Title VI Program

During the May 28th, 2021, work session of the Fayetteville City Council, the updated 2021 Title VI Program and Service Standard & Policies were approved as well as its continuing plan to provide meaningful access to all FAST services and programs.

Provision of Additional Information to the FTA

FAST will provide the FTA with additional information upon request. Such information may be related to, but not limited to, investigation of complaints of discrimination or to resolve concerns about possible noncompliance with Title VI. FAST will submit an updated Title VI Program to the FTA's Regional Civil Rights Officer once every three (3) years.

Discrimination Complaint Procedure

Any person who believes he or she has been discriminated against on the basis of race, color, or national origin by FAST may file a discrimination complaint. To file a complaint with FAST, the complainant must complete and submit the FAST Title VI Discrimination Complaint Form. Complaint forms are made available online at <https://www.fayettevillenc.gov/city-services/transit/customer-support/title-vi-civil-rights> (see Figure 6) and upon request at the FAST Transit Center, 505 Franklin Street, Fayetteville, NC 28311.

The complaint may also be filed in writing with FAST at the following address

Fayetteville Area System of Transit
Civil Rights Program Analyst/DBELO
455 Grove Street
Fayetteville, NC 28301

Or via email to TitleVI@ci.fay.nc.us

Figure 7: Title VI Complaint Form location on FAST's Website

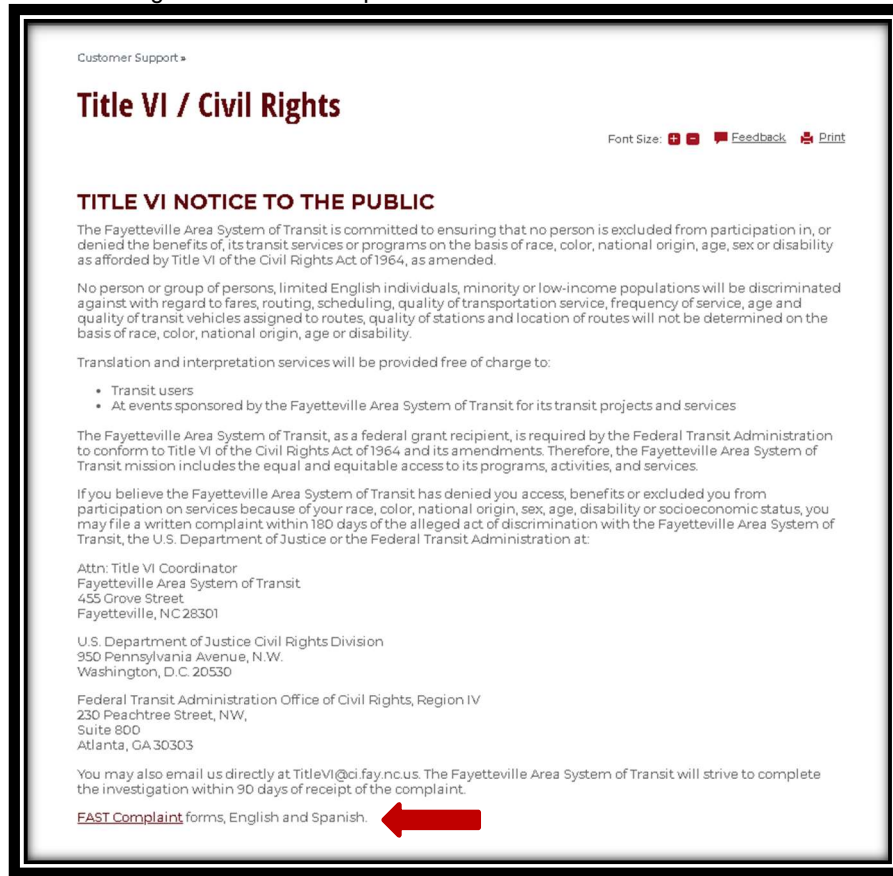


Figure 8: Title VI Complaint Forms (English & Spanish)

Discrimination Complaint Procedure (con't.)

FAST will investigate complaints received no more than 180 calendar days after the alleged discrimination. Completed complaints submitted to FAST, in writing, will be investigated by FAST's Civil Rights Program Analyst and must include all relevant information related to the complaint.

In cases where the complainant is unable or incapable of providing a written statement, FAST will assist in converting verbal complaints to writing. The complainant or his/her representative is required to sign all complaint forms.

Once the complaint is received, an acknowledgement letter will be sent to the complainant acknowledging receipt. If FAST finds that discrimination may have occurred, FAST has thirty (30) calendar days to investigate the complaint(s) and follow-up with the complainant.

If FAST finds that discrimination did not occur, the complainant will be notified and advised of their right to submit a complaint to the FTA for further investigation.

Every effort will be made to obtain an early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between affected parties and FAST's Civil Rights Program Analyst may be utilized for resolution at any stage of the process.

If additional information is required to resolve the complaint, FAST may contact the complainant. The complainant has thirty (30) calendar days from the date of outreach to provide FAST the requested information.

After a thorough investigation, FAST's Civil Rights Program Analyst will make a determination of discrimination. FAST will issue one of two determination letters to the complainant:

- 1) Closure Letter (CL)
- 2) Letter of Finding (LOF)

A CL summarizes the allegations and indicates there was no Title VI violation and that the complaint is closed. An LOF summarizes the allegations and interviews regarding the alleged incident and explains whether any disciplinary action, additional staff training or other remedial actions are necessary.

FAST can administratively close the complaint under the following circumstances:

- 1) A response from the complainant is not received within the allotted timeframe
- 2) The complainant no longer wishes to pursue the complaint

The complainant may appeal the decision within thirty (30) calendar days of the post-marked determination letter by submitting a written request for an appeal hearing. He/she may also file a written complaint directly with FAST at the following mailing address:

FAST
Attn: Title VI Coordinator
455 Grove Street
Fayetteville, NC 28301

In addition to filing Title VI complaints with FAST, complainants may also file a Title VI complaint with the FTA:

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

Title VI complaints are investigated by the City of Fayetteville's Human Relations Department in accordance with the City's discrimination complaint procedures.

Recording Title VI Investigations, Complaints & Lawsuits

To comply with 49 CFR Section 12.9 (b) FAST will prepare and maintain a list of any active investigations conducted by FAST or any other entities other than the FTA, lawsuits, or complaints naming FAST and/or its subcontractor(s) that allege discrimination on the basis of race, color, or national origin.

This list will include:

- 1) The date the investigation, lawsuit, or complaint was filed
- 2) Summary of the allegation(s)
- 3) Status of the investigation, lawsuit, or complaint
- 4) Actions taken by FAST or subcontractor in response to the investigation, lawsuit, or complaint

FAST currently has no open complaints, investigations or lawsuits alleging discrimination on the basis of race, color, or national origin.

Active Lawsuits, Complaints or Inquiries Alleging Discrimination

Type (Investigation, Lawsuit, Complaint)	Date	Summary of Complaint	Status	Action(s) Taken
There are no current or pending lawsuits, complaints or inquiries.				

Previous Lawsuits, Complaints or Inquiries Alleging Discrimination

Type (Investigation, Lawsuit, Complaint)	Date	Summary of Complaint	Status	Action(s) Taken
There are no previous lawsuits, complaints or inquiries.				

PUBLIC PARTICIPATION

FAST's Public Participation Plan offers early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions. The strategies of the Public Participation Plan are used to encourage and guide public involvement efforts and to enhance access to FAST's transportation decision-making for minority, low-income and Limited English Proficiency (LEP) populations.

FAST's ongoing Public Participation Plan ensures that:

- 1) Potentially affected community members will have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health and ability to participate in life activities
- 2) Contribution from the public can and will influence FAST's decision-making
- 3) Concerns of all persons and groups involved will be considered in the decision-making process
- 4) FAST will seek and facilitate the involvement of those potentially affected

FAST uses a variety of communication mechanisms to ensure that all populations, including those residing in minority census tract, persons with low-income, persons with disabilities, and persons with limited English proficiency have an opportunity to participate in service development and changes to service delivery.

Opportunities for Public Participation

Service and Fare Changes

The following examples indicate when the Public Participation Plan will be applied to service and fare changes:

- 1) New or revised fare media, policy or change in fare collection method and pricing
- 2) New route is introduced, or a reconfiguration of an existing route is proposed
- 3) Route is proposed for elimination
- 4) Frequency of service is modified such as proposed change to days/hours of service

Each of these instances above would result in the full public participation process.

Minor adjustments to a schedule or route would be posted at least thirty days in advance of any change.

FAST's most recent fixed route service change (involving the public participation process) occurred on May 29, 2018. The proposal included the adult single-fare increase (\$1.25/ride to \$1.50/ride) along with proportionate increases in other fare categories and multiple ride passes. Strategies to encourage public participation included informational sessions and public hearings to discuss and receive testimony on proposed fare increase to the fixed-route services.

Informational sessions, which gave the public the opportunity to review the proposal, were held on May 29th, 2018 at 7:00 p.m., in the City of Fayetteville's City Council Chambers, 433 Hay Street, Fayetteville, NC 28301. Transit Staff also provided an opportunity for the

public to learn about the proposed service modifications and to solicit for comments on May 22, 2018 (4:00 p.m. - 6:00 p.m.) and May 23, 2018 (12:30 p.m. - 2:30 p.m.). Both sessions were held at the FAST Transit Center, 505 Franklin Street, Fayetteville, NC. FAST accepted written comments and questions about the proposed changes via email and mail until close of business on May 24, 2018.

The public was notified of the proposed changes and opportunities for comment through the following efforts:

- 1) Notice of the intent to change fixed route services and fares published on the website in both English and Spanish on April 30, 2018
- 2) Legal notice published in local newspaper on April 11, 2018
- 3) Notices to drivers distributed on April 30, 2018
- 4) Notice of public hearing onboard vehicles as posters in both English and Spanish
- 5) Notice of public hearing as seat drop fliers in both English and Spanish

Transit Enhancements

The opportunity for public participation presents itself when transit enhancements are considered that would support the delivery of services. FAST has made several improvements to include the installation of new bus stop signs, shelters and benches, ITS deployment, and establishing new policies for use of services. The Fayetteville Advisory Committee on Transportation (FACT) plays a role in capturing input from public participation.

Capital Planning

FAST works in collaboration with the Fayetteville Area Metropolitan Planning Organization (FAMPO) on long range planning. Capital projects for replacement of vehicles and facility improvements are included in the Transportation Development Plan (TDP) which is vetted through an extensive public participation process.

The current TDP was adopted in May 2014. The Plan provided a phased set of service, capital and management recommendations for short-term, mid-term and long term improvements. Improvements instituted to date have resulted in significant increases in ridership and revenues, as well as, an improved appreciation of the transit services provided.

FAST is currently scheduled to revise the 2014 TDP and adopt the new plan in early 2022.

Public Outreach Efforts – Service and Fare Changes

Depending on the type of service/fare changes being examined, a variety of options are considered to encourage public participation. The measures taken are targeted to overcome linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and low-income populations, persons with disabilities and persons with LEP from effectively participating in the FAST's decision-making process.

The potential for a change/enhancement to service and/or fares is a result of carefully evaluated data by appropriate FAST staff. The data collection will not only include ridership and financial analyses as well as recaps of community conversations and recommendations from targeted groups and organizations.

A proposal is then developed internally and presented to FACT. Once the proposal is accepted, such will be presented to COF's City Council for public comment and ultimate approval by Council.

Public outreach meeting sites, dates and times will be determined with consideration of the proposed changes and its impact on specific locations/populations within FAST's service area.

When appropriate, meetings will be held at convenient and accessible locations for targeted populations. Partner locations include the FAST Transit Center, FAST Operations Facility, Cumberland County Public Libraries, Fayetteville-Cumberland Parks & Recreation Centers, etc. Spanish speaking COF employees are invited to attend meetings to translate for LEP persons.

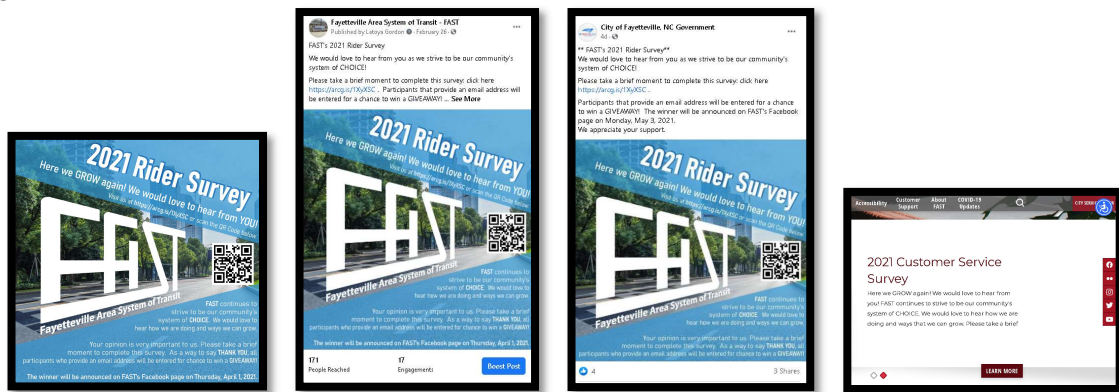
The Title VI Coordinator will oversee the following in establishing appropriate meeting locations:

- 1) Convenience and accessibility for minority, persons with disabilities and LEP communities
- 2) Size of venue should provide for meaningful dialogue
- 3) Invitation of community organizations to help support public engagement strategies, implementation of public relations campaigns and communications on behalf of FAST, including development of an overall communications strategy to increase positive
- 4) Ensure public awareness of FAST services and the promotion of public transportation as a valuable community service

FAST utilizes as many communication opportunities as possible to solicit for public input. Such methods may include, but are not limited to, notices posted and distributed on buses in both English and Spanish; legal notices and news stories published in local newspapers; notices posted on FAST's website with multi-lingual translation option; notices distributed at public meetings and Spanish speaking COF employees are encouraged to attend public meetings to assist with translation for Spanish-speaking persons with LEP.

Public Outreach Efforts – Community Engagement

In an effort to safely engage the public, especially during the global COVID-19 pandemic, FAST utilized electronic Customer Service Surveys via FAST's website, COF's and FAST's Facebook pages, flyers on FAST's fixed route and paratransit fleet and in the FAST Transit Center. The survey was geared towards FAST's service and the impact of the pandemic.



Next Steps

FAST continues to strive to implement its Public Participation Plan and recognizes that on-going public participation benefits the organization. Several of the next steps noted in the previous plan period were unable to be achieved due to the loss of personnel specifically responsible for these planning initiatives and the global coronavirus pandemic.

We are currently and will continue to find creative ways to engage the public. The pandemic has motivated us to step outside the box and ensure we continue our efforts even in unconventional times.

Conducting focus groups and building relationships with stakeholders guide FAST on how to best captivate the community in which FAST serves. To help address the challenges of engaging diverse populations in transportation planning, the FACT Committee was created in 2010. The committee's responsibilities include, but are not limited to, finding optimal solutions that balance the transit needs of the community and responding to community concerns in a prompt, professional and respectful manner.

FAST actively utilizes Facebook and its website for up-to-date service information, deviations and public outreach opportunities.

All public outreach efforts will be on-going to ensure consistency and continuous engagement with existing partners and various stakeholders including COF department's external agencies and organizations, civic and community groups and the general public for the purpose of establishing and maintaining an effective community relations program.

LANGUAGE ASSISTANCE PLAN

Improving Access for People with Limited English Proficiency

Limited English Proficiency (LEP) persons are defined as individuals whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

As a first step, and to ensure meaningful access to programs and activities, FAST uses the information obtained in a Four Factor Analysis to determine the specific language services that are appropriate. This analysis helps FAST determine if it communicates effectively with LEP persons and supports language access planning.

Limited English Proficiency (LEP) Persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

The Four Factor Analysis is a local assessment that considers:

- 1) The number or proportion of LEP persons eligible to be served or likely to be encountered by FAST
- 2) The frequency with which LEP persons come into contact with FAST services and programs
- 3) The nature and importance of FAST services and programs in people's lives
- 4) The resources available to FAST for LEP outreach, as well as the costs associated with that outreach

FAST's Language Assistance Plan incorporates all reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of FAST's programs and activities for LEP individuals. The Language Assistance Plan has the following key elements:

- 1) Identification of LEP individuals who need language assistance in FAST's service area (using the four-factor analysis that follows)
- 2) Determination of the appropriate language assistance measures based on what is learned
- 3) Training of all employees regarding LEP policies and procedures
- 4) Providing notification to LEP persons of the language services offered by FAST
- 5) Procedures to monitor and update the Language Assistance Plan

Four Factor Analysis

Factor 1 - The number or proportion of LEP persons eligible to be served or likely to be encountered by FAST's services.

The first step in determining the appropriate components of a Language Assistance Plan is understanding the proportion LEP persons who may utilize FAST's services, their literacy skills in English and their native language, the location of their communities and neighborhoods and, more importantly, if any are underserved as-a-result of a language barrier. Data for this review is derived from U.S. Census Bureau's 2019 American Community Survey (ACS) of "Language Spoken at Home" (five-year estimate data) for Cumberland County comparisons.

Overview of Service Area

For this section of this analysis, the most recent data available containing the LEP statistics representative of FAST's service area is reported within the U.S. Census Bureau's 2015 ACS of "Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over" (five-year estimate data).

To better evaluate the proportion of LEP persons eligible to be served or likely to utilize FAST's services, this analysis takes a look at the demographics of Cumberland County. To define a local service area, FAST's fixed route and/or demand-response services operate within the city limits of Fayetteville. Of the local population (307,616), 3.5% (10,701) reported speaking English "less than very well."

The following table shows the proportion of the population within the local service area that speaks English "less than very well". Of the total population, 11.6% (35,659) speaks a language other than English. Of that population, 30.0% (10,701) speak English "less than very well". Spanish speaking persons are 7.0% (21,519) of the total local service area population. Of that population, 27.9% speak English "less than very well."

	Cumberland County, North Carolina					
	Total	%	% of specified language speakers			
			Speak English only or speak English "very well"	% speak English only or speak English "very well"	Speak English less than "very well"	% speak English less than "very well"
Population 5 years and over	307,616	(X)	296,915	96.5%	10,701	3.5%
Speak only English	271,957	88.4%	(X)	(X)	(X)	(X)
Speak a language other than English	35,659	11.6%	24,958	70.0%	10,701	30.0%
Spanish	21,519	7.0%	15,506	72.1%	6,013	27.9%
Other Indo-European languages	6,205	2.0%	4,853	78.2%	1,352	21.8%
Asian and Pacific Island languages	6,524	2.1%	3,590	55.0%	2,934	45.0%
Other languages	1,411	0.5%	1,009	71.5%	402	28.5%

Safe Harbor Provisions

As outlined in FTA's Circular 4702.1B, "the Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost."

FAST's 2018 Title VI Plan submittal indicates there was one language, Spanish or Spanish Creole, identified as meeting the Safe Harbor threshold. Three (3) additional languages, German, Korean and Tagalog met the Safe Harbor threshold and were added as a result of the analysis for the 2021 plan.

The following table breakdown depicts the results of the Safe Harbor analysis for Cumberland County utilizing 2019, ACS 5-year data estimates. Those highlighted in yellow represent those languages that meet the Safe Harbor provisions in Cumberland County. Of the 36 languages identified, only four (4) languages meet the safe Harbor provisions for FAST's service area.

Cumberland County, North Carolina					
	Estimate				
Total:	297,822				
Speak only English	263,962				
Spanish or Spanish Creole:	20,343	Serbo-Croatian:	79	Mon-Khmer, Cambodian:	60
Speak English "very well"	14,737	Speak English "very well"	63	Speak English "very well"	0
Speak English less than "very well"	5,606	Speak English less than "very well"	16	Speak English less than "very well"	60
French (incl. Patois, Cajun):	899	Other Slavic languages:	16	Hmong:	144
Speak English "very well"	693	Speak English "very well"	16	Speak English "very well"	90
Speak English less than "very well"	206	Speak English less than "very well"	0	Speak English less than "very well"	54
French Creole:	486	Persian:	33	Thai:	250
Speak English "very well"	160	Speak English "very well"	23	Speak English "very well"	144
Speak English less than "very well"	326	Speak English less than "very well"	10	Speak English less than "very well"	106
Italian:	358	Gujarati:	208	Laotian:	125
Speak English "very well"	327	Speak English "very well"	162	Speak English "very well"	38
Speak English less than "very well"	31	Speak English less than "very well"	46	Speak English less than "very well"	87
Portuguese or Portuguese Creole:	87	Hindi:	127	Vietnamese:	713
Speak English "very well"	59	Speak English "very well"	104	Speak English "very well"	232
Speak English less than "very well"	28	Speak English less than "very well"	23	Speak English less than "very well"	481
German:	2,455	Urdu:	128	Other Asian languages:	500
Speak English "very well"	2,074	Speak English "very well"	92	Speak English "very well"	277
Speak English less than "very well"	381	Speak English less than "very well"	36	Speak English less than "very well"	223
Other West Germanic languages:	61	Other Indic languages:	253	Tagalog:	1,188
Speak English "very well"	44	Speak English "very well"	219	Speak English "very well"	855
Speak English less than "very well"	17	Speak English less than "very well"	34	Speak English less than "very well"	333
Scandinavian languages:	9	Other Indo-European languages:	165	Other Pacific Island languages:	501
Speak English "very well"	9	Speak English "very well"	115	Speak English "very well"	407
Speak English less than "very well"	0	Speak English less than "very well"	50	Speak English less than "very well"	94
Greek:	117	Chinese:	723	Navajo:	37
Speak English "very well"	76	Speak English "very well"	316	Speak English "very well"	14
Speak English less than "very well"	41	Speak English less than "very well"	407	Speak English less than "very well"	23
Russian:	238	Japanese:	372	Other Native North American languages:	55
Speak English "very well"	156	Speak English "very well"	194	Speak English "very well"	55
Speak English less than "very well"	82	Speak English less than "very well"	178	Speak English less than "very well"	0
Polish:	101	Korean:	1,932	Hungarian:	48
Speak English "very well"	83	Speak English "very well"	969	Speak English "very well"	19
Speak English less than "very well"	18	Speak English less than "very well"	963	Speak English less than "very well"	29
Hebrew:	12	African languages:	439	Arabic:	582
Speak English "very well"	12	Speak English "very well"	376	Speak English "very well"	410
Speak English less than "very well"	0	Speak English less than "very well"	63	Speak English less than "very well"	172
Other and unspecified languages:	16				
Speak English "very well"	16				
Speak English less than "very well"	0				

Vital Documents

As a matter of practice, many of the agency's written and verbal communications and documents are provided in both English and Spanish. However, documents pertaining to vital subject matter can also be translated into other languages upon request. Those vital documents include:

- 1) Language Assistance Cards
- 2) Consent and complaint forms, such as customer comment and Title VI discrimination
- 3) Application forms such as the ADA complementary paratransit eligibility application
- 4) ADA User Guide
- 5) Notice of denials, losses, or decreases in benefits or services
- 6) Notice of person's rights under Title VI
- 7) Notice advising LEP individuals of free language assistance services
- 8) Guidance on how to contact the transit agency
- 9) Guidance on how to obtain schedule/route information, notice of public events and outreach, how to file a complaint and explanation of discounted fare, etc.

Figure 9: Translation Request Cards (available in all fleet & facilities)

LanguageLine Solutions™ Interpretation Services Available	
English Translation: Point to your language. An interpreter will be called. The interpreter is provided at no cost to you.	
Arabic عربي انشر إلى لغتك. وسيتصل بمترجم فوري. كما سيتم إحضار المترجم الفوري مجاناً.	Korean 한국어 귀하의 언어를 지정하시면 해당 언어 통역 서비스를 무료로 제공해 드립니다.
Burmese မြန်မာစာ သင့်ဘာသာစကားကို ဝေဖန်ပြောဆိုပေးမည့် အသံပြောဆိုသူများကို အခမဲ့ ခေါ်ယူပေးပါမည်။	Mandarin 國語 請指認您的語言，以便為您提供免費的口譯服務。
Cantonese 廣東話 請指認您的語言，以便為您提供免費的口譯服務。	Polish Polski Proszę wskazać swój język i wezwiemy tłumacza. Usługa ta zapewniana jest bezpłatnie.
Farsi فارسی زبان مورد نظر خود را مشخص کنید. یک مترجم برای شما درخواست خواهد شد. مترجم بصورت رایگان در اختیار شما قرار می گیرد.	Portuguese Português Indique o seu idioma. Um intérprete será chamado. A interpretação é fornecida sem qualquer custo para você.
French Français Indiquez votre langue et nous appellerons un interprète. Le service est gratuit.	Punjabi ਪੰਜਾਬੀ ਅਪਣੀ ਭਾਸ਼ਾ ਦੀ ਟਿੱਕਤ ਚੁਣੋ। ਸਿਰਫੇ ਅਨੁਸਾਰ ਆਪਣੇ ਭਾਸ਼ਾ ਦੁਆਰਾ ਸੰਬੰਧਤ ਭਾਸ਼ਾ ਦੀ ਟਿੱਕਤ ਚੁਣੋ। ਸੇਵਾ ਸੁਭਾਅ ਤੋਂ ਮੁਫਤ ਹੈ।
Haitian Creole Kreyòl Lonje dwèt ou sou lang ou pale a epi n ap rele yon entèprèt pou ou. Nou ba ou sèvis entèprèt la gratis.	Russian Русский Укажите язык, на котором вы говорите. Вам вызовет переводчика. Услуги переводчика предоставляются бесплатно.
Hindi हिन्दी अपनी भाषा को टिकत करें। सिर्फे अनुसार अपने भाषा दुवाफिया बुलाया जाएगा। अपने भाषा की टिकत चुनकर भाषा की चयन करें।	Somali Af-Soomaali Farta ku fiigluqadaada... Waxa laguugu yeeri doonaa turjubaan. Turjubaanka wax lacagi kaaga bixi mayso.
Hmong Hmoob Taw rau koj hom lus. Yuav hu rau ib tug neeg bħais lus. Yuav muaj neeg bħais lus yam uas koj tsis tau them dab tsì.	Spanish Español Señale su idioma y llamaremos a un intérprete. El servicio es gratuito.
Italian Italiano Indicare la propria lingua. Un interprete sarà chiamato. Il servizio è gratuito.	Tagalog Tagalog Ituro po ang inyong wika. Isang tagasalin ang ipagkakaloob nang libre sa inyo.
Japanese 日本語 あなたの話す言語を指してください。無料で通訳サービスを提供します。	Vietnamese Tiếng Việt Hãy chỉ vào ngôn ngữ của quý vị. Một thông dịch viên sẽ được gọi đến, quý vị sẽ không phải trả tiền cho thông dịch viên.

Factor 2 – The frequency with which LEP persons come into contact with FAST's services and programs.

There are several places where members of the LEP population can come into contact with FAST services including the use of fixed route and paratransit vehicles, communication with customer service representatives and outreach materials. An important component of the development of FAST's Language Access Plan is the assessment of major points of contact including (but not limited to):

- 1) Use of transit services (i.e. on-board signage, announcements, operator language skills, etc.)
- 2) Communication with customer service staff
- 3) Bus pass sales
- 4) Printed and web-based outreach materials
- 5) Public meetings
- 6) Paratransit dispatchers (call takers)
- 7) Local news media (i.e. print and radio)
- 8) Automatic, service-related audio announcements on-board buses and within the FAST Transit Center

Employees as a Resource

To better understand the frequency with which LEP persons come into contact with FAST services, an internal survey of employees was completed in March 2021. The objective of the language survey was to determine the current language resources at FAST and measure the number and nature of the encounters with customers where language may be a barrier.

FAST employees (Supervisors & Dispatchers) were asked to respond to the following questions:

- 1) **Can you communicate in a language other than English, and if so, what language(s) or dialect(s)?** 90% of respondents stated no, they were unable to communicate in any other language. 10% of respondents are able to communicate in Spanish.
- 2) **In a TYPICAL DAY, approximately how many passengers/members of the public do you encounter?** 80% of respondents stated they interact with 1-50 customers daily; 10% of respondents stated they interact with 51-100 customers and 10% stated they interact with 151-200 customers daily.
- 3) **Have you encountered customers who were unable to communicate in English? (Yes or No)** 100% of respondents stated they do, in fact, encounter customers who are unable to communicate in English.
- 4) **Of these, approximately how many would you say are unable to communicate well in English?** 100% of respondents stated the customers they encounter are unable to communicate in English well.

- 5) How often do you TYPICALLY encounter riders/members of the public seeking assistance who are unable to communicate well in English? 20% of respondents stated they encounter an LEP customer once daily; 30% stated they encounter an LEP customer once to twice a week; and 40% stated they encounter an LEP customer one to two times per month; 10% stated that they encounter an LEP customer less than once per month.
- 6) What services or information are those limited English speaking customers/members of the public TYPICALLY seeking? (i.e. schedule info, details about fares, route information)
The most common responses were:
 - 1) Schedule Information
 - 2) Route Times
 - 3) Eligibility Information
 - 4) Booking a reservation for paratransit services
- 7) What are commonly asked questions from customers unable to communicate in English?
 - 1) What is the location of the bus stop/bus?
 - 2) When will the bus arrive?
 - 3) Do you have an interpreter?
 - 4) Which routes to take to get to a specific location?
 - 5) What's the fare?
 - 6) How to connect the Language Line?
- 8) Which of these languages do you recognize as being COMMONLY used by limited English speaking customers/members of the public you encounter? 90% of respondents stated they encounter members of the Spanish speaking community; 10% of respondents stated the language was unknown.
- 9) For which of these language groups, if any, could FAST services be improved? 90% of respondents did not provide any recommendations for FAST improvements; 10% of respondents stated there could be improvements made for any of the language groups; however, they did not provide any specific recommendations.
- 10) In what specific ways would you suggest improving FAST services for limited English riders? 60% of respondents stated they didn't have any recommendations because accommodations were being met for the LEP population; 10% of respondents suggested an electronic/ automatic translation device on the bus to assist Operators in real time.

Community Partners

As part of this assessment, FAST reached out their community partners. The partners are listed below:

Employee Name	Department	Email Address
Silvia Jordan	Police	sjordan@ci.fay.nc.us
Ulrich Johannes	Information Technology	ujohannes@ci.fay.nc.us
Max Lohr	Fire	mlohr@ci.fay.nc.us
Birgit Sexton	Budget & Evaluation	bsexton@ci.fay.nc.us
Gavin MacRoberts	Corporate Communications	gmacroberts@ci.fay.nc.us
Ben Thomsen	Fire	bthomsen@ci.fay.nc.us
Moisbiell Alvarez	Fire	malvarez@ci.fay.nc.us
Juan Larregui	Transit	jarregui@ci.fay.nc.us
Merla Molina	Police	Mmolina@ci.fay.nc.us
Yamile Nazar	Human Relations	ynazar@ci.fay.nc.us

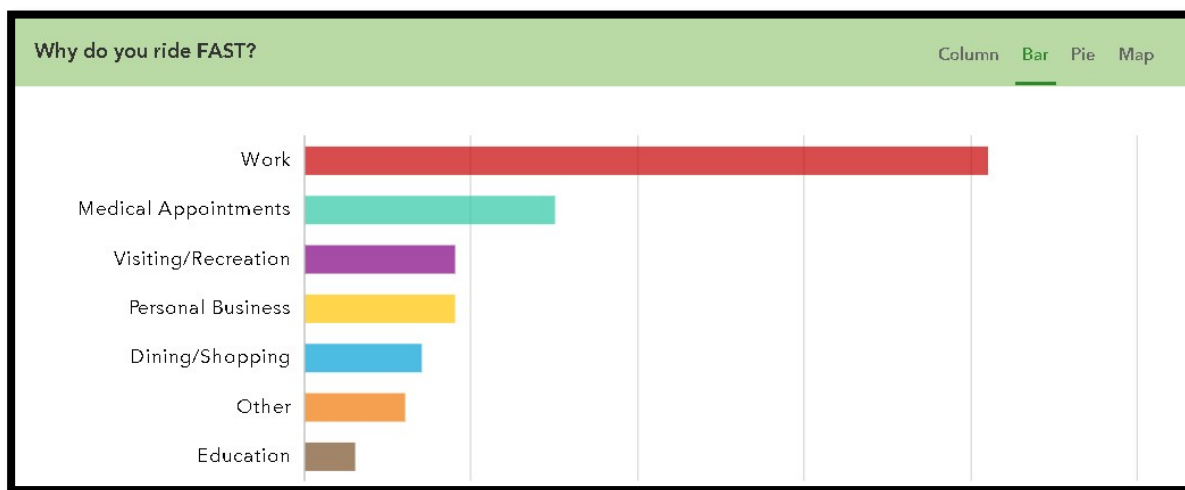
FAST used the following questionnaire to assess the extent to which their community partners come into contact with LEP populations.

- 1) **Does your department encounter non-English speaking/reading customers who need your services?** 75% of respondents stated they encounter non-English speaking customers; 25% of respondents stated they did not encounter non-English speaking customers.
- 2) **Giving your best estimate, what percentage of customers does your department interact with that are non-English speaking?** 75% of respondents stated they interact with non-English customers up to 25% of the time during a normal workday; 25% of respondents stated they interact with non-English customers approximately 26-50% of the time during a normal workday.
- 3) **Other than English, what are the three (3) most common languages or dialects your department encounters?** 100% of respondents stated that Spanish and Arabic were two of the most common languages used; however, Korean, Chinese, French and Italian were all tied for the third most commonly used language.
- 4) **How do you/your department address language barriers?** 75% of respondents stated they utilize COF employees from the City's LEP liaison group; 50% of respondents stated they utilize the Language Line; 25% of respondents stated they utilize Google Translate; 12.5% of respondents stated they utilize Translation manuals and technology respectively.
- 5) **Do you find language to be a barrier preventing your organization from providing service to non-English customers?** 100% of respondents stated there are no barriers preventing their organization from providing service to non-English speaking customers.

Factor 3 – The nature and importance of FAST's services and programs in people's lives.

Access to services provided by FAST, both fixed-route and paratransit are important to the basic life needs of the many citizens within our service area. For fixed-route customers, employment is the most common trip purpose, followed by medical, recreation and personal use, and so on.

FAST's 2019 Customer Survey report findings where 26.6% of respondents indicated their trips were employment-related; 9.7% of respondents indicated their trips were medical-related; 5.8% of respondents indicated their trips were recreation and personal respectively; 4.5% of respondents indicated their trips were dining and shopping-related; 1.9% of respondents indicated their trips were educational-related and the remaining percentage indicated other.



Because of the essential nature of the services and the importance of these programs within the community, there is a need to ensure that language is not a barrier to access FAST services. Using the information FAST gathers from demographic analyses, employee experiences, community partner observations and customer comments, FAST will continue to provide outreach to ensure access to its services is not compromised as a result of any language barrier.

Factor 4 – The resources available to FAST for LEP outreach, as well as the costs associated with the outreach.

FAST has always committed resources to improve access to its services and programs for LEP persons. The Spanish population has a significant presence within FAST's service area; therefore, it is important to continue to offer materials in a format that is easily understood by this identified population. These materials include, but are not limited to:

- 1) Spanish outreach materials (i.e. public notices, service explanations)
- 2) English/Spanish on-board signage (i.e. Rider Rules of Conduct)
- 3) English/Spanish brochures (i.e. Title VI- Know Your Rights)

- 4) English/Spanish website which includes routes and schedules
- 5) Spanish representation at public meetings, when requested
- 6) Language translation services - Language Line
- 7) Ongoing analysis of LEP population to ensure Safe Harbor Languages are identified and translation of all documents are readily available to groups meeting the identified threshold of the service area population

The costs associated with customer service and public outreach initiatives are included in the annual budget for marketing. It is expected that any additional costs associated with the expansion of the language assistance program, specifically the inclusion of three (3) new LEP populations, as identified, will be reasonably accommodated.

OUTCOMES

Language Assistance Measures

Based on the data compiled from the results of the Four Factor Analysis, each of the language assistance products and methods utilized by FAST for the Spanish speaking LEP population has served FAST well; however, improvements to this program would enhance the current Spanish LEP population and benefit other LEP populations.

From the 2018 Title VI Plan update, FAST has successfully implemented the following language assistance measures:

- 1) Update Title VI notices, brochures, forms and notice of free language assistance
- 2) Contract with an interpreter phone service to assist customer service staff
- 3) Develop language assistance guide and training procedures for staff and host training of new and existing employees as part of the new hire training program,
- 4) Update the website to include language translation tool

In an effort to continuously improve our language assistance efforts, FAST will strive to implement the following before the conclusion of this Title VI Plan:

- 1) Ensure inclusivity of representatives from LEP and minority populations on the FACT Committee
- 2) Implement a customer service survey semi-annually to engage the Fayetteville community
- 3) Ensure translation of vital documents in the newly added Safe Harbor Languages are easily accessible
- 4) Conduct a community partners survey to engage interaction with LEP populations
- 5) Conduct an employee survey

Monitoring and Updating the LEP Plan and Public Participation Process

The Civil Rights Program Analyst (Title VI Coordinator) will continue to monitor and ensure compliance with FAST's Title VI Plan, Public Participation Program, Language Assistance Plan and other community outreach efforts.

Monitoring of the Language Assistance Plan will include:

- 1) Triennial review of county census data for changing patterns of LEP populations
- 2) Ongoing collaboration with community partners
- 3) Ongoing review of customer service comments and passenger interaction reports
- 4) Assessment immediately following events involving public participation

Following service changes, fare increases and planning projects, FAST will assess the following questions to ensure the effectiveness of the Public Participation Plan:

- 1) Did the public know there was an opportunity to participate?
- 2) Was the purpose of the participation clearly articulated to the public?
- 3) Did the public have access to appropriate resources and information to allow for meaningful participation?
- 4) Did the decision-making process allow for consideration and incorporation of public input?

- 5) Were there complaints about the public engagement process?
- 6) Were the public engagement efforts cost effective?
- 7) What additional methods could have been employed to improve the process?
- 8) Should the Public Participation Process or Language Assistance Plan be amended?

FAST's LEP Plan will continue as an active planning tool. It will evolve to include new LEP populations as they are identified. Ongoing evaluations will be performed to ensure the following goals are met:

- 1) Existing language assistance measures are meeting the needs of the affected populations
- 2) Staff training is adequate to serve our customers
- 3) Resources are appropriate for the needs of our new and existing LEP customers

Most of the following items related to service delivery are typically reviewed during the course of daily operations through the review of Key Performance Indicators (KPI). A formal review of all items will be evaluated triennially unless findings require immediate action.

- 1) Supervisor daily reports of customer interactions
- 2) Customer complaints
- 3) FACT Committee recommendations
- 4) Language assistance requests (translations of documents, interpreter needs at public meetings, customer service encounters, monitoring use of translation capability on website)
- 5) Availability of new technologies to provide language assistance
- 6) Review U.S. Census data updates
- 7) Industry best practices
- 8) Community Feedback
- 9) Customer feedback

Evaluations will not be limited to those items noted above and will serve as a foundation for reviewing the effectiveness of service delivery to LEP customers.

Providing Notice to LEP Persons

LEP persons are notified of free language assistance services provided by FAST. Notices will be available in Spanish or Spanish Creole, German, Korean and Tagalog.

- 1) Onboard vehicle posters
- 2) Signage at the FAST Transit Center
- 3) Signage posted at the facilities of community partners
- 4) Website and social media posts
- 5) Printed service information and announcements

Employee Training

Resources are made available for staff to provide meaningful access to information and services for LEP persons upon request. An effective LEP plan includes training to ensure staff is informed of LEP policies/procedures. Frontline staff is trained to provide available resources to assist LEP persons.

Through the employee survey, FAST has identified that transit operators, supervisors, dispatchers and customer service staff are most likely to come into contact with LEP persons.

The following is the Language Assistance Procedure (included in the new hire training for all new employees) which have been established to address the LEP population:

E-mail Communication

An LEP customer can contact FAST via e-mail at TitleVI@ci.fay.nc.us. Once an e-mail message is received, FAST will request a telephone number in an attempt to coordinate an interpreter with the LEP customer. During such communication, the interpreter will determine the appropriate language the customer comprehends.

NOTE: Once FAST is contacted by an LEP customer, staff will attempt to identify the customer's appropriate language. Should COF employees who communicate such language be available, staff will immediately utilize that resource to respond to the customer's inquiry. Should there not be COF employees who communicate such language be available, FAST will contact the Language Line to request interpreting services.

Telephone Communication

When FAST receives a call from an LEP customer, staff will attempt to identify the appropriate language the customer comprehends.

Procedure when an interpreter is required

1. Use the phone's conference feature to place the LEP customer on hold
2. Ask the customer to hold
3. Dial 1-866-874-3972 (Language Line)
4. Enter Client ID #
5. Select the appropriate language
 - a. Press 0 for agent assistance (if the appropriate language is unknown)
 - b. Press 1 for Spanish
 - c. Press 2 for all other languages (indicate the desired language)
6. Brief the interpreter. Summarize what is necessary for effective communication and provide any special instructions.
7. Conference the LEP customer in to the call
8. Say "End of Call" to the interpreter when your call is completed

NOTE: When placing an outbound call to an LEP customer, begin at #2. If you need assistance placing a call to the LEP customer, please inform the interpreter or agent at the beginning of the call. When an LEP customer is face-to-face, begin at #2. Once the interpreter joins the line, brief him/her and place the phone on "speaker" mode or pass the handset back-and-forth.

Training will be included in new employee orientation. Frontline employees shall periodically take part in re-training to remain up-to-date on their responsibilities to LEP persons. The training curriculum will be based on new technology and procedures adopted by FAST.

DECISION MAKING BODIES

Non-Elected Committees & Councils

When FAST takes on new projects or prepares to initiate/plan a service change, representative advisory committees are established made up of employees, technical advisors, advocates, transit partners, consumers, as well as citizens of the communities served in both minority and non-minority census tracts.

Decisions regarding policy, service changes, fares, capital programming and facility locations are made by the Fayetteville City Council. Meetings, excluding closed sessions, are open to the public and announced on the www.CityofFayetteville.gov website and social media platforms.

Body	Caucasian	Latino	African American	Asian American	Native American
FACT Committee Members	1		9		

In addition, FAST staff serve on boards, commissions and committees of organizations and community partners who advocate for impacted populations. The active participation by FAST staff on boards, commissions and committees dates back to the 1980s.

The needs of affected populations can be articulated through affiliate agencies. Acting as liaisons, advocates share the barriers consumers face and remediation or explanation is filtered through these organizations. FAST staff will continue to work with organizations that represent the interest of minority, low-income, LEP and senior populations.

SERVICE STANDARDS & POLICIES

SYSTEM-WIDE SERVICE STANDARDS AND POLICIES

Service standards and guidelines serve as useful policy tools that reflect the mission and goals of the transit organization. These define attributes of service design and delivery as well as create an objective set of criteria under which existing services, proposed alterations to services, and prospective new services are evaluated. Service standards also provide a basis for the open and equitable allocation of budget-limited service resources in accordance with Title VI and Environmental Justice requirements.

The City of Fayetteville City Council adopted Transit Service Standards (Resolution No. R2013-040) according to 4702.1B in August 2013. For additional detail, see FAST's Service Standards.

FAST's service standards and policies are:

Standards:

- Vehicle Loads
- Vehicle Headway/Frequency of Service
- On-Time Performance
- Service Availability
- Route Design

Policies:

- Distribution of Transit Amenities
- Vehicle Assignment

These standards and policies assist in guiding the development and delivery of service in support of FAST's mission to improve quality of life by connecting people and places with safe, efficient, reliable, courteous and innovative transportation.

These standards and policies also provide benchmarks to ensure that service design and operations practices do not result in discrimination on the basis of race, color, or national origin. They establish a basis for future monitoring and analysis of service delivery, availability, and the distribution of amenities and vehicles to determine whether or not any disparate impacts are evident.

Vehicle Loads

- 1) Vehicle Load Factor (passengers on board/bus seating capacity) shall not exceed 1.3 (i.e., 30% standing) on any trip for more than 10 minutes.
- 2) Routes with Vehicle Loads exceeding 1.3 will be considered first for headway improvement.

Vehicle Headway/Frequency of Service

- 1) FAST has developed a service standard for vehicle headway and service frequency.
- 2) Vehicle Headway/Frequency of Service: Regular Fixed Route Vehicle Headway on any route shall not exceed 60 minutes (or one vehicle per hour frequency) between 6:00a.m. and 7:00p.m.

- 3) Regular Fixed Route Vehicle Headway may exceed 60 minutes before 6:00a.m. and after 7:00p.m. (Weekdays and Saturday) or at any time on Sunday. This headway standard shall not apply to express bus or suburban bus services.

On-Time Performance

- 1) On-time is defined as the trips completed between one (1) minute early and five (5) minutes late as compared to schedule. Arriving at a trip's destination point early will not be counted as an early for calculations purposes as long as the bus does not depart the stop early.
- 2) System-wide on-time performance shall be a minimum of 95% of schedule at route origins and destinations (i.e., terminal points).
- 3) Individual route on-time performance shall be a minimum of 90% of schedule at route origins and destinations.
- 4) System-wide on-time performance shall be a minimum of 70% of schedule at published time points.

Service Availability

FAST developed a standard for availability of service within its service area.

Access to Service: Sixty percent (60%) of service area residents shall have access to bus service. Access to bus service is defined as less than ½ mile walk from residence to bus stop from 6:00 a.m.to 7:00 p.m. on weekdays

Bus Stop Spacing: Stops shall be no closer than 800 feet, unless land use and passenger demand indicate a need for closer stops.

Minimum four (4) stops per mile in core

Minimum two (2) stops per mile in outlying areas (depending on density and land use Flag Stops may be used in areas where installation of ADA accessible bus stops is very difficult.)

Bus stop spacing standards shall not apply to express or limited stop bus service

Route Design

Routes shall operate on major thoroughfares or arterial streets to the maximum extent possible. Exceptions will be allowed for turnaround loops or major destinations located on non-arterial streets. Services should be designed to operate in two directions on the same street whenever possible in order to reduce confusion to passengers and maximize service effectiveness. However, due to street configurations, some loop routes maybe necessary.

Route Deviation

Fixed routes may deviate off their primary alignment for a variety of reasons - to serve a major destination, to avoid a bottleneck and to provide coverage. Deviations off the basic alignment of a fixed route should be minimized whenever possible. Any deviations considered as a part of a route change should meet the following criteria:

- 1) The additional time necessary for the deviation should not exceed five minutes, or 10% of the one-way travel time of the existing route without deviation.
- 2) Deviations should result in an increase in overall route productivity.

Distribution of Transit Amenities

FAST has written guidelines that form a framework for the deployment of amenities as part of its projects and programs. The following is FAST's transit amenities standard:

Bus Shelters	At stops with 15 or more boardings per day or locations where 3 or more routes converge
Bus Benches	At stops with 6 or more boardings per day
Bus Stop Signs	At all stops. Bus stop signs should display FAST name, information contact number and route/schedule information.
Sponsorships	Shelters or benches may be placed at stops that have less boardings than noted above when a non-City entity agrees to provide funding to sponsor such stop.

Vehicle Assignment

Vehicle assignment is described as follows by FTA Circular 4702.1B:

VEHICLE ASSIGNMENT REFERS TO THE PROCESS BY WHICH TRANSIT VEHICLES ARE PLACED INTO SERVICE IN DEPOTS AND ON ROUTES THROUGHOUT THE TRANSIT PROVIDER'S SYSTEM. POLICIES FOR VEHICLE ASSIGNMENT MAY BE BASED ON THE AGE OF THE VEHICLE, WHERE AGE WOULD BE A PROXY FOR CONDITION. FOR EXAMPLE, A TRANSIT PROVIDER COULD SET A POLICY TO ASSIGN VEHICLES TO DEPOTS SO THAT THE AGE OF THE VEHICLES AT EACH DEPOT DOES NOT EXCEED THE SYSTEM-WIDE AVERAGE. THE POLICY COULD ALSO BE BASED ON THE TYPE OF VEHICLE. FOR EXAMPLE, A TRANSIT PROVIDER MAY SET A POLICY TO ASSIGN VEHICLES WITH MORE CAPACITY TO ROUTES WITH HIGHER RIDERSHIP AND/OR DURING PEAK PERIODS. THE POLICY COULD ALSO BE BASED ON THE TYPE OF SERVICE OFFERED. FOR EXAMPLE, A TRANSIT PROVIDER MAY SET A POLICY TO ASSIGN SPECIFIC TYPES OF VEHICLES TO EXPRESS OR COMMUTER SERVICE. TRANSIT PROVIDERS DEPLOYING VEHICLES EQUIPPED WITH TECHNOLOGY DESIGNED TO REDUCE EMISSIONS COULD CHOOSE TO SET A POLICY FOR HOW THESE VEHICLES WILL BE DEPLOYED THROUGHOUT THE SERVICE AREA.

The following is FAST's fleet and route assignment policy:

Vehicle Equipment	Revenue vehicles shall be clean, in good condition, with working ramp or lift and working air conditioning or heat (depending on season)
Route Assignment	Higher capacity buses shall be used on routes with the highest ridership and load factors
Vehicle Age/Mileage	Vehicles shall be distributed equally throughout the route system. Vehicle assignments shall be evaluated a minimum of every three (3) months to ensure equitable aging (accumulated miles) and distribution of equipment, including onboard technology features, to all route

Evaluating and Altering Services

FAST strives to allocate service resources equitably and efficiently. Circumstances may change requiring that routes be evaluated and adjusted to ensure effectiveness and proper allocation of resources. Routes will be evaluated at least annually. Although several factors are considered, the primary route productivity measure FAST will use is **Average Daily Passengers** per Revenue Service Hour.

Routes to Review	Less than 80% of system average Passengers per Hour
Routes to Modify	Less than 60% of system average Passengers per Hour
Maturing Service	New routes do not generally generate stable ridership levels immediately. A two-year period permits adequate time to build a transit market. Routes that have operated less than two years will be considered maturing. Maturing routes will be monitored but may be exempted from corrective actions to provide opportunity to meet ridership expectations. FAST anticipates making fine-tuning adjustments to maturing routes over its first two years.
Lifeline Routes	Factors such as percentage of population below federal poverty guidelines, elderly population, and zero-vehicle households will be examined when considering route modifications.

Corrective Action

The following is FAST's corrective action measures:

Targeted Marketing	Low ridership may result from a lack of awareness of routes and services available. A targeted marketing campaign before a service reduction may be considered.
Route Realignment	A route may miss several key locations which can be accessed with short route deviations or extensions. A route may also have unproductive segments. Careful evaluation of boardings by stop can result in route revisions that can help to build ridership and improve service productivity.
Alternative Service	An area with scheduled fixed route with low productivity may better be served by other service delivery methods, such as flex-route, on-demand services, etc.
Service Reduction	A route may have more frequent service than warranted by load factors or ridership. Headway adjustments, reductions in hours of operation, and/or elimination of service on weekends may improve route productivity with limited negative impacts.
Service Elimination	If ridership is consistently poor with little hope for future growth, a route may be eliminated. Service elimination is a last resort and generally follows prior actions to improve productivity. Elimination of service does not preclude restoration of service at a later time, but new factors supporting ridership demand must exist before such a step is considered.

PROGRAM SPECIFIC REQUIREMENTS

Sub-Recipient Compliance

During this report period, FAST has engaged one sub-recipient, Mid-Carolina Council of Governments (MCCOG) in cooperation with Cumberland County's Community Transportation Program.

Equity Analysis for Facility

During the past three years, FAST has not constructed a vehicle storage, operations or maintenance facility.

Demographic Service Profile

FAST operates fewer than 50 vehicles in peak fixed-route service; therefore, a demographic profile was not prepared for this plan update.

ENVIRONMENTAL JUSTICE

Introduction

As a recipient of federal funding, FAST is required to abide by the non-discrimination policies expressed in the Title VI of the Civil Rights Act of 1964. These requirements were further enhanced by President Clinton's Executive Order No. 12898 (issued February 11, 1994). This order directed all recipients of federal assistance to incorporate environmental justice as part of their mission by identifying and addressing the effects of all programs, policies and activities on minority and low-income populations. FAST will use the following fundamental principles when planning new services or revising existing services; when operating and administrative policies are reviewed; and, when construction of fixed facilities are decided or in progress:

- 1) Ensure the full and fair participation by all potentially affected communities in the transportation decision-making process
- 2) Prevent the denial of, reduction in or significant delay in the receipt of benefits by minority and low-income populations
- 3) Avoid, minimize or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations

In accordance with the U. S. Department of Transportation's Order to Address Environmental Justice in Minority and Low-Income Populations, all services, policies and projects must be analyzed to determine whether there would be a "disproportionately high and adverse effect on minority and low-income populations". For the effect to be determined as "disproportionately high and adverse", it must be borne or will be suffered by a minority or low income population appreciably more or greater in magnitude than would be suffered by the non-minority or non-low-income population.

Incorporating Environmental Justice into Planning

Environmental justice practices are incorporated into the overall commitment of FAST to provide its services and benefits equitably. Thus, specific steps are followed when conducting a service change, planning study and/or construction project.

The major steps in this process include:

- 1) Identification of the study area
- 2) Compilation of population characteristics and identification of locations with populations of concern for environmental justice
- 3) Conducting public outreach
- 4) Identifying adverse effects on populations of concern
- 5) Evaluating the project's overall effects

Fixed-Facility/Construction Projects

Construction projects possess unique issues that may be of particular importance to low-income and minority populations and should be considered as part of the assessment:

- 1) Human health and quality of life effects related to construction and construction truck traffic off-site

- 2) Continued availability of community facilities, services and open space
- 3) Preservation/enhancement of community character and cohesion
- 4) Direct and indirect residential and business displacements arising from secondary development or change in community character
- 5) Economic vitality and job opportunities

Conclusion

In conclusion, FAST recognizes how its system plays a vital role in supporting the Fayetteville/Cumberland County community, in which it serves, by connecting people to jobs, schools, services, family, and friends. With its focus on Title VI policies and program efforts, FAST will continue to ensure that minorities, low-income and LEP customers are a priority consideration when evaluating service changes, cost of fare, location of facilities, and health/human environmental impacts.

CONTACT

For additional information on FAST's Title VI Plan, or its efforts to comply with the Civil Rights Act of 1964 or Executive Order 13166 Improving Access to Services for Persons with Limited English Proficiency, please contact:

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BOARD ADOPTION OF POLICY

Fayetteville City Council Meeting Minutes (DRAFT) – 05.27.21

11.02 Transit Title VI Program

Ms. Tyffany Neal, Assistant Transit Director, presented this item with the aid of a PowerPoint presentation and stated the Transit Department is the recipient of federal transit grant funds with numerous terms and conditions. Federal Transit Administration (FTA) requires grantees to update and submit for approval a Title VI program every three years. The City's/FAST's Title VI program update is due on August 1, 2021.

Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. This plan incorporates Environmental Justice (EJ), which was initiated by Executive Order 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations), and also addresses Limited English Proficiency (LEP). The program update has few changes since the 2018 program was approved.

City Council's approval of the program update is requested for submission to FTA.

MOTION: Council Member Davis moved to approve the Transit Title VI Program Update
SECOND: Council Member Kinston
VOTE: UNANIMOUS (10-0)

11.03 Approval of Service Standards for Fixed Route Bus Services

Mr. Randy Hume, Transit Director, presented this item and stated the City is the recipient of FTA transit operating and capital grants. FTA requires grant recipients that provide fixed route transit services to establish service standards and policies that ensure services are provided in a manner that is equitable and do not discriminate on the grounds of race, color, or national origin. These standards and policies must address how service is distributed across the transit system, and must ensure that the manner of the distribution affords users access to these assets. The standards are required to address such factors as vehicle loads, frequency of service, availability of service, on-time performance, vehicle assignment and distribution of bus stop amenities such as benches and shelters.

Based on City Council's desire to expand the availability of shelters and benches and the fact that most stops that have ridership meeting the established threshold of 20 daily boardings for a shelter and 10 daily boardings for a bench, staff began working with the City's FACT members to reduce the thresholds in late 2019.

There are a few exceptions or barriers to shelter placement. These include: 1) stops along NCDOT roadways that have planned improvement projects that will add bus stops once completed; 2) stops that require a private property easement that the property owner is unwilling to grant; or 3) stops where the topography and right of way make construction of an accessible bus stop infeasible. At the current time, we have 144 stops with a shelter and/or bench installed. 76% of our average daily boardings prior to the pandemic occurred at sheltered stops. When the bench only sites are added, 78% of riders have a stop with a seat. Two (2) more shelters and a stop with bench will be installed by the end of May. Four (4) more shelters will be ready for installation in July when the next order of shelter packages arrive. The number of daily boardings to warrant a shelter or bench are

proposed to be reduced from 20 to 15 for a full shelter package and from 10 to 6 for a bench with trash can.

The revised standards also provide for some new methods to make transit buses easier and more convenient to use. The standards introduce "flag stops" for areas FAST has a very difficult time installing accessible bus stops. Staff plans to introduce a pilot project this summer along Strickland Bridge Road, Rim Road, Deep Creek Road, Stacy Weaver and Hoke Loop Road should that route be approved as part of the FY22 budget. These areas that have deep ditches, few sidewalks, no curb or gutter and are difficult to obtain permits from NCDOT. We have also included on-demand services similar to LYFT and Uber as an alternative method of providing service in low density and low ridership areas. Such services are growing as part of transit services in North Carolina. The City of Wilson recently eliminated its fixed route bus service and replaced it with an on-demand model earlier this year.

The service standards once adopted will be incorporated into Transit's Title VI Program update and submitted to FTA for review. The Title VI program is being presented as a separate item for Council's review and approval.

Discussion ensued.

RESOLUTION TO ADOPT TRANSIT SERVICE STANDARDS AND POLICIES. RESOLUTION NO. R2021-040

MOTION: Council Member Davis moved to adopt the Resolution to approve the Service Standards and Policies

SECOND: Council Member Kinston

VOTE: UNANIMOUS (10-0)

NOTE: Final approved minutes will be submitted upon approval from City Council.

Appendix A

Definitions

The following terms and definitions are from FTA Circular 4702.1B, unless otherwise noted.

Adverse Effect - The totality of significant individual or cumulative human health or environmental effects, including interrelated social and economic effects, which may include, but are not limited to: bodily impairment, infirmity, illness, or death; air, noise, and water pollution and soil contamination; destruction or disruption of man-made or natural resources; destruction or diminution of aesthetic values; destruction or disruption of community cohesion or a community's economic vitality; destruction or disruption of the availability of public and private facilities and services; vibration; adverse employment effects; displacement of persons, businesses, farms, or non-profit organizations; increased traffic congestion, isolation, exclusion or separation of individuals within a given community or from the broader community; and the denial of, reduction in, or significant delay in the receipt of benefits of Department of Transportation (DOT) programs, policies, or activities.

Beneficiary - Any person or group of persons (other than States) entitled to receive benefits directly or indirectly, from any federally assisted program, i.e., relocation assistance program, impacted citizens, communities, etc.

Census Unit of Analysis - Analyses are conducted at the smallest and most recently available Census unit for which data is readily available for determining both minority and low-income status.

Compliance - The satisfactory condition existing when a recipient has effectively implemented all of the Title VI requirements or can demonstrate that every good faith effort toward achieving this end has been made.

Designated Recipient - An entity designated by the Governor of a State, responsible local officials, and publicly owned operators of public transportation, to receive and apportion federal funds to urbanized areas of 200,000 or more in population.

Direct Recipient - An entity that receives funding directly from FTA. For purposes of Title VI, a direct recipient is distinguished from a primary recipient in that a direct recipient does not extend financial assistance to sub-recipients, whereas a primary recipient does.

Discrimination - Any action or inaction, whether intentional or unintentional, in any program or activity of a federal aid recipient, sub-recipient, or contractor that results in disparate treatment, disparate impact, or perpetuating the effects of prior discrimination based on race, color, or national origin.

Disparate Impact - A facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.

Disparate Treatment - Actions that result in circumstances where similarly situated persons are intentionally treated differently (i.e. less favorably) than others because of their race, color, or national origin.

Disproportionate Burden - A neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.

Federal Financial Assistance - Assistance includes any of the following:

- 1) Grants and loans of federal funds
- 2) The grant or donation of federal property and interests in property
- 3) The detail of federal personnel
- 4) The sale and lease of, or the permission to use (on other than a casual or transient basis), federal property or any interest in such property without consideration or at a nominal consideration, or at a consideration which is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be served by such sale or lease to the recipient
- 5) Any federal agreement, arrangement, or other contract that has as one of its purposes the provision of assistance

Fixed Route - Public transportation service provided in vehicles operated along pre-determined routes according to a fixed schedule.

Limited English Proficient (LEP) Persons - Persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

Low-Income Household - A low-income household is a household with a median yearly income less than or equal to 50% of the regional median.

Low-Income Population - Any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or American Indians) who will be similarly affected by a proposed FTA program, policy or activity.

Low-Income Tract - Any tract where the percentage of the population that is low-income is greater than the average percent low-income in the entire study area.

Minority Persons - Minority persons include the following:

- 1) American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
- 2) Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
- 3) Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
- 4) Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- 5) Native Hawaiian or Other Pacific Islander, which refers to people having origin Native

Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Island.

Minority Population - Any readily identifiable group of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient populations (such as migrant workers or American Indians) who will be similarly affected by a proposed Department of Transportation (DOT) program, policy, or activity.

Minority Tract - Any tract where the percentage of the population that is minority is greater than the average percent minority in the entire study area.

National Origin - The particular nation in which a person was born, or where the person's parents or ancestors were born.

Noncompliance - An FTA determination that the recipient or sub-recipient has engaged in activities that have had the purpose or effect of denying persons the benefits of, excluding participation in, or subjecting persons to discrimination in a recipient's program or activity.

Persons with Disabilities - An individual with a disability is a person who has a physical or mental impairment which substantially limits one or more major life activities. For transportation services, a person with a disability is an individual, who by reason of illness, incapacity or disability, is unable, without special facilities or special planning or design, to utilize mass transportation facilities and services as effectively as persons who are not so affected.

Predominantly Minority Area - A geographic area, such as a neighborhood, Census tract, or traffic analysis zone, where the proportion of minority persons residing in that area exceeds the average proportion of minority persons in the recipient's service area.

Predominantly Low-Income Area - A geographic area, such as a neighborhood, Census tract, or traffic analysis zone, where the proportion of low-income persons residing in that area exceeds the average proportion of low-income persons in the recipient's service area.

Program - Includes any program, project, or activity for the provision of services, financial aid, or other benefits to individuals (including education or training, health, welfare, rehabilitation, housing, or other services, whether provided through employees of the recipient of federal financial assistance or provided by others through contracts or other arrangements with the recipient, and including work opportunities), or for the provision of facilities for furnishing services, financial aid or other benefits to individuals. The services, financial aid, or other benefits provided under a program receiving Federal financial assistance shall be deemed to include any services, financial aid, or other benefits provided with the aid of Federal financial assistance or with the aid of any non-Federal funds, property, or other resources required to be expended or made available for the program to meet matching requirements or other conditions which must be met in order to receive the Federal financial assistance, and to include any services, financial aid or other benefits provided in or through a facility provided with the aid of Federal financial assistance or such non-Federal resources.

Public Participation - An open process in which the rights of the community to be informed, to provide comments to the government and to receive a response from the government are met through a full opportunity to be involved and express needs and goals.

Public Transportation - Regular, continuing, shared-ride surface transportation services that are open to the general public or open to a segment of the general public defined by age, disability, or low-income. Public transportation includes buses, subways, light rail, commuter rail, monorail, passenger ferry boats, trolleys, inclined railways, people movers, and vans. Public transportation does not include Amtrak, intercity bus service, charter bus service, school bus service, sightseeing service, courtesy shuttle service for patrons of one or more specific establishments, or intra-terminal or intra-facility shuttle services. Public transportation can be either fixed route or demand response service.

Secretary - The Secretary of the U.S. Department of Transportation.

Service Standard/Policy - An established service performance measure or policy used by a transit provider or other recipient as a means to plan or distribute services and benefits within its service area.

Service Area - The geographic area in which a transit agency is authorized by its charter to provide service to the public or the planning area of a State Department of Transportation or Metropolitan Planning Organization.

Service Frequency - The frequency of service is a general indication of the same level of service provided along a route and the travel time expended by a passenger to reach his/her destination.

Service Standard/Policy - An established policy or service performance measure used by a transit provider, other recipient, or sub-recipient as a means to plan or distribute services and benefits within its service area.

Sub-recipient - An entity that receives federal financial assistance from FTA through a primary recipient.

Title VI Program - A document developed by an FTA recipient or sub-recipient to demonstrate how the recipient/sub-recipient is complying with Title VI requirements. Direct and primary recipients must submit their Title VI Programs to FTA every three years. The Title VI Program must be approved by the recipient's board of directors, or appropriate governing entity or official(s) responsible for policy decisions, prior to submission to FTA.

Transit Provider - Any entity that operates public transportation service; includes states, local and regional entities, and public and private entities. This term is inclusive of direct recipients, primary recipients, designated recipients, and sub-recipients that provide fixed route public transportation service.

Vehicle Headway - The time interval between two vehicles traveling in the same direction.

Vehicle Load - Can be expressed as the ratio of passengers per vehicle or the ratio of passengers to the number of seats on a vehicle during a vehicle's maximum load point.

Vital Document - Documents that convey information that critically affects the ability of the recipient/customer to make decisions about his or her participation in the program.

Appendix B

FAST's Service Area Map

