



HAMPTON ROADS TRANSIT

Title VI Program 2017-2020

TITLE VI OF THE CIVIL RIGHTS ACT OF 1964



This page intentionally left blank.

Contents

CHAPTER 1: INTRODUCTION	1
1.1 TITLE VI OF THE CIVIL RIGHTS ACT OF 1964	1
1.2 HAMPTON ROADS TRANSIT	1
CHAPTER 2: GENERAL REPORTING REQUIREMENTS	7
2.1 TITLE VI NOTICE TO THE PUBLIC.....	7
2.2 HRT TITLE VI COMPLAINT PROCEDURES AND FORM	9
2.3 TITLE VI INVESTIGATIONS, COMPLAINTS AND LAWSUITS.....	12
2.4 PUBLIC PARTICIPATION PLAN.....	14
2.5 LIMITED ENGLISH PROFICIENCY (LEP)	14
2.6 MEMBERSHIP OF NON-ELECTED COMMITTEES AND COUNCILS	15
2.7 MONITORING OF SUBRECIPIENTS AND CONTRACTORS	17
2.8 FIXED FACILITY IMPACT ANALYSIS.....	20
2.9 COMMISSION APPROVAL OF THE Title VI PROGRAM	21
CHAPTER 3: SERVICE STANDARDS AND POLICIES	20
3.1 MAJOR SERVICE/FARE CHANGE POLICY.....	21
3.2 DISPARATE AND DISPROPORTIONATE IMPACT.....	21
3.3 EQUITY ANALYSIS PROCEDURES.....	28
3.4 SERVICE STANDARDS.....	31
3.5 SERVICE POLICIES	34
CHAPTER 4: DEMOGRAPHIC AND SERVICE PROFILE MAPS AND CHARTS	33
4.1 POPULATION ETHNICITY CHARACTERISTICS	33
4.2 INCOME CHARACTERISTICS.....	34
4.3 COMPOSITE MINORITY & LOW-INCOME CHARACTERISTICS	41
4.4 ROUTING DEMOGRAPHIC CHARACTERISTICS	42
4.5 DEMOGRAPHIC RIDERSHIP AND TRAVEL PATTERNS COLLECTED BY SURVEYS.....	42
CHAPTER 5: SERVICE MONITORING.....	40
5.1 EQUITABLE SERVICE AND AMENITIES	40
5.2 VEHICLE LOAD MONITORING	43
5.3 ON-TIME PERFORMANCE REPORT	47

5.4 SERVICE AVAILABILITY ANALYSIS.....	48
CHAPTER 6: SERVICE AND FARE CHANGES	50
6.1 MAJOR SERVICE CHANGES SINCE 2014.....	50
6.2 FARE CHANGES SINCE 2014	50
APPENDICES.....	48
APPENDIX A: PUBLIC PARTICIPATION PLAN	50
APPENDIX B: LIMITED ENGLISH PROFICIENCY PLAN	71
APPENDIX C: BOARD AND COMMITTEE MEMBERS	86
APPENDIX D: COMMISSION RESOLUTION.....	91
APPENDIX E: DETAILED VEHICLE ASSIGNMENT.....	91
APPENDIX F: ROUTE MINORITY/LOW-INCOME STATUS	95
APPENDIX G: VEHICLE LOAD ANALYSIS	102
APPENDIX H SERVICE CHANGE ANALYSES 2014-2016	100
APPENDIX I: FARE CHANGE ANALYSES 2014-2016.....	101
APPENDIX J: TITLE VI EQUITY ANALYSIS OF STUDENT FREEDOM PASS PROGRAM FARE	128

CHAPTER 1: INTRODUCTION

TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

The Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin. Section 601 of Title VI of the Civil Rights Act of 1964 states 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 subjected to discrimination under any program or activity receiving federal financial assistance."

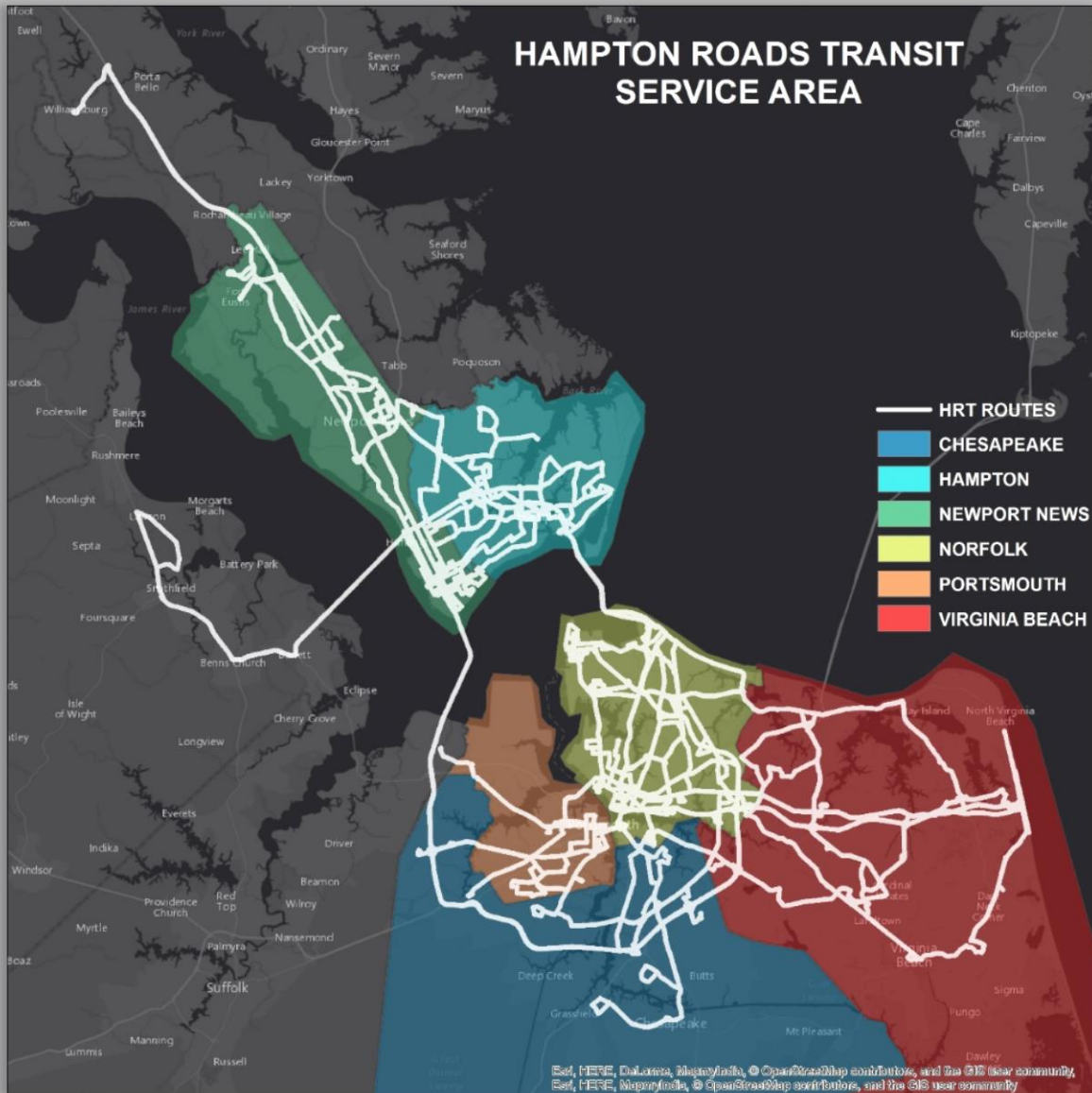
To achieve this purpose, each Federal department and agency which provides financial assistance for any program or activity is authorized and directed by U.S. Department of Justice (DOJ) to effectuate provisions of Title VI for each program or activity by issuing generally applicable rules, regulations, or requirements.

In this regard, it is the responsibility of applicants, recipients, and sub-recipients of Federal Transit Administration (FTA) assistance, to distribute transit services and related benefits in a manner consistent with Title VI. Title VI of the Civil Rights Act of 1964 requires recipients of federal assistance to monitor and evaluate federally assisted programs for compliance. The FTA is responsible for ensuring compliance of transit agencies receiving federal assistance. FTA Circular 4702.1B describes the monitoring methodology used by recipients. Transit providers must conduct periodic assessments to determine whether the transit service provided to minority communities and minority users is consistent with the objectives cited in this circular. Hampton Roads Transit receives federal assistance for the provision of public transit services and therefore complies with the Civil Rights Act of 1964 and the provision of Title VI.

HAMPTON ROADS TRANSIT

The Transportation District Commission of Hampton Roads (Hampton Roads Transit or HRT) was established in 1999 to provide local and sub-regional fixed-route bus services for the Hampton Roads region. The primary communities served by HRT are Chesapeake, Hampton, Newport News, Norfolk, Portsmouth, and Virginia Beach. The service area provides HRT with over 15.2 million passenger trips from a diverse community of 1.33 million, of which 47.1% are designated as minorities (2014 American Community Survey (ACS)) and 20.5% are designated as low-income (150% of the federal poverty line with respect to household size as determined by the US Department of Health and Human Services) (2014 ACS).

FIGURE 1: HAMPTON ROADS TRANSIT SYSTEM MAP (AUGUST 2016)



FACILITIES

Hampton Roads Transit operates from the following facilities located throughout its service area.

TABLE 1: HRT TRANSIT FACILITIES

FACILITY	ADDRESS
HRT Northside Bus Operations, Maintenance and Administration Facility	2400 Victoria Boulevard Hampton, VA 23661
HRT Southside Bus Operations, Maintenance and Administration Facility	509 E. 18 th Street Norfolk, VA 23504
Norfolk Tide Facility (light rail maintenance and operations)	1850 Brambleton Avenue Norfolk, VA 23504
Rail Operations (warehouse)	3404 Mangrove Avenue Norfolk, VA 23502
Downtown Norfolk Transit Center	434 St. Paul's Blvd Norfolk, VA 23510
Hampton Transit Center	2 West Pembroke Avenue Hampton, VA 23669
Newport News Transit Center	150 35 th Street Newport News, VA 23607
Silverleaf Transit Center	4300 Commuter Drive Virginia Beach, VA 23452
Ward's Corner Transfer Center	7725 Granby Street Norfolk VA 23505
HRT Virginia Beach Operations Facility (seasonal trolley base)	1400 Parks Avenue Virginia Beach, VA 23451

SERVICES PROVIDED

Hampton Roads Transit operates fixed-route local and express bus service, fixed guideway ferry and light rail service, paratransit bus service, and TRAFFIX (vanpool) service. All buses, ferries, and light rail vehicles are ADA accessible.

Local Fixed-Route Bus Service

Approximately seventy local bus routes connect customers to work, school, retail, recreational opportunities, and other destinations. Fixed-route service is provided with 29-, 35-, and 40-foot buses. While service frequency, hours, and days vary by route, the bus system operates seven (7) days a week from 4:00 a.m. to 2:00 a.m. Fixed-route buses can accommodate up to two bicycles.

MAX Express Bus Service

The MAX is a regional express bus service traveling mostly along interstates and connecting some of the region's largest employers, including Naval Station Norfolk and Huntington Ingalls Shipyard in Newport News. MAX routes have limited stops for faster connections. MAX service operates on coach buses. Some MAX routes operate throughout the day; others are designed for commuter service, only operating during peak periods.

Virginia Beach Wave Seasonal Bus Service

The VB Wave is a seasonal fixed-route that serves residents and tourists of the Virginia Beach resort area. The VB Wave operates from May to October from 8:00 a.m. to 2:00 a.m. The VB Wave service operates with trolley vehicles.

Peninsula Commuter Service

The Peninsula Commuter Service provides five (5) fixed-route, limited stop, bus routes that connect major employment destinations, such as Canon and Huntington Ingalls Shipyard. These routes offer commuter service with only one or two trips per day, designed to coincide with shift changes at major employers.

The Tide Light Rail

The Tide extends 7.4 miles from Fort Norfolk and the Eastern Virginia Medical Center, through downtown Norfolk, east to Newtown Road at the border of Norfolk and Virginia Beach. There are 11 stations with single car platforms that are ADA accessible. In addition to four park-and-ride locations that offer free parking, customers connect to light rail by walking, biking, or riding one of 18 routes that offer direct connections to six stations. The Tide operates seven days a week; operating from 6:00 a.m. to 11:00 p.m. on Monday through Thursday, 6:00 a.m. to 12:00 a.m. on Friday and Saturday, and 10:55 a.m. to 9:00 p.m. on Sunday.

Elizabeth River Ferry

HRT operates three paddleboat ferries on the Elizabeth River that provide daily connections between downtown Norfolk and downtown Portsmouth. Ferry service is provided to Harbor Park baseball stadium between April and September. The ferry operates seven (7) days a week, provides peak and off-peak service, and offers a winter and summer schedule. In the winter, the ferry operates from 5:30 a.m. to 9:45 p.m. Monday through Thursday; 5:30 a.m. – 11:00 p.m. on Friday; 10:00 a.m. to 12:00 a.m. on Saturdays; and 10:00 a.m. to 10:00 p.m. on Sundays. Service hours during the summer schedule are extended to 11:45 p.m. Monday through Thursday and on Sunday.

TRAFFIX

TRAFFIX is a Transportation Demand Management program that is designed to decrease traffic congestion in Southeastern Virginia by offering commuters ways to reduce the number of Single Occupancy Vehicles (SOV's) commuting to work. The TRAFFIX program encourages the usage of HOV lanes through ridesharing (ex. vanpool) and by encouraging the usage of alternatives to driving such as public transportation, teleworking, biking, or walking to work.

Paratransit

HRT provides demand-response paratransit service for persons with disabilities. Paratransit service is offered to those eligible for service within $\frac{3}{4}$ of a mile of any route during HRT's hours of operation.

This page intentionally left blank.

CHAPTER 2: GENERAL REPORTING REQUIREMENTS

TITLE VI NOTICE TO THE PUBLIC

The following notice is posted in all HRT administrative reception areas and transfer centers and is stated on the HRT website.

FIGURE 2: HRT TITLE VI NOTICE OF PUBLIC RIGHTS


Notifying the Public of Rights under Title VI

Hampton Roads Transit (HRT) operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act of 1964. Any person who believes he or she has been subjected to discrimination prohibited under Title VI may file a complaint with HRT.

For more information on HRT's civil rights program and the procedures to file a complaint, call 757.222.6000; online at www.gohrt.com and click "Contact"; or visit our administrative offices at 509 E. 18th Street, Building #4, Norfolk, VA 23504 or 3400 Victoria Boulevard, Hampton, VA 23661.

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, **Attn: Complaint Team, East Building, 5th Floor – TCR, 1200 New Jersey Ave. SE, Washington, DC 20590.**

If information is needed in another language, contact 757-222-6000.
Para más información en español, por favor llame 757-222-6000.


HAMPTON ROADS
TRANSIT
gohrt.com

The following text is printed on all route and system maps. Route maps are provided on all transit vehicles. System maps and route maps are provided at all administration buildings and transfer centers. Additionally, these maps are placed in over 90 locations throughout our service district.

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. Hampton Roads Transit is committed to a program of non-discrimination in the conduct of its business and in the delivery of equitable and accessible transportation services. For more information on HRT's policy on Title VI of the Civil Rights Act of 1964, visit our web site <http://gohrt.com> and click on "Contact".

If information is needed in another language, contact 757-222-6000. Para más información en español, por favor llame 757-222-6000.

HRT TITLE VI COMPLAINT PROCEDURES AND FORM

The complaint form shown in Figure 3 is available for download on the HRT website. It is also available upon request through Customer Service, by e-mail, and in print through direct mail.

TITLE VI COMPLAINT PROCESS

1. Purpose

These procedures cover all complaints under Title VI of the Civil Rights Act of 1964, Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations” (1994), and Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” (2000), for alleged discrimination in any program or activity administered by Hampton Roads Transit.

2. Statement of Policy

No person 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 Hampton Roads Transit program or activity, as provided by Title VI of the Civil Rights act of 1964, and as amended.

3. How to File a Complaint

a. Any person who believes he or she has been discriminated against on the basis of race, color, or national origin by Hampton Roads Transit (hereinafter referred to as “HRT”) may file a Title VI complaint by completing and submitting the agency’s Title VI Complaint Form.

i. All complaints must be in written form.

ii. A complaint submitted by mail must be addressed as follows:

Hampton Roads Transit
Attention: Title VI Compliance Officer
3400 Victoria Boulevard
Hampton, VA 23661

iii. A complaint can be submitted through the HRT website at <http://gohrt.com/contact/title-vi-program/title-vi-complaint-form/>

iv. A complaint submitted on HRT’s Title VI Complaint Form can be emailed to TitleVI@hrtransit.org; Subject: Title VI Complaint

b. A copy of the Agency’s Title VI Complaint Form may be obtained as follows:

i. Website at <http://gohrt.com/contact/title-vi-program/>

ii. Phone: Call (757) 222-6000 and ask to speak with Customer Service who will email or mail a copy of the Form.

c. Complaints must be received within 180 days from the date of the alleged incident and must be complete and provide the requested information.

d. A Title VI complaint may also be filed directly with the Federal Transit Administration. The Complaint Form may be found at <https://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/fta-civil-rights-complaint-form>. The complaint form must be signed and mailed to:

Federal Transit Administration
Office of Civil Rights
Attention: Complaint Team
East Building, 5th Floor – TCR
1200 New Jersey Avenue SE

Washington, DC 20590


4. How HRT will Respond to Complaints

The following is a summary of the procedures that HRT uses for investigation and resolution of Title VI customer complaints.

- a. Once a Title VI complaint is received, HRT will review the complaint to determine if our office has jurisdiction. The complainant will receive an acknowledgment letter informing her/him whether the complaint will be investigated by our office or a letter closing the matter.
- b. HRT has 90 days to investigate the complaint from the date that it was received by HRT. If more information is needed to resolve the case, HRT may contact the complainant for a meeting, interview or additional information. The complainant has 30 calendar days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 30 calendar days, HRT can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.
- c. After the investigator reviews the complaint, he/she will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains how the situation will be addressed. If the complainant wishes to appeal the decision, he/she has 90 days after the date of the letter or the LOF to do so.

FIGURE 3: TITLE VI COMPLAINT FORM

Title VI Program Complaint Form



HAMPTON ROADS
TRANSIT

Title VI of the Civil Rights Act of 1964 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 assistance.

1. Today's Date: _____
2. Complainant's Name: _____
Address: _____
City, State, Zip Code: _____
Telephone No(s): (____) _____ / (____) _____
E-Mail Address: _____
3. Person discriminated against (if someone other than Complainant):
Name: _____
Address: _____
City, State, Zip Code: _____
Telephone No(s): (____) _____ / (____) _____
4. What was the discrimination complaint based on? (check all that apply):
 Race Color National Origin
5. Date of alleged incident resulting in discrimination: _____
6. Describe the alleged discrimination. Explain what happened and who was responsible? If more space is needed, attach any written materials or other information that you believe supports your complaint on an additional sheet of paper.

7. Where did the incident take place? Provide location, bus number, HRT employee name, etc.



TITLE VI COMPLAINT FORM

8. Witness(es) (if applicable). Please provide their contact information.

Witness Name: _____

Address: _____

City, State, Zip Code: _____

Telephone No.(s): _____

Witness Name: _____

Address: _____

City, State, Zip Code: _____

Telephone No.(s): (____) _____ / (____) _____

9. Did you file this complaint with any other federal, state, or local agency or with a Federal or State court (check the appropriate space)?

Yes No

If yes, check all that apply:

Federal agency Federal court State agency State court Local agency

10. Please provide contact information the agency/court where the complaint was filed.

Agency: _____

Name/Title: _____

Address: _____

City, State, Zip Code: _____

E-Mail Address: _____

Telephone No: _____

11. If you need any special accommodations for communication regarding this complaint, please specify which alternative format you require.

Large Print (specify size): _____ TDD Audio Other: _____

Signature and date required below.

Signature _____ Date _____

Print or Type Name _____

If you feel that you have been discriminated against, a formal complaint may be filed with HRT'S Title VI Compliance Officer within 180 days after the date of the alleged discrimination. These procedures do not deny you the right to file formal complaints with other state or federal agencies. Once completed, please mail or deliver the completed and signed form to:

Hampton Roads Transit
Attention: Title VI Compliance Officer
3400 Victoria Boulevard
Hampton, VA 23661
757-222-6000

TITLE VI INVESTIGATIONS, COMPLAINTS AND LAWSUITS

Since the submission of its 2014 Title VI Program, Hampton Roads Transit has had no lawsuits or any active Title VI investigations conducted by FTA or entities other than FTA. During this period (April 2014 –

December 2016), HRT has received 13 complaints alleging Title VI violations. Of the 13 reported complaints alleging Title VI violations, 12 were not substantiated, and one (1) is currently under review (received December 2016). The following list summarizes the thirteen complaints.

TABLE 2: LIST OF SUBMITTED TITLE VI COMPLAINTS

Comment Number	Created On	Complaint Description Summary	Summary of Review, Resolution, Action Taken	Status
2014-02	5/13/2014	Customer stated that she was told by the bus driver that she could no longer ride the bus because she had reached her "inbound and outbound limit for the day" even though the customer held a One Day Max Pass. Customer believes she was discriminated against.	After a thorough investigation, Hampton Roads Transit (HRT) has determined that the operators identified in this incident were not accurately informed about re-boarding protocol. Based on this investigation, HRT learned that several operators were misinformed about re-boarding protocol and HRT has taken appropriate action.	Closed
2014-03	6/27/2014	Customer stated that her son was riding his bike and his friend was on rollerblades. She stated that the bus was in a rush and her son fell off his bike and the bus almost hit her son.	Customer Service staff reviewed the complaint and consulted with Legal staff. No evidence of Title VI discrimination was found. This complaint was forwarded to Operations for further review and resolution.	Closed
2014-04	12/2/2014	Third-party submitted a complaint behalf of person who had concerns about driver behavior. The person reported that she was informed she was not allowed to drink water while riding in one of the cars, and inquired if water was allowed while riding as a passenger. The person also reported that the driver was rude, spoke to her and her co-workers inappropriately and used inappropriate language. (Paratransit)	Based on the review process, HRT has determined that there is no evidence to demonstrate that HRT staff acted in a discriminatory manner and that there is insufficient evidence to warrant further Title VI investigation. Complaint processed through Customer Service and Operations as a complaint against the service provided by one of our operators.	Closed
2015-01	1/30/2015	Customer stated that he was at the rear of the bus speaking in a normal tone to another customer. He stated the operator told them they were talking to loud and that if they didn't stop she would pull the bus over and stop. The customer stated that this action/behavior had been repeated a number of times and when the passengers do not stop talking the driver pulls the bus over for a period of time. The customer felt he was being treated like a child.	Based on the review process, HRT has determined that there is no evidence to demonstrate that HRT staff acted in a discriminatory manner and that there is insufficient evidence to warrant further Title VI investigation.	Closed
2015-02	1/30/2015	Customer stated that he witnessed a white passenger ask the female driver to hold a bus. The driver stated that she could not do that. Customer stated that later two African-American customers on the bus asked to hold a bus and that the driver called the dispatcher and sent the request to hold buses as the African-American customers requested. Customer feels that operator committed racial discrimination against the white customer and did not even make an attempt to hold the bus for the white passenger.	Based on the review process, HRT has determined that there is no evidence to demonstrate that HRT staff acted in a discriminatory manner and that there is insufficient evidence to warrant further Title VI investigation.	Closed
2015-03	2/4/2015	Complainant stated that an off-duty HRT operator came into a store and was hostile and displayed racist behavior and language. Stated the operator had to be removed from the store.	As the complaint is against an HRT employee who was off duty, not on HRT property, and not providing HRT service at the time of the incident, this complaint does not fall under the jurisdiction of Title VI oversight and action.	Closed
2015-04	3/18/2015	Customer complaint - No complaint of discrimination/Title VI	Submitted through HRT Title VI web-form. No complaint of alleged discrimination filed. Complaint forwarded to customer service for action.	Closed
2015-05	6/19/2015	Customer complaint - No complaint of discrimination/Title VI	Submitted through HRT Title VI web-form. No complaint of alleged discrimination filed. Complaint forwarded to customer service for action.	Closed
2016-01	11/11/2016	Customer stated that the bus drove away when he was 5 feet from the front door. The customer ran across the street, approx. 6 ft. from the bus stop and the driver did not stop. The customer stated that he walked to the traffic stop sign and knocked on the door and the bus drove away. The customer stated that he rode this bus on multiple occasions and had seen the driver stop and wait for black people to board. The customer believes that the driver discriminated against him.	Based on the review process, HRT has determined that there is no evidence to demonstrate that HRT staff acted in a discriminatory manner and that there is insufficient evidence to warrant further Title VI investigation.	Closed
2016-02	11/17/2016	Customer stated that he boarded the bus and asked the driver what did time they pulled off. The driver responded, "right now" but did not proceed. The customer stated to the driver the time they were supposed to leave, and then the customer stated the operator responded that they knew what time they were to leave. The customer stated they were made late for work.	Based on the review process, HRT has determined that there is no evidence to demonstrate that HRT staff acted in a discriminatory manner and that there is insufficient evidence to warrant further Title VI investigation. Complaint processed through customer service for action.	Closed
2016-03	11/22/2016	Customer stated that she was on the phone when she boarded the bus and accidentally cursed. At a later time on the trip the customer pulled the stop request bell, but the driver did not stop. The driver and the passenger argued and comments were made that upset the customer. The customer stated the driver was racist toward her and her family.	Submitted through HRT Title VI web-form. No complaint of alleged discrimination filed. Complaint forwarded to customer service for action.	Closed
2016-04	11/29/2016	Customer boarded the bus and was asked to show her Medicare Card. The driver asked the customer for ID, and the customer did not have it ready in her hand. The driver told the customer to hurry up. The driver stated moving the bus, almost causing the customer to fall. The customer felt she was discriminated against based on her race.	Submitted through HRT Title VI web-form. No complaint of alleged discrimination filed. Complaint forwarded to customer service for action.	Closed
2016-05	12/29/2016	The customer stated the that she tried to board the bus. He said excuse me to customers in front of him, and that he did not have to pay and showed his handicap paratransit ID. He told the bus driver that he had knee pain and needed to sit down. The driver went to get the VA police and had the cusotmer taken off the bus. The cutomer asked why he was removed from the bus, and the police told her that the bus driver thought he was a threat.	Review in progress	In Process

PUBLIC PARTICIPATION PLAN

The public, as the primary customer and beneficiary of transit service, is provided the opportunity for input and review through the public engagement process. Actions such as the establishment of new service, fare adjustments, major modifications of existing service, and/or suspension or abandonment of any bus routes may include a formal process of review by HRT; including, meaningful public engagement conducted by HRT staff. Under 49 USC Chapter 53, Section 5307, the Federal Transit Administration (FTA) requires “a locally developed process to consider public comment before raising a fare or carrying out a major reduction in transportation service.” HRT uses a broad range of outreach tools documented in the Public Participation Plan (Appendix A) to serve this requirement.

Meaningful public engagement may include public hearings, public meetings, pop-up meetings, interactive web-based tools, distribution of written materials at major transfer points, posting of informational flyers, and the posting of information on the HRT website. Notices (signs, pamphlets, brochures) describing proposed action(s), date(s) and location(s) of any hearings or meetings may be posted on buses and at transfer centers. Notices may be published in major local and/or relevant neighborhood newspapers and on the HRT website. HRT also uses social media (ex. Facebook posts, Twitter) and HRT website comment forms to provide access through the internet. Open public meetings and formal public hearings are frequently used to gain public review and comment. Community organizations, public agencies and elected officials may be notified by mail (direct and/or electronic) of significant service changes. All public comments submitted to HRT through any of these outreach tools become part of the official record.

Hampton Roads Transit communicates with many organizations throughout the region and often attends meetings and events sponsored by these groups. These groups consist of cultural organizations, senior organizations, city partners, business associations and other organizations invested in HRT’s service area. In this arena, we are able to create relevant conversations and dialogue between Hampton Roads Transit and the specific community regarding transit needs.

If a special accommodation is desired at any public meeting held by HRT, the public can call HRT Customer Service a minimum of two (2) business days prior to the meeting to arrange the proper accommodations. HRT will provide Spanish translation and offer interpreters for other languages, including sign language, upon request and following the same time period of special accommodation requests (a minimum of two (2) business days). Hampton Roads Transit selects meeting and hearing locations to provide reasonable accommodations in accordance with the Americans with Disabilities Act of 1990. Hampton Roads Transit public meetings are wheelchair accessible.

Besides actions defined as a fare change or a major reduction in service, Hampton Roads Transit has established that changes in service will be the subject of public hearings, meetings, or other reasonable use of meaningful public outreach or engagement methods as appropriate to the nature of the proposed change. Public input is solicited while proposals are under consideration. Customers and the public are notified prior to the implementation of changes in service.

LIMITED ENGLISH PROFICIENCY (LEP)

HRT’s Limited English Proficiency (LEP) Plan, or LEPP, was updated for this Title VI Program and is attached in Appendix B: The LEPP documents the four-factor analysis completed to identify appropriate language

assistance measures needed to improve access to HRT services and benefits for LEP persons. Under the analysis, it was determined that approximately 3% of the population in HRT's service area has limited proficiency in the English language. The most predominate language spoken other than English is Spanish. The LEPP documents current measures used by HRT to assist LEP populations including:

- HRT's current Customer Service Call Center Translation Services that provide translation services on a per-call basis.
- The use of Census Bureau's "*I Speak*" cards at workshop or conference sign-in sheet tables, as well as HRT's reception area.

HRT's Customer Service department reported that it received 14 calls from LEP speakers requiring translation services in 2016. HRT ensures that a Spanish language translator is available at public hearings upon a request for services. Within the 2014-2016 Title VI review period, HRT has not needed to utilize these services for a public hearing. HRT has received no request for any other translation services during the 2014-2016 review periods.

As part of the four-factor analysis, the factor 1 analysis showed that 3.08 percent of the population in HRT's service area can be classified as limited English proficiency, reporting that they speak English less than very well. The factor 2 analysis showed that the frequency of contact with HRT's customer service center was limited. However, with those contacts HRT ensures that all persons, regardless of language proficiency, have access to information on public transportation services and programs. This level of service is an important element of the agency's customer service and operating program. HRT currently offers translation services to those who call into their customer service line through contracted translation services. HRT utilizes Google Translate for translation on its website.

HRT paratransit service is operated by MV Transportation. If their call center receives a call from a non-English speaking customer, they have bi-lingual personnel who will either speak with the person directly at that time or the person will be called back. If the MV assigned staff is not available, MV Transportation can forward the call to HRT's customer service which will provide translation service in accordance with HRT's process. MV Transportation can also contact their Call Center in Washington DC for assistance. They have over 250 employees, with several bi-lingual staff members.

MEMBERSHIP OF NON-ELECTED COMMITTEES AND COUNCILS

The Transportation District Commission of Hampton Roads, HRT's governing body referred to as the Commission or the Board, consists of 13 members, one elected official and one citizen representative from each city served by Hampton Roads Transit, and the chairman of the Commonwealth Transportation Board (CTB) or a designee. Citizen representatives are appointed by the Governor.

The Chairman designates Commission members to sit on the following Standing Committees: Audit/Budget Review Committee, Operations and Oversight Committee, and the Planning and New Starts Development Committee.

The Board appoints non-Board members to the following advisory committees: Transit Riders Advisory Committee (TRAC), and Paratransit Advisory Committee (PAC).

The full list of Board members and Committee members is provided in Appendix C which also indicates the minority representation on the Board and the Committees.

STANDING COMMITTEES

Audit/Budget Review Committee

The Audit/Budget Review Committee reviews financial statements and performance reports concerning actual expenses and revenues relative to the annual budget on a quarterly basis. It refers those reports to the full Commission.

Planning and New Starts Development Committee

The Planning and New Starts Development Committee works with the President and CEO to provide policy and direction for HRT's major initiatives. The committee meets on an ad-hoc basis.

Operations and Oversight Committee

The Operations & Oversight Committee works with the President and CEO to consider proposals from HRT staff on the acquisition of goods and services. It also receives staff reports on system performance. The committee meets the second Thursday of each month, with the exceptions of November and December when it meets the first Thursday of the month.

ADVISORY COMMITTEES

Transit Riders Advisory Committee

The Transit Riders Advisory Committee (TRAC) is a subcommittee under the Transportation District Commission of Hampton Roads (TDCHR) Executive Committee and is operated by citizens on a voluntary basis. The purpose of TRAC is to:

- Provide HRT administration with feedback and recommendations for improving operational or service issues affecting HRT customers
- Provide input into HRT's customer outreach activities
- Provide HRT customers and the community at-large with information about HRT services and soliciting input concerning service improvements

Members should include (but are not limited to) HRT customers and persons who currently utilize or have the desire to utilize public transportation. Members are appointed by the TDCHR Executive Committee Chairperson upon recommendation by HRT staff and/or the Commissioner(s) of the represented city.

The TRAC reports to the TDCHR Executive Committee at each regularly scheduled meeting. A written report is prepared by the Recording Secretary and reviewed by the committee Chairperson and/or Vice-Chairperson and HRT staff to be submitted to the TDCHR Executive Committee Chairperson prior to presentation to the full TDCHR Commission meeting. HRT staff provides assistance as required to ensure that the report is prepared and placed on the TDCHR Executive Committee and TDCHR agendas. The TRAC was established by the TDCHR in July 2009.

Paratransit Advisory Committee

The Paratransit Advisory Committee (PAC) is a subcommittee that is operated by citizens on a voluntary basis. The committee provides a communication link between the TDCHR, persons with disabilities who use or may use its services, and service providers to the disabled community on matters related to paratransit service within HRT's service area.

Membership shall consist of no more than twenty-one voting members and the non-voting members. Furthermore, membership shall generally consist of:

- Two consumers from each member jurisdiction
- One service provider representative from each member jurisdiction.

Every effort will be made to have equal representation from each jurisdiction and balanced representation of the various disabilities present in the member jurisdictions. If the above-referenced number of consumers and/or service providers is not available from a jurisdiction, the Commission may, and shall be encouraged to, appoint a representative from another jurisdiction.

The PAC reports to the TDCHR Executive Committee at each regular meeting. A written report is prepared by the Recording Secretary and reviewed by the committee Chairperson and/or Vice-Chairperson and HRT staff to be submitted to the TDCHR Executive Committee Chairperson prior to presentation to the full TDCHR Commission meeting. HRT staff provides assistance as required to ensure that the report is prepared and placed on the TDCHR Executive Committee and TDCHR agendas. The PAC was established by the TDCHR in 2002.

MONITORING OF SUBRECIPIENTS AND CONTRACTORS

As of Commission Adoption of this Title VI Program, there is one sub-recipient of federal funds through Hampton Roads Transit, demand response service provider, Black and White Cabs, Inc.

With the adoption of this Title VI Program, HRT requires all subrecipients to be fully compliant with FTA Circular 4702.1B, *Title VI Requirements and Guidelines for Federal Transit Administration Recipients*. HRT will monitor compliance through the submittal of Title VI Assurance Forms and Title VI Programs as follows:

- All subrecipients must submit their Title VI Assurance Form and Board-approved Title VI Program to HRT prior to the receipt of any federal funds.
- Subrecipients must submit updated Title VI program including any public transportation-related Title VI investigations, complaints, or lawsuits:
 - Prior to first receipt of federal funds for each grant cycle, and
 - Prior to final receipt of federal funds for final grant cycle.
- Lack of compliance with the Title VI program or the submittal schedule will delay or halt disbursement of federal funds.
- HRT and Subrecipients will follow compliance reviews as set forth under FTA C 4702.1B, Chapter 8.

Currently, Hampton Roads Transit contracts out portions of their service to two companies:

- Norfolk By Boat operates the Elizabeth River Ferry, a ferry services that connects downtown Norfolk and Portsmouth across the Elizabeth River.

- MV Transportation operates HRT's federally mandated complementary paratransit service. Paratransit service is available to qualified disabled residents in the HRT service area.

As part of its efforts to ensure that Norfolk By Boat and MV Transportation comply with the requirements of Title VI, Hampton Roads Transit will hold periodic meetings with representatives of the above companies to discuss any Title VI issues that arise. Hampton Roads Transit staff has briefed them on their Title VI obligations and provided them with copies of the most recent Title VI circular from October 2012, as amended. The two companies have agreed to abide by the Title VI requirements.

FIXED FACILITY IMPACT ANALYSIS

HRT may not select the site or location of facilities with the purpose or effect of excluding persons from, denying the benefits of, or subjecting them to discrimination on the basis of race, color, national origin, or income level. The location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, national origin, or income-level.

Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, and operations centers. Bus shelters are not included in this provision as they are considered transit amenities and are covered by regulations discussed in Section 3.5 of this Title VI Program. Transit stations, power substations, and similar facilities are not included in this provision as they are evaluated during project development and the NEPA process.

For facilities covered by this provision, HRT is required to:

- Complete a Title VI equity analysis during the planning stage with regard to where a project is located to ensure the location is selected without regard to race, color, national origin, or income and engage in outreach to persons potentially impacted by siting of facilities. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.
- Give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group level where appropriate to ensure proper analysis of localized impacts.
- Provide substantial legitimate justification for locating a project in a location that will result in a disparate impact on the basis of race, color, or national origin or disproportionate impact on the basis of income, and show that there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin or disproportionate impact on the basis of income. In order to show that both tests have been met, HRT must consider and analyze reasonable, feasible, and prudent alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin or disproportionate impact on the basis of income, and then implement the least discriminatory alternative.
- Under HRT's Title VI program, all Title VI equity analyses for proposed service and fare changes and siting of fixed facilities will be considered and approved by the Board prior to implementation. Evidence of consideration and approval will be documented through the meeting minutes of the Commission or through Resolution and will be attached to each final Title VI equity analysis report.

COMMISSION APPROVAL OF THE TITLE VI PROGRAM

This Title VI Program, which includes the disparate impact policy, major service change policy, service and fare change equity analysis procedures, and service monitoring, was considered and approved by HRT's governing board on January 26, 2017 as evidenced by the passing of Resolution 01 – 2017 – Title VI Program (Appendix D).

Under HRT's Title VI program, all Title VI equity analyses for proposed service and fare changes and siting of fixed facilities will be considered and approved by the Board prior to implementation. Evidence of consideration and approval will be documented through the meeting minutes of the Commission or through Resolution and will be attached to each final Title VI equity analysis report.

This page intentionally left blank.

CHAPTER 3: SERVICE STANDARDS AND POLICIES

MAJOR SERVICE/FARE CHANGE POLICY

Recommendations for service changes are developed by HRT staff to maintain efficient service. The HRT key performance measure for proposed service changes is based on passengers per trip. When a route ridership falls at or below an average of 10 passengers per trip, it is considered an “under performer” and is subject to a detailed review to improve its performance and may be recommended for elimination. In accordance with industry-standard practice, HRT will consider a percentage change of 25% hours or mileage for a route a “Major Service Change.” All proposed Major Service Changes require a Title VI Equity Analysis under the procedures established by this Title VI program. The performance of the referenced analysis would include a 25% percentage change by service and/or day type.

As stated in the Equity Analysis Procedures, if a disparate equity impact is determined and HRT chooses not to alter the proposed service or fare change despite the potential disparate impact on minority populations or disproportionate impact on low-income populations, or if HRT finds, even after the revisions, that minority or low-income riders will continue to bear a disproportionate share of the proposed service change, HRT may implement the service change if; HRT has a substantial legitimate justification for the proposed service change, and HRT can show that there are no reasonable alternatives that would have a less disparate impact on minority or low income riders but would still accomplish the transit provider’s legitimate program goals.

Under the HRT Fare Policy at the time of adoption of this Title VI Program, HRT has a farebox recovery ratio target between 22 and 25%. HRT staff annually reviews and reports the farebox recovery ratio compared to the target. Based on the analysis, HRT may recommend fare adjustments as part of a range of solutions to maintain a sustainable long-term Financial Plan for the agency. All proposed Fare Changes require a Title VI Equity Analysis under the procedures established by this Title VI program.

DISPARATE AND DISPROPORTIONATE IMPACT

For any proposed change that requires an equity analysis as defined in Section 3.1, HRT will determine if the change would create a disparate or disproportionate impact minority and/or low-income populations, respectively.

Determination of whether a proposed Major Service Change has either disparate or disproportionate impact is based on whether the percentage of minority and/or low-income passengers on an affected transit route (bus or fixed-guideway) is greater than five (5) percentage points of the transit system’s percentage of minority and/or low-income riders.

Determination of whether a proposed fare adjustment has either disparate or disproportionate impacts is based on minority and/or low-income populations bearing a fare rate change of greater than five (5) percentage points as compared to non-minority and/or non-low-income populations.

PUBLIC OUTREACH

In developing the updated HRT Title VI Program HRT engaged in public outreach activities to request public review and comment from January 3, 2016 to January 25, 2016. No public comment was received by mail, e-mail, through HRT’s website, or by phone.

An 8-1/2 by 11 notice (shown on the following page) was posted in all major Customer Service Areas including:

- HRT Northside Bus Operations, Maintenance and Administration Facility
- HRT Southside Bus Operations, Maintenance and Administration Facility
- Silverleaf Transit Center
- Hampton Transit Center
- Newport News Transit Center

A tri-fold pamphlet was created with a summary of information on the changes to the HRT Title VI Policy. The pamphlet directly and clearly asked for public comment on the policy. The draft Title VI policy was posted on gohrt.com under the Title VI section of the website. During the month of January, Public Outreach staff distributed approximately 500 pamphlets to customers at the following locations:

- Newport News Transit Center
- Downtown Norfolk Transfer Center
- Hampton Transit Center
- Silverleaf Transit Center
- Robert Hall Transfer Center
- Pembroke Transfer Center

FIGURE 4: HRT TITLE VI POLICY UPDATE NOTICE FOR PUBLIC COMMENT

Notice of Update HRT's Title VI Policy Under the Civil Rights Act of 1964

What is Title VI of the Civil Rights Act of 1964?

Title VI of the Civil Rights Act of 1964 states that, "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

The Federal Transit Administration (FTA) issued guidance (effective October 1, 2012) that helps recipients of FTA grant funding better understand and comply with federal civil rights requirements and to; ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner; promote full and fair participation in public transportation decision-making without regard to race, color, or national origin; to ensure meaningful access to transit-related programs and activities by persons with limited English proficiency. HRT is required to update its Title VI Policy by January 31, 2017.

HRT's Title VI Policy

Hampton Roads Transit's Title VI Program and Policy includes policy, reports, data, procedures, and plans that ensure that HRT is in compliance with the requirements in Title VI of the Civil Rights Act of 1964. HRT's existing Title VI Program also evaluates potential impacts of proposed service and fare changes on minority and low-income riders and provides the provision of language access to persons with limited English proficiency. HRT completes Title VI assessments when proposing a major service change or when proposing changes in the fare structure that could provide a disparate impact and/or disproportionate burden on Title VI populations. HRT's Title VI Program includes an update of related population, data, statistics and mapping for Title VI populations, Title VI complaint procedures and Title VI Complaint Form, public involvement, service standards and policies, and service monitoring.

Public Comments on HRT's Title VI Program

HRT's revised Title VI Policy is available for review and public comment on our website - <http://gohrt.com/contact/title-vi-program/>

All comments must be received no later than January 25, 2017.

Your feedback is very important and will allow us to continue to serve all of our transit populations. Comments can be submitted by email at TitleVI@hrtransit.org or by calling 757-222-6000 and asking to speak with the Title VI Compliance Officer, Jamie Jackson. Comments can also be mailed to Hampton Roads Transit, Attn: Title VI Compliance Officer, 3400 Victoria Blvd., Hampton, VA 23661.

Para más información en español, por favor llame 757-222-6000.



gohrt.com

FIGURE 5: HRT TITLE VI POLICY UPDATE NOTICE FOR PUBLIC COMMENT – PAMPHLET

[Pamphlet Exterior](#)


What is Title VI of the Civil Rights Act of 1964?

Title VI of the Civil Rights Act of 1964 states that, "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

The Federal Transit Administration (FTA) issued guidance (effective October 1, 2012) that helps recipients of FTA funding better understand and comply with federal civil rights requirements and to; ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner; promote full and fair participation in public transportation decision-making without regard to race, color, or national origin; to ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

Hampton Roads Transit's Title VI Policy

Hampton Roads Transit's Title VI Program and Policy includes policy, reports, data, procedures, and plans that ensure that HRT is in compliance with the requirements in Title VI of the Civil Rights Act of 1964. HRT's existing Title VI Program also evaluates potential impacts of proposed service and fare changes on minority and low-income riders and provides the provision of language access to persons with limited English proficiency. HRT completes Title VI assessments when proposing major service change or when proposing changes in the fare structure that could provide a disparate impact and/or disproportionate burden on Title VI populations.



CONTACT

Phone: 757-222-6000

Northside Bus Operations, Maintenance and Administration Facility
3400 Victoria Boulevard
Hampton, VA 23661


Southside Bus Operations, Maintenance and Administration Facility
509 E. 18th Street
Norfolk, VA 23504

YOUR FEEDBACK IS IMPORTANT.

Comments can be submitted by:
Email: TitleVI@hrtransit.org
Mail: 3400 Victoria Blvd., Hampton, VA 23661

Phone: 757-222-6000
 Request to speak to the Title VI Compliance Officer, Jamie Jackson


A copy of the draft report can be reviewed on Hampton Roads Transit's website at:
<http://gohrt.com/contact/title-vi-program>




gohrt.com

NOTICE OF PROGRAM UPDATE

Hampton Roads Transit Title VI Policy Under the Civil Rights Act of 1964





HAMPTON ROADS
TRANSIT

gohrt.com

Summary of updates and modifications of Hampton Roads Transit's Title VI Program

A summary/highlights of some of the program updates, changes, and modifications are included below. Additional information and detail on HRT's complete 2017 Title VI Program; including all updates and content is provided in the full Title VI Program Draft. Details and the full draft of 2017 Title VI Program can be viewed on Hampton Roads Transit's website at <http://gohrt.com/contact/title-vi-program>

Hampton Road's Transit is required to update its Title VI Policy by January 31, 2017.

Title VI Program – General

- Update of related population data, statistics, and mapping for minority, low-income, and LEP populations.
- Update of program material, notices, and related information.

Chapter 2: General Reporting Requirements

- Update of Title VI Complaint Procedures
- Update of Title VI Complaint Form
- Public Involvement - Inclusion of pop-up meetings and interactive web-based tools as meaningful public involvement.
- Public Involvement - Update of time notification period for customer request for accommodations.

Chapter 3: Service Standards and Policies

- Update of evaluation criteria for major service/fare change policy
- Addition of Passenger Amenities Policy
- Development of vehicle assignment data analysis process and monitoring
- Definition, inclusion and clarification of service types (ex. seasonal service) and vehicle assignment by service type (ex. MAX Service)

Chapter 5: Service Monitoring

Replacement of criteria of "Transit Access Analysis" to "Service Availability Analysis." Analyzed data to determine the availability of transit and transit stops within ¼ of a mile of Title VI populations, non-Title VI populations and the HRT system.



EQUITY ANALYSIS PROCEDURES

SERVICE CHANGE ANALYSIS PROCEDURE

The process for analyzing service changes generally follows the following ten (10) steps:

1. Define the Service Area covered by HRT system.

Identify Transportation Analysis Zones (TAZ) or Census tracts in the service area that are predominantly minority and predominantly low-income using FTA's recommended procedures specified in Circular 4702.1B. Determine the percentage of minorities and low-income populations residing in the service area. Generate maps showing the geographic distribution of minority and low-income populations.

Identify the type of service change proposed for each transit route, along with the percentage change between existing conditions and future conditions. It is only necessary to analyze those routes for which changes are proposed. Apply the threshold for a Major Service Change to determine whether the percentage change between existing and future conditions is above or below the threshold, and whether any of the proposed changes constitute the designation of a Major Service Change.

After identifying the type of service change proposed and whether or not the service change(s) will be classified as Major Service Changes, HRT will consider the proposed change in the context of existing data. That data will include travel pattern data from HRT's Origin-Destination surveys for the affected route(s) and the Census demographic data previously obtained.

- a. For changes to existing transit routes involving service frequencies, reductions in revenue service miles, or other modifications in route length, HRT will review the change based on data from HRT's Origin-Destination survey.
- b. For changes involving route extensions to serve new geographic areas or the addition of new routes, HRT will consider Census geographic data to establish a market capture area for the proposed new service area.

Based on the type of service change (reduced service frequency, route restructuring, route modification etc.), determine the percentage of minorities and/or low-income populations that would be affected by the proposed service change. In cases where a service frequency change is proposed, or a route is modified such that there is a reduction in service level or geographic area covered, the analysis should use data obtained from the HRT origin-destination survey of existing riders along the route affected by the change, as these populations will be most affected by the proposed change. Conversely, if a route is proposed to be extended to serve a new geographic area, HRT will use Census data as the geographic base for identifying minority and/or low-income populations residing within the specified distance of the route (market capture area).

Compare the percentage of minorities and/or low-income populations computed in Step 5 with the minority and/or low-income population percentage for the service area determined in Step 2.

If the minority population percentage in Step 6 is greater than the service area minority population percentage by five (5) percentage points or more, and the proposed service change is identified as a Major Service Change, a disparate equity impact is determined. If the low-income population percentage in Step 6 is greater than the service area low-income population percentage by five (5) percentage points or more, and the proposed service change is identified as a Major Service Change,

a disproportionate equity impact is determined. In these cases, an appropriate mitigation plan should be developed by HRT to address the equity impacts identified. Again, only those service changes that are deemed Major Service Changes need to be evaluated for equity. If the minority or low-income population percentages are below the impact threshold of 5 points above the service area population percentages, no adverse equity impacts are determined.

HRT will present the proposed service change and results of the equity analysis for meaningful public involvement as defined by the public participation plan.

If a disparate equity impact is determined and HRT chooses not to alter the proposed service change despite the potential disparate impact on minority populations or disproportionate impact on low-income populations, or if HRT finds, even after the revisions, that minority or low-income riders will continue to bear a disproportionate share of the proposed service change, HRT may implement the service change only if:

- HRT has a substantial legitimate justification for the proposed service change, and
- HRT can show that there are no alternatives that would have a less disparate impact on minority or low income riders but would still accomplish the transit provider's legitimate program goals.

HRT Board will fully consider the results of the equity analysis, proposed alternatives and mitigation if applicable, and public comments on the proposed change prior to approval.

FARE IMPACT ANALYSIS PROCEDURE

The process for analyzing fare adjustments generally follows the following nine (9) steps:

1. Define the Service Area covered by HRT system.

Identify TAZs or Census tracts in the service area that are predominantly minority and predominantly low-income using FTA's procedures. Using Census data, compute percent of minorities and low-income population in the Service Area. Generate maps showing the geographic distribution of minority and low-income populations.

Using travel pattern data obtained from Origin-Destination survey and the current fare structure, estimate average fares paid by minorities, non-minorities, low-income and non-low income riders in the entire Service Area. Further, break down the average fares by fare type.

Repeat Step 3 by replacing the current fare structure by the proposed fare structure.

Determine percent increase in fares for minorities, non-minorities, low-income and non-low-income populations in the Service Area.

If the percent differences in fare increase for minorities versus non-minorities and low-income versus non-low income populations are under the 5% impact threshold, a determination of "no impacts" will be made. If the estimated differences exceed HRT's 5% impact thresholds, it will be concluded that the proposed fare change would result in adverse equity impacts. In that case, appropriate mitigation plan will be developed by HRT to address those equity impacts.

HRT will present the proposed fare change and results of the equity analysis for meaningful public involvement as defined by the public participation plan.

If a disparate equity impact is determined and HRT chooses not to alter the proposed fare change despite the potential disparate impact on minority populations or disproportionate impact on low-income populations, or if HRT finds, even after the revisions, that minority or low-income riders will

continue to bear a disproportionate share of the proposed fare change, HRT may implement the fare change only if:

- HRT has a substantial legitimate justification for the proposed fare change, and
- HRT can show that there are no alternatives that would have a less disparate impact on minority or low income riders but would still accomplish the transit provider’s legitimate program goals.

HRT Board will fully consider the results of the equity analysis, proposed alternatives and mitigation if applicable, and public comments on the proposed change prior to approval.

SERVICE STANDARDS

VEHICLE LOAD

The number of passengers, or load, carried per hour measures the efficiency of service. HRT’s system-wide efficiency goal for buses is 10 passengers or more per trip. The Load Factor, measured as a percent of a fully seated load, varies with service type. Load Factors for individual service types are shown in the following table.

TABLE 3: LOAD FACTORS BY SERVICE TYPES

SERVICE TYPE	PEAK	OFF-PEAK
Major Hub Radial	120%	100%
Circulator/Shuttle	120%	120%
MAX Commuter	100%	100%
Demand Response	100%	100%

To ensure service quality, any service consistently operating at more than 100% of its seating capacity (load factor) will be evaluated to reduce overcrowding.

VEHICLE HEADWAY

Generally, routes operating in urban areas have 15 to 30 minute headways during the peak and 30 to 60 minutes during the non-peak. Service in the less dense areas generally have one hour headways. It should be noted the specific frequency levels are determined by each sponsoring jurisdiction in conjunction with planning and budget considerations.

ON-TIME PERFORMANCE

On-time performance for HRT’s bus service is measured against the published schedule and actual bus arrival times at approximately 200 designated time points throughout the system. A bus is considered "on-time" if not more than five minutes late or one minute early at each scheduled time point. There is approximately one time point for every 10 bus stops. Actual bus arrival times are captured by HRT’s Navigator, an automatic vehicle location (AVL) system which uses Global Positioning System (GPS) technology. Bus on-time

performance can be impacted by traffic congestion, detours, weather, a larger than anticipated number of boardings, and boardings of passengers with accessibility needs.

SERVICE AVAILABILITY

Service availability in each of HRT's six cities is set by each of its member jurisdictions. This means that the number of routes, service frequency, service span, and service coverage areas as operated by HRT are directly determined by each city during the annual budgetary cycle. Article IV of HRT's Cost Allocation Agreement describes how transit service in the HRT service district is determined.

ARTICLE IV PROVISION OF PUBLIC TRANSPORTATION SERVICES

1. The Commission will own and operate the consolidated regional public transportation system within and between the Participating Cities.

The Commission recognizes the service provided by local contract carriers and other transportation companies and will attempt to foster continuation and improvement of services provided by these private companies.

Each year, as part of the budgeting process, the Commission will propose a public Transportation Service Program (TSP) for the region. The TSP will contain a description of service such as route name, hours of service to be provided, estimated cost, estimated revenue and estimated city share of the cost of service. The TSP will identify the service program of each Participating City and its contribution based on estimated costs and revenues.

Each Participating City will review its portion of the TSP and recommend revisions where appropriate. After each Participating City has approved funding of its portion of the TSP, the Commission will approve and publish the TSP as the Transportation Service Program of Hampton Roads.

Each Participating City will determine the type, amount and location of public transportation services for which it provides funds within its borders. Each Participating City, by approving its portion of the TSP, agrees to pay monthly in advance its portion of the administrative, capital and net operating costs of the Commission's approved TSP.

Each Participating City will have final determination on the type, amount, and location of public - transportation service provided within its borders. Nothing in this Agreement will be construed as a requirement that a Participating City must provide public transportation services.

The Commission will provide the transit service contained in the TSP as approved by each Participating City and each city will finance its share of net capital and operating costs incurred by the Commission in providing transportation services contained in the approved TSP.

Additions, deletions, or revisions to the TSP may be proposed at any time by a Participating City by letter from the City Manager or his designated representative to the Executive Director of the Commission. Changes may also be proposed at any time by the Commission by letter from the Executive Director or his designated representative to the City Manager of a Participating City. If the change is to be implemented during the year of the previously approved TSP and increases the total In Service Hours for the Participating City, no federal or state public support funds already allocated will be applied to that service until that service is included in the annual TSP and budget.

Whenever an addition, deletion, or revision to the TSP is proposed, the Commission will develop an estimated cost of the proposed change. The estimated cost will be furnished to the Participating City or Participating Cities affected by the proposed change.

The Participating Cities will review and approve all proposed changes and estimated costs of the TSP before implementation by the Commission. The TSP will be revised to incorporate all changes approved by the Participating Cities. If no response is made by the City Manager or his designated representative before or at the public hearing, in the case of a change requiring a public hearing, or within 15 days before implementation in the case of a minor change, the Commission will assume that there are no objections to the service changes and will proceed.

Any capital cost or operating cost liability incurred by the Commission as a result of a reduction of transit service requested by a Participating City will be paid by the Participating City requesting the reduction until such time as the liability is relieved.

SERVICE POLICIES

TRANSIT AMENITIES

Transit amenities refer to fixed items of comfort and convenience available to the general riding public such as bus stop benches, shelters, lighting, and bike racks. HRT's Passenger Amenity Policy provides guidelines for proposing, planning, and implementing transit stop amenities in an effort to provide the highest quality of amenities to Hampton Roads Transit customers. This Passenger Amenities Policy is intended to be utilized with Hampton Roads Transit Bus Stop Location policy. The guidelines included considers the operational needs of HRT in addition to all federal and state mandates, including equity requirements under Title VI of the Civil Rights Act and accessibility requirements related to the Americans with Disabilities Act (ADA).

Bus stop amenities are provided by a myriad of sources including local governments, private developers, citizens' groups, as well as funds flowing to HRT. At times these amenities are not owned or maintained by HRT and are put in place without direction or control of the transit agency.

HRT inventories existing amenities within HRT's control and determines where new or replacement facilities should be located based on bus stop average daily boarding counts, property ownership status, minimum area requirements, infrastructure requirements and other related factors.

VEHICLE ASSIGNMENT

Vehicle assignment refers to the allocation of transit vehicles to ensure that all communities receive the same quality of rolling stock benefits.

HRT fixed-route vehicles differ primarily by length of vehicle and age. Passenger amenities such as air conditioning and upholstery are standard. The length of vehicle assigned to a route is primarily determined by the ridership load and type of service (see the following table below), leaving age the primary variable to consider in equitable vehicle assignments. HRT average fleet age as of the adoption of this Title VI Program is 9.3 years and is anticipated to decrease over the next several years as the new fleet purchases outlined in HRT's Transit Development Plan are executed. In order to ensure equitable distribution of vehicles, each route is randomly assigned buses without regard to the vehicle age, as maintenance and repair needs permit. Also to note, the age/useful life of the vehicle may have been extended due vehicle/maintenance upgrades

(ex. engine repower). However, those vehicles may be more reliable than a vehicle that is older based on acquisition year. Those vehicles (and related age) are also included in the random vehicle assignment.

HRT also provides vehicle assignment based on service type; which includes MAX service, by agreement with the State, and its seasonal service - VB Wave. As stated, the MAX service is a regional commuter service and is randomly assigned vehicles from HRT’s coach fleet due to the type of service and its distance. As part of the state of Virginia’s agreement with the Elizabeth River Crossing to construct and upgrade infrastructure in Portsmouth, ERC provided funding for HRT to purchase seven new buses that are assigned to routes 45 and 47. The city of Virginia Beach funded the purchase of replica trolley buses that are assigned to our seasonal service the VB Wave.

A sample table showing HRT vehicle assignment by route and vehicle size is attached in Appendix E. These assignments change with ridership levels, service adjustments, and available equipment. HRT will begin collecting and analyzing vehicle assignment data to further review vehicle assignment and its impacts on Title VI populations. If disparate or disproportionate impacts are found, HRT will address those as outlined in its Equity Analysis Procedures. The table below provides a sample of one month’s analysis of data, and will be utilized in the future for the purpose of analyzing fleet assignment.

TABLE 4: SAMPLE ANALYSIS OF JULY 2016 VEHICLE ASSIGNMENTS

		MINORITY	NON-MINORITY	LOW-INCOME	NON-LOW INCOME	MINORITY OR LOW-INCOME	NEITHER MINORITY NON-LOW INCOME
ALL HRT BUS SERVICE	Average Age (Years)	8.6	8.8	8.6	8.4	8.5	9.6
	% Difference	2.4%		-2.3%		12.4%	

This page intentionally left blank.

CHAPTER 4: DEMOGRAPHIC AND SERVICE PROFILE MAPS AND CHARTS

The FTA requires transit providers receiving federal assistance to provide demographic maps that identify census tracts where the percentage of total minority and low-income population residing in these areas exceeds the average minority and low-income population for the service area as a whole. The maps and charts must be updated: 1) at least every three years, 2) after each Federal census data become available, and 3) when there are significant changes in the transit system.

POPULATION ETHNICITY CHARACTERISTICS

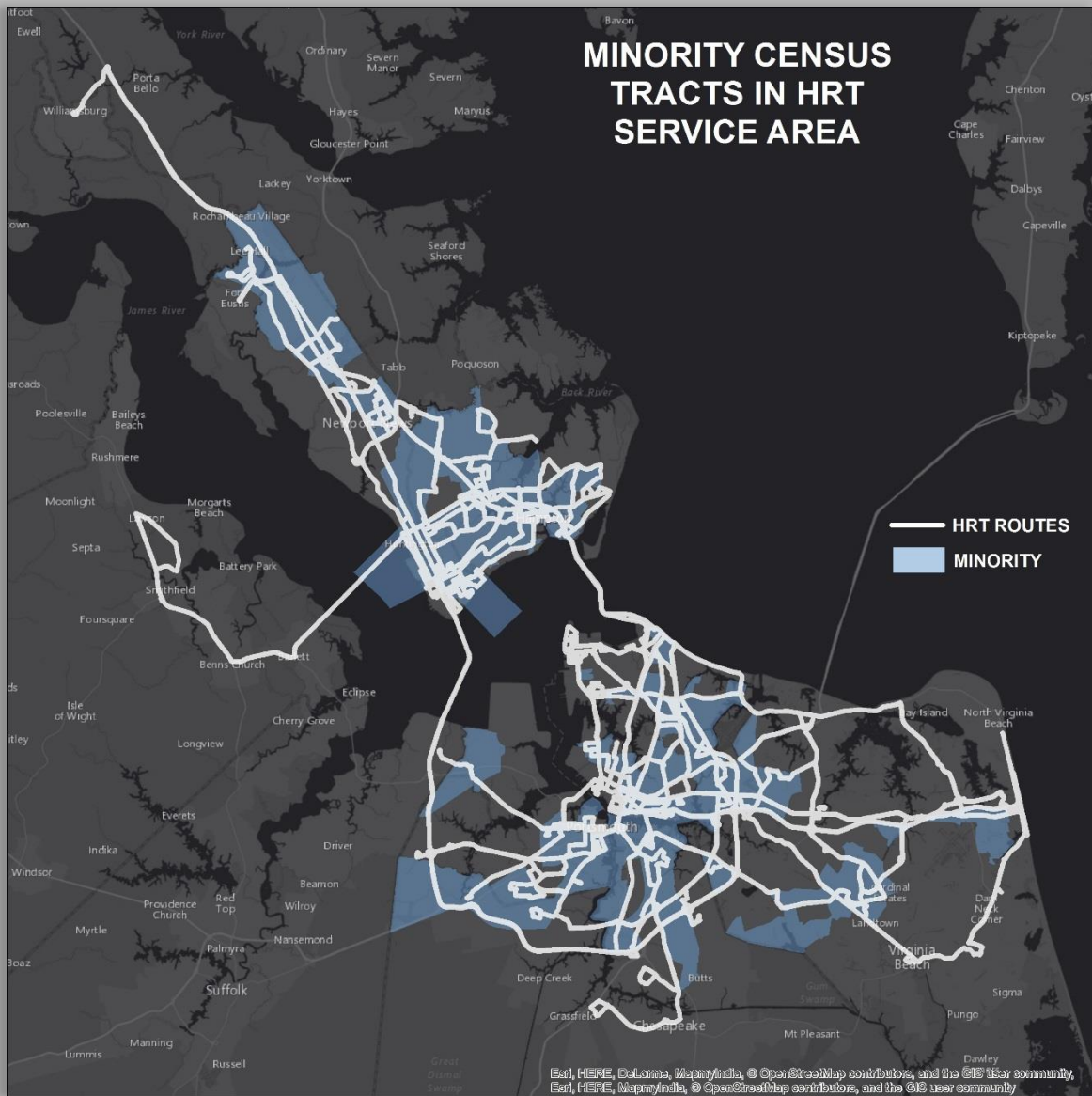
In 2014, the U.S. Census identified 1,332,339 residents in the census tracts within the HRT service area. The minority population includes Hispanic or Latino, African Americans, Asians, American Indians and Alaskan Natives, Pacific Islanders, other non-white races, and persons of two or more races. In the HRT service area, 47.1% of the residents were designated minority utilizing 2014 ACS data. **In this report, census tracts in which the minority percentage exceeds 47.1% are defined as minority tracts.**

TABLE 5: HRT SERVICE AREA MINORITY STATUS (2014 AMERICAN COMMUNITY SURVEY)

TOTAL POPULATION	MINORITY		NON-MINORITY	
1,332,339	627,714	47.1%	704,625	52.9%

The following map shows census tracts in which the percentage of minority residents is at or above 47.1% in the HRT service area. It also shows all Hampton Roads Transit routes as of August 2016.

FIGURE 6: MINORITY CENSUS TRACTS IN THE HRT SERVICE AREA



INCOME CHARACTERISTICS

Hampton Roads Transit, utilizing accepted industry standards, considers persons living at or below 150% of the federal poverty line to be low-income for the purposes of this Title VI analyses.

Poverty Guidelines are provided by the U.S. Department of Health & Human Services in 2014 to define poverty in the 48 Contiguous States and the District of Columbia is shown on the following table.

TABLE 6: POVERTY GUIDELINES BY HOUSEHOLD SIZE

	POVERTY GUIDELINE
--	-------------------

1	\$12,071
2	\$15,379
3	\$18,850
4	\$24,230
5	\$28,695
6	\$32,473
7	\$36,927
8	\$40,968
9+	\$49,021

(U.S. Department of Health & Human Services - 2014)

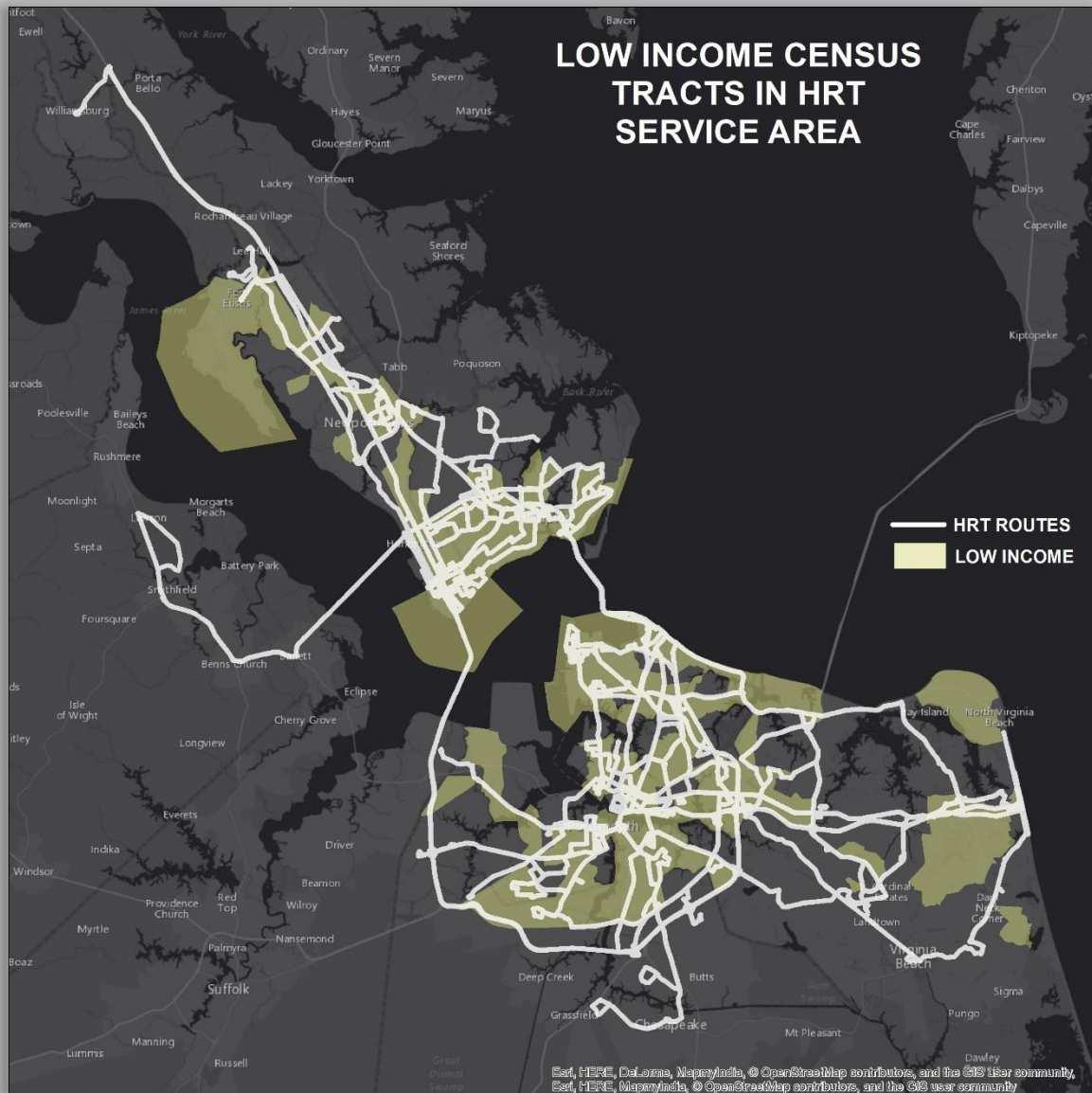
According to the guidelines and 2014 American Community Survey results, 20.5% of the population was living at or below 150% of the poverty line in HRT’s service area. In this report, census tracts in which the low-income percentage exceeds 20.5% are defined as low-income tracts.

TABLE 7: HRT SERVICE AREA POVERTY STATUS (2014 ACS)

TOTAL POPULATION	PEOPLE BELOW 150% OF POVERTY LINE	LOW-INCOME PERCENTAGE
1,332,339	272,924	20.5%

The following map shows the census tracts in HRT service area in which the percentage of low-income residents is at or above 20.5%:

FIGURE 7: LOW-INCOME CENSUS TRACTS IN THE HRT SERVICE AREA



COMPOSITE MINORITY & LOW-INCOME CHARACTERISTICS

To better understand the minority and low-income population distribution pattern, each census tract in HRT service area is classified into one the following four categories: Minority Tract, Low-Income Tract, Minority and Low-Income Tract, and Non-Minority/Non-Low Income Tract. The following map shows the distribution pattern of minority & low-income populations in HRT's service area.

FIGURE 8: MINORITY & LOW-INCOME CENSUS TRACTS IN THE HRT SERVICE AREA

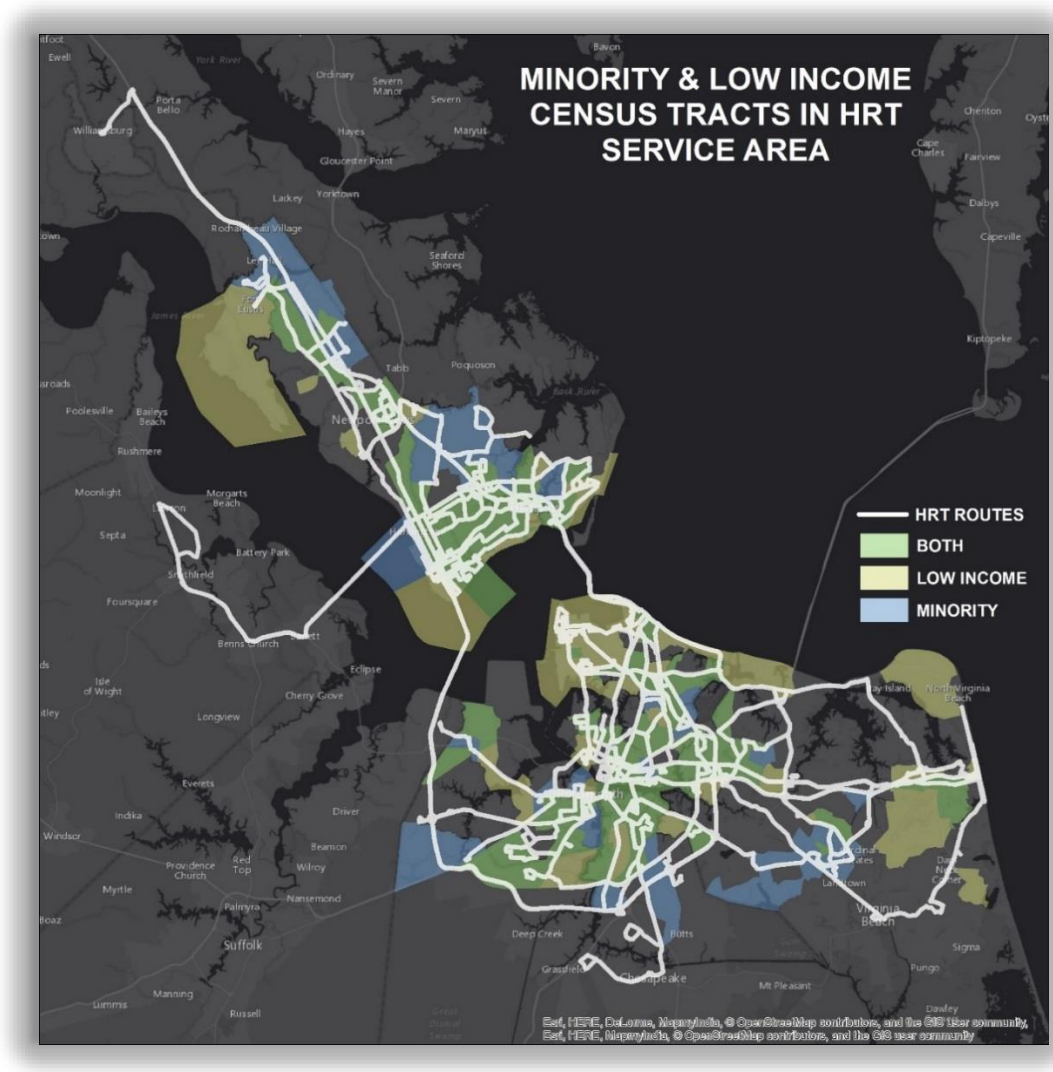


TABLE 8: MINORITY & LOW-INCOME THRESHOLDS BY CENSUS TRACT DATA IN THE HRT SERVICE AREA

CATEGORY	MINORITY PERCENTAGE	LOW-INCOME PERCENTAGE
MINORITY TRACT	≥ 47.1%	<20.1%
LOW-INCOME TRACT	<47.1%	≥20.1%
MINORITY & LOW-INCOME TRACT	≥ 47.1%	≥20.1%
NON-MINORITY / NON-LOW-INCOME TRACT	<47.1%	<20.1%

ROUTING DEMOGRAPHIC CHARACTERISTICS

A route will be designated as minority or low-income route if over 33% of its length is in minority or low-income areas. A list showing the minority or low-income status for each HRT route can be found in Appendix F.

Ninety-one and one-half percent (91.5%) of existing HRT bus routes are defined as minority and/or low income routes. The remaining six routes are defined as non-minority, non-low-income routes. The Elizabeth River Ferry is a minority/low-income route, as is The Tide light rail line.

Hampton Roads Transit makes a concerted effort to take into account the needs of minority and low-income passengers during the service change process. This effort is represented in the distribution of resources in its service area.

DEMOGRAPHIC RIDERSHIP AND TRAVEL PATTERNS COLLECTED BY SURVEYS

The last time demographic ridership and travel patterns were collected by surveys at Hampton Roads Transit was during the 2014 Origin & Destination Survey for all bus, ferry, and light rail routes. The data collected included information on fare usage, income, and minority status needed to conduct service and fare change analyses.

HRT is currently conducting an origin and destination survey of all bus, ferry, and light rail routes. HRT expects this data to be collected, completed and received in early 2017. Once the survey is completed and the data expanded, HRT will update our system and route level ridership demographic information.

This page intentionally left blank.

CHAPTER 5: SERVICE MONITORING

EQUITABLE SERVICE AND AMENITIES

Hampton Roads Transit reviews the distribution and location of transit amenities to provide equitable distribution throughout its service area regardless of an area’s socioeconomic demographics. HRT provides guidelines for proposing, planning, and implementing transit stop amenities in the Passenger Amenity Policy (2017). HRT analyzes amenity requests using specific stop criteria, including average daily boarding counts, property ownership status, minimum area requirements, and infrastructure requirements. The maps on the following pages show the current distribution of HRT owned and maintained shelters and benches throughout the HRT system (Figures 14 and 15, respectively).

As defined in Section 1.2, HRT’s service area is designated as 47.1% minority and 20.5% low-income. As evidenced through the Figures 5 and 6 and the following table, HRT amenities are distributed equitably throughout its service area.

TABLE 9: DISTRIBUTION OF HRT AMENITIES BY MINORITY AND LOW INCOME AREAS

	% IN MINORITY TRACTS	% IN LOW- INCOME TRACTS	% IN MINORITY OR LOW INCOME	% IN NON- TITLE VI TRACTS	TOTAL STOPS W/AMENITY	TOTAL NUMBER OF STOPS	% OF STOPS W/AMENITY
BENCHES	55%	63%	74%	26%	233	2847	8%
SHELTERS	55%	63%	74%	26%	231	2847	8%

FIGURE 9: SHELTER DISTRIBUTION IN HRT SERVICE AREA

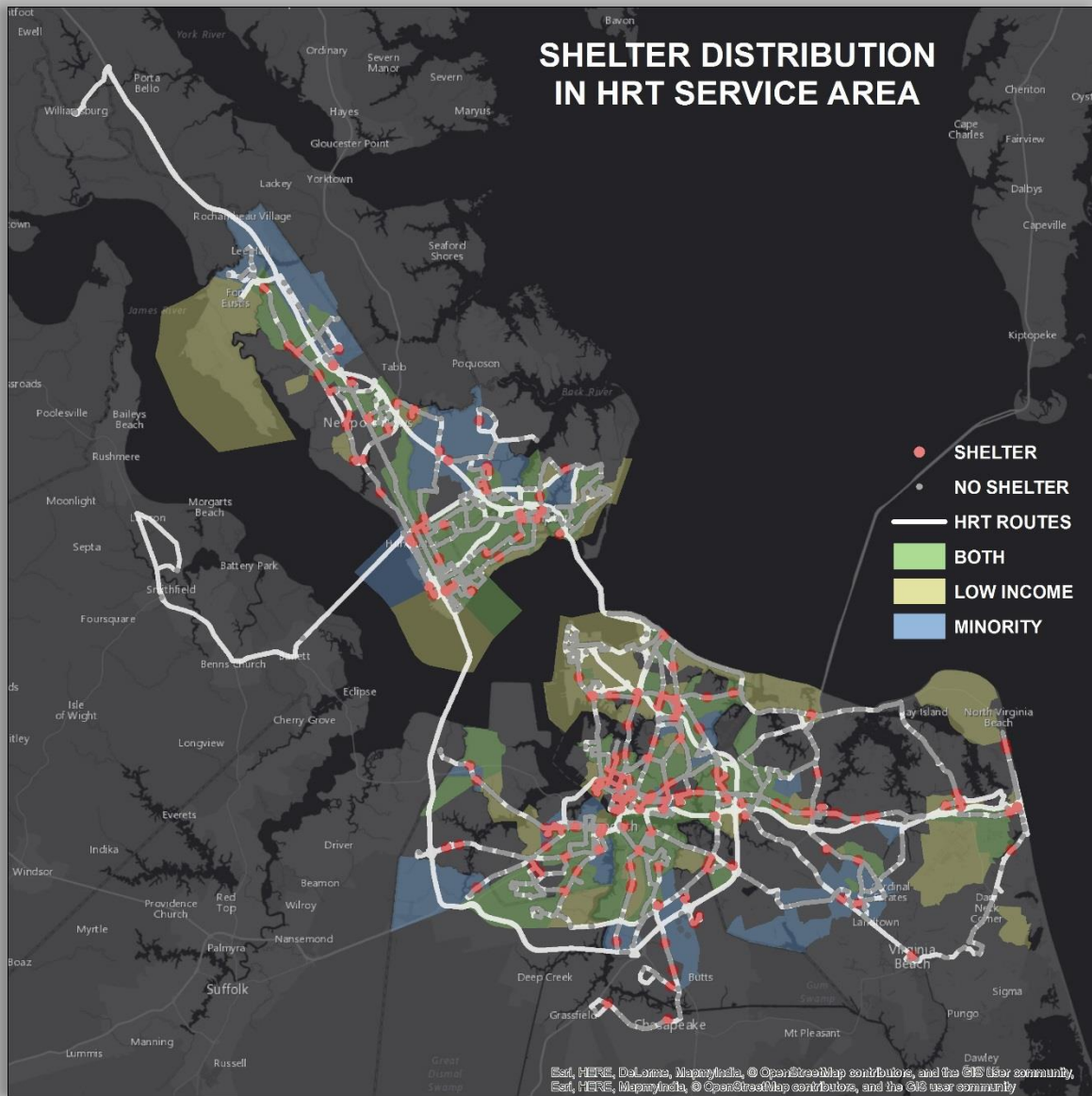
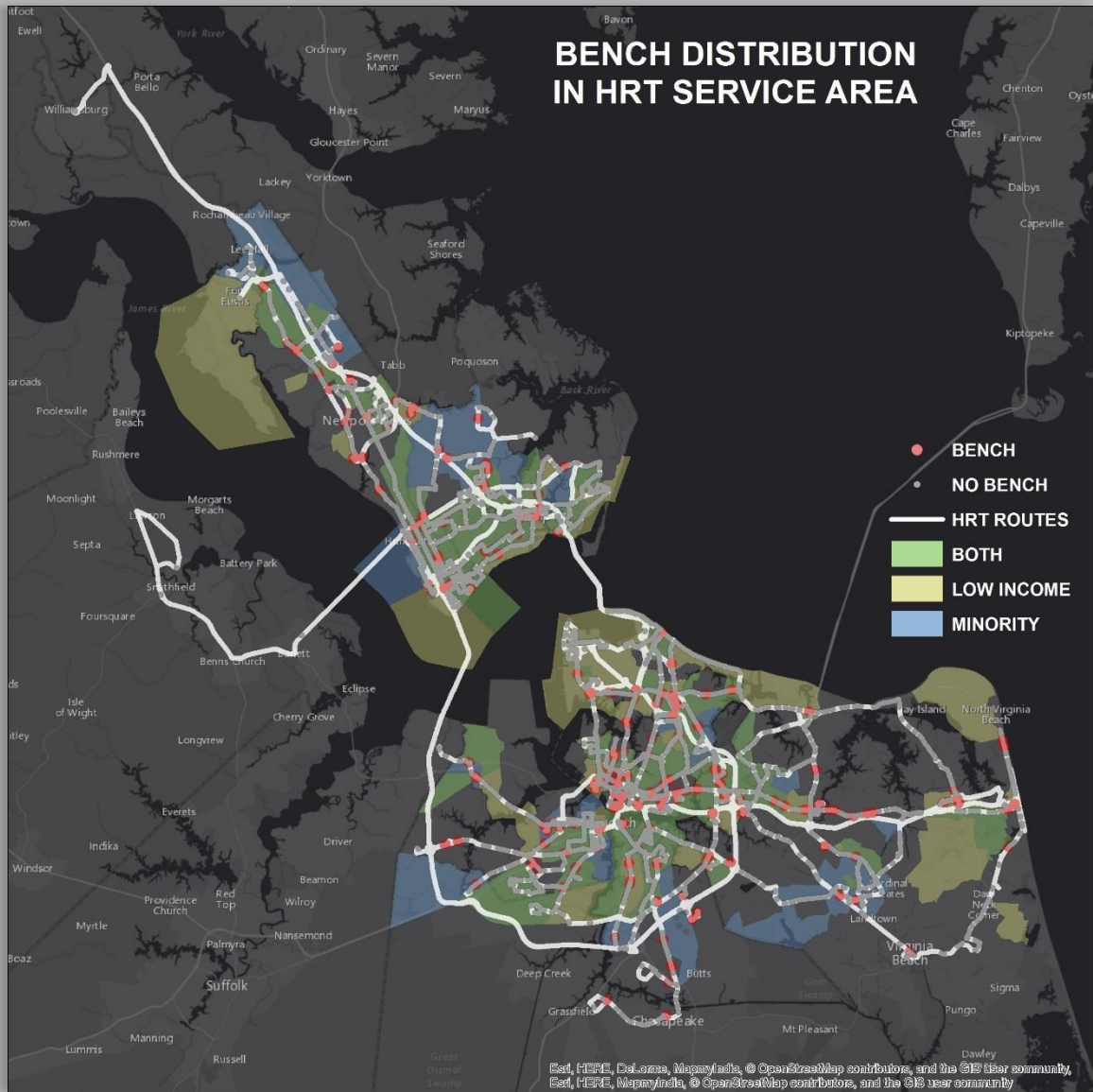


FIGURE 10: BENCH DISTRIBUTION IN HRT SERVICE AREA



VEHICLE LOAD MONITORING

All bus lines throughout the service area are monitored for their vehicle load through periodic surveys and random sampling by data collector observations. Hampton Roads Transit continues to work to update its vehicle fleet with APC technology which will enable the agency to obtain peak load information from the APCs. Since less than 1/3 of the HRT fleet is equipped with APC's, and with random vehicle assignment, to utilize the data for this purpose would be unreliable. HRT is constantly improving data collection and reliability and anticipates being able to utilize APC data in the future.

The most recent survey data for HRT occurred in November 2013, whereby HRT was able to review random counts of average peak and daily loads. This data is representative of random trip ridership by route. Analysis of vehicle load averages using this data shows that average maximum load per trip is below 100% of seating capacity on all routes. A route-by-route breakdown of average vehicle load as well as maximum observed vehicle load using the November 2013 data can be found in Appendix G.

When evidence is presented through data collection efforts or through customer comments that the load factor on a route is being exceeded, HRT will review the service and make recommendations or adjustments to alleviate the problem.

ON-TIME PERFORMANCE REPORT

On-time performance for HRT's bus service is measured against the published schedule and actual bus arrival times at approximately 200 designated timepoints throughout the system. A bus is considered "on-time" if it is not more than five minutes late at each scheduled time point and if it is less than one minute early. There is approximately one timepoint for every 10 bus stops. Actual bus arrival times are captured by HRT's Navigator an automatic vehicle location (AVL) system which uses Global Positioning System (GPS) technology. Hampton Roads Transit reports on-time performance monthly to the TDCHR Operations and Oversight Committee. Also reported are the Top 10 Best and Worst on-time performing routes.

The average system-wide on-time performance was reported at 82% as of July 2016.

Based on the 2014 Origin & Destination Survey, the MAX and fixed-route bus service routes averaged 83% minority riders and 64% low-income riders. HRT assessed the minority and low income ridership levels for the top ten performing routes (Routes 43, 11, 4, 13, 22, 110, 47, 50, 5, and 1 from best to worst) and the worst ten performing routes (Routes 111, 405, 108, 33, 121, 967, 415, 414, 403, and 427 from best to worst) and compared these levels to the average. As shown in the table below, the minority and low-income ridership for the top ten routes is comparable to the average system route. The worst ten routes had lower percentages of minority and low income riders when compared to the average.

TABLE 10: PERCENT MINORITY AND LOW-INCOME RIDERS ON BEST AND WORST PERFORMING ROUTES

	% MINORITY	% NON-MINORITY	% LOW-INCOME	% NON-LOW-INCOME
AVERAGE	83%	17%	64%	36%
TOP 10 ROUTES	84%	16%	63%	37%

WORST 10 ROUTES	75%	25%	60%	40%
------------------------	-----	-----	-----	-----

SERVICE AVAILABILITY ANALYSIS

HRT strives to make transit available to as many people within its six-city service area as possible. Table 9 and 10 below show the percentage of the minority/non-minority and low income/non-low income population served by transit within the HRT service area. The percentages in the tables reflect the proportion of individuals within ¼ mile of a transit stop. As the data shows, minority and low income populations have better access to transit than both non-minority/non-low income populations and the population within the entire service area.

TABLE 11: MINORITY TRANSIT AVAILABILITY

MINORITY TRANSIT AVAILABILITY		
POPULATION	Within 1/4 Mile	More Than 1/4 Mile
MINORITY	95.5%	4.5%
NON-MINORITY	90.5%	9.5%
SYSTEM	92.8%	7.2%

TABLE 12: LOW INCOME TRANSIT AVAILABILITY

LOW INCOME TRANSIT AVAILABILITY		
POPULATION	Within 1/4 Mile	More Than 1/4 Mile
LOW INCOME	97.1%	2.9%
NON-LOW INCOME	91.7%	8.3%
SYSTEM	92.8%	7.2%

This page intentionally left blank.

CHAPTER 6: SERVICE AND FARE CHANGES

MAJOR SERVICE CHANGES SINCE 2014

Hampton Roads Transit has implemented several major service changes since 2014 as reported in the related Equity Analyses.

TABLE 13: EQUITY ANALYSIS REPORTS BY SERVICE BOARD

SERVICE CHANGE	IMPLEMENTATION DATE
SUMMER 2014	7/6/2014
SUMMER 2015	7/19/2015
WINTER 2016	1/17/2016
SUMMER 2016	8/28/2016

Title VI Equity Analysis Reports for all Major Service Changes are attached in Appendix H.

FARE CHANGES SINCE 2014

Hampton Roads Transit implemented a fare change on October 5, 2014. A Title VI analysis of the proposed change was completed and presented to and approved by the Commission on February 27, 2014.

Hampton Roads Transit added the Student Freedom Pass Fare as a fare type in December 2016. A Title VI analysis was completed, presented to, and approved by the Commission on December 8, 2016.

The 2014 - 2016 Title VI Fare Change Analyses are attached in Appendix I.

This page intentionally left blank.

APPENDICES

This page intentionally left blank.

APPENDIX A: PUBLIC PARTICIPATION PLAN



Hampton Roads Transit:
Public Participation Plan

Updated:
January 2017



Contents

1	HRT Commitment to Public Involvement and Non-Discrimination	1
2	The Purpose of the Public Participation Plan	2
2.1	Public Participation Plan Goals	2
2.2	Definitions	2
3	HRT’s Public Participation Process	5
3.1	Public Involvement on Fare and Service Changes	5
3.2	Public Notice on Program of Projects	6
3.3	Public Hearings for Compliance with the National Environmental Policy Act	6
3.4	Public Notice on DBE Program and Goals	6
4	Target Audiences	8
4.1	HRT’s Stakeholders	8
4.2	Limited English Proficient Customers	9
5	Public Communication and Outreach Tools	10
5.1	Customer Feedback	10
5.2	Customer Alerts	11
5.3	Print and electronic media	11
5.4	Partnerships with Community-Based Organizations	11
5.5	Participation in local community events	11
5.6	School Outreach	11
5.7	Transit Riders Advisory and Paratransit Advisory Committees	12
5.8	Meet & Greet/ Open House	12
5.9	Surveys	12
5.10	Public Meetings and Hearings	13

1 HRT Commitment to Public Involvement and Non-Discrimination

HRT is committed to informing and involving the public in the planning and delivery of public transportation services in the region. HRT will diligently work to overcome obstacles that may hinder effective public involvement. Public information and experiences are consistently used to update its plans to improve public participation.

HRT takes public involvement seriously and will continuously work to add new components to all public involvement efforts in order to facilitate achieving public participation goals or to comply with amended laws or regulations relative to Title VI of the Civil Rights Act of 1964. Title VI of the Civil Rights Act of 1964 states that “no person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

Subsequent laws and Presidential Executive Orders further prohibit discrimination based on handicap, sex, age, or income status. In accordance with these laws and regulations, HRT assures that no person shall, on the basis of race, color, national origin, handicap, sex, age, or income status, be excluded from participation in, be denied benefits of, or be otherwise subject to discrimination under any program or activity.

Pursuant to Federal Transportation Administration Title VI regulatory guidance Circular FTA C4702.1B, “Every Title VI program shall include an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Program submission. A recipient’s targeted public participation plan for minority populations may be part of efforts that extend more broadly to include other constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others”.

To meet these requirements, this public participation plan will provide detailed information how HRT complies with Title VI objectives listed as follows:

- Ensure the level and quality of public transportation service is provided in a nondiscriminatory manner.
- Promote full and fair participation in public transportation decision-making without regard to race, color, or national origin.
- Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

2 The Purpose of the Public Participation Plan

The public participation plan describes the overall goals, public involvement strategy and outreach methods used to reach out to all members of the public. HRT also ensures meaningful outreach is extended for low-income, minority and LEP populations. HRT views public involvement as a significant factor when making transportation decisions. Public involvement provides an ample mix of perspectives and value to HRT's planning decisions. Some key benefits of an established and supported Public Participation policy are as follows:

- Improved public understanding of complex public policy decisions which increases the opportunity for public consensus on planning decisions.
- Encourages proactive community involvement with HRT's planning staff.
- Demonstrates transparency in HRT's planning decisions and policies.
- Establishes meaningful relationships with underserved populations.

2.1 Public Participation Plan Goals

- Inform the public about HRT services and initiatives.
- Maintain consistent and complete transparency with the public.
- Allow the plan to facilitate a responsive and accountable relationship with the ridership community.
- Increase public awareness and actively involve the public in transit service planning decisions and delivery.
- Proactively promote the open exchange of information to solicit public feedback that will identify how proposed changes to service will affect our customers in a way that may not be readily apparent to HRT staff.
- Comply with federal and state laws and regulations.

2.2 Definitions

The following definitions are used within the HRT Public Participation Plan.

Discrimination: Refers to 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.

Limited English Proficient (LEP) Population: Refers to 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 Population: Refers to 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 Native Americans) who will be similarly affected by a proposed FTA program, policy or activity.

Minority Persons include the following:

- 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.
- 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.
- Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
- Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- 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 Islands.

Minority Population: Means 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 Native Americans) who will be similarly affected by a proposed DOT program, policy, or activity.

Outreach: An effort by an organization to educate, inform, to engage and seek input from other organizations, groups, specific audiences or the general public.

Outreach Methods: Methods that identify and invite target audiences and stakeholders to participate in a public participation opportunity.

Provider of Fixed Route/Guideway Public Transportation (or “Transit Provider”): Means any entity that operates public transportation service and includes States, local and regional entities, and public and private entities.

PUBLIC PARTICIPATION PLAN
JANUARY 2017

Public Transportation: Means 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: and does not include Amtrak, intercity bus service, charter bus service, school bus service, sightseeing service, courtesy shuttle service for patrons for one or more specific establishments, or intra-terminal or intra-facility shuttle. Public transportation includes buses, subways, light rail commuter rail, monorail, passenger ferry boats, trolleys, inclined railways, people movers, and vans. Public transportation can be either fixed route or demand response service.

Public Input: Participation methods that seek community feedback on a policy, project, program or activity. A response is required from the public.

Public Participation: Any process that seeks to involve the public in decision-making processes. Public participation is an umbrella term that describes methods including: public information, education, outreach, input, involvement, collaboration and engagement.

Public Participation Plan: A tailored plan that describes how HRT achieves public involvement, information, education, participation and/or outreach methods.

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

Target Audience: Low income, minority and Limited English Proficiency (LEP) populations.

Title VI Program: Refers to a document developed by a FTA recipient (in this instance, HRT) to demonstrate how the 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. For State DOTs, the appropriate governing entity is the State's Secretary of Transportation or equivalent.

3 HRT's Public Participation Process

HRT adheres to a proactive public participation process. All public involvement activities must be functional for HRT decisions and must be meaningful to the public. HRT benefits from public involvement by engaging the public at the earliest project stages from the development of the purpose and need through project implementation. HRT's public involvement activities increases public awareness and give the public an active voice in planning decisions. HRT's public participation process includes the following steps:

- Step 1** ➔ Outline a public participation plan at the beginning of key HRT planning projects.
- Step 2** ➔ Previously established mailing and email lists are identified.
- Step 3** ➔ Update existing mailing and email lists; new lists are created.
- Step 4** ➔ All final project documentation is archived with HRT's records management department throughout the life of the project.
- Step 5** ➔ Based on a project's milestones and requirements, a public involvement timeline is created.
 - The public involvement timeline outlines each activity of the project's outreach efforts.
- Step 6** ➔ The effectiveness of the public participation plan is periodically assessed throughout the life of the project, to determine if the public involvement objectives were achieved.
 - The public participation strategy is assessed at different stages of a project to determine if the practices were effective in reaching each of the expected populations and, equally important, whether the events created opportunities for meaningful involvement.
 - HRT will change the public participation strategy to improve future performance in response to the assessment.

3.1 Public Involvement on Fare and Service Changes

Federal Transit Administration, (FTA) regulations requires, "a locally developed process to consider public comment before raising a fare or carrying out a major reduction in transportation service"¹ as defined by HRT's Title VI Policy.

HRT uses a broad range of outreach tools documented in this plan to serve this requirement, including newsletters, on-board notices and announcements, social media (ex. Facebook posts,

¹ See U.S. Department of Transportation Circular FTA C4702.1B (2012) Chapter III-6.

Twitter), website comment forms, and open public meetings in an effort to gain public review and comment. All public comments become part of the official record.

3.2 Public Notice on Program of Projects

Each year HRT is also required to provide public notice and an opportunity for holding public hearings on the agency's proposed Program of Projects. These are projects HRT intend to use federal grant funds (Section 5307) (49 U.S.C. 5323(b)). The purpose of the public notice is to give citizens, private transportation operators, and local officials an opportunity to examine the contents of the proposed program, ensure equity, and to allow comments on the proposed program.

Each year, the Grants Administration Officer at HRT complies with this requirement through the publishing of the Program of Projects in local newspapers. A formal public hearing is held and announced in a public notice if written requests are received within 30 days of the publishing of the Program of Projects.

3.3 Public Hearings for Compliance with the National Environmental Policy Act

HRT will complete a full public involvement process for major capital projects requiring review and analysis under the national Environmental Policy Act. This shall include all Environmental Impacts Statements (EIS), and it may include Environmental Assessments and Categorical Exclusions in situations of public controversy or sensitivity. Each program will have an individually defined public participation plan tailored to the project needs and requirements.

3.4 Public Notice on DBE Program and Goals

The Transportation District Commission of Hampton Roads (TDCHR), the public transportation system serving the Hampton Roads metropolitan area establishes a Disadvantaged Business Enterprise (DBE) utilization goal on Federal Transit Administration funded projects for each Federal Fiscal year's (FFY). The goal is derived using Virginia Department of Minority and Business Enterprise's Unified Certification program Directory, previous Fiscal year achievement, Vendor's List, and current area business consultations.

In accordance with 49 CFR Part 26.45 (g), TDCHR invites maximum public participation and solicits comments regarding the proposed goal. Further, TDCHR invites the submission of evidence and information that may support the use of mixed components of race-conscious and race-neutral measures to achieve the overall goal.

A complete description of the proposed goal is made available for public inspection for 45 days from the date of the initial notification online at www.gohrt.com. It is also made available at

**PUBLIC PARTICIPATION PLAN
JANUARY 2017**

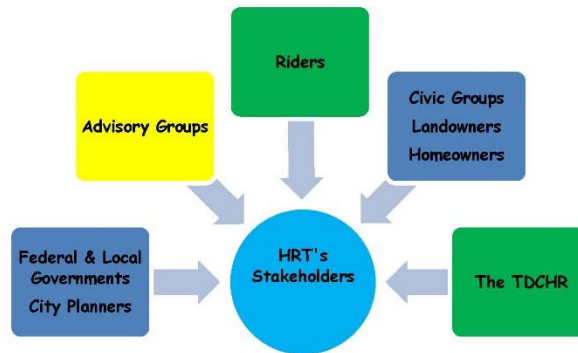
the reception desk at HRT Headquarters at 3400 Victoria Boulevard, Hampton, VA 23661 or 509 East 18th Street, Norfolk, VA 23504.

Comments on the proposed program goal are accepted after the publication of the notice. The public is advised to send all comments to the DBE/Contract Compliance Office or by email to db@hrtransit.org.

4 Target Audiences

HRT’s target audience for public involvement is its stakeholders. HRT’s stakeholders include HRT system riders, the public, area businesses, the TDCHR, and federal, state, and local governments. The public is defined as citizen advisory committees, advocacy groups, civic groups, homeowners, business owners and landowners; all whom who may be impacted by transit planning decisions. HRT works closely with the target audience on key projects and planning decisions to ensure transparent decision-making and meaningful input and consideration of public input.

In addition to broad public involvement, HRT takes care to ensure meaningful involvement among groups of people traditionally disenfranchised from the public process. This includes minority groups based on race, ethnicity, and national origin as well as low-income populations. HRT uses on-board rider surveys to identify characteristics of system riders and U.S. Census Bureau data to identify low income, minority and LEP populations in the six cities served by HRT. Through these data sources, we can more effectively target these regions and riders.



4.1 HRT’s Stakeholders

HRT stakeholder list includes but is not limited to:

- Statewide and Local Agencies and Governments
- Advocacy groups
- Community development organizations
- Civic Leagues



- Local elected officials and staff
- Business Owners
- State and local land-use planners
- Architects, archeologists, landscape architects, architectural historians, etc.
- General public
- Minorities and ethnic groups
- Low-Income groups
- Educational institutions, museums
- Historic district commissions
- The TDCHR

4.2 Limited English Proficient Customers

Pursuant to FTA guidelines “recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited-English-proficient (LEP).”² LEP customers may reach HRT and receive route assistance by calling 757-222-6000 during business hours in their desired language. HRT uses a translation service called Certified Language Services with US based translators. The service supports 180 languages.

When there is a LEP request for a public meeting, HRT will ensure all meeting content is available for LEP customers in both print and online. LEP customers may also use the Google Translate function on gohrt.com which translates the website into their desired language. Google Translate is a web-based service provided by Google Inc. to translate written text from one language into another. The link to this site is available on www.gohrt.com.

² See U.S. Department of Transportation Circular FTA C4702.1B (2012) Chapter III-6.

5 Public Communication and Outreach Tools

Different public involvement strategies, tools, and activities are applicable in different areas. HRT may use traditional and non-traditional outreach methods. Traditional outreach may involve a public meeting or hearing. Non-traditional outreach may involve social media, pop-up meetings, interactive web-based tools, or community partnerships. Public participation efforts may also vary depending on the information offered. HRT is familiar with its service community and makes every effort to know key demographic aspects about where they work, live, what venues they may frequent, what languages they speak, and how they get their information.

For example, public involvement requirements are different in the case of a route change compared to a long-range transit planning study. The most common areas include the following:

- Daily operations
- Fare changes
- Service changes (including schedules and route changes)
- Transit development plans, corridor studies
- Capital projects
- Marketing (including advertising, public service announcements, and safety campaigns)
- Human services transportation (including transit planning for persons with disabilities, seniors, and low-income populations)

HRT uses various public involvement methods. These different outreach methods provide a broader window of opportunity for HRT to provide meaningful public input in everyday operations and activities as well as proposed changes in service, operations, or fare. Outreach methods were designed to be aligned with the public involvement goals ensuring public awareness, education and an opportunity for meaningful interactions, and public input on key planning decisions. These methods are also used to ensure compliance with Federal Transit Administration guidelines under Title VI of the Civil Rights Act.

5.1 Customer Feedback

HRT encourages public comment and suggestions (formal and informal). Public comments are accepted via customer service, gohrt.com, Facebook and Twitter. HRT's customer contact center receives about 75,000 calls each month. All customer feedback is entered into the customer assistance database for follow up within seven business days. HRT has a dedicated customer advocacy team for this purpose.

5.2 Customer Alerts

Customer Alerts inform the public of significant agency events such as a change in hours, route schedules, public hearings, meetings, special events, safety messages and other important information. Customer Alerts are posted at transfer centers, distributed on routes, on gohrt.com and through social media (ex. Facebook and Twitter).

“goAlerts” is a free email and text subscription service. Customers are encouraged to sign up for “goAlerts” on HRT’s homepage at www.gohrt.com. Subscribers receive real time updates on service changes and events through automated emails or text messages.

5.3 Print and electronic media

Print and electronic advertisements are used to inform the public of various changes, events and services. We use these methods mainly on buses, transfer centers, transit centers.

5.4 Partnerships with Community-Based Organizations

HRT fosters strong community partnerships by regularly engaging community based organizations for its public involvement initiatives. Civic leagues and other community based organizations can be helpful in clarifying the best outreach strategies for their constituent community. These partnerships result in increased public participation, better meeting locations and overall better meetings. HRT purposefully seeks community based organizations that serve diverse groups and have proven to be helpful in gaining public participation.

5.5 Participation in local community events

To insure community engagement, HRT actively participates in city sponsored community events. HRT collaborates in a consistent and planned manner with the region’s city planning, communications and safety offices. During these events, HRT’s public outreach team will advocate on behalf of and educate the public on the importance of public transportation. HRT distributes transit materials relative to the location during every community event.

5.6 School Outreach

The public outreach team regularly visits the region’s schools to teach and engage students about public-transportation. Students are encouraged to participate in discussions, lessons and facility tours. The topics reviewed during school outreach sessions include; how to use public transportation, the importance of transportation safety and the different modes of public transportation. An HRT bus and driver may be staged at the school. This allows the students to have an interactive experience.

5.7 Transit Riders Advisory and Paratransit Advisory Committees

The Transit Riders Advisory Committee and Paratransit Advisory Committee are subcommittees of the TDCHR Executive Committee and report to the Chair of the Executive Committee. The Paratransit Advisory Committee and the Transit Riders Advisory Committee both meet bi-monthly. The Paratransit Advisory Committee members include persons with disabilities who use regular public transportation or Paratransit services. The Transit Riders Advisory Committee members include customers who ride public transportation on a daily and/or weekly basis. Participants on both committees serve on a voluntarily basis.

Contact information for HRT staff liaisons for these committees as well meeting dates, times, and locations are listed on HRT's website at www.gohrt.com/about/governing. Meeting agendas are posted to the HRT website prior to the meeting; and meeting minutes are posted to the HRT website within two weeks after the meeting. All TRAC and PAC meetings are open to the public and visitors are invited to comment as noted on the meeting agenda.

5.8 Meet & Greet/ Open House

Meet and Greet or Open House programs allow our customers to speak with the staff face to face. The public involvement team regularly hold meet and greet sessions at transit and transfer centers, area colleges and businesses.

The Open House session provides an interactive forum for public involvement. Open House sessions can be helpful in major planning projects because it allows an opportunity for the public to review visual aids and speak one on one with HRT representatives about the project. The Virginia Beach Transit Extension open house is a good example of a successful Open House session would be). The public was able to ask specific questions tailored to their personal experiences or concerns. Participants also had an opportunity to discuss the project with HRT staff and have their questions answered quickly. The Open House session enabled HRT to inform the public on the project's status.

5.9 Surveys

HRT conducts surveys on a regular basis. The purpose of the survey is to help the agency understand ridership demographics, trip characteristics, and quality of service it delivers. The survey information also helps us determine where improvements or changes are required. Surveys are conducted on-line, on-board HRT services, and at HRT transit centers.



5.10 Public Meetings and Hearings

A public meeting is an event organized by the agency at a specific date, time, and location. The public meeting provides a structured environment for the public to learn about upcoming changes, personally interact with the agency, and give input on the proposed changes. Public meetings may include, but are not limited to, traditional settings, open houses, workshops, charettes, small group meetings, or citizen advisory committee meetings.

A public hearing is a formalized public meeting where the public's input may be included in the decision-making process.

HRT uses the "Hampton Roads Transit Policies and Procedures - Public Hearings and Meetings" PD-107, adopted 8-23-2013 for all public meetings and public hearings.

This page intentionally left blank.

APPENDIX B: LIMITED ENGLISH PROFICIENCY PLAN



Hampton Roads Transit:
Limited English Proficiency Plan

Updated:
January 2017



Contents

1.0	Introduction	1
1.1	Legal and Regulatory Context.....	1
1.2	Purpose of this Document	1
1.3	LEP Methodology	2
2.0	Four Factor Analysis	4
2.1	Factor 1: LEP Population Identification	4
2.2	Factor 2: Frequency with which LEP individuals come in contact with HRT programs, activities, or services	8
2.3	Factor 3: Evaluation of Importance of HRT Services to the LEP Population.....	8
2.4	Factor 4: Available Resources and Cost of Language Assistance Services	9
3.0	Follow Up To Measures Proposed Previously	Error! Bookmark not defined.
4.0	References	11

Tables

Table 1	English Proficiency, by City in HRT Service Area	4
Table 2	Comparison of English Proficiency, 2000 Census Data vs. 2008-2012 5-Year ACS Estimates for Current HRT Service Area	5
Table 3	Language Spoken At Home By Language Proficiency for the Population 5 Years and Over for HRT Service Area (Source: U.S. Census Bureau, 2008-2012 American Community Survey).....	6
Table 4	HRT LEP Measures and Status	10

Figures

Figure 1	Six-City HRT Service Area.....	3
----------	--------------------------------	---

**Acronyms and Abbreviations**

ACS	American Community Survey
FTA	Federal Transit Administration
HRT	Hampton Roads Transit
LEP	Limited English Proficient
LEPP	Limited English Proficiency Plan
TDCHR	Transportation District Commission of Hampton Roads
USDOT	U.S. Department of Transportation

1.0 INTRODUCTION

Hampton Roads Transit (HRT), incorporated on October 1, 1999, began through the voluntary merger of Pentran and Tidewater Regional Transit, the region's two existing public transit operators. HRT is governed by the Transportation District Commission of Hampton Roads (TDCHR), which consists of 13 members, one elected official and one citizen representative from each city served by Hampton Roads Transit, and the chairman of the Commonwealth Transportation Board (CTB) or a designee. Citizen representatives are appointed by the Governor. The purpose of the Commission is to provide reliable and efficient transportation services and facilities to the Hampton Roads community, located in southeastern Virginia. HRT currently serves six municipalities of the Southside and Peninsula areas of Hampton Roads, consisting of the cities of Hampton, Norfolk, Newport News, Portsmouth, Chesapeake, and Virginia Beach. The City of Suffolk elected to remove itself from the HRT service area effective December 30, 2011.

1.1 Legal and Regulatory Context

Federal regulations require that recipients of federal funds take reasonable steps to ensure meaningful access to their services and benefits for persons with limited English proficiency. Under these regulations, programs and activities normally provided in English must be accessible to persons who have a limited ability to speak, read, write, or understand English. Otherwise, English-only services may be discriminatory on the basis of national origin, in violation of Title VI of the Civil Rights Act of 1964, as amended, and its implementing regulations.

This four-factor analysis identifies appropriate language assistance measures needed to improve access to HRT services and benefits for limited English proficient (LEP) persons. This Language Assistance Plan (LAP) assesses language needs in the six-city HRT service area shown in Table 3.

1.2 Purpose of this Document

HRT developed a Limited English Proficiency Plan (LEPP) in December, 2010 and committed to regular updates of the LEPP when population and demographic data for the service area is updated, or when additional HRT technological, staff, or financial resources become available to support further meeting the needs of the LEP population. This document will provide an update on:

- The population and demographic profiles of the LEP population in the HRT service area (please see Figure 1) and
- The resources available and measures taken to address the needs of the HRT LEP population.

1.3 LEP Methodology

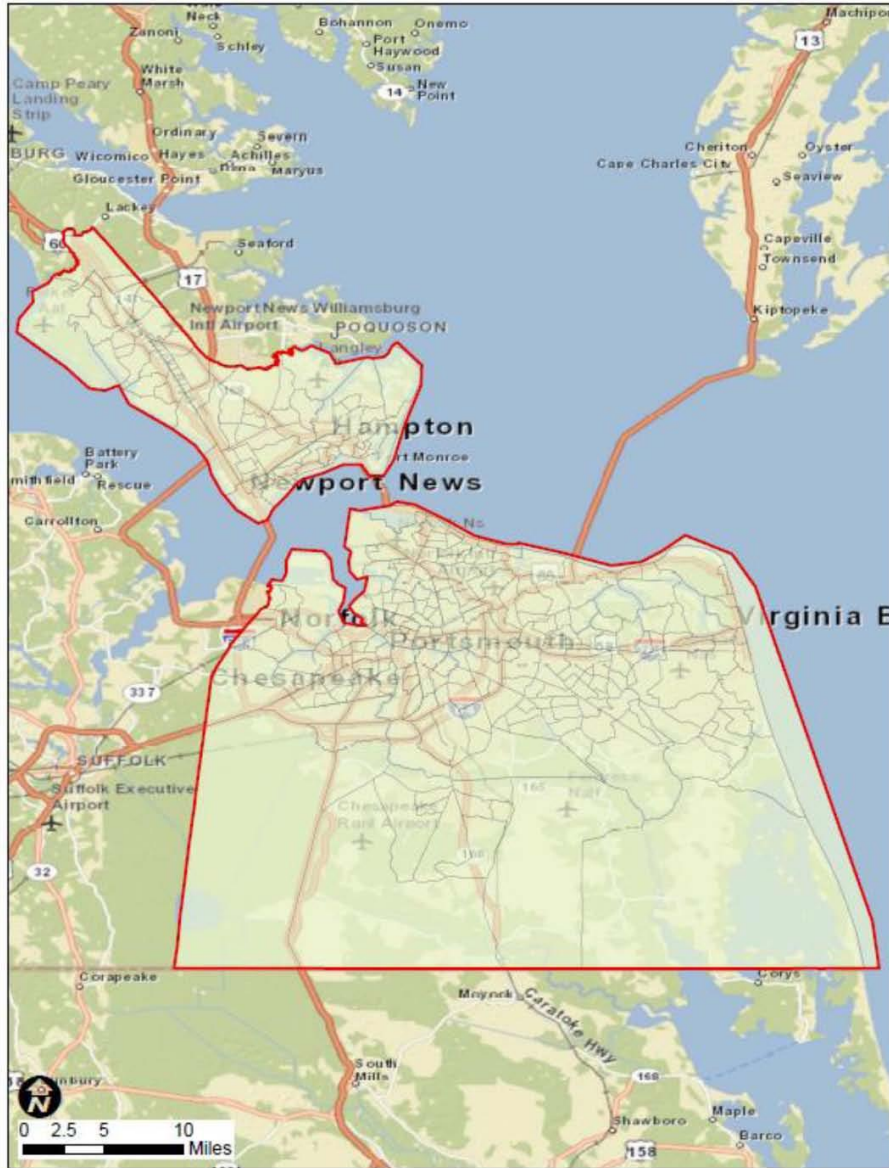
HRT has updated the Limited English Proficiency Plan to provide language assistance for LEP persons seeking meaningful access to HRT programs as required by Executive Order 13166, USDOT, and FTA’s policy guidance. In developing the LEPP, the HRT staff undertook an update of the previous LEPP Four-Factor LEP analysis, which requires the following considerations:

- Factor 1. The number or proportion of LEP persons eligible to be served or likely to be encountered by HRT programs, activities, or services.
- Factor 2. The frequency with which LEP individuals come in contact with HRT programs, activities, or services;
- Factor 3. The nature and importance of the program, activity or service provided by the HRT to the LEP population; and
- Factor 4. The resources available to the HRT and overall cost to provide LEP assistance.

Data Sources

Determining the presence of LEP populations in the HRT service area was completed through an analysis of the American Community Survey (ACS) 2015 5-Year Estimates for census tracts that lie within the six-city HRT service area.

Figure 1 Six-City HRT Service Area



2.0 FOUR FACTOR ANALYSIS

Each of the four factors noted above will be considered with updated population estimates, and compared to the findings from the December, 2010 LEPP in the following sections.

2.1 Factor 1: LEP Population Identification

The Factor 1 analysis assesses the number and proportion of persons with limited English-speaking proficiency likely to be encountered within HRT’s six-city service area. The LEP population is those persons who reported to the American Community Survey that they speak English “less than very well.”

Table 1 below shows, for those five years and older: the total population by city, the population that only speak English, the population that speak other languages, and the population that do not speak English well or at all. It is this last group that compromises the LEP populations within HRT’s member cities. As shown in the last column in Table 1, across HRT’s seven member cities, the percentage of the population that does not speak English well or at all is three percent (3.00%).

Table 1 English Proficiency, by City in HRT Service Area

City	Population 5 years and over, Total	Population 5 years and over, Speaks language other than English in the home, Speaks English Very Well, Total	Population 5 years and over, Speaks language other than English in the home, Does not Speak English Very Well, Total	% of Population 5 years and over, Does not Speak English Very Well, Total
Chesapeake	213,662.00	10,994.74	4,156.76	2%
Hampton	128,312.00	6,643.69	2,690.42	2%
Newport News	167,840.00	10,812.40	7,665.65	5%
Norfolk	227,889.00	15,285.03	7,802.05	3%
Portsmouth	88,790.00	3,483.57	975.91	1%
Virginia Beach	415,876.00	34,334.91	15,035.73	4%
Grand Total	1,242,369.00	81,554.33	38,326.51	3%

Source: U.S. Census Bureau, 2012 American Community Survey, 2015 American Community Survey

Table 2 Comparison of English Proficiency, 2000 Census Data, 2012 5-Year ACS Estimates, and 2015 5-Year ACS Estimates for Current HRT Service Area

Source: U.S. Census Bureau; 2000 Census, 2012, 2015 American Community Survey

Table This table compares the values from each of the LEP analyses in 2010, 2012, and 2014.

City	Population 5 years and over, Total			Population 5 years and over, Does not Speak English Very Well, Total			Percentage of Population 5 years and over, Does not Speak English Very Well		
	2000 Census	2012 5-Yr ACS	2014 5-Yr ACS	2000 Census	2012 5-Yr ACS	2014 5-Yr ACS	2000 Census	2012 5-Yr ACS	2014 5-Yr ACS
Chesapeake	185,025	208,881	213,662.00	1,238	4,795	4,156.76	0.67%	2.30%	1.95%
Hampton	137,303	128,642	128,312.00	1,048	2,709	2,690.42	0.76%	2.11%	2.10%
Newport News	165,897	167,330	167,840.00	1,666	6,770	7,665.65	1.00%	4.05%	4.57%
Norfolk	217,818	226,213	227,889.00	2,021	7,382	7,802.05	0.93%	3.26%	3.42%
Portsmouth	93,508	88,717	88,790.00	632	890	975.91	0.68%	1.00%	1.10%
Virginia Beach	394,892	410,322	415,876.00	4,435	14,321	15,035.73	1.12%	3.49%	3.62%
Total	1,194,443	1,230,105	1,242,369.00	11,040	36,867	38,326.51	0.92%	3.00%	3.08%



LIMITED ENGLISH PROFICIENCY PLAN
JANUARY 2017

Other and unspecified languages	59	14	73	0.00%	0.00%	0.01%
Navajo	20	6	26	0.00%	0.00%	0.00%
Hmong	26	0	26	0.00%	0.00%	0.00%
Yiddish	0	0	0	0.00%	0.00%	0.00%
SUBTOTAL	1,210,248	38,319.00	1,369,627	96.93%	3.07%	100.00%
TOTAL	1,210,248					

Factor 1 Findings

Table 3 demonstrate that over 90% of the population in the HRT service area speaks only English. Spanish and Tagalog are the only two languages spoken at home by more than one percent of the population within the HRT service area. Additionally, the Spanish Speaking population is the only language group where English is spoken less than very well by more than 1% of that language group.

2.2 Factor 2: Frequency with which LEP individuals come in contact with HRT programs, activities, or services

Through the analysis of available Census data, the Factor 1 analysis identified LEP populations within the six-city HRT service area. The second step of the four-factor LEP needs assessment is an evaluation of the current frequency of contact between LEP individuals and HRT programs, activities, and services. The US DOT “Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons” (US DOT, 2005) advises that:

“Recipients should assess, as accurately as possible, the frequency with which they have or should have contact with LEP individuals from different language groups seeking assistance, as the more frequent the contact, the more likely enhanced language services will be needed. The steps that are reasonable for a recipient that serves an LEP person on a one-time basis will be very different than those expected from a recipient that serves LEP persons daily.”

HRT’s customer service department reports that 14 calls from Spanish language speakers requiring translation services were received in 2016. HRT has received no request for any other translation services during the 2011-2013 review periods.

2.3 Factor 3: Evaluation of Importance of HRT Services to the LEP Population

The USDOT “Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons” (USDOT 2005) advises that:

“The more important the activity, information, service, or program, or the greater the possible consequences of the contact to the LEP individuals, the more likely language services are needed. The obligations to communicate rights to an LEP person who needs public transportation differ, for example, from those to provide recreational programming. A recipient needs to determine whether denial or delay of access to services or information could have serious or even life-threatening implications for the LEP individual . . . providing public transportation access to LEP persons is crucial. An LEP person’s inability to utilize effectively public transportation may adversely affect his or her ability to obtain health care, education, or access to employment.”

The Factor 1 analysis showed that nearly 3.07% of the population in HRT’s service area is limited English proficiency, reporting that they speak English less than very well. While the Factor 2 analysis showed that the frequency of contact with HRT’s customer service center was limited, ensuring that all persons - regardless of language proficiency - have access to information on public transportation services and programs is an important element of a transit agency’s operating program. HRT currently offers

Table 3 Language Spoken At Home By Language Proficiency for the Population 5 Years and Over for HRT Service Area (Source: U.S. Census Bureau, 2015 American Community Survey)

	TOTAL			PERCENT OF POPULATION		
	Speaks English Well	Less Than Very Well	Total	Speaks English Well	Less Than Very Well	Total
English Only	1,127,507		1,248,567	90.30%	0.00%	90.30%
Spanish or Spanish Creole	36,995	16,466	53,461	2.96%	1.32%	4.28%
Tagalog	12,750	6,071	18,821	1.02%	0.49%	1.51%
German	4,469	772	5,241	0.36%	0.06%	0.42%
French (incl. Patois, Cajun)	4,127	1,025	5,152	0.33%	0.08%	0.41%
Chinese	2,083	2,748	4,831	0.17%	0.22%	0.39%
Vietnamese	1,630	2,204	3,834	0.13%	0.18%	0.31%
African languages	2,272	738	3,010	0.18%	0.06%	0.24%
Arabic	1,788	1,027	2,815	0.14%	0.08%	0.23%
Korean	1,050	1,584	2,634	0.08%	0.13%	0.21%
Japanese	1,381	610	1,991	0.11%	0.05%	0.16%
Italian	1,799	183	1,982	0.14%	0.01%	0.16%
Russian	1,005	582	1,587	0.08%	0.05%	0.13%
Other Indic languages	989	465	1,454	0.08%	0.04%	0.12%
Other Asian languages	824	399	1,223	0.07%	0.03%	0.10%
Other Pacific Island languages	741	465	1,206	0.06%	0.04%	0.10%
Greek	886	290	1,176	0.07%	0.02%	0.09%
Portuguese or Portuguese Creole	948	189	1,137	0.08%	0.02%	0.09%
Gujarati	728	344	1,072	0.06%	0.03%	0.09%
Persian	516	350	866	0.04%	0.03%	0.07%
Other Indo-European languages	638	208	846	0.05%	0.02%	0.07%
Urdu	653	173	826	0.05%	0.01%	0.07%
Mon-Khmer, Cambodian	550	267	817	0.04%	0.02%	0.07%
French Creole	600	72	672	0.05%	0.01%	0.05%
Hindi	434	236	670	0.03%	0.02%	0.05%
Scandinavian languages	522	42	564	0.04%	0.00%	0.05%
Other Slavic languages	461	102	563	0.04%	0.01%	0.05%
Other West Germanic languages	475	77	552	0.04%	0.01%	0.04%
Thai	204	268	472	0.02%	0.02%	0.04%
Hebrew	328	116	444	0.03%	0.01%	0.04%
Serbo-Croatian	266	134	400	0.02%	0.01%	0.03%
Polish	252	11	263	0.02%	0.00%	0.02%
Latvian	53	45	98	0.00%	0.00%	0.01%
Other Native North American languages	85	13	98	0.01%	0.00%	0.01%
Hungarian	76	4	80	0.01%	0.00%	0.01%
Armenian	58	19	77	0.00%	0.00%	0.01%

Table 4 HRT LEP Measures and Status

Measure	Description	Status	Estimated Burden	Resources Available (Y/N)		
				Staff	Financial	Technological
A	Identify an LEP coordinator	In Progress	Low	Y	Y	Y
B	Examine possibility of establishing a Title VI/LEP group that could meet quarterly to review LEP/Title VI needs and activities	In Progress	Medium	Y	Y	Y
C	Coordinate with HRT operations staff to better identify LEP-related activity on-board the buses and impact on drivers, if any.	Not Started	Medium	Y	Y	Y
D	Document LEP requests—both customer service calls and outreach activities.	In Progress	Low	Y	Y	Y
E	Monitor requests/calls to customer service to see if there is a need to include a "For Spanish, press..." option.	In Progress	Low	Y	Y	Y
F	Coordinate with IT department to identify whether the addition of a "For Spanish, press..." option is a possibility	Not Started	Medium	Unknown	Unknown	Unknown
G	Coordinate with the HRPDC/HRTPO in their efforts to establish a Hampton Roads Limited English Proficiency (LEP) Employee Guide and a database of community groups and local agencies that work with LEP populations and identify volunteer translators and interpreters.	Not Started	Medium to High	Y	Y	Y
H	Post a notice of available language assistance in HRT's reception area and website.	Finished	Low	Y	Y	Y
I	Examine possibility of adding an online language translation feature to HRT's website.	In Progress	Low	Y	Y	Y
J	Add a statement when running general public meeting notices: "The HRT will strive to provide reasonable accommodations and services for persons who require special assistance to participate in this public involvement opportunity. Para información en español, llame al (757)....."	In Progress	Low	Y	Y	Y
K	Examine possibility of creating information in other languages, primarily in Spanish. For example, the "How to Ride the Bus" guide that has important information (fares, policies) related to HRT's service could be a key first document	Not Started	High	N	N	Y
L	Cards placed inside buses listing who to contact if information is needed in other languages (Spanish).	In Progress	Low	Y	Y	Y
M	Add questions in Spanish to rider surveys to better gauge amount/frequency of LEP communities using HRT services.	Not Started	Medium	Y	N	Y
N	Conduct training/informational sessions with HRT customer service department regarding LEP and Title VI populations. Training topics will include:	Not Started	Medium	Y	Y	Y
N1	Understanding Title VI of the Civil Rights Act of 1964 and LEP responsibilities.					
N2	LEP program responsibilities and obligations.					
N3	Language assistance services offered.					
N4	Use of LEP Language Assistance Cards ("I Speak Cards").					
N5	Documentation of language assistance requests.					

3.0 REFERENCES

Federal Transit Administration (FTA). 2007a. *Circular 4702.1A: Title VI and Title VI-Dependent Guidelines for Federal Transit Administration Recipients.*

———. 2007b. *Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers.*

U.S. Department of Transportation (USDOT). 2005. *Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons.* 70 *Federal Register* 74087. December 14, 2005.

The White House. 2000. *Executive Order 13166. Improving Access to Services for Persons with Limited English Proficiency.* August 11, 2000.

This page intentionally left blank.

APPENDIX C: BOARD AND COMMITTEE MEMBERS

Tables showing all current board and committee members as of January 26, 2017 are provided below.

TABLE 1: RACIAL COMPOSITION OF TDCHR BOARD MEMBERS

Commissioner	District	Race/Ethnicity
Rick West	Chesapeake	Caucasian
Douglas Fuller	Chesapeake	Caucasian
William Moffett	Hampton	African-American
Gaylene Kanoyton	Hampton	African-American
Robert Coleman	Newport News	Caucasian
Patricia Woodbury	Newport News	Caucasian
Paul Riddick	Norfolk	African-American
Keith Parnell	Norfolk	Caucasian
James Wood	Virginia Beach	Caucasian
Amelia Ross-Hammond	Virginia Beach	African-American
John Rowe	Portsmouth	Caucasian
Charles Hunter	Portsmouth	African-American
Jennifer Mitchell	Virginia Department of Rail and Public Transportation	Caucasian

TABLE 2: RACIAL COMPOSITION OF TRANSIT RIDERS ADVISORY COMMITTEE

CLASSIFICATION	NAME	RACE/ETHNICITY
Chair	Jamie Battle	African-American
Vice Chair	Joe Belec	Caucasian

Recording Secretary	Scott MacFarlane	Caucasian
Chesapeake	Cino Stone-Smith	African-American
Hampton	Kenneth Jones	African-American

TABLE 3: RACIAL COMPOSITION OF ADVISORY COMMITTEE FOR PERSONS WITH DISABILITIES

Name	District	Consumer/Provider	Race/Ethnicity
OPEN	Chesapeake	Consumer	
Debra Vaughan	Chesapeake	Consumer	African-American
OPEN	Chesapeake	Provider	
Patricia Brown	Hampton	Consumer	African-American
Benjamin Farmer Jr.	Hampton	Consumer	African-American
Linda Gurley	Hampton	Provider	African-American
OPEN	Newport News	Consumer	
Alicia Griffin	Newport News	Consumer	African-American
OPEN	Newport News	Provider	
OPEN	Norfolk	Consumer	Caucasian
Korinda Rusinyak	Norfolk	Consumer	Caucasian
Helen Brown	Norfolk	Provider	Caucasian
Scott Spradlin	Portsmouth	Consumer	Caucasian
OPEN	Portsmouth	Consumer	
David Gonzalez	Portsmouth	Provider	Hispanic
Mary Mathena	Virginia Beach	Consumer	Caucasian
Nancy Smith	Virginia Beach	Consumer	Caucasian
Brian Trickler	Virginia Beach	Provider	Caucasian
Janice Taylor	Extra VB Member	Consumer	Hispanic
OPEN	Extra Member		
OPEN	Extra Member		
Non-Voting & Supporting			
Joe Paulus	TDCHR	EX-Officio	Caucasian
Keith Parnell	TDCHR	Commissioner	Caucasian

Keith Johnson	HRT	HRT Liaison	Caucasian
----------------------	-----	-------------	-----------

This page intentionally left blank.

APPENDIX D: COMMISSION RESOLUTION - TDCHR

**Resolution 01 – 2017 – Title VI Program**

A Resolution of the Transportation District Commission of Hampton Roads adopting the *Hampton Roads Transit 2017 Title VI Program*

WHEREAS, pursuant to Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq. and 23 CFR part 21, the U.S. Department of Transportation and the Federal Transit Administration (FTA) prohibit discrimination on the basis of race, color or national origin; and

WHEREAS, Hampton Roads Transit (HRT) operates public transportation service, including; bus, light rail, ferry, vanpool, and paratransit services; and

WHEREAS, HRT receives FTA funding to operate public transportation services and is, therefore, required to demonstrate compliance with such federal laws and regulations by submitting a Title VI program update once every three years; and

WHEREAS, HRT seeks to ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner; and

WHEREAS, HRT seeks to promote full and fair participation in public transportation decision-making without regard to race, color, or national origin; and

WHEREAS, HRT seeks to ensure meaningful access to transit-related programs and activities by persons with limited English proficiency; and

WHEREAS, pursuant to federal laws and regulations, the HRT Title VI Program must be considered and approved by the HRT Governing Board; and

WHEREAS, an inclusive public participation process, consistent with federal requirements and HRT policies, was undertaken prior to Board consideration of the Title VI Program update; and

WHEREAS, revisions have been made to the Hampton Roads Transit 2014 Title VI Program to reflect recent changes in federal laws and regulations, and to reflect changes in HRT's operations since the last update, all of which is detailed in the *Hampton Roads Transit 2017 Title VI Program*, dated January 26, 2017;

WHEREAS, the Commission has specifically considered and is aware of the following new and updated information and provisions contained in the *Hampton Roads Transit 2017 Title VI Program*:

- Title VI Program population data, statistics, and mapping

- Program material notices and related information
- Title VI Complaint Procedures and Form
- Service Standards and Policies
- Passenger Amenities Policy
- Public Involvement Process
- Service Monitoring criteria; and

NOW, THEREFORE, BE IT RESOLVED that the Transportation District Commission of Hampton Roads adopts the attached *Hampton Roads Transit 2017 Title VI Program*.

APPROVED and ADOPTED by the Transportation District Commission of Hampton Roads at its meeting on the 26th day of January, 2017.

**TRANSPORTATION DISTRICT COMMISSION
OF HAMPTON ROADS**



The Honorable James L. Wood, Chairman

ATTEST:



**Luis R. Ramos
Commission Secretary**

This page intentionally left blank.

APPENDIX E: DETAILED VEHICLE ASSIGNMENT

A detailed table of assignments of vehicle size by route is shown below. Routes are grouped by bus length requirement.

TABLE 4: BASE ASSIGNMENT OF VEHICLE SIZE BY ROUTE

Route	Peak Buses	Bus Length
4 Church St.	4	29
5 Willoughby	1	29
9 Sewells Point Rd.	6	29
11 Colonial Ave.	1	29
18 Ballentine Pl.	1	29
22 Haygood	2	29
25 Newtown Rd.	2	29
26 Lynnhaven Mall	3	29
27 Northampton Blvd.	3	29
29 Great Neck Rd./Lynnhaven Pkwy.	3	29
31 Science Museum Exp.	2	29
32 Lynnhaven Mall	2	29
33 General Booth Blvd.	3	29
41 Craddock	2	29
43 Parkview	1	29
50 Academy Pk.	1	29
55 Crossways Blvd.	1	29
58 Bainbridge Blvd.	2	29
102 Queen Street	1	29

Route	Peak Buses	Bus Length
108 Warwick/Lee Hall	3	29
115 Fox Hill Rd.	1	29
116 Mall Hall Loop	1	29
119 Oyster Point	1	29
120 Mallory	1	29
121 Williamsburg	1	29
Subtotal 29 Ft	47	
2 Hampton Blvd	4	35
6 South Norfolk	2	35
8 Tidewater Dr.	5	35
12 Indian River Rd.	3	35
13 Campostella Rd.	3	35
14 Battlefield Blvd	2	35
36 Holland Rd.	2	35
44 Midtown	3	35
47 Churchland	6	35
57 Deep Creek	3	35
64 Smithfield	2	35
101 Kecoughtan	3	35
103 Shell Rd.	3	35
104 Newsome Pk.	3	35
105 Briarfield Rd.	2	35
109 Buckroe	0	35
110 Thomas Nelson	3	35
111 Riverside	2	35
114 Weaver Rd.	4	35
117 Phoebus	1	35
118 Magruder	3	35
405 Peninsula Commuter Service	1	35
414 Peninsula Commuter Service	1	35

Route	Peak Buses	Bus Length
-------	------------	------------

Subtotal 35 Ft	63	
1 Granby St.	10	40
3 Chesapeake Blvd.	10	40
15 Military Hwy.	8	40
20 Virginia Beach Blvd.	15	40
21 Little Creek Rd.	5	40
23 Princess Anne Rd.	6	40
45 Portsmouth	5	40
106 Warwick Blvd.	3	40
107 Denbigh Blvd.	3	40
112 Jefferson Ave.	4	40
415 Peninsula Commuter Service	0	40
430 Peninsula Commuter Service	1	40
918 MAX Staff College	1	40
968 MAX Silverleaf to DOD Suffolk	2	40
969 MAX Greenbrier/Indian River to DOD Suffolk	2	40
Subtotal 40 Ft	15	
919 MAX Silverleaf Station	6	Coach
922 MAX Indian River / Greenbrier	6	Coach
960 MAX Norfolk to Virginia Beach	2	Coach
961 MAX Crossroads	8	Coach
965 MAX PH to NSN	0	Coach
966 MAX Silver to NNSY	1	Coach
967 MAX Indian River to Ches Sq	6	Coach
Subtotal Coaches	10	
30 Atlantic Ave.	12	Trolley
Subtotal Trolleys	10	
Total	227	

This page intentionally left blank.

APPENDIX F: ROUTE MINORITY/LOW-INCOME STATUS

The table below shows the minority/low-income status of all routes. This data is based on American Community Survey data.

Blue highlighting indicates the route is considered a minority route and yellow highlighting indicates that the route is a low-income route. A 33% threshold was used per Section 4.4 of this document.

TABLE 5: MINORITY/LOW-INCOME STATUS OF FIXED-ROUTES

Route	% Minority	% Low Income	Route	% Minority	% Low Income
1	18.3%	51.6%	101	65.0%	85.0%
2	12.8%	83.2%	102	100.0%	86.3%
3	33.3%	82.5%	103	90.5%	91.8%
4	76.5%	82.3%	104	86.2%	99.4%
5	48.9%	89.4%	105	86.4%	87.4%
6	74.4%	73.6%	106	49.3%	50.0%
8	59.0%	52.7%	107	45.6%	32.8%
9	83.9%	55.8%	108	82.2%	62.4%
11	31.2%	43.4%	109	49.9%	85.5%
12	71.5%	41.6%	110	95.2%	74.0%
13	96.4%	95.5%	111	65.8%	38.3%
14	14.9%	3.1%	112	74.2%	75.6%
15	66.6%	52.8%	114	100.0%	83.3%
18	90.5%	77.7%	115	55.2%	85.9%
20	47.3%	63.4%	116	83.6%	22.1%
21	39.4%	92.4%	117	100.0%	100.0%
22	33.4%	43.1%	118	87.1%	39.4%
23	67.9%	82.2%	119	62.2%	62.5%
25	35.3%	17.1%	120	60.5%	89.0%
26	77.9%	6.1%	121	86.5%	39.7%
27	40.0%	51.3%	403	65.6%	80.2%

29	7.6%	21.2%		405	84.7%	51.6%
30	0.0%	36.1%		414	79.8%	54.3%
31	0.0%	0.0%		415	44.4%	21.7%
32	12.0%	32.2%		427	57.8%	37.9%
33	4.7%	8.1%		430	43.9%	22.0%
36	53.4%	5.6%		437	76.1%	78.3%
41	75.7%	75.8%		800	62.5%	87.5%
43	60.8%	44.4%		918	33.5%	59.0%
44	16.3%	27.7%		919	37.0%	66.5%
45	53.7%	66.3%		922	38.9%	68.5%
47	49.3%	62.0%		960	48.1%	50.1%
50	49.3%	63.4%		961	54.2%	65.4%
57	42.0%	49.9%		965	46.7%	66.3%
58	58.4%	50.8%		966	48.5%	47.9%
64	92.5%	7.5%		967	44.1%	35.2%

(Census and American Community Survey Data)

This page intentionally left blank.

APPENDIX G: VEHICLE LOAD ANALYSIS

FIGURE 5: AVERAGE OBSERVED VEHICLE LOAD BY ROUTE FROM NOVEMBER 2013 SURVEY

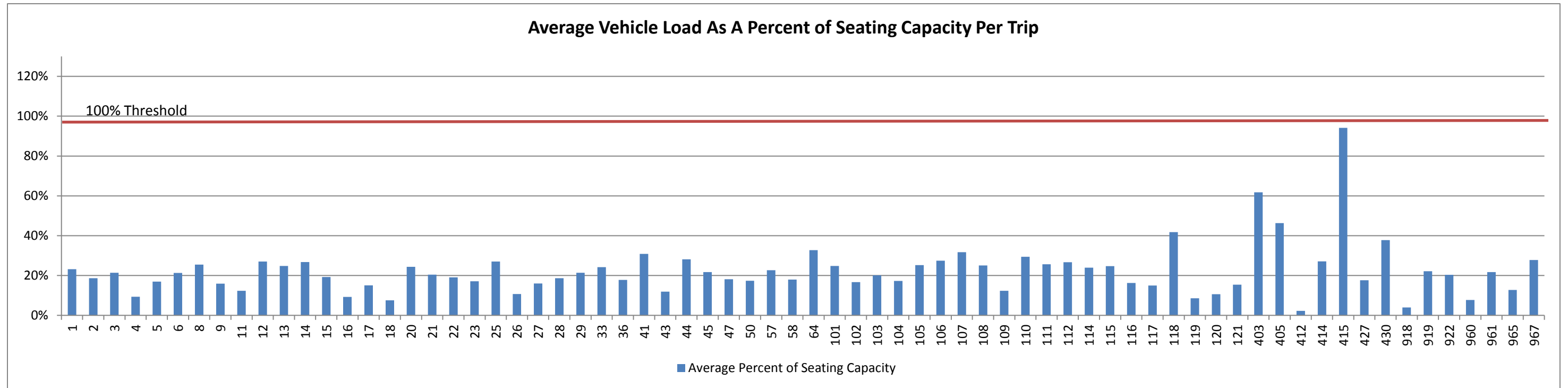
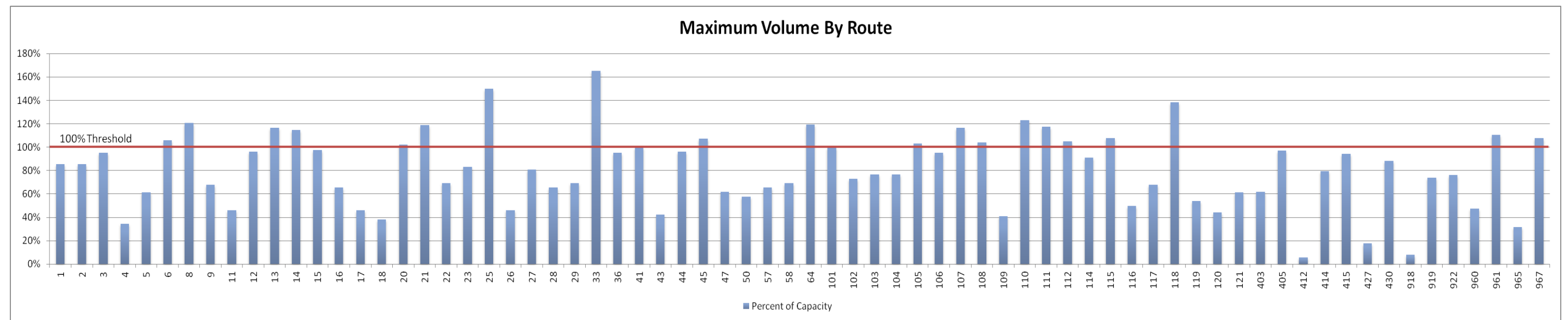


FIGURE 6: MAXIMUM OBSERVED VEHICLE LOAD BY ROUTE FROM NOVEMBER 2013 SURVEY



This page intentionally left blank.

APPENDIX H: SERVICE CHANGE ANALYSES 2014-2016

The following pages include the Service Equity Analysis completed in 2014-2016:

SERVICE CHANGE	IMPLEMENTATION DATE
SUMMER 2014	7/6/2014
SUMMER 2015	7/19/2015
WINTER 2016	1/17/2016
SUMMER 2016	8/28/2016

This page intentionally left blank.

APPENDIX I: FARE CHANGE ANALYSES 2014-2016

The following pages include the Fare Change Analysis completed in 2014 - 2016.

**HAMPTON ROADS TRANSIT****Resolution 03 – 2014 – Title VI Equity Analysis for Proposed Fare Adjustments**

A Resolution of the Transportation District Commission of Hampton Roads approving the *Title VI Equity Analysis for the Proposed July 1, 2014 and July 1, 2016 Fare Adjustment*

WHEREAS, the Transportation District Commission of Hampton Roads adopted the *Hampton Roads Transit (HRT) 2014 Title VI Program* through Resolution 01-2014 on the 24th day of January, 2014, in compliance with Federal Law and FTA Policy; and

WHEREAS, the adopted *HRT 2014 Title VI Program* requires that the Commission demonstrate the consideration, awareness, and approval of the Title VI Equity Analysis results for each proposed Major Service or Fare Change prior to approval or implementation of the proposed change; and

WHEREAS, Hampton Roads Transit has proposed a phased fare increase for implementation on July 1, 2014 and July 1, 2016; and

WHEREAS, Hampton Roads Transit has completed a program of comprehensive public involvement on the proposed change and reported the results of the public involvement process to the Commission for full consideration; and

WHEREAS, Hampton Roads Transit has completed a Title VI Equity Analysis on the proposed change and reported the results of the analysis to the Commission for full consideration; and

WHEREAS, the Title VI Equity Analysis included a full discussion of any potential Disparate or Disproportionate Impacts in regards to race, color, national origin, or income; and

WHEREAS, the Title VI Equity Analysis included a full discussion of all proposed alternatives and potential mitigation for the proposed action; and

WHEREAS, Hampton Roads Transit has shown a substantial legitimate justification for the proposed action:

NOW, THEREFORE, BE IT RESOLVED that the Transportation District Commission of Hampton Roads has given full consideration of, is aware of, and approves the equity analysis for the proposed July 1, 2014 and July 1, 2016 Fare Increase.


APPROVED by the Transportation District Commission of Hampton Roads at its meeting on the 27th day of February, 2014.

**TRANSPORTATION DISTRICT COMMISSION
OF HAMPTON ROADS**



Dr. Richard West, Acting Chairman

ATTEST:


**Luis R. Ramos
Commission Secretary**



Title VI Equity Analysis for the Proposed HRT Fare Adjustment

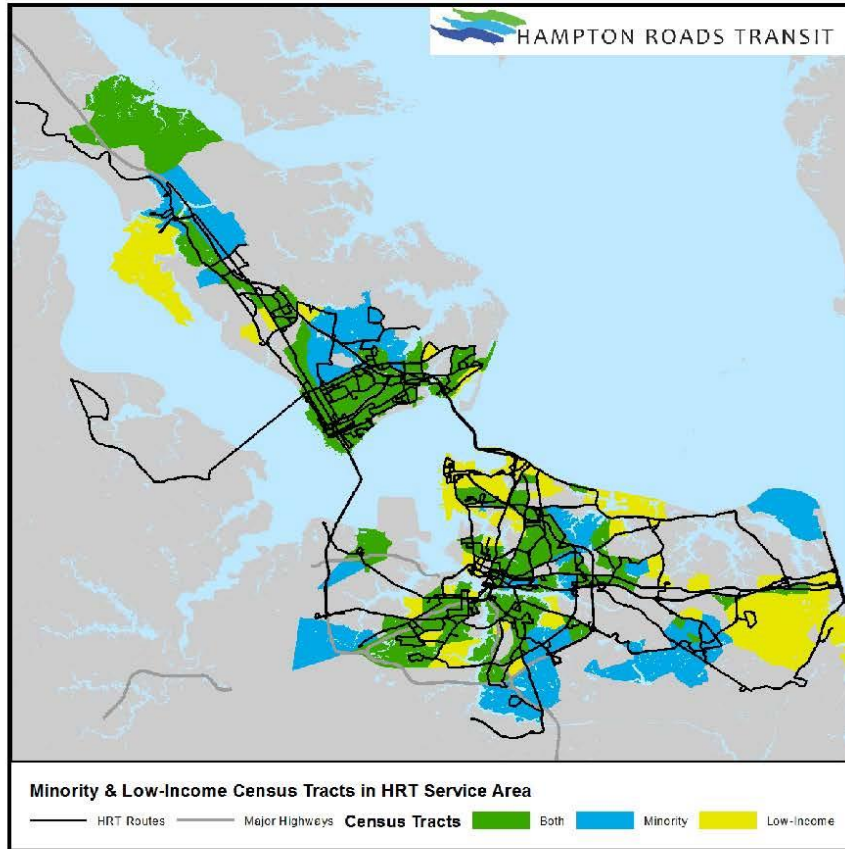
Introduction

As part of the Civil Rights Act of 1964, Title VI is intended to ensure equity and equal access in the provision of public transportation services regardless of race, age, national origin, or socioeconomic condition. Transit agencies receiving federal funds must comply with Title VI requirements to continue receiving funding. Hampton Roads Transit (HRT), as a recipient of Federal funds, must comply with Title VI requirements.

HRT is planning to increase their transit fares to generate additional operating revenues. The proposed fare increase would go into effect in the Summer of 2014. Two fare structure alternatives are being considered. As per the Title VI program, HRT is required to conduct a fare impact analysis and determine if the proposed fare increase would result in any disparate or disproportionate impacts on minority and low-income populations respectively.

Definition of Service Area

Hampton Road Transit's (HRT) service area includes the cities of Chesapeake, Hampton, Newport News, Norfolk, Portsmouth, and Virginia Beach. The map below shows the distribution of low-income and minority populations in the service area, as well as HRT routes.



Fare Impact Methodology

HRT’s methodology to conduct fare impact analysis is consistent with the guidance set forth in FTA’s Circular, FTA C470.2.1B, Chapter IV-19, published on October 1, 2012. The procedure consists of the following steps.

1. Define the Service Area covered by HRT system.
2. Identify TAZs or Census tracts in the service area that are predominantly minority and predominantly low-income using FTA’s procedures. Using Census data, compute percent of minorities and low-income population in the Service Area. Generate maps showing



3. Using travel pattern data obtained from Origin-Destination survey and the current fare structure, estimate average fares paid by minorities, non-minorities, low-income and non-low income riders in the entire Service Area. Further, break down the average fares by fare type.
4. Repeat Step 3 by replacing the current fare structure by the proposed fare structure.
5. Determine percent increase in fares for minorities, non-minorities, low-income and non-low-income populations in the Service Area.
6. If the percent differences in fare increase for minorities versus non-minorities and low-income versus non-low income populations are within the thresholds established by HRT board, a determination of “No impacts” will be made. If the estimated differences exceed HRT’s thresholds, it will be concluded that the proposed fare change would result in adverse equity impacts. In that case, appropriate mitigation plan will be developed by HRT to address those equity impacts.
7. HRT will present the proposed fare change and results of the equity analysis for meaningful public involvement as defined by the public participation plan.
8. If a disparate equity impact is determined and HRT chooses not to alter the proposed fare change despite the potential disparate impact on minority populations or disproportionate impact on low-income populations, or if HRT finds, even after the revisions, that minority or low-income riders will continue to bear a disproportionate share of the proposed fare change, HRT may implement the fare change only if:
9. HRT has a substantial legitimate justification for the proposed fare change, and
10. HRT can show that there are no alternatives that would have a less disparate impact on minority or low income riders but would still accomplish the transit provider’s legitimate program goals.
11. HRT Board will fully consider the results of the equity analysis, proposed alternatives and mitigation if applicable, and public comments on the proposed change prior to approval.



Fare Impact Threshold

Determination of whether a proposed fare adjustment has either disparate or disproportionate impacts is based on minority and/or low-income populations bearing a fare rate change of greater than five (5) percentage points as compared to non-minority and/or non-low-income populations.

Proposed Fare Structures

HRT proposed a fare change with an average 33% increase over current fares to be implemented in July 2014. This proposed increase and modified fare structure, as shown in Appendix A as “Alternative 1”, was put forth to public for review and comment through a series of formal Public Hearings and public Comment period held in every municipality in HRT’s service area. Based on the public input HRT received from its public outreach efforts, a second fare structure alternative, as shown in Appendix A as “Alternative 2”, was devised that would phase in the proposed 33% increase in two phase in July 2014 and July 2016.

Analysis of Alternatives

The 2012 O-D survey indicates about 70 percent of HRT transit users belong to a minority group and 43 percent are low-income (see Table 2 and 3). Local bus mode appears to have the highest share of minority and low-income users in the system, while VB Wave has the lowest.

Transit Mode	Non-minority users	Minority Users	Total Users	Percent Minority
Bus	12,439	34,009	46,448	73%
Ferry	998	788	1,786	44%
LRT	1,451	3,473	4,924	71%
MAX	581	914	1,495	61%
VBWave	1,484	533	2,018	26%
Grand Total	16,954	39,716	56,670	70%


Table 1: Proportion of Minority and Non-Minority Users by Transit Mode

Transit Mode	Non-low Income Users	Low Income Users	Total Users	Percent Low Income
Bus	25,556	20,892	46,448	45%
Ferry	1,129	657	1,786	37%
LRT	2,797	2,127	4,924	43%
MAX	1,097	398	1,495	27%
VBWave	1,585	433	2,018	21%
Grand Total	32,164	24,506	56,670	43%

Table 2: Proportion of Low-Income and Non-Low-Income Users by Transit Mode

Tables 4 and 5 summarize the existing fares and proposed fares for each alternative and the corresponding fare increase for each fare category. As seen, fare increase ranges from 0 % to 125 % depending on the fare type and alternative. However, for the entire system, the average fare increase is about 33 percent for Alternative 1 and 35 percent for Alternative 2.

Fare Type	Existing fare	Proposed Fare	% change by fare type
Cash - Adult	\$1.50	\$2.00	33%
Cash - Sr. or Disabled	\$0.75	\$1.00	33%
Go 1-Day Pass	\$3.50	\$4.50	29%
Go 1-Day Pass - Youth, Sr or Disabled	\$1.75	\$2.25	29%
MAX 1-Day Pass	\$5.50	\$8.25	50%
GO 7-Day Pass	\$17.00	\$22.00	29%


 HAMPTON ROADS TRANSIT

Go 30-Day Pass	\$50.00	\$70.00	40%
Go 30 Day - Youth, Sr. or Disabled	\$35.00	n/a	
MAX 30-Day Pass	\$95.00	\$140.00	47%
Cash - Youth	\$1.00	\$1.00	0%
2 ride ferry ticket	\$1.50	n/a	
GoPass 365	\$50.00	\$50.00	0%
eTide ticket	\$1.50	n/a	
VBWave Cash	\$1.00	\$1.50	50%
VBWave Cash S D	\$0.50	\$0.75	50%
VBWave Day Pass	\$2.00	\$3.50	75%
VBWave YSD Day Pass	\$1.00	\$1.75	75%
Weighted Average Fare Increase (system wide, all fare types)			33%

Table 3: Proposed Fare Increase - Alternative 1

Fare Type	Existing fare	Proposed Fare 2014	Proposed Fare 2016	% change by fare type
Cash - Adult	\$1.50	\$1.75	\$2.00	33%
Cash - Sr. or Disabled	\$0.75	\$0.75	\$1.00	33%
Go 1-Day Pass	\$3.50	\$4.00	\$4.50	29%
Go 1-Day Pass - Youth, Sr or Disabled	\$1.75	\$2.00	\$2.25	29%
MAX 1-Day Pass	\$5.50	\$6.50	\$7.50	50%



GO 7-Day Pass	\$17.00	\$20.00	\$22.00	29%
Go 30-Day Pass	\$50.00	\$60.00	\$70.00	40%
Go 30 Day - Youth, Sr. or Disabled	\$35.00	\$35.00	\$40.00	14%
MAX 30-Day Pass	\$95.00	\$110.00	\$135.00	42%
Cash - Youth	\$1.00	\$0.75	\$1.00	0%
2 ride ferry ticket	\$1.50	n/a	n/a	
GoPass 365	\$50.00	\$50.00	\$50.00	0%
eTide ticket	\$1.50	n/a	n/a	
VBWave Cash	\$1.00	\$2.00	\$2.00	100%
VBWave Cash S D	\$0.50	\$1.00	\$1.00	100%
VBWave Day Pass	\$2.00	\$4.00	\$4.50	125%
VBWave YSD Day Pass	\$1.00	\$1.75		75%
Weighted Average Fare Increase (system wide, all fare types)				33%

Table 4: Proposed Fare Increase - Alternative 2

Appendix A shows the calculation of average fares by fare type for minority, low-income and all users. The table presents the different steps involved in estimating the percent fare increase and proportion of users for each fare category, relative to the system average.

Alternative 2 was analyzed as two separate fare increases to reflect the two separate phases of implementation. The analysis was done this way to capture any intermediate impacts the proposed increase may have.

Results of the Title VI analysis indicate the percent fare increase for seven of the seventeen fare



categories, relative to system average, would be higher than the threshold of 5 percent set forth for “fare increase” (see Appendix A). However, the percent of minority and low-income users in those categories is so small that it falls way below the threshold set forth for the “proportion of users”, except in the Alternative 2 Youth and Sr./Disabled Cash fares. The only reason the model showed these fares as having disparate and disproportionate impacts was because of the way these fares were phased. The youth fare actually goes down to \$0.75 in the first phase and then resumes being \$1.00, as it was before. Since the Youth Cash fare is thus discounted and then brought back up to current rates, it is not a true impact. As to the disproportionate impact that the model shows for the Sr./Disabled Cash fare, the implementation of the increase from \$0.75 to \$1.00 is being delayed until the second phase. Although waiting to implement the 33% increase until phase two makes it seem as though there is an impact, HRT is actually providing a discount in the interim years to Sr./Disabled Cash fare users by keeping fares at current rates during Phase 1.

As a result, it is concluded that HRT’s proposed fare increase would not result in either disparate or disproportionate impacts.

Public Involvement

HRT has worked to engage the public in a meaningful way throughout the fare change process. Customer notices were distributed on buses and at transfer centers. A press release was created and submitted to various news outlets and posted on the HRT website. Public hearings were held throughout the service area and advertised at least two weeks in advance. Comments were accepted through the HRT website, the customer service call-center, and the public hearings. A full summary of HRT’s public involvement strategy is summarized in Appendix B.

Mitigation

Since the analysis resulted in a finding of “No Impacts”, no mitigation strategies are proposed.


Appendix A: Fare Impact Calculation

The last two columns in the table apply the threshold conditions for “relative fare increase” and “proportion of users” to determine if any disparate or disproportionate impacts would result for each fare category.

Fare Type	Existing	Proposed	Percent Change by Fare Type	Percent Fare Increase Above the System Average of 33% (-ve sign implies below system average)	Percent of Minority Users Above the System Average of 70% (-ve sign implies below system average)	Percent of Low-Income Users Above System Average of 43% (-ve sign implies below system average)	Minority Disparate Impact	Low-Income Disp. Burden
Cash - Adult	\$1.50	\$2.00	33%	0%	6%	6%	no	no
Cash - Sr. or Disabled	\$0.75	\$1.00	33%	0%	0%	7%	no	no
Go 1-Day Pass	\$3.50	\$4.50	29%	-4%	9%	6%	no	no
Go 1-Day Pass - Youth,Sr or Disabled	\$1.75	\$2.25	29%	-4%	5%	0%	no	no
MAX 1-Day Pass	\$5.50	\$8.25	50%	17%	-1%	-18%	no	no
GO 7-Day Pass	\$17.00	\$22.00	29%	-4%	15%	2%	no	no


HAMPTON ROADS TRANSIT

Go 30-Day Pass	\$50.00	\$70.00	40%	7%	4%	1%	no	no
Go 30 Day - Youth, Sr. or Disabled	\$35.00	n/a		-33%	-2%	-1%	no	no
MAX 30-Day Pass	\$95.00	\$140.00	47%	14%	3%	-19%	no	no
Cash - Youth	\$1.00	\$1.00	0%	-33%	19%	3%	no	no
2 ride ferry ticket	\$1.50	n/a			-33%	-12%	no	no
GoPass 365	\$50.00	\$50.00	0%	-33%	-3%	-5%	no	no
eTide ticket	\$1.50	n/a		-33%	-39%	-14%	no	no
VBWave Cash	\$1.00	\$1.50	50%	17%	-44%	-18%	no	no
VBWave Cash S D	\$0.50	\$0.75	50%	17%	-29%	-31%	no	no
VBWave Day Pass	\$2.00	\$3.50	75%	42%	-46%	-23%	no	no
VBWave YSD Day Pass	\$1.00	\$1.75	75%	42%	-10%	-14%	no	no

Table 5: Alternative 1 Impact Analysis


HAMPTON ROADS TRANSIT

For Alternative 2, impacts were calculated between the current and intermediate fare and between the intermediate and final fare. This was done to capture the impacts at both points in time.

Fare Type	Existing	Proposed	Percent Change by Fare Type	Percent Fare Increase Above the System Average of 33% (-ve sign implies below system average)	Percent of Minority Users Above the System Average of 70% (-ve sign implies below system average)	Percent of Low-Income Users Above the System Average of 43% (-ve sign implies below system average)	Minority Disparate Impact	Low-Income Disp. Burden
Cash - Adult	\$1.50	\$1.75	17%	-1%	6%	6%	no	no
Cash - Sr. or Disabled	\$0.75	\$0.75	0%	-18%	0%	7%	no	no
Go 1-Day Pass	\$3.50	\$4.00	14%	-3%	9%	6%	no	no
Go 1-Day Pass - Youth, Sr or Disabled	\$1.75	\$2.00	14%	-3%	5%	0%	no	no
MAX 1-Day Pass	\$5.50	\$6.50	18%	1%	-1%	-18%	no	no
GO 7-Day Pass	\$17.00	\$20.00	18%	0%	15%	2%	no	no
Go 30-Day Pass	\$50.00	\$60.00	20%	2%	4%	1%	no	no


HAMPTON ROADS TRANSIT

Go 30 Day - Youth, Sr. or Disabled	\$35.00	\$35.00	0%	-18%	-2%	-1%	no	no
MAX 30-Day Pass	\$95.00	\$110.00	16%	-2%	3%	-19%	no	no
Cash - Youth	\$1.00	\$0.75	-25%	-43%	19%	3%	no	no
2 ride ferry ticket	\$1.50	n/a			-33%	-12%	no	no
GoPass 365	\$50.00	\$50.00	0%	-18%	-3%	-5%	no	no
eTide ticket	\$1.50	n/a			-39%	-14%	no	no
VBWave Cash	\$1.00	\$2.00	100%	82%	-44%	-18%	no	no
VBWave Cash S D	\$0.50	\$1.00	100%	82%	-29%	-31%	no	no
VBWave Day Pass	\$2.00	\$4.00	100%	82%	-46%	-23%	no	no
VBWave YSD Day Pass	\$1.00	\$2.00	100%	82%	-10%	-14%	no	no

Table 6: Alternative 2 - Phase 1 Impact Analysis


HAMPTON ROADS TRANSIT

Fare Type	Existing	Proposed	Percent Change by Fare Type	Percent Fare Increase Above the System Average of 33% (-ve sign implies below system average)	Percent of Minority Users Above the System Average of 70% (-ve sign implies below system average)	Percent of Low-Income Users Above System Average of 43% (-ve sign implies below system average)	Minority Disparate Impact	Low-Income Disp. Burden
Cash - Adult	\$1.75	\$2.00	14%	-1%	6%	6%	no	no
Cash - Sr. or Disabled	\$0.75	\$1.00	33%	18%	0%	7%	no	yes
Go 1-Day Pass	\$4.00	\$4.50	13%	-2%	9%	6%	no	no
Go 1-Day Pass - Youth, Sr or Disabled	\$2.00	\$2.25	13%	-2%	5%	0%	no	no
MAX 1-Day Pass	\$6.50	\$7.50	15%	1%	-1%	-18%	no	no
GO 7-Day Pass	\$20.00	\$22.00	10%	-5%	15%	2%	no	no
Go 30-Day Pass	\$60.00	\$70.00	17%	2%	4%	1%	no	no
Go 30 Day - Youth, Sr. or	\$35.00	\$40.00	14%	-1%	-2%	-1%	no	no


HAMPTON ROADS TRANSIT

Disabled									
MAX 30-Day Pass	\$110.00	\$125.00	14%	-1%	3%	-19%	no	no	
Cash - Youth	\$0.75	\$1.00	33%	18%	19%	3%	yes	no	
2 ride ferry ticket	n/a	n/a		-15%	-33%	-12%	no	no	
GoPass 365	\$50.00	\$50.00	0%	-15%	-3%	-5%	no	no	
eTide ticket	n/a	n/a		-15%	-39%	-14%	no	no	
VBWave Cash	\$2.00	\$2.00	0%	-15%	-44%	-18%	no	no	
VBWave Cash S D	\$1.00	\$1.00	0%	-15%	-29%	-31%	no	no	
VBWave Day Pass	\$4.00	\$4.50	13%	-2%	-46%	-23%	no	no	
VBWave YSD Day Pass	\$2.00	\$2.25	13%	-2%	-10%	-14%	no	no	

Table 7: Alternative 2 - Phase 2 Impact Analysis



Appendix B: Public Outreach Summary

On November 14, 2013, Hampton Roads Transit staff presented to the Governing Board an overview of the Draft Fare Policy and Fare Structure, which included information on a proposal for fare increases beginning FY 2015. The information about a proposed fare increase was announced in the local media immediately after the meeting. HRT staff was prepared by having information for all bus operators to give to passengers who asked about this and were directed to call Customer Service.

At the December 12, 2013 meeting of the Governing Board, they were asked to approve the 2013 Fare Policy and Authorization for Staff to Obtain Public Input on Proposed Fare Adjustments. With the approval, HRT staff began to set up public hearings for the month of January 2014. Once again, information was available for bus operators to give out to customers to contact Customer Service when asking about the public hearing dates and times.

Public Hearings Dates and Times

Hampton Roads Transit held eight public hearings to get feedback and comments from the public with regards to the proposed fare increases and fare media changes. The meetings dates included:

Wednesday, January 15, 2014 6:00-8:00 pm
City of Virginia Beach
Meyer Oberndorf Public Library

Thursday, January 16, 2014 6:00-8:00 pm
City of Norfolk
Mary Pretlow Public Library

Saturday, January 18, 2014 10:00 am to 12:00 Noon
City of Chesapeake
Indian River Middle School

Thursday, January 23, 2014 6:00-8:00 pm
City of Newport News
Midtown Community Center

Saturday, January 25, 2014 12:00-2:00 pm
City of Newport News
Denbigh Community Center

Monday, January 27, 2014 6:00-8:00 pm
City of Norfolk



Huntersville Recreation Center

Saturday, February 1, 2014 11:00 am to 1:00 pm*

City of Hampton

Hampton Roads Transit-Administrative Offices

Wednesday, February 5, 2014 6:00-8:00 pm*

City of Portsmouth

Tidewater Community College

*These public hearings were scheduled for the month of January, but due to inclement weather and the closing of public buildings, they were rescheduled to early February.

The public was also invited to address the following Commission meetings with their comments as well:

- Thursday, January 23, 2014 1:00 pm
- Thursday, February 27, 2014 1:00 pm

Communications and Distribution of Meeting Information

Hampton Roads Transit used many communication tools to get the information out to the public with information on the proposed fare changes and when the meetings would be held. The following will show how these public hearings were advertised to our customers, residents and the military:

Ads were placed in the following local newspapers:

- The Virginian Pilot – December 18, 2013 and January 9, 2014
- The Daily Press – December 18, 2013 and January 9, 2014
- Tidewater Hispanic News – December 19, 2013 and January 9, 2014
- New Journal and Guide – December 18, 2013 and January 8, 2014

Meeting announcement banner placed on home page of website – gohrt.com. Clicking on the banner allowed the reader to get more information on the proposed fare changes, meetings, and how to submit comments about the changes. A comment page was also placed so they could submit comments via the webpage.

Posters (11x17) were prepared for posting in all Customer Service Areas of Hampton Roads Transit. Posted in all centers on January 6, 2014.

- Silverleaf Transit Center – Virginia Beach
- Hampton Roads Transit Administrative Offices – Norfolk
- Hampton Roads Transit Administration Offices – Hampton



- Hampton Transit Center – Hampton
- Newport News Transit Center – Newport News

Posters (11x17) were also posted at the following locations:

- Newtown & Military Highway light rail stations (bus shelters only) - Norfolk
- Navy Exchange Mall Transfer Center – Norfolk
- Military Circle Transfer Center – Norfolk
- Downtown Norfolk Transit Center – Norfolk
- Crawford and Court Street Transfer Center – Portsmouth
- Victory Crossing Transfer Center – Portsmouth
- 20th & Seaboard Transfer Center – Chesapeake
- Robert Hall Transfer Center – Chesapeake
- Chesapeake Crossing Transfer Center – Chesapeake
- 19th and Pacific Transfer Center – Virginia Beach
- Tidewater Community College – Virginia Beach Campus
- Pleasure House/Short Drive Transfer Center – Virginia Beach
- Thomas Nelson Community College – Hampton
- Warwick/Denbigh Blvd. Transfer Center – Newport News
- Public Health Facility/Riverside Hospital Transfer Center – Newport News
- Patrick Henry Mall Transfer Center – Newport News

Announcements about the public hearings began on all buses on January 6, 2014. These messages played until February 5, 2014.

Customer Alert announcing dates and times of public hearings was posted to gohrt.com website and sent out via govdelivery.com database. Alert posted and sent January 6, 2014.

Information on the public hearings dates, times and places was also shared with HRT's Paratransit staff and MV Transportation for distribution to clients. Information was sent to the Paratransit Advisory Committee.

Information on the public hearing dates, times and places was shared with the HRT's Transit Riders Advisory Committee.

Customer Service staff were sent to major transfer centers (weather permitting) to distribute flyers about the upcoming public hearings – these areas included:

- Downtown Norfolk Transit Center - Norfolk
- Military Circle Transit Center - Norfolk
- Robert Hall Transfer Center - Chesapeake
- Pleasure House Road/Shore Drive Transfer Center – Virginia Beach



In the week leading up to the first public hearings and throughout the month of January/early February, Facebook and Twitter posting were continually announcing each of the public hearings. Postings to Facebook were also sent during each meeting showing attendees.

Attendance at Public Hearings and Comments Received

When selecting the venues for each of the public hearings, we were looking at facilities that would allow upwards of 100 people who would come and give comment on the proposed fare increases. While we did not see large groups, those that did attend gave good information on their concerns with the current bus services and what the impact a fare increase would be to them as a rider.

A total of 104 people attended the public hearings with 63 attendees signing up to speak. Others who addressed the public hearing did so after hearing from some of the attendees and then deciding to speak as well.

A database was developed to record comments submitted through the gohrt.com website, phone calls, Facebook postings, and through the email for the Public Outreach staff. A total of 47 comments are included in the database.

Four completed comment forms were submitted at the various meetings.

At each of the public hearings, Zahn Court Reporting staff was there to record all meeting information including comments. A total of 8 transcripts are available for review of comments.

Comments received at Commission meetings were recorded and completed by Public Outreach staff.

News Articles about Proposed Fare Increases and Public Hearings

- “HRT proposal would raise bus, ferry, light rail fares”; November 15, 2013 – Virginian Pilot
- “HRT board discussed possible bus fare hike”; November 15, 2013 – Daily Press
- “Editorial- Transportation News”; November 15, 2013 – Virginian Pilot
- “HRT proposes ticket fare increase”; December 12, 2013 – WAVY-TV 10
- “Peninsula transit study on legislative wish list” – (mention of public hearings); December 12, 2013 – Daily Press
- “Fare increase, new state funds should help with HRT needs”; December 13, 2013 – Daily Press
- “Hearings scheduled on plan to raise HRT base fares”; December 13, 2013 – Virginian Pilot
- “Public hearings set on proposed bus, light rail fare hikes”; December 13, 2013 – WVEC-TV 13
- “HRT to solicit public comments on proposed fare hike”; December 17, 2013 – Rail News-Passenger Rail
- “HRT to hold hearings on proposed fare increases”; January 14, 2014 – Virginian Pilot
- “HRT to solicit public comments on proposed fare hikes”; January 14, 2014 – Passenger Rail
- “HRT looks to raise bus, light rail, ferry fares 50 cents”; January 17, 2014 – Virginian Pilot



- “HRT’s fares are so last century – it’s high time for 50-cent hike”; January 18, 2014 – Columnist Roger Chelsey – Virginian Pilot
- “HRT, riders debate bump in fares”; January 18, 2014 – Virginian Pilot
- “Public Hearing tonight in Portsmouth on HRT fares”; January 21, 2014 – Virginian Pilot
- “HRT board to discuss finances, strategies and proposed fare increases on Thursday”; January 22, 2014 – Daily Press
- “HRT Public Hearing Rescheduled”; January 24, 2014 – Virginian Pilot
- “Customers worried about proposed HRT fare increases”; January 24, 2014 – Daily Press
- “HRT to raise rates, wants to hear from riders”; January 26, 2014 – WVEC-TV 13
- “New hearing dates”; January 27, 2014 – HRT press release
- “HRT reschedules Hampton public hearing on proposed fare increases”; January 28, 2014 – Daily Press
- “No fare hike for HRT”; February 2, 2014 – Letter to the Editor – Virginian Pilot

This page intentionally left blank.

APPENDIX J:

TITLE VI EQUITY ANALYSIS OF STUDENT FREEDOM PASS PROGRAM FARE

The following pages include the Analysis of the Student Freedom Pass Fare Type completed in 2016.



Resolution 05 – 2016
Title VI Equity Analysis for Student Freedom Pass Program Fare

A Resolution of the Transportation District Commission of Hampton Roads approving the *Title VI Equity Analysis for Student Freedom Pass Program Fare*.

WHEREAS, pursuant to Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq. and 23 CFR part 21, the U.S. Department of Transportation and the Federal Transit Administration (FTA) prohibit discrimination on the basis of race, color or national origin; and

WHEREAS, the Transportation District Commission of Hampton Roads adopted the *Hampton Roads Transit (HRT) 2014 Title VI Program* through Resolution 01-2014 on the 24th day of January, 2014, in compliance with Federal Law and FTA Policy; and

WHEREAS, the adopted *HRT 2014 Title VI Program* requires that the Commission demonstrate the consideration, awareness, and approval of the Title VI Equity Analysis results for each proposed Major Service or Fare Change prior to approval or implementation of the proposed change; and

WHEREAS, Hampton Roads Transit has proposed the Student Freedom Pass Program Fare for permanent implementation starting on January 1, 2017; and

WHEREAS, Hampton Roads Transit has completed a Title VI Equity Analysis on the proposed program fare and reported the results of the analyses to the Commission for full consideration; and

WHEREAS, Hampton Roads Transit has completed meaningful and comprehensive public outreach on the proposed changes and reported the results of the public outreach to the Commission for full consideration; and

WHEREAS, the Title VI Equity Analysis included a full discussion of any potential Disparate or Disproportionate Impacts in regards to race, color, national origin, or income:

NOW, THEREFORE, BE IT RESOLVED that the Transportation District Commission of Hampton Roads has given full consideration of, is aware of, and approves the equity analysis for the proposed January 2017 Student Freedom Pass Program.

APPROVED by the Transportation District Commission of Hampton Roads at its meeting on the 08th day of December, 2016.

**TRANSPORTATION DISTRICT COMMISSION
OF HAMPTON ROADS**



James L. Wood
Chairman

ATTEST:



Luis R. Ramos
Commission Secretary



**TITLE VI EQUITY ANALYSIS OF PROPOSED
STUDENT FREEDOM PASS PROGRAM FARE**

DECEMBER 8, 2016



INTRODUCTION

Hampton Roads Transit (HRT) proposes to make the Student Freedom Pass fare a permanent fare type. The purpose of this report is to evaluate the Student Freedom Pass fare based on the Federal Transit Administration (FTA) Title VI Requirements and Guidelines for Federal Transit Administration Recipients. Title VI is intended to ensure equity and equal access in the provision of public transportation services regardless of race, age, national origin, or socioeconomic condition. As stated in HRT's Title VI Program, the agency is required to conduct a fare impact analysis and determine if the proposed fare change would result in a disparate impact or disproportionate burden on minority and low-income populations respectively. The proposed Student Freedom Pass Program (fare) began its six-month pilot test on July 1, 2016 and will conclude its six-month pilot period on December 31, 2016. The Senior Executive Team has recommended to the President and CEO that the Student Freedom Pass fare type be made permanent, and upon the concurrence of the TDCHR Board would become permanent on January 1, 2017; therefore, the equity analysis is required.

PROGRAM OVERVIEW AND HIGHLIGHTS

- The Student Freedom Pass Program provides youth 17 and under with unlimited free rides on HRT's service in the cities of Chesapeake, Hampton, Newport News, Norfolk, Portsmouth, and Virginia Beach.
- The parent/guardian of the eligible youth must complete a Student Freedom Pass Application.
- Program participants must renew their pass annually.
- Passes are distributed at HRT transit centers and at schools within the region (if applicable).

HRT FARE EQUITY ANALYSIS POLICIES AND PROCEDURES

Hampton Roads Transit's Fare Impact Analysis Procedures are defined in HRT's Title VI Program (Updated: April 19, 2014). HRT's methodology to conduct fare impact analysis is consistent with the guidance set forth in FTA's Circular, FTA C 4702.1B, published on October 1, 2012. This section summarizes HRT's process for analyzing fare impacts and the process for determining when a disparate impact and/or disproportionate burden occurs.

The approval of the Student Freedom Pass Program would make the fare identified in the program a permanent fare type. The change/introduction of a fare type requires that an equity analysis be performed and determination as to whether the fare has either a disparate impact and/or disproportionate burden on those persons identified in Title VI of the Civil Rights Act of 1964.

As defined in the FTA Circular C 4702.1B:

Disparate impact refers to 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.



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

Determination of when a Disparate Impact or Disproportionate Burden Occurs

In accordance with HRT's Title VI Program, the determination of whether a proposed fare change has either disparate or disproportionate impacts is based on minority and/or low-income populations bearing a fare rate change of greater than five (5) percentage points as compared to non-minority and/or non-low-income populations.

Hampton Roads Transit Fare Impact Analysis Procedure Summary

HRT's Title VI Program outlines in detail the Equity Analysis Procedures in Section 3.3. A summary of the procedure is included below.

- Define the Service Area covered by HRT system. Identify TAZs or Census tracts in the service area that are predominantly minority and predominantly low-income using FTA's procedures. Using Census data, compute percent of minorities and low-income population in the Service Area.
- Using travel pattern data obtained from the Origin-Destination survey and the current fare structure, estimate average fares paid by minorities, non-minorities, low-income and non-low income riders in the entire Service Area. Further, break down the average fares by fare type.
- Determine percent increase in fares for minorities, non-minorities, low-income and non-low-income populations in the Service Area. If the percent differences in fare increase for minorities versus non-minorities and low-income versus non-low income populations are within the thresholds established by HRT, a determination of "no impacts" will be made. If the estimated differences exceed HRT's thresholds, it will be concluded that the proposed fare change would result in adverse equity impacts. In that case, appropriate mitigation plan will be developed by HRT to address those equity impacts.
- If a disparate equity impact is determined and HRT chooses not to alter the proposed fare change despite the potential disparate impact on minority populations or disproportionate impact on low-income populations, or if HRT finds, even after the revisions, that minority or low-income riders will continue to bear a disproportionate share of the proposed fare change, HRT may implement the fare change only if:
 - HRT has a substantial legitimate justification for the proposed fare change, and
 - HRT can show that there are no alternatives that would have a less disparate impact on minority or low income riders but would still accomplish the transit provider's legitimate program goals.
- HRT Board will fully consider the results of the equity analysis, proposed alternatives and mitigation if applicable, and public comments on the proposed change prior to approval.

PROPOSED FARE – STUDENT FREEDOM PASS

HRT proposes to add the Student Freedom Pass fare to the existing fare types; (upon approval) this fare type would be permanently implemented in January 1, 2017. The fare for the Student Freedom Pass Program is \$0.00 with the Student Freedom Pass. This proposed new fare would be available to all youth ages 17 and under that choose to ride identified HRT services, is eligible for the program, and completes the requirements for program participation which includes the completion of the application. The program does not consider race

Page | 3



on income for eligibility.

Information on all fare types are provided in Appendix A.

ANALYSIS AND TITLE VI IMPACTS

The 2014 Origin and Destination survey indicates approximately 82 percent of all HRT transit users belong to a minority group and 63 percent are low-income persons (Table 1 and 2). The percentage of youth who identified as minority and/or low income is outlined in the tables below. The tables show that the percentage of HRT transit system users that are identified as youth (17 and under) display a higher percentage of being minority and low-income persons compared to the system average.

The data utilized for the Title VI analysis of the Student Freedom Pass Program fare type includes available data for all system users ages 17 and under. The data also provides additional detail into the percentage of the youth population identified as minority and low income. The purpose of the analysis is to determine whether the introduction of the new fare type has either disparate or disproportionate impacts based on minority and/low income populations bearing a fare rate change of greater than five (5) percentage points as compared to non-minority and/or non-low income populations as described in HRT’s Title VI Program: Service Standards and Policy.

The Student Freedom Pass fare is a new fare type and is available to all youth under the age of 17 irrespective of race and income. The Student Freedom Pass fare type is a new fare type and there is no monetary change in fare for non-minority and minority and non-low income and low income youth. Therefore, the rate change of percentage points in the comparison of minority and non-minority and low-income and non-low income is zero. The Title VI analysis determination is that the proposed fare introduction does not impose an adverse or disparate impact nor does it provide a disproportionate burden to youth identified as minority or low-income. Thus, it is concluded that HRT’s proposed fare change/introduction would not result in either disparate or disproportionate impacts to minority and low-income populations.

The Title VI analysis shows that the change/introduction of the Student Freedom Pass Program fare type would have a 7% change in percentage points above the system average to benefit youth identified as minority. The findings of the analysis also show that the change/introduction of the Student Freedom Pass Program fare type indicate the introduction of the program and fare type would have a 16% change in percentage points above the system average to benefit youth identified as low-income.

Table 1: Proportion of Minority and Non-Minority Users for all Transit Modes (Age)

All Transit Modes	Non-minority users	Minority Users	Total Users	Percent Minority
Under 18	125	1,000	1,125	89%
System Total/Average	10,323	47,465	57,788	82%

2014 Origin and Destination Survey Data


Table 2: Proportion of Low-Income and Non-Low-Income Users by Transit Mode (Age)

All Transit Modes	Non-low Income Users	Low Income Users	Total Users	Percent Low Income
Under 18	158	574	727	79%
System Total/ Average	20,474	34,594	55,068	63%

2014 Origin and Destination Survey Data
Table 3: Proposed Fare

Fare Type	Existing fare (pilot program)	Proposed Fare 2016	% change by fare type
Student Freedom Pass	\$0.00	\$0.00	N/A

Appendix A provides the calculation of average fares by fare type for minority, low-income and all users. The table presents the different steps involved in estimating the percent fare increase and proportion of users for each fare category, relative to the system average. Origin and destination and demographic data regarding users of the Student Freedom Pass has not been collected as it is currently a 6-month pilot program. Appendix A also provides that the introduction of the Student Freedom Pass Fare shows no disparate impact to minorities and no disproportionate burden to low-income system users.

Mitigation

The analysis resulted in a finding of “No Disparate Impact” and “No Disproportionate Burden”; therefore, no mitigation strategies are proposed for the introduction of the fare type.

Conclusion

The analysis shows that the percentage of HRT transit system users that are identified as youth (17 and under) display a higher percentage of being minority and low-income persons compared to the system wide average. Therefore, there are no demonstrated findings of disparate or disproportionate impacts on affected populations with the introduction of the Student Freedom Pass Fare type.



Appendix A: Fare Impact Calculation

Existing and Proposed Fares

Fare Type	Existing	Proposed	Percent change by fare type	Percent fare increase above the system average of 33% (-ve sign implies below system average)	Percent of minority users above the system average of 82%. Negative sign implies below system (-) average average)	Percent of low-income users above the system average of 63%. Negative sign implies below system (-) average	Minority Disparate Impact	Low Income Disp. Burden
Cash – Adult	\$1.75	\$1.75	0%	0%	1%	-3%	no	no
Cash – YSD	\$0.75	\$0.75	0%	0%	7%	-6%	no	no
Go 1-Day Pass	\$4.00	\$4.00	0%	0%	3%	4%	no	no
Go 1-Day Pass – YSD	\$2.00	\$2.00	0%	0%	8%	0%	no	no
MAX 1-Day Pass	\$6.50	\$6.50	0%	0%	-17%	5%	no	no
GO 7-Day Pass	\$20.00	\$20.00	0%	0%	-3%	3%	no	no
Go 30-Day Pass	\$60.00	\$60.00	0%	0%	-1%	-5%	no	no
Go 30 Day – YSD	\$35.00	\$35.00	0%	0%	-1%	0%	no	no
MAX 30-Day Pass	\$110.00	\$110.00	0%	0%	-22%	-13%	no	no
2 Ride Pass	\$3.50	\$3.50	0%	0%	-27%	-9%	no	no
GoPass 365	\$50.00	\$50.00	0%	0%	-16%	-5%	no	no
eTide ticket	\$1.50	\$1.50	0%	0%	-18%	3%	no	no
VBWave Cash	\$2.00	\$2.00	0%	0%			no	no
VBWave Cash YSD	\$1.00	\$1.00	0%	0%			no	no
VBWave Day Pass	\$4.00	\$4.00	0%	0%			no	no
VBWave YSD Day Pass	\$2.00	\$2.00	0%	0%			no	no
VBWave 3-Day Pass	\$8.00	\$8.00	0%	0%			no	no
VBWave 3-Day Pass YSD	\$4.00	\$4.00	0%	0%			no	no
Student Freedom Pass	n/a	\$0.00		0%			no	no

* The socioeconomic characteristics of the Student Freedom Pass are not included for the SFP fare change analysis because the 2014 O&D Survey, which is the most recent survey data collected by HRT, did not survey these routes.

*The socioeconomic characteristics of the VB Wave are not included for the SFP fare change analysis because the 2014 O&D Survey, which is the most recent survey data collected by HRT, did not survey these routes.



Appendix B: Public Engagement and Outreach Summary

Communications and Distribution of Program Information

Hampton Roads Transit has and continues to utilize various methods of communication and outreach tools to provide information to the public regarding the Student Freedom Pass program. The information below provides details on the public outreach and engagement activities of Hampton Roads Transit on the introduction and implementation of the pilot Student Freedom Pass Program.

Events:

Date	Event	Location
8/24/2016	Freshman Orientation	Norview High School
8/26/2016	American Red Cross: Back to School	Kroc Center
8/13/2016	Inglefest	Ingleside Recreation Center
8/19/2016	Tide 5th Anniversary	MacArthur Square
8/27/2016	City of Norfolk Back to School Festival	Norfolk Scope
8/29/2016	Freshman Orientation	Booker T. Washington High
8/30/2016	Freshman Orientation	Granby High School
7/11/2016	Hampton Roads Transit Employees	18th Street
7/12/2016	Hampton Roads Transit Employees	HQ
7/13/2016	Hampton Roads Transit Employees	HQ
7/15/2016	Hampton Roads Transit Employees	18th Street
9/10/2016	Norfolk Commonwealth Attorney's Office	Lamberts Point Recreation
9/17/2016	Norfolk Neighborhood Celebration	Military Circle Mall
9/26/2016	School Open House	Waters Middle School



9/30/2016	Presentation to Dept. Juvenile Justice Employees	Huntersville Community Center
10/14/2016	City of VA. Beach: Wayside Apartments	VA Beach Church
10/11/2016	Presentation to Olde Towne Business Association	Towne Bank
10/26/2016	Dept. of Juv. Justice/Norfolk Sheriff's Community	Huntersville Community Center
11/3/2016	Oscar Smith High School Distribution	Oscar Smith High School

Marketing and Communications – Social Media, Media, and Print Material:

Marketing/Communication Medium	Data
Facebook	697 shares
Bus Announcements	8/1/16-9/1/16
Bus Ads	Two (2) buses
Interior Cards	Two (2) on each bus
Website	www.studentfreedompass.com
Brochures	35,000 brochures distributed to the following places
Letter to school districts	Six (6) letters
Articles	Daily Press
	Alt Daily
	Virginian Pilot
Press Release	8/1/2016
News Reports	WTKR



	WAVY
Poster	Norfolk Public Libraries
	Norfolk Recreation Centers
	Norfolk Community Centers
Websites	HRPTA
	Portsmouth Public Schools
	HR Scene
	My Active Child
	Healthy Hampton Roads
	Southside Daily
Customer Alert	Posted on HRT website
	Posted inside every HRT bus
	Posted at every HRT transit center

Printed Materials:

Location	Brochures	Posters
Hampton University	400	4
An Achievable Dream Academy	450	4
18th Street Operations	4600	
HQ Operations	7700	



HRT Transit Centers	8700	
Norfolk Parks and Recreation	2500	10
Norfolk Public Library	1300	15
Hampton Parks and Recreation	1300	
Twin Canal Community Center	25	2
Bethel High School	200	2
Food Bank	100	2
VA Community Development	400	2
Portsmouth Private School	400	2
Norview High School	100	5
Granby High School	100	5
Deep Creek High School	50	2
Bayside High School	100	2
Norfolk Open Campus	100	1
Sail Nauticus	50	1
Maury High School	100	5
Booker T. Washington High	250	5
Department Juvenile Justice	100	3
Woodrow Wilson High School	100	2



Title VI – Analysis of Student Freedom Pass Program Fare (December 2016)

- 1) **What service and/or fare changes does the Transportation District Commission of Hampton Roads dba as Hampton Roads Transit (HRT) propose? Please describe the nature of the change, the bases or rationale for the change, the modes of service impacted, and the communities affected by the change.**
Fare change: Proposed introduction of a new fare type with the permanency of the Student Freedom Pass program. The fare for the program is \$0.00 to youth, 17 years old or younger, that hold the Student Freedom Pass are eligible and meet the requirements. The intended goals of the program include providing more access to community offerings through transit to youth in the region, to increase transit ridership, to develop current youth into transit riders of who may not have chosen transit as their means of transportation. The fare type impacts all current modes of service, not to include paratransit, and all communities served by HRT.
- 2) **What are the impacts of the fare change on minority and/or low income communities?**
The introduction of the Student Freedom Pass fare provides a (fare) benefit to youth in minority and low income communities, as compared to the users identified in the system average. There is no disparate impact or disproportionate burden on minority and low-income communities.
- 3) **What are the transit alternatives available for riders who would be impacted by proposed fare changes?**
All youth in HRT's service area are eligible for the Student Freedom Pass Program Fare type. Those users who elect not to participate in the program are still eligible for all fare and pass types for youth identified in HRT's fare policy.
- 4) **What, if any measures would HRT take to avoid, minimize, or mitigate any adverse effects of the service and/or fare change on minority populations and/or low-income populations? What, if any enhancements or offsetting benefits would HRT implement in conjunction with the service and/or fare change?**
There are no identified adverse effects on minority populations and/or low-income populations with the introduction of the Student Freedom Pass Fare type.
- 5) **Would the proposed service and/or fare change have a disproportionately high and adverse effect on minority populations and/or low-income populations?**
No, the proposed fare change/introduction would not have a disproportionately high and adverse effect on minority populations and/or low-income populations.
- 6) **What steps does HRT plan to take to seek out and consider the viewpoints of minority and low-income populations in the course of conducting public outreach and involvement activities?**
The Student Freedom Pass program will operate as a pilot program until December 31, 2015. HRT will continue to engage the public through various outreach activities if the program and fare type are approved as a permanent program by the TDCHR.
- 7) **Does HRT believe that it is necessary to disseminate information on the fare change that is accessible to Limited English Proficient persons?**
The Student Freedom Pass program will operate as a pilot program until December 31, 2015. HRT will identify strategies and methods to continue to disseminate information on the introduction of the new fare type to LEP persons if the fare type if it the fare type is approved by the TDCHR.

END OF DOCUMENT