Title VI Plan and Procedures

Title VI of the Civil Rights Act of 1964

Danville Transit System

Adopted date

September 3, 2019

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I. INTRODUCTION

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." (42 U.S.C. Section 2000d).

The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities of Federal-aid recipients, sub-recipients, and contractors whether those programs and activities are federally funded or not.

Recently, the Federal Transit Administration (FTA) has placed renewed emphasis on Title VI issues, including providing meaningful access to persons with Limited English Proficiency.

Recipients of public transportation funding from FTA and the Virginia Department of Rail and Public Transportation (DRPT) are required to develop policies, programs, and practices that ensure that federal and state transit dollars are used in a manner that is nondiscriminatory as required under Title VI.

This document details how Danville Transit incorporates nondiscrimination policies and practices in providing services to the public. Danville Transit's Title VI policies and procedures are documented in this plan and its appendices and attachments. This plan will be updated periodically (at least every three years) to incorporate changes and additional responsibilities that arise.

II. OVERVIEW OF SERVICES

The Danville Transit System provides multiple transportation options to its customers within the city limits of Danville, Virginia to maintain effective transportation access. Fixed route bus service for six (6) runs and paratransit service is offered Monday through Saturday from 6 am until 6 pm and dial-a-ride service is provided to the general public Monday through Saturday, 21 hours a day from 4:00 am until 1:00 am. Danville Transit also provides fixed route service that links Averett University to the fixed route network, Monday through Friday and a trolley circulator is provided on Fridays and Saturdays during the evening. In addition, door to door service is also offered through a coordinated service arrangement with the Southern Area Agency on Aging and Danville Parks and Recreation for persons with disabilities and seniors. Paratransit and dial-a-ride operations do not apply to fixed route corridors to determine whether passengers can be transported.

Fixed route service is provided approximately every 40 minutes or 80 minutes along 11 different fixed routes from 6:00 am until 6:00 pm, Monday through Saturday. The majority of the fixed route network operates in low income residential areas and commercial districts where popular locations like the Danville Mall and Wal-Mart are located. Most routes receive 40 minute frequency of service but sparsely populated areas of the city including the remote east and west sides of Danville do not receive regular fixed route operations.

Danville Transit's fixed route base fare is $1 and persons with disabilities and seniors can ride for $.50 from 6 am until noon. After 12 pm all fixed route fares are $1 and from 6 am until 6 pm one child 12 years old and younger can ride free with a paying adult. The paratransit fare for persons with disabilities is $2 per one-way trip and one child can ride for free with a paying adult from 6 am until 6 pm. The dial a ride fare is $4 per one way trip and two children 12 years old and younger can ride for free with a paying adult. The dial a ride fare structure was modified to facilitate work trips in which parents are traveling with children to daycare or to school. The additional deviated fixed route Mainline trolley service fee is $1.00 for all riders.

The Danville Transit System completes approximately 340,000 trips annually including transfers. The majority of the trips completed are fixed route trips however over 60% of the total service hours provided are related to demand response operations.

III. POLICY STATEMENT AND AUTHORITIES

Title VI Policy Statement

The Danville Transit System is committed to ensuring that no person shall, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, whether those programs and activities are federally funded or not.

The Danville Transit System Title VI Manager is responsible for initiating and monitoring Title VI activities, preparing required reports, and other responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200, and Title 49 CFR Part 21.

Marc Ad[illegible] September 3, 2019

Signature of Authorizing Official Date

Authorities

Title VI of the 1964 Civil Rights Act provides that 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 otherwise subjected to discrimination under any program or activity receiving federal financial assistance (refer to 49 CFR Part 21). The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of the terms "programs or activities" to include all programs or activities of Federal Aid recipients, sub recipients, and contractors, whether such programs and activities are federally assisted or not.

Additional authorities and citations include: Title VI of the Civil Rights Act of 1964 (42 U.S.C. Section 2000d); Federal Transit Laws, as amended (49 U.S.C. Chapter 53 et seq.); Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601, et seq.); Department of Justice regulation, 28 CFR part 42, Subpart F, "Coordination of Enforcement of Nondiscrimination in Federally-Assisted Programs" (December 1, 1976, unless otherwise noted); U.S. DOT regulation, 49 CFR part 21, "Nondiscrimination in Federally-Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964" (June 18, 1970, unless otherwise noted); Joint FTA/Federal Highway Administration (FHWA) regulation, 23 CFR part 771, "Environmental Impact and Related Procedures" (August 28, 1987); Joint FTA/FHWA regulation, 23 CFR part 450 and 49 CFR part 613, "Planning Assistance and Standards," (October 28, 1993, unless otherwise noted); U.S. DOT Order 5610.2, "U.S. DOT Order on Environmental Justice to Address Environmental Justice in Minority Populations and Low-Income Populations," (April 15, 1997); U.S. DOT Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons, (December 14, 2005), and Section 12 of FTA's Master Agreement, FTA MA 13 (October 1, 2006).

IV. NONDISCRIMINATION ASSURANCES TO DRPT

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from the Federal Transit Administration (FTA) must be accompanied by an assurance that the applicant will carry out the program in compliance with DOT's Title VI regulations. This requirement is fulfilled when the Virginia Department of Rail and Public Transportation (DRPT) submits its annual certifications and assurances to FTA. DRPT shall collect Title VI assurances from sub-recipients prior to passing through FTA funds.

As part of the Certifications and Assurances submitted to DRPT with the Annual Grant Application and all Federal Transit Administration grants submitted to the DRPT, The Danville Transit System submits a Nondiscrimination Assurance which addresses compliance with Title VI as well as nondiscrimination in hiring (EEO) and contracting (DBE), and nondiscrimination on the basis of disability (ADA).

In signing and submitting this assurance, The Danville Transit System confirms to DRPT the agency's commitment to nondiscrimination and compliance with federal and state requirements.

V. PLAN APPROVAL DOCUMENT

I hereby acknowledge the receipt of the Danville Transit System Title VI Implementation Plan. I have reviewed and approve the Plan. I am committed to ensuring that no person is excluded from participation in, or denied the benefits of the Danville Transit System's transportation services on the basis of race, color, or national origin, as protected by Title VI according to Federal Transit Administration (FTA) Circular 4702.1B Title VI requirements and guidelines for FTA sub-recipients.

Ken Larking

Signature of Authorizing Official

9/4/19

DATE

Ken Larking, City Manager

City of Danville, Virginia

VI. ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES

The Danville Transit System's Transportation Services Director is responsible for ensuring implementation of the agency's Title VI program. Title VI program elements are interrelated and responsibilities may overlap. The specific areas of responsibility have been delineated below for purposes of clarity.

Overall Organization for Title VI

The Title VI Manager and staff are responsible for coordinating the overall administration of the Title VI program, plan, and assurances, including complaint handling, data collection and reporting, annual review and updates, and internal education.

Detailed Responsibilities of the Title VI Manager

The Title VI Manager is charged with the responsibility for implementing, monitoring, and ensuring compliance with Title VI regulations. Title VI responsibilities are as follows:

1. Process the disposition of Title VI complaints received.

2. Collect statistical data (race, color or national origin) of participants in and beneficiaries of agency programs, (e.g., affected citizens, and impacted communities).

3. Conduct annual Title VI reviews of agency to determine the effectiveness of program activities at all levels.

4. Conduct Title VI reviews of construction contractors, consultant contractors, suppliers, and other recipients of federal-aid fund contracts administered through the agency.

5. Conduct training programs on Title VI and other related statutes for agency employees.

6. Prepare a yearly report of Title VI accomplishments and goals, as required.

7. Develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English.

8. Identify and eliminate discrimination.

9. Establish procedures for promptly resolving deficiency status and writing the remedial action necessary, all within a period not to exceed 90 days.

General Title VI responsibilities of the agency

The Title VI Manager is responsible for substantiating that these elements of the plan are appropriately implemented and maintained, and for coordinating with those responsible for public outreach and involvement and service planning and delivery.

1. Data collection

To ensure that Title VI reporting requirements are met, the Danville Transit System will maintain:

- A database or log of Title VI complaints received. The investigation of and response to each complaint is tracked within the database or log.

- A log of the public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

2. Annual Report and Updates

As a sub-recipient of FTA funds, the Danville Transit System is required to submit a Quarterly Report Form to DRPT that documents any Title VI complaints received during the preceding quarter and for each year. The Danville Transit System will also maintain and provide to DRPT an annual basis, the log of public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

Further, we will submit to DRPT updates to any of the following items since the previous submission, or a statement to the effect that these items have not been changed since the previous submission, indicating date:

- A copy of any compliance review report for reviews conducted in the last three years, along with the purpose or reason for the review, the name of the organization that performed the review, a summary of findings and recommendations, and a report on the status or disposition of the findings and recommendations
- Limited English Proficiency (LEP) plan
- procedures for tracking and investigating Title VI complaints
- A list of Title VI investigations, complaints or lawsuits filed with the agency since the last submission
- A copy of the agency notice to the public that it complies with Title VI and instructions on how to file a discrimination complaint

3. Annual review of Title VI program

Each year, in preparing for the Annual Report and Updates, the Title VI Manager will review the agency's Title VI program to assure implementation of the Title VI plan. In addition, they will review agency operational guidelines and publications, including those for contractors, to verify that Title VI language and provisions are incorporated, as appropriate.

4. Dissemination of information related to the Title VI program

Information on our Title VI program will be disseminated to agency employees, contractors, and beneficiaries, as well as to the public, as described in the "public outreach and involvement "section of this document, and in other languages when needed according to the LEP plan as well as federal and State laws/regulations.

5. Resolution of complaints

Any individual may exercise his or her right to file a complaint if that person believes that he, she or any other program beneficiaries have been subjected to unequal treatment or discrimination in the receipt of benefits/services or prohibited by non-discrimination requirements. The Danville Transit System will report the complaint to DRPT within three business days (per DRPT requirements), and make a concerted effort to resolve complaints locally, using the agency's Title VI Complaint Procedures. All Title VI complaints and their resolution will be logged as described under Section 1. Data collection and reported annually (in addition to immediately) to DRPT.

6. Written policies and procedures

Our Title VI policies and procedures are documented in this plan and its appendices and attachments. This plan will be updated periodically to incorporate changes and additional responsibilities that arise. During the course of the Annual Title VI Program Review (item 3 above), the Title VI Manager will determine whether or not an update is needed.

7. Internal education

Our employees will receive training on Title VI policies and procedures upon hiring and upon promotion. This training will include requirements of Title VI, our obligations under Title VI (LEP requirements included), and required data that must be gathered and maintained. In addition, training will be provided when any Title VI-related policies or procedures change (agency-wide training), or when appropriate in resolving a complaint.

Title VI training is the responsibility of the Transportation Services Director.

8. Title VI clauses in contracts

In all federal procurements requiring a written contract or Purchase Order (PO), Danville Transit's contract/PO will include appropriate non-discrimination clauses. The Title VI Manager will work with the Purchasing Director who is/are responsible for procurement contracts and PO's to ensure appropriate non-discrimination clauses are included.

VII. PROCEDURES FOR NOTIFYING THE PUBLIC OF TITLE VI RIGHTS AND HOW TO FILE A COMPLAINT

Requirement to Provide a Title VI Public Notice

Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, the Danville Transit System shall disseminate this information to the public by posting a Title VI notice on the agency's website and in public areas of the agency's office(s), including the reception desk, meeting rooms, in federally-funded vehicles, etc.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. Section 2000d).

Danville Transit is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1B. If you feel you are being denied participation in or being denied benefits of the transit services provided by Danville Transit, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

Name: Marc Adelman
Title: Transportation Services Director
Agency Name: Danville Transit System
Address: P.O. Box 3300
City, State Zip code: Danville, Virginia 24543
Telephone Number: 434-799-5110
Email address: madelman@danvilleva.gov

SEE APPENDIX A –Title VI Public Notice

Title VI Complaint Procedures

Requirement to Develop Title VI Complaint Procedures and Complaint Form.

In order to comply with the reporting requirements established in 49 CFR Section 21.9(b), all recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. Recipients must also develop a Title VI complaint form. The form and procedure for filing a complaint shall be available on the recipient's website and at their facilities.

Any individual may exercise his or her right to file a complaint with Danville Transit if that person believes that he or she has been subjected to unequal treatment or discrimination in the receipt of benefits or services. Danville Transit will report the complaint to DRPT within three business days (per DRPT requirements), and make a concerted effort to resolve complaints locally, using the agency's Nondiscrimination Complaint Procedures. All Title VI complaints and their resolution will be logged and reported annually (in addition to immediately) to DRPT.

A person may also file a complaint directly with the Federal Transit Administration, Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th floor – TCR, 1200 New Jersey Avenue SE, Washington, DC 20590.

Danville Transit includes the following language on all printed information materials, on the agency's website, in press releases, in public notices, in published documents, and on posters on the interior of each vehicle operated in passenger service:

Danville Transit is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services on the basis of race, color or national origin, as protected by Title VI in the Federal Transit Administration (FTA) Circular 4702.1B. For additional information on Danville Transit's nondiscrimination policies and procedures, or to file a complaint, please visit the website at www.danvilletransit.com or contact Marc Adelman, Transportation Services Director, P.O. Box 3300, Danville, Virginia 24543, Title VI Manager.

Instructions for filing Title VI complaints are posted on the agency's website, signs located on the interior of each vehicle operated in passenger service, Danville Transit's Transfer Center and are also included within Danville Transit's route and schedule guide.

A copy of Danville Transit Title VI Complaint Form is attached as APPENDIX B.

SEE APPENDIX B – TITLE VI COMPLAINT FORM

Procedures for Handling and Reporting Investigations/Complaints and Lawsuits

Should any Title VI investigations be initiated by FTA or DRPT, or any Title VI lawsuits are filed against Danville Transit the agency will follow these procedures:

Procedures

1. Any individual, group of individuals, or entity that believes they have been subjected to discrimination on the basis of race, color, or national origin may file a written complaint with the Title VI Manager. The complaint is to be filed in the following manner:

    a. A formal complaint must be filed within 180 calendar days of the alleged occurrence.
    b. The complaint shall be in writing and signed by the complainant(s).
    c. The complaint should include:
        - the complainant's name, address, and contact information
        - (i.e., telephone number, email address, etc.)
        - the date(s) of the alleged act of discrimination (if multiple days, include the date when the complainant(s) became aware of the alleged discrimination and the date on which the alleged discrimination was discontinued or the latest instance).
        - a description of the alleged act of discrimination
        - the location(s) of the alleged act of discrimination (include vehicle number if appropriate)
        - an explanation of why the complainant believes the act to have been discriminatory on the basis of race, color, and national origin
        - if known, the names and/or job titles of those individuals perceived as parties in the incident
        - contact information for any witnesses
        - indication of any related complaint activity (i.e., was the complaint also submitted to DRPT or FTA?)
    d. The complaint shall be submitted to the Danville Transit Title VI Manager at P.O. Box 3300, Danville, Virginia 24543 or madelman@danvilleva.gov.
    e. Complaints received by any other employee of Danville Transit will be immediately forwarded to the Title VI Manager.
    f. In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the Title VI Manager. Under these circumstances, the complainant will be interviewed, and the Transportation Services Director or his designee will assist the complainant in converting the verbal allegations to writing.

2. Upon receipt of the complaint, the Title VI Manager will immediately:
    a. notify DRPT (no later than 3 business days from receipt)
    b. notify the Danville Transit Authorizing Official
    c. ensure that the complaint is entered in the complaint database
3. Within 3 business days of receipt of the complaint, the Title VI Manager will contact the complainant by telephone to set up an interview.

4. The complainant will be informed that they have a right to have a witness or representative present during the interview and can submit any documentation he/she perceives as relevant to proving his/her complaint.
5. If DRPT has assigned staff to assist with the investigation, the Title VI Manager will offer an opportunity to participate in the interview.
6. The alleged discriminatory service or program official will be given the opportunity to respond to all aspects of the complainant's allegations.
7. The Title VI Manager will determine, based on relevancy or duplication of evidence, which witnesses will be contacted and questioned.
8. The investigation may also include:
   a. investigating contractor operating records, policies or procedures
   b. reviewing routes, schedules, and fare policies
   c. reviewing operating policies and procedures
   d. reviewing scheduling and dispatch records
   e. observing behavior of the individual whose actions were cited in the complaint
9. All steps taken and findings in the investigation will be documented in writing and included in the complaint file.
10. The Title VI Manager will contact the complainant at the conclusion of the investigation, but prior to writing the final report, and give the complainant an opportunity to give a rebuttal statement at the end of the investigation process.
11. At the conclusion of the investigation and within 60 days of the interview with the complainant, the Title VI Manager will prepare a report that includes a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition. This report will be provided to the Authorizing Official, DRPT, and, if appropriate, Danville Transit's legal counsel.
12. The Title VI Manager will send a letter to the complainant notifying them of the outcome of the investigation. If the complaint was substantiated, the letter will indicate the course of action that will be followed to correct the situation. If the complaint is determined to be unfounded, the letter will explain the reasoning, and refer the complainant to DRPT in the event the complainant wishes to appeal the determination. This letter will be copied to DRPT.
13. A complaint may be dismissed for the following reasons:
    a. The complainant requests the withdrawal of the complaint.
    b. An interview cannot be scheduled with the complainant after reasonable attempts.
    c. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
14. DRPT will serve as the appealing forum to a complainant that is not satisfied with the outcome of an investigation conducted by Danville Transit. DRPT will analyze the facts of the case and will issue its conclusion to the appellant according to their procedures.

Transportation-Related Title VI Investigations, Complaints, and Lawsuits

Background
All recipients shall prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the recipient.

This list shall include the date that the transportation-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program submitted to DRPT every three years and information shall be provided to DRPT quarterly and annually.

The sample identified below is used for the purposes of tracking and documenting civil rights (Title VI, EEO and ADA) investigations, lawsuits and/or complaints.

SAMPLE List of Investigations, Lawsuits and Complaints

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color or national origin)	Status	Action(s) taken
Investigations				
1.				
Lawsuits				
1.				
Complaints				
1.				

SEE APPENDIX C- Investigations, Lawsuits and Complaints Document

Public Outreach and Involvement

PUBLIC PARTICIPATION PLAN

Introduction

The Public Participation Plan (PPP) is a guide for ongoing public participation endeavors. Its purpose is to ensure that Danville Transit utilizes effective means of providing information and receiving public input on transportation decisions from low income, minority and limited English proficient (LEP) populations, as required by Title VI of the Civil Rights Act of 1964 and its implementing regulations.

Under federal regulations, transit operators must take reasonable steps to ensure that Limited English Proficient (LEP) persons have meaningful access to their programs and activities. This means that public participation opportunities, normally provided in English, should be accessible to persons who have a limited ability to speak, read, write, or understand English.

In addition to language access measures, other major components of the PPP include: public participation design factors; a range of public participation methods to provide information, to invite participation and/or to seek input; examples to demonstrate how population-appropriate outreach methods can be and were identified and utilized; and performance measures and objectives to ensure accountability and a means for improving over time.

Danville Transit established a public participation plan or process that will determine how, when, and how often specific public participation activities should take place, and which specific measures are most appropriate.

Danville Transit will make these determinations based on a demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, and the resources available. Efforts to involve minority and LEP populations in public participation activities may include both comprehensive measures, such as placing public notices at all transit stations, stops, and vehicles, as well as targeted measures to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in our decision-making process.

A SAMPLE OF EFECTIVE PUBLIC OUTREACH PRACTICES INCLUDES:

a. Determining and identifying what meetings and program activities lend themselves to client public participation.

b. Scheduling meetings at times and locations that are convenient and accessible for minority and LEP communities.

c. Employing different meeting sizes and formats.

d. Coordinating with community and faith-based organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities.

e. Considering radio, television, or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations could also include audio programming available on podcasts.

f. Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments.

Other outreach efforts could include providing a translator for public meetings upon request from LEP individuals and providing a supplemental public notice that is translated for LEP populations. Danville Transit's Transfer Center bulletin board is currently used to identify public notices regarding transit operations and fees in Spanish.

SEE APPENDIX D-Summary of Outreach Efforts

VIII. LANGUAGE ASSISTANCE PLAN FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY (LEP)

Introduction and Legal Basis

LEP is a term that defines any individual not proficient in the use of the English language. The establishment and operation of an LEP program meets objectives set forth in Title VI of the Civil Rights Act and Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency (LEP). This Executive Order requires federal agencies receiving financial assistance to address the needs of non-English speaking persons. The Executive Order also establishes compliance standards to ensure that the programs and activities that are provided by a transportation provider in English are accessible to LEP communities. This includes providing meaningful access to individuals who are limited in their use of English. The following LEP language implementation plan, developed by Danville Transit is based on FTA guidelines.

As required, Danville Transit developed a written LEP Plan (below). Using 2011-2015 American Community Survey (ACS) Census data, Danville Transit has evaluated data to determine the extent of need for translation services of its vital documents and materials.

LEP persons can be a significant market for public transit, and reaching out to these individuals can help increase their utilization of transit. Therefore, it also makes good business sense to translate vital information into languages that the larger LEP populations in the community can understand.

Assessment of Needs and Resources

The need and resources for LEP language assistance were determined through a four-factor analysis as recommended by FTA guidance.

Factor 1: Assessment of the Number and Proportion of LEP Persons Likely to be Served or Encountered in the Eligible Service Population

The agency has reviewed census data on the number of individuals in its service area that have limited English Proficiency, as well as the languages they speak.

U.S. Census Data – American Community Survey (2011-2015)

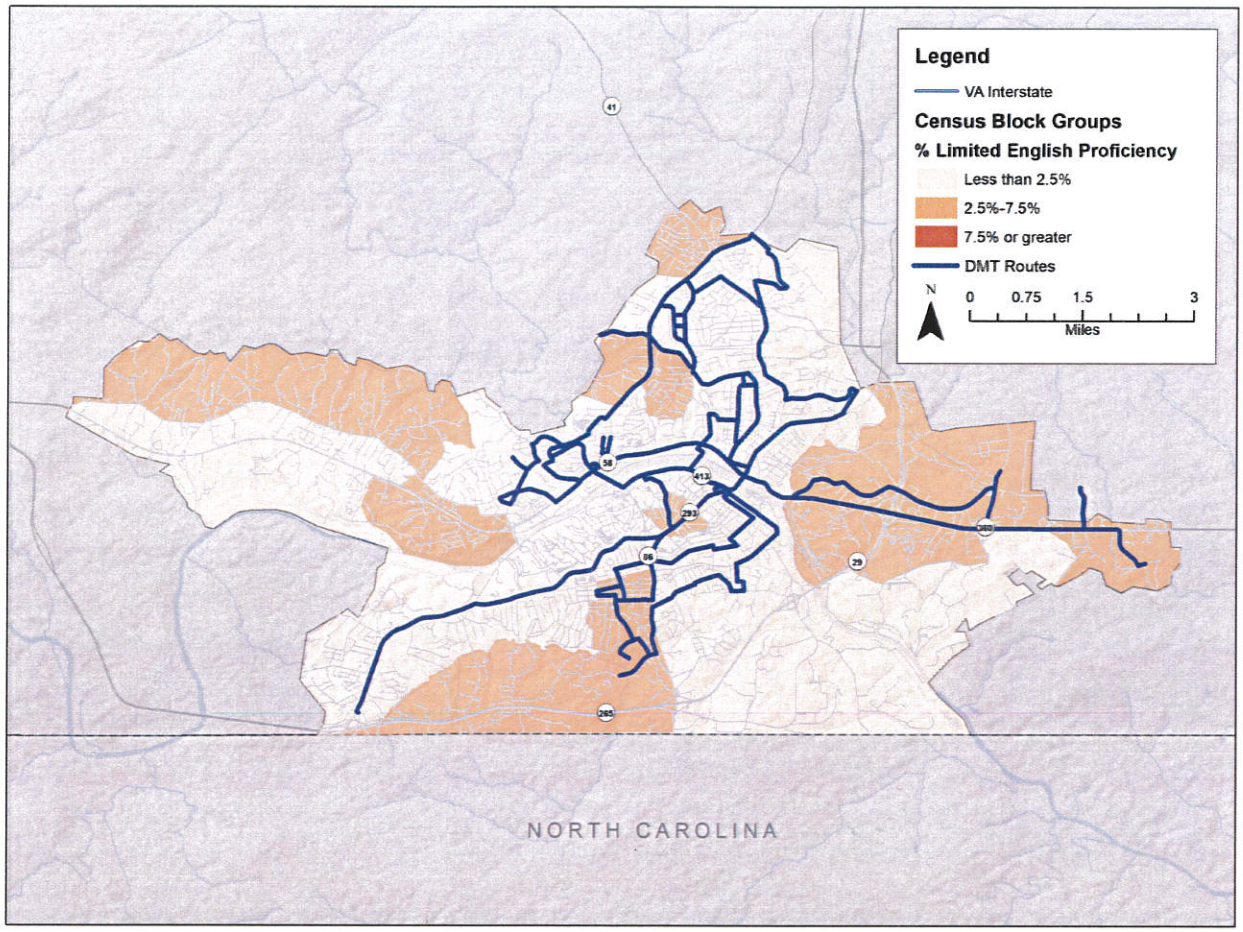
Data from the U.S. Census Bureau's American Community Survey (ACS) were obtained through www.census.gov by Danville Mass Transit's service area. The agency's service area includes a total of 631 (1.59%) persons with Limited English Proficiency (those persons who indicated that they spoke English "less than very well" in the 2011-2015 ACS Census).

Information from the 2011-2015 ACS also provides more detail on the specific languages that are spoken by those who report that they speak English less than very well. Languages spoken at home by those with LEP are presented below. These data indicate the extent to which translations into other language are needed to meet the needs of LEP persons.

Danville City			
Language	**Number of LEP Population**	**Percent of Service Area Population Speaking Language**	**Percent of LEP Population Speaking Language**
Spanish or Spanish Creole	353	0.89%	55.94%
Gujarati	112	0.28%	17.75%
Chinese	49	0.12%	7.77%
Hindi	41	0.10%	6.50%
Urdu	15	0.04%	2.38%
Portuguese or Portuguese Creole	13	0.03%	2.06%
Serbo-Croatian	13	0.03%	2.06%
French	8	0.02%	1.27%
Japanese	8	0.02%	1.27%
Greek	7	0.02%	1.11%
Korean	6	0.02%	0.95%
Vietnamese	6	0.02%	0.95%
Total LEP Population	**631**	**1.59%**	
Total City Population	**39,726**		

Spanish or Spanish Creole (353) is the most widely spoken language among LEP individuals in the Service Area. No other language group surpasses the Safe Harbor Provision. Figure 1 shows the percentage of LEP individuals in each Census Block Group. There are higher percentages of LEP persons in western, southern, and eastern Danville.

Figure 1 - % LEP by Census Block Group



Factor 2: Assessment of Frequency with Which LEP Individuals Come Into Contact with the Transit Services or System

Danville Transit reviewed the relevant benefits, services, and information provided by the agency and determined the extent to which LEP persons have come into contact with these functions through ***one or more of*** the following channels:

- Contact with transit vehicle operators;
- Contact with transit facility supervisors;
- Calls to Danville Transit's customer service telephone line;
- Visits to the agency's headquarters;
- Access to the agency's website;
- Attendance at community meetings or public hearings hosted by Danville Transit;
- Contact with the agency's ADA complementary paratransit system (including applying for eligibility, making reservations, and communicating with drivers).

Agency employees communicate regularly with fixed route and demand response passengers via the transit phone lines. Staff indicated that they interact with approximately 3 LEP individuals per month who schedule demand response service. Fixed route drivers indicated that they do not interact with any LEP individuals on a regular basis. Staff indicated that successful communications only required requesting the passenger to repeat statements in order to schedule trips properly. No requests from LEP persons have been made to produce marketing materials in a different language or to provide for an interpreter at a public meeting or hearing.

Danville Transit will continue to identify emerging populations as updated Census and American Community Survey data become available for our service area. In addition, when LEP persons contact our agency, we attempt to identify their language and keep records on contacts to accurately assess the frequency of contact. To assist in language identification, we use a language identification flashcard based on that which was developed by the U.S. Census. (http://www.lep.gov/ISpeakCards2004.pdf)]

Information from Community Organizations that Serve LEP Persons

To supplement the Census, education, and labor department data, Danville Transit conducted community outreach to the following organizations that work with LEP populations.

- School system
- Community organizations
- Local government
- Religious organizations

Phone surveys were completed with Danville Social Services, Sacred Heart Church, Adult Education and Learning Center and the Telemon Corporation. Survey results reflected that Danville Transit's current outreach efforts and daily activities with providing service to LEP individuals is satisfactory. Community organizations also indicated that few LEP persons are using the transit service because a vehicle is available for them to drive.

Factor 3: Assessment of the Nature and Importance of the Transit Services to the LEP Population

Danville Transit provides the following programs, activities and services:

Paratransit and fixed route service is provided Monday through Saturday from 6:00 am until 6:00 pm and dial a ride service is provided 21 hours a day from 4:00 am until 1:00 am. The Mainline trolley service operates Friday and Saturday from 6:00 pm until 12:00 am.

Based on past experience serving and communicating with LEP persons and interviews with community agencies, Danville Transit learned that the dial a ride service is currently of particular importance with LEP persons in the community.

The following are the most critical services provided by Danville Transit for all customers, including LEP persons.

- Public transit services, including the dial a ride operation and the reduced fare application process for the fixed route service
- ADA paratransit services including eligibility certification process

Factor 4: Assessment of the Resources Available to the Agency and Costs

Costs

The following language assistance measures currently being provided by Danville Transit

- Marilyn Dell of the Danville Transit System translate notices for Danville Transit and will serve as an interpreter for public meetings upon request. On average the transit system will spend less than $100 per year for translation assistance since no requests have been made for an interpreter.
- Administrative and operations staff including demand response drivers will interact with LEP individuals on an incidental basis a few times a month with taking reservations or providing technical assistance, which results in a very small percent of time.
- Danville Transit employs a 2 full time drivers who speak Spanish and can translate as needed with passengers

  Danville Transit does not anticipate these activities and costs will increase.

Based on the analysis of demographic data and contact with community organizations and LEP persons, Danville Transit has determined that no additional services are needed to provide meaningful access.

Other potential cost saving measures include: telephonic and video conferencing interpretation services, translating vital documents posted on Web sites, pooling resources and standardizing documents to reduce translation needs, centralizing interpreter and translator services to achieve economies of scale.

Feasible and Appropriate Language Assistance Measures

Based on the available resources, the following language assistance measures are feasible and appropriate for our agency at this time:

- Translating public notices and advertising these notices in the local paper to ensure meaningful access

- Employing staff who speak Spanish who can provide language assistance
- Advertising public notices at the Transfer Center
- Provide translation assistance upon request for public meetings

LEP Implementation Plan

Through the four-factor analysis, Danville Transit has determined that the following types of language assistance are most needed and feasible:

- ***Translation of vital documents into Spanish. These documents include:***
  - ***Public Notices***
  - ***Fare Information***
- ***Attempt to hire bilingual staff with competency in spoken and written Spanish***
- ***Language Line Translation Services for telephone contacts.***
- ***In-person translation for ADA eligibility assessments.***

Staff Access to Language Assistance Services

Agency staff who come into contact with LEP persons can access language services by offering the individual a language identification flashcard, having a supply of translated documents on hand or referring a call to bilingual staff. All staff will be provided with a list of available language assistance services and additional information and referral resources (such as community organizations which can assist LEP persons). This list will be updated at least annually.

Responding to LEP Callers

Staff who answer calls from the public respond to LEP customers as follows: a mass transit employee is referred to the passenger who can provide language assistance or an outside contractor/ Dee Hacker is requested to provide assistance if Danville Transit does not employ a staff person who is bilingual.

Responding to Written Communications from LEP Persons

The following procedures are followed when responding to written communications from LEP persons: a mass transit employee is referred to the passenger who can provide written communications or outside assistance/ Gabriella Woodard is requested to provide written communications assistance if Danville Transit does not employ a staff person who is bilingual.

Responding to LEP Individuals in Person

The following procedures are followed when an LEP person visits our customer service and administrative office: The LEP person is informed of the availability of transit staff who can provide assistance or outside assistance/ Gabriella Woodard would be contacted by phone to assist the LEP person.

The following procedures are followed by operators when an LEP person has a question on board a Danville Transit vehicle: The driver would first seek volunteer translation assistance from fellow passengers and if no assistance was available then the driver would attempt to communicate with base to locate a transit employee who is bilingual to offer assistance.

Staff Training

As noted previously, all Danville Transit staff are provided with a list of available language assistance services and additional information and referral resources, updated annually.

All new hires receive training on assisting LEP persons as part of their sensitivity and customer service training. This includes:

- A summary of the transit agency's responsibilities under the DOT LEP Guidance;
- A summary of the agency's language assistance plan;
- A summary of the number and proportion of LEP persons in the agency's service area, the frequency of contact between the LEP population and the agency's programs and activities, and the importance of the programs and activities to the population;
- A description of the type of language assistance that the agency is currently providing and instructions on how agency staff can access these products and services; and
- A description of the agency's cultural sensitivity policies and practices.

Also, all staff who routinely come into contact with customers, as well as their supervisors and all management staff, receive annual refresher training on policies and procedures related to assisting LEP persons.

Providing Notice to LEP Persons

LEP persons are notified of the availability of language assistance through the following approaches:

- through our Title VI policy statement included on our vital documents.
- on our website
- through signs posted in our customer service and administrative offices.
- through ongoing outreach efforts to community organizations, schools, and religious organizations.
- sending translated news releases and public service announcements about the availability of translated information to newspapers and broadcast media that target local LEP communities

LEP persons will also be included in all community outreach efforts related to service and fare changes.

Monitoring/updating the plan

This plan will be updated on a periodic basis (at least every three years), based on feedback, updated demographic data, and resource availability.

As part of ongoing outreach to community organizations, Danville Transit will solicit feedback on the effectiveness of language assistance provided and unmet needs. In addition, we will conduct periodic surveys and internal meetings with staff who assist LEP persons and review updated Census data and formal studies of the adequacy and the quality of the language assistance provided to determine changes to LEP needs.

In preparing the triennial update of this plan, Danville Transit will conduct an internal assessment using the Language Assistance Monitoring Checklist provided in the FTA's "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers." This checklist is attached at the end of this sample plan.

Based on the feedback received from community members and agency employees, Danville Transit will make incremental changes to the type of written and oral language assistance provided as well as to their staff training and community outreach programs. The cost of proposed changes and the available resources will affect the enhancements that can be made, and therefore Danville Transit will attempt to identify the most cost-effective approaches.

As the community grows and new LEP groups emerge, Danville Transit will strive to address the needs for additional language assistance.

MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES

Title 49 CFR Section 21.5(b)(1)(VIII) states that a recipient may not, on the grounds of race, color, or national origin, "deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program."

Danville Transit has transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which we select.

1. Danville City Council's Committee on Appointments consisting of three members of Council considers and recommends to the entire Council names of persons qualified for appointments to Boards and Commissions of the City including the Transportation Advisory Committee per the City Code. Interested parties may obtain an application in the Clerk's office or fill out an application on the city's website. Sixty days prior to a vacancy on the Committee the City Clerk publishes an advertisement in the local newspaper as well as posting the vacancy on the city's website.

2. Identified below is a table depicting the racial breakdown of the membership of Danville's Transportation Advisory Committee

Committee	Black or African American	White/ Caucasian	Latino/ Hispanic	American Indian or Alaska Native	Asian	Native Hawaiian or other Pacific Islander	Other *Note	Totals
Transportation Advisory Committee (CAC)	4	3						7
% of CAC Committee	57%	43%						100%

SEE APPENDIX E- TABLE MINORITY REPRESENTATION ON COMMITTEE BY RACE

REQUIREMENTS OF TRANSIT PROVIDERS

Requirements and Guidelines for Fixed Route Transit Providers

The requirements apply to all providers of fixed route public transportation (also referred to as transit providers) that receive Federal financial assistance, inclusive of States, local and regional entities, and public and private entities.

Transit providers that are sub-recipients will submit the information to their primary recipient (the entity from whom they directly receive transit funds) every three years on a schedule determined by the primary recipient. The requirements are scaled based on the size of the fixed route transit provider.

Danville Transit is required to plan and deliver transportation services in an equitable manner. This means the distribution of service levels and quality is to be equitable between minority and low income populations and the overall population. Danville Transit has reviewed its services and policies to ensure that those services and benefits are provided in an equitable manner to all persons.

Service Standards

The agency has set standards and policies that address how services are distributed across the transit system service area to ensure that the distribution affords users equitable access to these services. As shown in Figures 3-12 and 3-13 from Danville Transit's 2019 Transit Development Plan Update the transit system's fixed route network effectively serves minority populations and below poverty populations. Please see Appendix F to review these figures. The agency's demand responsive services are

available to all callers on a first-come first-served basis, without regard for race, color or national origin.

The following system-wide service standards are used to guard against service design or operations decisions from having disparate impacts. All of Danville Transit's services meet the agency's established standards; thus it is judged that services are provided equitably to all persons in the service area, regardless of race, color or national origin.

- **Vehicle load** -Vehicle load is expressed as the ratio of passengers to the total number of seats on a vehicle at its maximum load point. The standard for maximum vehicle load is 20 to 28 passengers, all of Danville Transit services meet this standards
- **Vehicle headway** -Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given route. A shorter headway corresponds to more frequent service. The standard for vehicle headways is 40 – 80 minutes, all of Danville Transit fixed routes meet this standards
- **On-time performance** -On-time performance is a measure of runs completed as scheduled. This criterion first must define what is considered to be "on time." Danville's standard for on-time performance is that 95% of all fixed route runs leave time check points including the main Transfer point per the scheduled departure times. Fixed route afternoon service did not meet this standard during FY15 based on recent planning activities completed internally and findings provided by KFH Group through their efforts with updating Danville's Transit Development Plan. As a result, service headways were modified during FY16 to accomplish this objective. Related changes involved adding an additional 10 minutes for the majority of afternoon runs and an additional 5 minutes were added for other runs. These changes have aided in meeting on-time performance standards
- **Service availability** - Service availability is a general measure of the distribution of routes within a transit provider's service area or the span of service. The standard for service availability is to equally provide comparable level of fixed route and demand response operations to areas of the city which maintain minority and low income populations, all of Danville Transit services meet this standard.

Service and Operating Policies

Danville Transit's service and operating policies also ensure that operational practices do not result in discrimination on the basis of race, color, or national origin.

- **Distribution and Siting of Transit Amenities** -Transit amenities refer to items of comfort, convenience, and safety that are available to the general riding public. Danville Transit has a policy to ensure the equitable distribution of transit amenities across the system. This policy applies to seating (i.e., benches, bus shelters,) provision of information and waste receptacles. Passenger amenities are sited based on ridership activity.

- **Vehicle assignment** - Vehicle assignment refers to the process by which transit vehicles are placed into service and on routes throughout the system. Danville

Transit assigns vehicles with the goal of providing equitable benefits to minority and low income populations. Vehicles are assigned with regard to service type (fixed-route, demand-response, or a hybrid type) and ridership demand patterns (routes with greater numbers of passengers need vehicles with larger capacities).

For each type of assignment, newer vehicles are rotated to ensure that no single route or service always has the same vehicle. The Transportation Supervisors and Transportation Services Director are responsible for Title VI compliance in service delivery reviews vehicle assignments on a monthly basis to ensure that vehicles are indeed being rotated and that no single route or service always has the old or new vehicles.

Danville Transit assigns vehicles with more capacity to routes with higher ridership and/or during peak periods and relative to whether fixed route or demand response operations are provided. Twenty passenger buses are used for routes like #3 Edgewood and #3 Danville Estates that maintain low ridership and for Danville Transit's Reserve-A-Ride and paratransit service. The largest vehicles in the fleet are 28 passenger body-on-chassis buses which are used for the majority of the fixed routes that maintain higher passenger loads.

Monitoring Title VI Complaints

As part of the complaint handling procedure, the Title VI Manager investigates possible inequities in service delivery for the route(s) or service(s) about which the complaint was filed. Depending on the nature of the complaint, the review examines span of service (days and hours), frequency, routing directness, interconnectivity with other routes and/or fare policy. If inequities are discovered during this review, options for reducing the disparity are explored, and service or fare changes are planned if needed.

In addition to the investigation following an individual complaint, the Title VI Manager periodically reviews all complaints received to determine if there may be a pattern. At a minimum, this review is conducted as part of preparing the Annual Report and Update for submission to DRPT.

Fare and Service Changes

Danville Transit follows its adopted written policy for the public comment process for major service reductions and fare increases. With each proposed service or fare change, Danville Transit considers the relative impacts on, and benefits to, minority and low income populations, including LEP populations. All planning efforts for changes to existing services or fares, as well as new services, have a goal of providing equitable service. *No major service reductions or fare increases are planned as part of Danville's 2019 Transit Development Plan Update.*

LANGUAGE ASSISTANCE MONITORING CHECKLIST

Periodic monitoring of language assistance measures that have been implemented can help an agency determine if assistance is being provided competently and effectively. Agencies can use the following checklist to monitor their services. Actual monitoring should be tailored to what services the agency has implemented. Depending on the language assistance provided, the following questions could be answered by periodic monitoring:

Stations/Transfer Center

Yes, fare information is translated for both fixed route and demand response service Are translated instructions on how to make fare payments available?

N/A Are translated schedules, route maps, or information on how to use the system available?

Yes, fare information is available in a visible location Has the information been placed in a visible location?

N/A How many units of the material have been distributed?

Yes, supervisors are aware of information provided on the bulletin board If such information is available, are station managers aware that they have this information?

N/A Are announcements audible?

N/A Are any announcements, such as security awareness announcements, made in languages other than English?

N/A Does the station display information or instructions using pictographs?

Yes, Danville Transit employs staff who are bilingual Can a person who speaks limited English or another language receive assistance from a station manager when asking for directions? How is this assistance provided?

Vehicles

N/A Are translated instructions on how to make fare payments available?

N/A Are translated schedules, route maps, or information on how to use the system available?

N/A Has the information been placed in a visible location?

N/A How many units of the material have been distributed?

N/A If such information is available, are vehicle operators aware that they have this information?

N/A Are announcements audible?

N/A Are any announcements, such as security awareness announcements, made in languages other than English?

Yes, Danville Transit does employ drivers who are bilingual and passengers can be referred to those persons in person or via the radio if needed. Can a person who speaks limited English or another language receive assistance from a bus operator when asking about the destination of the vehicle? How is this assistance provided?

Customer Service

N/A Is the customer service telephone line equipped to handle callers speaking languages other than English?

Yes Can customer service representatives describe to a caller what language assistance the agency provides and how to obtain translated information or oral interpretation?

Yes Can a person speaking limited English or a language other than English request information from a customer service representative?

Community Outreach

Yes, upon request Are translators present at community meetings?

Yes, upon request Are translated versions of any written materials that are handed out at a meeting provided?

Yes Can members of the public provide oral as well as written comments?

Press/Public Relations

Yes Are meeting notices, press releases, and public service announcements translated into languages other than English?

N/A Does the agency website have a link to translated information on its home page?

APPENDIX A – TITLE VI PUBLIC NOTICE AND LIST OF LOCATIONS

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. Section 2000d).

Danville Transit is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1B. If you feel you are being denied participation in or being denied benefits of the transit services provided by Danville Transit, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

Name: Marc Adelman
Title: Transportation Services Director
Agency Name: Danville Transit System
Address: P.O. Box 3300
City, State Zip code: Danville, Virginia 24543
Telephone Number: 434-799-5110
Email address: madelman@danvilleva.gov

LIST OF LOCATIONS OF PUBLIC NOTICE

Transfer Center Bulletin Board – Bulletin board is in case and locked
Danville Transit Route and Schedule Guide
All transit buses
Danville Transit website, www.danvilletransit.com

APPENDIX B

TITLE VI COMPLAINT FORM

Section I:				
Name:				
Address:				
Telephone (Home):		Telephone (Work):		
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	

Section II:		
Are you filing this complaint on your own behalf?	Yes*	No
*If you answered "yes" to this question, go to Section III.		
If not, please supply the name and relationship of the person for whom you are complaining:		
Please explain why you have filed for a third party:		
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.	Yes	No

Section III:

I believe the discrimination I experienced was based on (check all that apply):

[ ] Race [ ] Color [ ] National Origin

Date of Alleged Discrimination (Month, Day, Year): _____

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.

_____

_____

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?

[ ] Yes [ ] No

If yes, check all that apply:

[ ] Federal Agency: _____

[ ] Federal Court _____ [ ] State Agency _____

[ ] State Court _____ [ ] 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:

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below

_____ _____

Signature Date

APPENDIX C
INVESTIGATIONS, LAWSUITS AND COMPLAINTS DOCUMENT

Danville Transit has not received any Title VI Complaints or been involved in any Title VI investigations or lawsuits

List of Investigations, Lawsuits and Complaints

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color or national origin)	Status	Action(s) taken
Investigations				
1.				
Lawsuits				
1.				
Complaints				
1.				

APPENDIX D-SUMMARY OF OUTREACH EFFORTS

a. Danville Transit has determined that meetings and program activities such as public participation meetings and public hearings are determined to lend themselves to client public participation that are related to service issues.

b. Meetings are scheduled at the Ballou Park Senior Center and Danville City Hall, which are convenient and accessible for minority and LEP communities. Mass Transit provides frequent bus service along Main Street and W. Main Street where the Ballou Park Senior Center is located. Danville Transit also offers dial a ride service to support meetings at the senior center and City Hall.

c. The Ballou Park Senior Center allows for large meetings and tables and chairs are positioned so attendees can sit in close proximity to the speaker. Public Hearings are scheduled at Danville City Hall that allows the public to participate by speaking to Danville City Council.

d. Danville Transit will coordinate with community and faith-based organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities.

e. Danville Transit places ads in the local newspaper that serve LEP populations and are translated in Spanish. Danville Transit's Transfer Center bulletin board is currently used to identify public notices in Spanish.

f. Danville Transit maintains a supervisor at the Transfer Center on Spring Street and the public maintains opportunities for public participation through communicating with staff at that location.

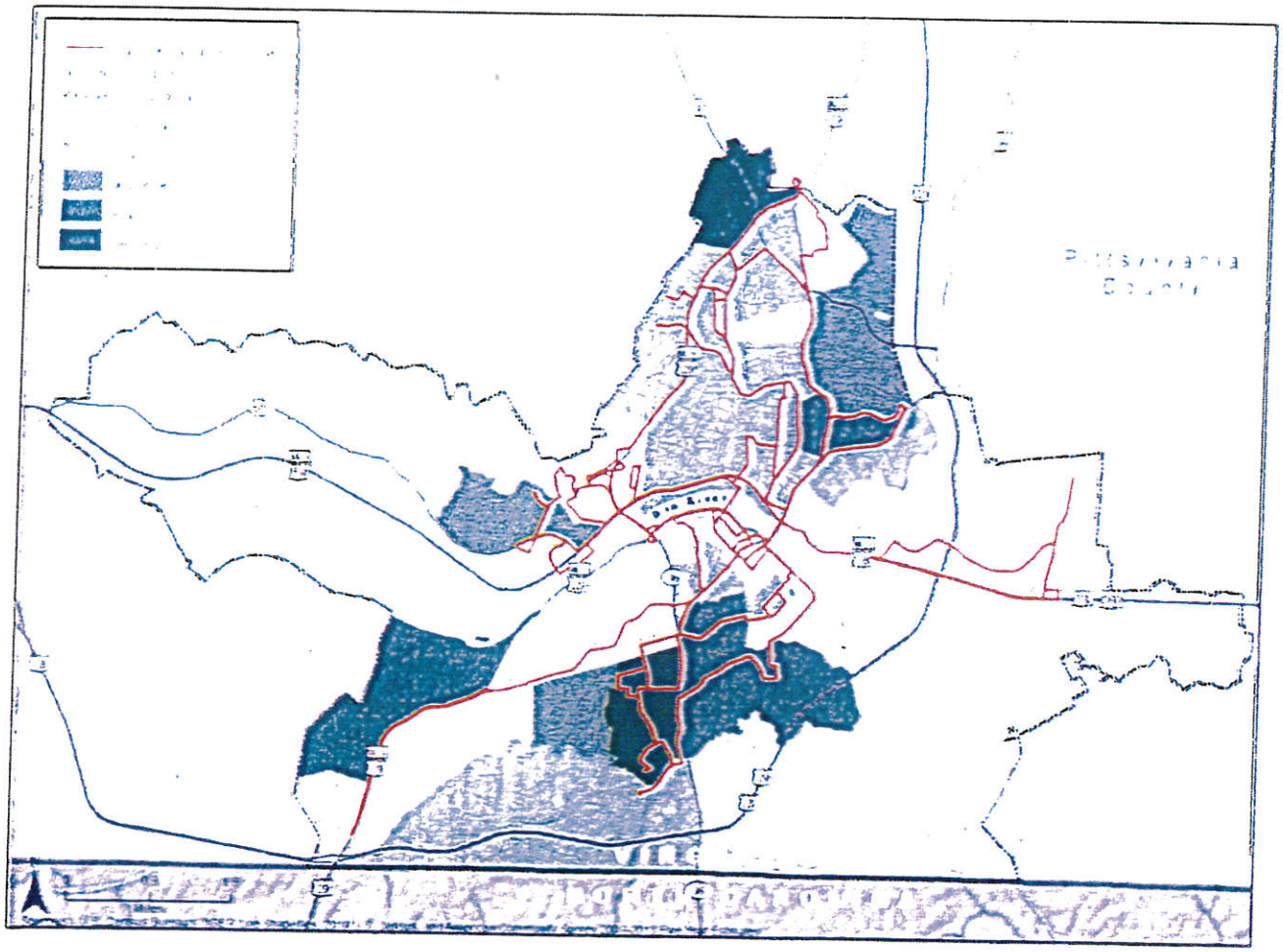
SEE APPENDIX E- TABLE MINORITY REPRESENTATION ON COMMITTEE BY RACE

Committee	Black or African American	White/ Caucasian	Latino/ Hispanic	American Indian or Alaska Native	Asian	Native Hawaiian or other Pacific Islander	Other *Note	Totals
Transportation Advisory Committee (TAC)	4	3						7
% of TAC Committee	57%	43%						100%

APPENDIX F- GEOGRAPHICAL REPRESENTATION OF FIXED ROUTES TO MINORITY AND LOW INCOME POPULATIONS FIGURES 3-12 AND 3-13

population, it is necessary to first understand where these relative concentrations of individuals reside. Figure 3-12 provides a geographical representation of the minority composition. Relative concentrations of minorities reside in the neighborhoods around the Danville Community College and to the north of Piney Forest Road near the intersection of State Route 41.

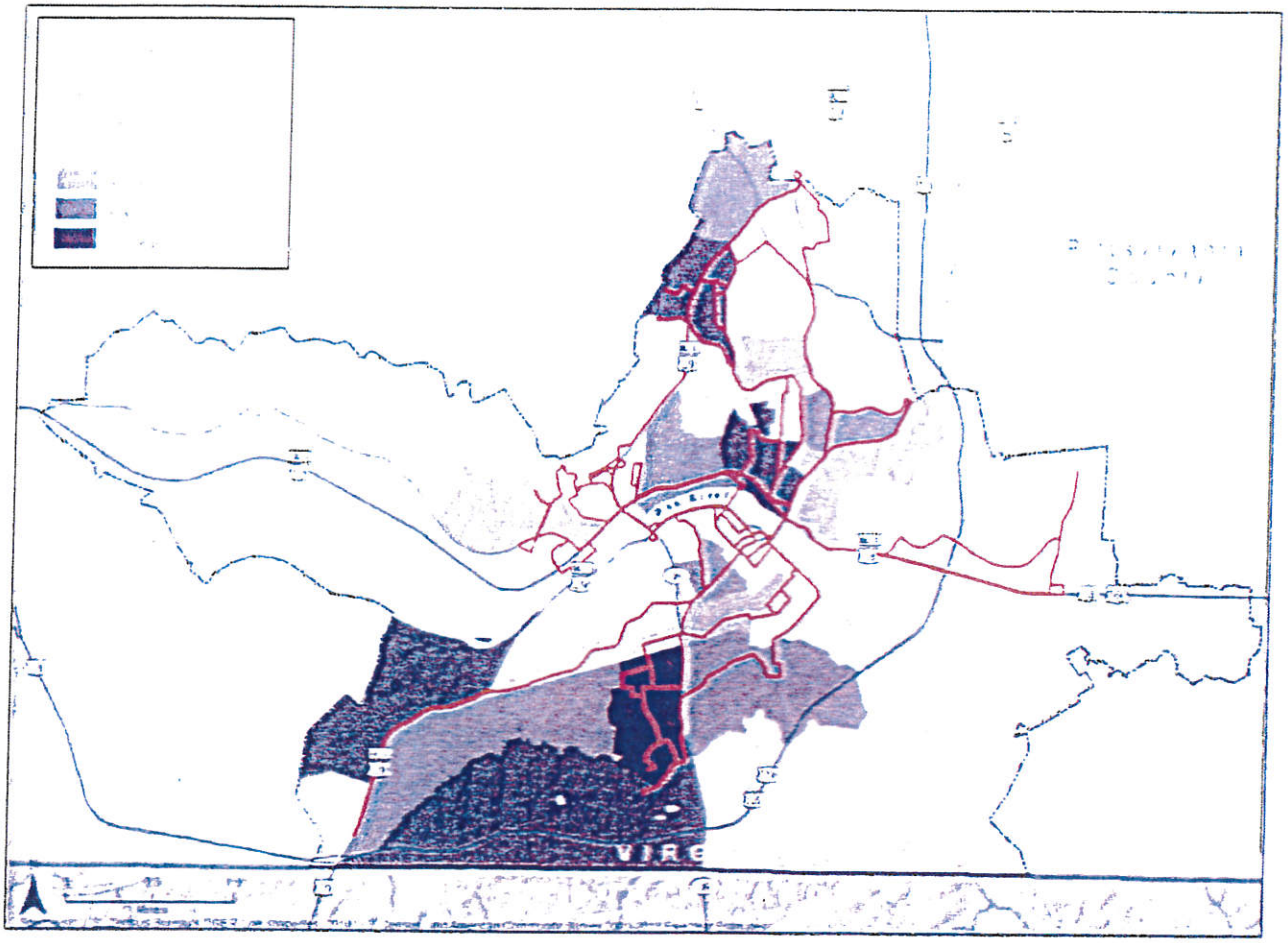
Figure 3-12: Minority Population



Low-Income Population

This socioeconomic group represents those individuals who earn less than the federal poverty level. These individuals face financial hardships that make the ownership and maintenance of a personal vehicle difficult, and thus they may be more inclined to depend upon public transportation. As seen in Figure 3-13, the block groups with large concentrations of below poverty populations are scattered through the central city area. The only block group with a very high proportion of below poverty individuals is located around the Danville Community College just to the west of S. Main Street. Other areas with notable concentrations include the southwestern areas of the city and neighborhoods along Piney Forest Road and Riverside Drive.

Figure 3-13: Below Poverty Population



Limited-English Proficiency (LEP)

In addition to equitably providing public transportation to individuals of diverse socioeconomic backgrounds, it is also important to realize the variety of languages spoken by area residents. According to the American Community Survey's five-year estimates for 2008-2012, English is the most predominately spoken language amongst Danville residents (94.9%). As seen in Table 3-16, amongst the other languages spoken by residents, only Spanish has a percent share greater than two percent (3.5%).