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BRITE TRANSIT

TITLE VI PLAN

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# Introduction

Title VI of the Civil Rights Act of 1964 prohibits federal agencies, recipients, and sub-recipients of federal funds from discriminating, on the basis of race, color, or national origin, against participants or clients of programs that receive federal funds. Subsequent laws added disability, sex, age, or income status to the criteria for which discrimination is prohibited. This document addresses prohibition of discrimination as mandated by Title VI as well as by the authorities listed in this document.

The Central Shenandoah Planning District Commission (CSPDC), as a recipient of federal financial assistance to provide the BRITE public transit service, is required to comply with Title VI and subsequent nondiscrimination laws. The purpose of this Title VI Plan is to describe the measures taken by the BRITE Transit, via the CSPDC, to ensure compliance with the rules and regulations associated with Title VI and subsequent nondiscrimination laws. The CSPDC maintains a separate Title VI Plan for all non-transit programs overseen. The CSPDC's governing body, the Board of Commissioners, has the authority to approve both the agency-wide and BRITE Transit Title VI programs.

BRITE Transit is committed to a policy of non-discrimination in the conduct of its business, including its Title VI responsibilities. BRITE and its contractors will deliver equitable and accessible transportation services and commit to ensuring that no person shall, on the grounds of race, color, or national origin be excluded from participation in, denied the benefits of, or be subjected to discrimination under the BRITE transit program. This Title VI Plan documents BRITE's efforts to comply with Title VI of the Civil Rights Act of 1964; Title 49 of the United States Code of Federal Regulations (CFR); and the Federal Transit Administration's circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients", dated October 1, 2012.

Toward this end, it is the CSPDC's/BRITE's objective to:

- Ensure that the level and quality of public transportation services and benefits are provided in a nondiscriminatory manner;
- Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities, on minority populations and low-income populations;
- Promote full and fair participation in public transportation decision-making without regard to race, color, or national origin;
- Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations; and
- Ensure meaningful access to transit-related programs and activities by persons with language access barriers.

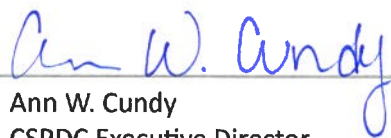
# Title VI Policy Statement

BRITE Transit, via the Central Shenandoah Planning District Commission (CSPDC), will effectuate the provisions of Title VI of the Civil Rights Act of 1964, 49 Code of Federal Regulations (CFR) Part 21, 23 CFR Part 200, and other applicable directives. These authorities provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which BRITE receives federal assistance. Further, under the Americans with Disabilities Act (ADA) of 1990, no entity shall discriminate against an individual with a physical or mental disability in connection with the provision of transportation service.

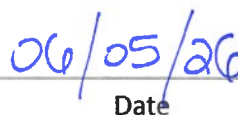
BRITE Transit, via the CSPDC, will ensure that every employee, contractor, and sub-recipient of federal aid funds administered in service of the BRITE Transit program, is aware of and applies the intent and spirit of Title VI of the Civil Rights Act of 1964 and other non-discrimination authorities in performing assigned duties.

The CSPDC Executive Director is designated as BRITE Transit's Title VI Coordinator and is responsible for ensuring that all matters relating to nondiscrimination are administered effectively. Individuals with questions, problems, or complaints regarding this statement, and the implementation of the provisions stated should contact the Title VI Coordinator:

Ann W. Cundy, Executive Director  
112 MacTanly Place  
Staunton, VA 24401  
540-885-5174  
[ann@cspdc.org](mailto:ann@cspdc.org)



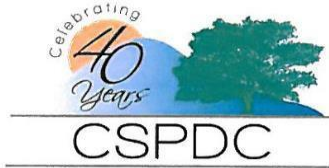
Ann W. Cundy  
CSPDC Executive Director

  
Date

The BRITE Transit Title VI Policy was originally adopted on February 3, 2014, by the CSPDC Board of Commissioners. The resolution adopting the policy is included on the following page. Federal Regulations require the Title VI plan to be reviewed annually and updated at least every three years. A Board Resolution approving the most recent update of the plan is included in **Appendix A**.

Date of last update and approval: June 15, 2026

# Title VI Plan Adoption: Board Resolution



Central Shenandoah Planning District Commission

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## RESOLUTION

### Central Shenandoah Planning District Commission Approving and Adopting the Title VI Plan

WHEREAS, Title VI of the Civil Rights Act of 1964 (U.S.C. 200D) provides that no person shall on the grounds of race, color, national origin, gender, or disabilities be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving Federal Funds; and

WHEREAS, the Federal Transit Administration requires that any organization that is the recipient of Federal financial assistance shall have an adopted Title VI Plan and Policy; and

WHEREAS, the Central Shenandoah Planning District Commission is the direct recipient of Federal Transit Administration Formula Grants intended for the operation of public transit service in the Staunton-Augusta-Waynesboro Region.

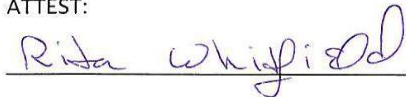
NOW THEREFORE, BE IT RESOLVED, that the Central Shenandoah Planning District Commission does hereby approve and adopt the Title VI Plan dated January 3, 2014.

Adopted by the CSPDC this 3<sup>rd</sup> day of February, 2014.

APPROVED:

  
Carolyn W. Dull  
CSPDC Chairman

ATTEST:

  
Rita Whipple

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112 MacTanly Place Staunton, VA 24401  
Phone: (540)885.5174 Fax: (540)885.2687 www.cspdc.org

# Overview of Services

This Title VI Plan was prepared by the Central Shenandoah Planning District Commission (CSPDC), the administrator of BRITE Transit services. The CSPDC represents and serves the Counties of Augusta, Bath, Highland, Rockbridge, and Rockingham; the Cities of Buena Vista, Harrisonburg, Lexington, Staunton, and Waynesboro; and the Towns of Broadway, Bridgewater, Craigsville, Dayton, Elkton, Glasgow, Goshen, Grottoes, Monterey, Mount Crawford, and Timberville. The CSPDC works with its member jurisdictions, communities, and partner agencies to provide high quality planning, technical assistance, and facilitation of services that address local, regional, and state needs. The CSPDC Board of Commissioners provides governance over CSPDC and BRITE Transit activities. Board Members are appointed by the governing body of member jurisdictions, and representation is based on population, with a majority of the members comprised of local government elected officials. **Appendix B** includes an organizational chart of CSPDC staff and **Appendix C** contains a list of Commissioners as of May 2026.

Since 2014, the CSPDC has been the designated recipient of federal and state transit grant funds and is responsible for the administration and management of the local fixed route, commuter bus, and paratransit service known as Blue Ridge Intercity Transit Express (BRITE). The BRITE Transit service area covers Staunton, Waynesboro, and portions of Augusta County, with connections to Harrisonburg, Charlottesville, and Albemarle County. BRITE operates in both the urbanized portion of the region as well as the bordering rural areas. Transit service is provided under a turnkey contract with a transportation provider. The turnkey contract requires the service provider ensure their policies, programs, and practices are performed in a manner that is nondiscriminatory as required under Title VI, and that their staff training plan includes modules dedicated to Title VI procedures.

## Title VI Program

### Title VI and Other Nondiscrimination Authorities

Title VI is usually referred to in the context of federal nondiscrimination laws. Title VI is one of eleven titles included in the Civil Rights Act of 1964. The following is a list of all the Civil Rights Act titles:

- Voting Rights
- Public Accommodation
- Desegregation of Public Facilities
- Desegregation of Public Education
- Commission on Civil Rights
- Nondiscrimination in Federally Assisted Programs and Activities
- Equal Employment Opportunity
- Registration and Voting Statistics
- Intervention and Procedures After Removal in Civil Rights Cases
- Establishment of Community Relations Service
- Miscellaneous

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise

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

Additional authorities and citations include: Federal Transit Laws, as amended (49 U.S.C. Chapter 53 et seq.); U.S. Department of Transportation (DOT) regulation, 49 CFR Section 1.51, “Delegations to Federal Transit Administrator” (October 1, 2011); Department of Justice (DOJ) regulation, 28 CFR part 42.401 et seq., “Coordination of Enforcement of Nondiscrimination in Federally-Assisted Programs” (December 1, 1976, unless otherwise noted); U.S. Department of Transportation (DOT) regulation, 49 CFR part 21, “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964” (June 18, 1970, unless otherwise noted); Section 12 of FTA’s Master Agreement, FTA MA 13 (October 1, 2006).

In accordance with 49 CFR Section 21.7, the CSPDC submits the FTA Civil Rights Assurance annually stating that the applicant will carry out the program in compliance with Title VI of the Civil Rights Act of 1964.

## Title VI Notices

BRITE Transit Title VI and ADA notices and provisions are included in the sections below. Notices are placed in revenue service vehicles, on the BRITE and CSPDC websites, at the BRITE Transit Facility, and inserted in transit-related publications that are distributed to the public (press releases, public notices, public meeting advertisements, and informational brochures).

### Notice to the Public

In accordance with 49 CFR Section 21.9(d), BRITE Transit makes available to the public information regarding its Title VI obligations and the protections against discrimination afforded by Title VI. The notice below is included in all significant transit-related publications distributed to the public, including public hearing and meeting notices, planning documents, and informational brochures. It is posted permanently on the CSPDC and BRITE websites in English and Spanish, with additional languages available upon request.

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*CSPDC operates BRITE Transit and its services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964. The CSPDC provides reasonable accommodation for persons who require special assistance, including information available in alternative formats and languages, upon request. To obtain more information, or to obtain a Discrimination Complaint Form, contact (540) 885-5174, [cspdc@cspdc.org](mailto:cspdc@cspdc.org), or visit [www.britebus.org](http://www.britebus.org).*

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*CSPDC opera BRITE Transit y sus servicios sin distinción de raza, color u origen nacional, conforme al Título VI de la Ley de Derechos Civiles de 1964. CSPDC ofrece adaptaciones razonables para quienes requieran asistencia especial, incluyendo información disponible en formatos y lenguajes alternativos, previa solicitud. Para más información, o para obtener un Formulario de Queja por Discriminación, comuníquese al (540) 885-5174, [cspdc@cspdc.org](mailto:cspdc@cspdc.org), o visite [www.britebus.org](http://www.britebus.org).*

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## **Notifying the Public of Rights**

The CSPDC, in the operation of BRITE Transit, is committed to ensuring that no person is excluded from participation in, or denied the benefits of, its transit services on the basis of race, color, or national origin, as protected by Title VI of the Civil Rights Act of 1964. The notice in **Appendix D** is posted on the CSPDC and BRITE websites, included in transit-related printed materials and public notices, and displayed on posters in the interior of each vehicle operated in passenger service.

Persons who believe they have been subjected to discrimination under Title VI may file a written complaint within 180 days of the date of the alleged discrimination. Complaints should include the complainant's name, address, and contact information; a description of how, when, where, and why the complainant believes discrimination occurred; and the names and contact information of any witnesses. Complaints may be submitted to:

Ann Cundy, Executive Director/Title VI Coordinator  
Central Shenandoah Planning District Commission  
112 MacTanly Place, Staunton, VA 24401  
(540) 885-5174 or [ann@cspdc.org](mailto:ann@cspdc.org)

Complaints may be filed with the U.S. Department of Transportation by contacting the Department at:

U.S. Department of Transportation  
Federal Transit Administration's Office of Civil Rights  
1200 New Jersey Avenue, SE  
Washington, D.C. 20590

*BRITE Transit se compromete a garantizar que ninguna persona sea excluida de la participación en, o privada de los beneficios de, sus servicios de transporte, por motivos de raza, color u origen nacional, conforme al Título VI de la Ley de Derechos Civiles de 1964. El aviso en el Apéndice D se publica en los sitios web de CSPDC y BRITE, se incluye en materiales impresos y avisos públicos relacionados con el transporte, y se exhibe en carteles en el interior de cada vehículo en servicio de pasajeros.*

*Las personas que crean haber sido objeto de discriminación conforme al Título VI pueden presentar una queja por escrito dentro de los 180 días posteriores a la fecha del presunto acto discriminatorio. Las quejas deben incluir el nombre, dirección e información de contacto del reclamante; una descripción de cómo, cuándo, dónde y por qué el reclamante cree que ocurrió discriminación; y los nombres e información de contacto de cualquier testigo. Las quejas pueden enviarse a:*

**Coordinador del Título VI** Ann Cundy, Directora Ejecutiva  
Central Shenandoah Planning District Commission

Las quejas también pueden presentarse directamente ante la Administración Federal de Tránsito en:

U.S. Department of Transportation  
Federal Transit Administration's Office of Civil Rights  
1200 New Jersey Avenue, SE  
Washington, D.C. 20590

### **Notice of Title VI Provisions & ADA Notice**

The Notice of Title VI Provisions and Notice Under the Americans with Disabilities Act are provided in **Appendix D**. These provisions are observed by both the CSPDC and their contracted service provider in the planning, oversight, and delivery of transit service.

### **Title VI Compliance History – Title VI Investigations, Complaints, and Lawsuits**

The CSPDC/BRITE prepares and maintains a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA
- Lawsuits
- Complaints naming CSPDC/BRITE

This list includes the date that the transit-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the CSPDC/BRITE in response, or final findings related to the investigation, lawsuit, or complaint.

There have been no transit-related Title VI investigations, complaints, or lawsuits during the past three years. The 2026 annual summary of Title VI investigations, complaints, or lawsuits is shown in **Appendix E**.

### **Organization & Title VI Program Responsibilities**

The CSPDC Executive Director serves as the Title VI Coordinator for BRITE Transit and is generally responsible for overseeing compliance with applicable nondiscrimination authorities in the transportation planning, programming, development, and operation process. Other staff members are expected to provide information and support to assist this staff member in performing his or her tasks.

#### **Responsibilities of the Title VI Coordinator:**

The Title VI Coordinator is responsible for supervising staff activities pertaining to nondiscrimination regulations and procedures set forth in federal guidance and in accordance with the BRITE Title VI Plan. In support of this, the Title VI Coordinator will:

- Maintain/oversee overall responsibility for Title VI compliance

- Identify, investigate, and work to eliminate discrimination when it is found to exist
- Coordinate Title VI implementation and process discrimination complaints
- Coordinate Title VI reviews and education and training
- Process discrimination complaints
- Maintain Title VI documentation

For questions on the BRITE Title VI Plan and procedures, please contact the CSPDC by phone (540) 885-5174 or by email at [cspdc@cspdc.org](mailto:cspdc@cspdc.org).

### **Annual Nondiscrimination Assurance to the Federal Transit Administration & Virginia Department of Rail and Public Transportation:**

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

### **Title VI Clauses in Contracts:**

The CSPDC/BRITE is responsible for selection, negotiation, and administration of its transit contracts. The CSPDC/BRITE operates under its internal contract procedures and all relevant federal and state laws.

In all procurements requiring a written contract, CSPDC's/BRITE's contract will include the federal nondiscrimination clauses. The Title VI Coordinator will work with the assigned Program Managers to ensure that these clauses are appropriately included in all contracts.

CSPDC/BRITE staff is responsible for evaluating and monitoring consultant contracts for compliance with nondiscrimination authorities. CSPDC/BRITE staff will:

- Ensure inclusion of nondiscrimination language in contracts and procurement documents.
- Ensure that all consultants verify their compliance with nondiscrimination authorities, procedures, and requirements. If a recipient or sub-recipient is found to be not in compliance with nondiscrimination authorities, the Title VI Coordinator and relevant staff will work with the recipient or sub-recipient to resolve the deficiency status and write a remedial action if necessary.
- Review outreach activities to ensure small, disadvantaged, minority, women, and disabled veteran businesses are not excluded to participate in opportunities to compete for consulting contracts.

## **Public Outreach & Involvement Process**

Public outreach and participation are vital to transit service planning efforts. The goal is to provide early and ongoing notification to the public related to any actions or decisions regarding service delivery, routes, stops and schedules, and fare structures.

### **Public Participation Plan**

In addition to operating BRITE, the CSPDC also acts as administrator for the Staunton-Augusta-Waynesboro Metropolitan Planning Organization (SAWMPO) which oversees the continuing, cooperative, and comprehensive (3C) transportation planning process for the region in which the BRITE transit service

operates. The SAWMPO develops the regional Transportation Improvement Program (TIP), the Long-Range Transportation Plan, assists the member jurisdictions with development of their transportation planning documents, provides all public transportation planning needs, promotes multi-modal transportation options for the region, and provides other services as needed. The SAWMPO performs this work through an appointed Policy Board and Technical Advisory Committee.

BRITE adheres to the SAWMPO Public Participation Plan, approved March 18, 2026, to guide the public outreach and involvement process for the BRITE transit program. This plan describes procedures for inclusive public participation that ensure access to low-income and minority populations to the transit agency's activities and programs. The SAWMPO Public Participation Plan is included in **Appendix G**.

The SAWMPO Public Participation Plan serves as the baseline requirement for public involvement in transit operations and planning activities. In some cases, transit activities may require public outreach and engagement beyond what is included in the MPO's Public Participation Plan. BRITE will make these decisions on a case-by-case basis, taking into consideration the extent to which the activity impacts transit-dependent populations. At no point will BRITE conduct public participation activities that are sub-standard to the MPO's Public Participation Plan.

### Public Outreach for Disadvantaged Populations

In seeking public comments and review, CSPDC/BRITE makes a concerted effort to reach all segments of the population, including people from historically disadvantaged populations, such as minority and low-income communities, persons with disabilities, and persons with language access barriers.

The CSPDC/BRITE collects and analyzes demographic data on an ongoing basis to ensure the organization is meeting Title VI obligations. Analysis of demographic trends within the transit service area allows the CSPDC/BRITE to evaluate the implications of past and future transit service changes – including how those changes may impact different groups within the service area.

Demographic data collection and analysis are conducted in furtherance of the following non-discrimination obligations under Title VI of the Civil Rights Act of 1964 and applicable federal regulations:

- To ensure the level and quality of transit services and benefits are provided without regard to race, color, or national origin
- To identify and avoid disproportionately high and adverse human health and environmental effects on low-income and minority populations
- To ensure full and fair participation by all potentially affected communities in the planning process
- To prevent the denial of, reduction in, or significant delay in receipt of benefits by low-income and minority populations; and
- To ensure meaningful access to BRITE Transit services by persons with language access barriers.

The CSPDC/BRITE updates the demographic analysis each time the Title VI Plan is updated or sooner if warranted. The most recent demographic analysis can be found in **Appendix F**. A separate Four-Factor Analysis is conducted to identify individuals with language access barriers in the BRITE Transit service area. The Four-Factor Analysis is reviewed at the time of each Title VI Plan update. The most recent Four-Factor Analysis can be found in **Appendix K**.

## Public Outreach Strategies

To reach disadvantaged populations within the BRITE Transit service area, CSPDC/BRITE collaborates with community groups and partner organizations to identify strategies best aligned with the populations they represent. CSPDC/BRITE staff work with organizations vested in the BRITE Transit service area, such as human service organizations, senior service organizations, workforce development programs, local government partners, and business associations.

In addition to these community partnerships, CSPDC/BRITE will establish and maintain active relationships with all relevant local media, including minority-based media (where available), to communicate pertinent information to the public. CSPDC/BRITE will also provide opportunities for public participation through a variety of mediums which may include but is not limited to printed materials, online engagement through the BRITE Transit website and Social Pinpoint platform, customer satisfaction and community surveys, public meetings, and both virtual and in-person outreach events.

## Implementation and Compliance

CSPDC/BRITE staff is responsible for evaluating and monitoring compliance with applicable nondiscrimination authorities in all aspects of the CSPDC/BRITE public participation process. CSPDC/BRITE staff members will:

- Ensure that all communications and public participation efforts comply with nondiscrimination authorities and distribute nondiscrimination information for CSPDC/BRITE programs to the general public.
- Provide accommodations where necessary to reduce and remove barriers to participation – with three (3) business days advance notice, CSPDC/BRITE will provide interpreters, translators, and accessible documents for individuals with sensory disabilities and individuals with language access barriers. Notifications of opportunities for public participation will include information on how to request accommodation.
- Include the BRITE Title VI Public Notice in all of the CSPDC/BRITE public notices, press releases, and post on the CSPDC and BRITE websites.

## Public Involvement in Transit Service Planning

Since transportation has a direct and personal impact on the population of a region and is of critical importance to economic vitality and quality of life, the CSPDC/BRITE continually endeavors to provide citizens, affected public agencies, and other interested parties with reasonable opportunities to be involved in transportation planning, programming, development, and operation process. The work of the CSPDC/BRITE is guided by the CSPDC Board of Commissioners and BRITE Transit Advisory Committee (BTAC).

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.” Actions such as establishing new service, adjusting fares, making major service modifications, or suspending or abandoning bus routes include formal review by the BTAC, CSPDC, and/or SAWMPO, supported by meaningful public engagement conducted by staff.

Public engagement methods may include public hearings, public meetings, distribution of written materials at major transfer points, informational flyers, and postings on the CSPDC and BRITE websites and social media. Notices describing proposed actions and any scheduled hearings are posted on buses and may be published in local newspapers. All public comments received through any outreach channel become part of the official record, and a public comment opportunity is provided at each scheduled meeting. Beyond fare changes and major service reductions, any change in service can be subject to appropriate public engagement, with customers notified prior to implementation.

If special accommodation is desired at any public meeting held by the CSPDC/BRITE, the public can call at least three (3) business days prior to the meeting to arrange the proper accommodations. The CSPDC/BRITE will provide language interpretation, including sign language, upon request. All CSPDC/BRITE public meetings are held at accessible locations, in accordance with the Americans with Disabilities Act of 1990, and served by public transit.

To ensure all persons have meaningful access to the BRITE transit system and planned projects, CSPDC/BRITE will:

- Notify the public of Title VI protections by providing information on their websites, [www.cspdc.org](http://www.cspdc.org) and [www.britebus.org](http://www.britebus.org).
- Place Title VI Provisions and Notice Under the Americans with Disabilities Act notification in all revenue vehicles and at the BRITE Transit Facility.
- Conduct meetings and public hearings at locations and times that are accessible by public transit.
- Place the BRITE Title VI statement in the printed bus schedules.
- Conduct periodic customer satisfaction surveys that are distributed to passengers on vehicles and available electronically.
- Provide notice that public hearings/meetings for CSPDC/BRITE include the offer of sign language or non-English language interpreters.
- Contract with language interpretation services and maintain a list of available interpreters.
- Notify the public of rights.

A complete record of all public outreach and involvement activities is maintained. Title VI outreach activities that have been completed or are ongoing in the past three years can be found in **Appendix H**.

## System-Wide Service Standards & Policies

### Procedures for Ensuring Equity in Service Provision

The CSPDC/BRITE is required to plan and deliver transportation services in an equitable manner. This means the distribution of service levels and quality is to be equitable between minority and low-income populations and the overall population. The CSPDC/BRITE has reviewed its service standards and those of its sub-recipients to ensure that those services and benefits are provided in an equitable manner to all persons.

## Service Standards

BRITE Transit has set standards and policies that address how services are distributed across the service area to ensure that the distribution affords users equitable access to these services. BRITE's services are available to all on a first-come first service basis, without regard for race, color, or national origin.

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

- **Vehicle Load** is expressed as the ratio of passengers to the total number of seats on a vehicle at its maximum load point. The following chart details the current 24 vehicle fleet, including spares, used in the service and the vehicle load standard for each style or model of bus:

Vehicle Type	Seating Capacity	Standing Capacity	Total Capacity	Maximum Load Factor
Trolley Bus (1)	24	6	30	1.3
Small Bus (9)	14	3	17	1.2
Small-Med Bus (5)	20	4	24	1.2
Medium Bus (2)	24	5	29	1.2
Med-Large Bus (1)	26	6	32	1.2
Med-Large Bus (3)	28	7	35	1.3
Large Bus (1)	29	7	36	1.2
Large Bus (1)	31	8	39	1.3
Extended Bus (1)	32	8	40	1.3

- **Vehicle Headway** is the amount of time between two vehicles traveling in the same direction on a given route. A shorter headway corresponds to more frequent service.

Route	Weekday Hours	Weekday Headways	Saturday Hours	Saturday Headways
250 Connector	7:30AM – 9:30PM	60 minutes	8:30AM – 7:30PM	60 minutes
Downtown Trolley (May-Oct)	10:00AM – 9:00PM	30 minutes	10:00AM – 6:00PM	30 minutes
Downtown Trolley (Nov-Apr)	10:00AM – 6:00PM	30 minutes	10:00AM – 6:00PM	30 minutes
Saturday Night Trolley (May-Oct)			6:00PM – 10:00PM	60 minutes
Saturday Night Trolley (Nov-Apr)			6:00PM – 9:00PM	60 minutes
West/North Loops	6:30AM – 7:30PM	60 minutes	7:30AM – 5:30PM	60 minutes
Waynesboro Circulator	6:30AM – 6:30PM	60 minutes	7:30AM – 8:30PM	60 minutes
Stuarts Draft Link	6:50AM – 6:50PM	60 minutes		
BRCC Shuttles (Bus 1)	7:00AM – 7:00PM	60 minutes		

BRCC Shuttles (Bus 2)	7:30AM – 5:30PM	60 minutes		
Afton Express	4:40AM – 10:20AM; 3:00PM – 8:50PM	Variable		

Scheduling involves the consideration of a number of factors including: ridership productivity, density of transit-dependent population and activities, and demand for services. Recommended vehicle headways were established in the development of the BRITE Transit Development Plan.

- **On-Time Performance** is a measure of runs completed as scheduled. A vehicle operating in BRITE service is considered on time if it departs a scheduled time point no more than one (1) minute early and no more than five (5) minutes late. BRITE’s on-time performance objective is 90% or greater. On-time performance is continuously monitored through periodic ride-along/on-time performance checks and dispatch and daily driver reports, and is reviewed by supervisory staff, and provided to CSPDC staff on a monthly report. In situations where the reports indicate that a specific bus/route does not meet performance standard, schedule time points may require adjustment. Unanticipated delays caused by roadway incidents or weather are communicated to transit patrons through website service alerts, social media, and TextMarks SMS alerts for the commuter bus route.
- **Service Availability** is a general measure of the distribution of routes within a transit provider’s service area or the span of service. The standard for service availability has been established by the needs of the community for public transportation. BRITE distributes transit service so that 78% of all residents in the service area are within a ½ mile walk to bus service.

### Service and Operating Policies

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

- **Distribution and Siting of Transit Amenities** – Transit amenities refer to items of comfort, convenience, and safety that are available to the general riding public and are located throughout the transit system. The CSPDC/BRITE encourages and works with local jurisdictions to site benches and bus shelters. Future passenger amenities such as provision of information, Intelligent Transportation Systems (ITS), and benches/shelters will be sited equally across the system, when funding for these amenities is available.
- **Vehicle Assignment** – Vehicle assignment refers to the process by which transit vehicles are placed into service and on routes throughout the system. The BRITE turnkey contractor assigns vehicles with the goal of providing equitable benefits to all riders. Vehicles are assigned regarding service type (deviated fixed-route or paratransit) and ridership demand patterns (routes with greater numbers of passengers need vehicles with larger capacities). Currently, a majority of the BRITE fleet is of the same age, and vehicles are monitored and assigned to ensure that mileage is relatively equal.
- **Monitoring of Sub-Recipients** – There are no sub-recipients involved in the provision of the transit service.

## Service Planning and Management

CSPDC/BRITE staff are responsible for evaluating and monitoring compliance with applicable nondiscrimination authorities in all aspects of the BRITE transit service.

CSPDC/BRITE staff will:

- Ensure that all aspects of the planning and programming process operation comply with nondiscrimination authorities.
- Prepare and update a demographic profile of the region using the most current and appropriate statistical information available on race, income, and other pertinent data.
- Make the document available to the public and member agencies on the CSPDC and BRITE websites or in hard copy format, if requested.
- Continue to ensure that staff make concerted efforts to involve members of all social, economic, and ethnic groups in the planning process.

## Discrimination Complaint Procedures

Title VI of the Civil Rights Act of 1964, as amended, prohibits discrimination on the basis of race, color, or national origin. Subsequent laws added disability, sex, age, income status, and language access barriers to the criteria for which discrimination is prohibited, in programs and activities receiving federal financial assistance. As a recipient of federal assistance, the CSPDC/BRITE has adopted a Discrimination Complaint Procedure as part of BRITE Transit's Title VI Plan to comply with Title VI and associated statutes.

### Eligibility

Any person who believes that they, individually, as a member of any specific class, or in connection with any disadvantaged business enterprise, have been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964, as amended, or any nondiscrimination authority, may file a complaint with the CSPDC/BRITE. Instructions for filing Title VI complaints are posted on the CSPDC and BRITE websites, in print posters on the interior of each BRITE vehicle operated in passenger service, and are included within BRITE brochures. A complaint may also be filed by a representative on behalf of such a person. All complaints will be referred to the CSPDC Title VI Coordinator for review and action.

### Requirements

To have the complaint considered under the procedure, the complainant must file the complaint no later than 180 calendar days after:

- The date of the alleged act of discrimination; or
- Where there was a continuing course of conduct, the date on which that conduct occurred was discontinued.

The CSPDC may extend the time for filing or waive the time limit in the interest of justice, specifying in writing the reason for so doing.

Complaints shall be in writing and shall be signed by the complainant and/or the complainant's representative. Complaints should set forth as fully as possible the facts and circumstances surrounding the claimed discrimination. In the event that a person makes a verbal complaint of discrimination to an officer or employee of the CSPDC/BRITE, the person shall be interviewed by the Title VI Coordinator. If necessary, the Title VI Coordinator will assist the person in putting the complaint in writing and submit the written version of the complaint to the person for signature. The complaint shall then be handled in the usual manner.

## Complaint Review Process

Within ten (10) days, the CSPDC Title VI Coordinator will acknowledge receipt of the allegation in writing, inform the complainant of action taken or proposed action to process the allegation, advise the respondent of their rights under Title VI and related statutes, and advise the complainant of other avenues of redress available, such as DRPT and FTA.

Within ten (10) days, a letter will be sent to the DRPT Public Information Officer and a copy to the FTA. This letter will list the names of the parties involved, the basis of the complaint, and the assigned investigator. In the case of a complaint again, the CSPDC and an FTA or DRPT investigator (as appropriate) will prepare a final investigative report and send it to the complainant, respondent, the CSPDC Title VI Coordinator, and FTA.

Generally, the following information will be included in every notification to the DRPT Public Information Officer:

- Name, address, and phone number of the complainant
- Name(s) and address(es) of alleged discriminating official(s)
- Basis of complaint (i.e., race, color, national origin, sex, age, handicap/disability, income status, language access barrier)
- Date of alleged discriminatory act(s)
- Date of complaint received by the recipient
- A statement of the complaint
- Other agencies (state, local, or federal) where the complaint has been filed
- An explanation of the actions the recipient has taken or proposed to resolve the issue raised in the complaint

Within sixty (60) days, the CSPDC Title VI Coordinator will conduct and complete an investigation of the allegation and based on the information obtained, will render a recommendation for action in a report of findings to the recipient of federal assistance. The complaint should be resolved by informal means whenever possible. Such informal attempts and their results will be summarized in the report of findings.

Within ninety (90) days of receipt of the complaint, the CSPDC Title VI Coordinator will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the complainant of his/her appeal rights with the DRPT or FTA, if they are dissatisfied with the final decision rendered by the CSPDC. The CSPDC's Title VI Coordinator will also provide the DRPT Public Information Officer with a copy of the determination and report findings.

In the case of a nondiscrimination complaint that originated at the CSPDC and is turned over to and investigated by DRPT, FTA, or another agency, the CSPDC Title VI Coordinator will monitor the investigation and notify the complainant of updates, in accordance with applicable regulations and DRPT policies and procedures.

In accordance with federal law, the CSPDC will require that applicants of federal assistance notify the CSPDC of any lawsuits filed against the applicant or sub-recipients of federal assistance or alleging discrimination; and a statement as to whether the applicant has been found in noncompliance with any relevant civil rights requirements.

The CSPDC will submit Title VI accomplishment reports to DRPT in compliance with their established processes. The CSPDC will collect demographic data on staff, committees, and program areas in accordance with 23 CFR, 49 CFR, and DRPT's established procedures and guidelines. Pursuant to the Virginia Public Records Act (VPRA) § 42.1-76 et seq., the CSPDC will retain Discrimination Complaint Forms and a log of complaints filed with or investigated by the CSPDC. Records of complaints and related data will be made available by request in accordance with the Virginia Freedom of Information Act (FOIA).

The CSPDC will investigate all complaints received. The CSPDC shall have sixty (60) days from receipt of written complaint to investigate the complaint and respond to the complainant in writing with a determination. The complainant may appeal this determination to the Federal Transit Administration or the United States Department of Transportation within thirty (30) days of receipt of the determination. The CSPDC/BRITE Title VI Complaint Form is included in **Appendix I**.

### FTA Process:

The letters of finding and resolution will offer the complainant and the recipient or sub-recipient the opportunity to provide additional information that would lead FTA to reconsider its conclusions. In general, FTA requests that the parties in the complaint provide this additional information within sixty (60) days of the date the FTA letter of finding was transmitted. After reviewing this information, FTA's Office of Civil Rights will respond either by issuing a revised letter of resolution or finding to the party, or by informing the party that the original letter of resolution or finding remains in force. FTA strives to transmit these letters within thirty (30) to sixty (60) days of receiving the complaint.

### Filing a Complaint Directly to the U.S. Department of Transportation:

A Title VI complaint may be filed with the U.S. Department of Transportation by contacting the Department at:

Federal Transit Administration  
Office of Civil Rights  
Attention: Director, FTA Office of Civil Rights  
East Building, 5<sup>th</sup> Floor – TCR  
1200 New Jersey Avenue, SE  
Washington, D.C. 20590

## Complaint Database:

Title VI Complaints will be archived in a complaint database and reviewed every three (3) years to see if patterns are present or evolving and to ensure that issues are being resolved.

The Civil Rights Complaint Database includes:

- The name and address of the person(s) filing the complaint
- Type of complaint
- Date of the complaint, investigation, or lawsuit
- The basis of the complaint
- Summary of the allegations
- Actions taken by the CSPDC/BRITE
- Status of the complaint, investigation, or lawsuit

The CSPDC/BRITE has never had any Title VI investigations, lawsuits, or complaints. Additionally, CSPDC/BRITE has not received any Title VI compliance reviews related to any federally funded projects within the past three years, nor has any Federal agency found CSPDC/BRITE to be in noncompliance with any civil rights requirement(s).

## Minority Representation on Planning and Advisory Bodies

BRITE established a BRITE Transit Advisory Committee (BTAC) which makes recommendations to the CSPDC regarding the operation of the BRITE transit system and supports the provision of public transportation. The BTAC is composed of the following voting representatives, or their alternates, designated by and representing their respective jurisdictions or agencies, and shall be appointed by the CSPDC Commission:

1. One (1) member from each of the current transit funding partners:
  - a. City of Staunton
  - b. Augusta County
  - c. City of Waynesboro
  - d. Augusta Health
  - e. Blue Ridge Community College (BRCC)
  - f. Shenandoah Valley Social Services (SVSS)
  - g. Wilson Workforce & Rehabilitation Center (WWRC)
  - h. Staunton Downtown Development Association (SDDA)
  - i. Valley Community Services Board (VCSB)
2. Two (2) members of the general public who utilize the transit system on a regular basis
3. One (1) non-voting member representing the staff of the Virginia Department of Rail and Public Transportation (DRPT)
4. One (1) non-voting member representing the contracted service provider
5. One (1) member representing any future funding partner(s)

Among the above individuals, the interests of the following demographic groups shall be represented: elderly population, persons with disabilities, minority populations, those with language access barriers,

and low income populations. BRITE makes a continual effort to recruit minority representation on the BTAC by advertising open positions on the BRITE website, BRITE social media, posters on the buses, press releases, and through BRITE community partners' outreach channels.

**Appendix J** contains a breakdown of the BTAC by race, and gender are noted.

## Equity Analysis in Siting and Location of Facilities

FTA Circular 4702.1B requires that recipients conduct an equity analysis when siting or locating new transit facilities to ensure that facility placement decisions do not result in a disparate impact on minority populations or a disproportionate burden on low-income populations. For purposes of this requirement, facilities include storage facilities, maintenance facilities, and operations centers; they do not include bus shelters, which are considered transit amenities, nor transit stations, power substations, and similar infrastructure evaluated through the National Environmental Policy Act (NEPA) process. When a new facility site is under consideration, CSPDC/BRITE will conduct an equity analysis in accordance with FTA guidance and will document findings as part of the Title VI Program record.

As of the most recent update to this Title VI plan, no additional facilities requiring an equity analysis are planned.

# Appendices

- Appendix A: Resolution
- Appendix B: CSPDC Organizational Chart
- Appendix C: CSPDC Commissioner Membership
- Appendix D: Notice of Title VI Provisions & ADA Notice
- Appendix E: Title VI Investigations, Lawsuits & Complaints Log
- Appendix F: Demographic Analysis
- Appendix G: SAWMPO Public Participation Plan
- Appendix H: Public Outreach Activities
- Appendix I: Title VI Complaint Forms
- Appendix J: BRITE Transit Advisory Committee Membership
- Appendix K: Four-Factor Analysis & Demographic Profile

# Appendix A: Resolution Approving Title VI Plan Update



## RESOLUTION

### Approving and Adopting the BRITE Title VI Plan

**WHEREAS**, Title VI of the Civil Rights Act of 1964 (U.S.C. 200D) provides that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving Federal financial assistance; and

**WHEREAS**, the Federal Transit Administration requires that any organization that is the recipient of Federal financial assistance shall have an adopted Title VI Plan and Policy; and

**WHEREAS**, the Central Shenandoah Planning District Commission is the direct recipient of Federal Transit Administration Formula Grants intended for the operation of public transit service in the Staunton-Augusta-Waynesboro region.

**NOW THEREFORE, BE IT RESOLVED**, that the Central Shenandoah Planning District Commission does hereby approve and adopt the Title VI Plan dated May 5, 2026.

Adopted by the CSPDC this 15th day of June 2026.

  
\_\_\_\_\_  
Frank Friedman  
CSPDC Chairperson

**ATTEST:**

  
\_\_\_\_\_  
Kimberly Miller  
Clerk of the Commission

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112 MacTanly Place, Staunton, VA 24401  
Phone: (540) 885-5174 · Fax: (540) 885-2687 · [www.cspdc.org](http://www.cspdc.org)

# Appendix B: CSPDC Organizational Chart

# CSPDC ORGANIZATION CHART



**Ann Cundy**

**Executive Director**

Responsible for the overall administration and direction of the Commission which serves a regional area of five counties, five cities and 11 towns.  
Hired 4/2013



**Jeremy Crute**

**Director of Planning**

Responsible for all planning projects and coordination of services in the areas of community development, economic development, housing, emergency management and environmental. Hired 2/2022



**Kimberly Miller**

**Office Manager**

Responsible for Human Resources administration, and oversees building and office management functions. Hired 8/2012



**Donnie Kern**

**Finance Director**

Responsible for the development of the budget, accounting, financial management and reporting systems for the organization. Hired 1/2024



**Paula Melester**

**Director of Transportation**

Responsible for regional transportation programs, including metropolitan and rural planning, transit, transportation demand management, bike and pedestrian planning, and the interface of land use and transportation. Hired 12/2021



**Philippe Bone**

**Regional Planner**

Provides planning services for local governments in the areas of community and economic development, housing, and recreation. Hired 4/2024



**Elizabeth Goodloe**

**Regional Planner**

Provides planning services for local governments in the areas of community and economic development. Hired 10/2024



**Rachel Kinzer**

**Regional Planner**

Provides planning services for local governments in the areas of environmental and emergency management. Hired 6/2024



**Carrie Sensabaugh**

**Administrative Assistant**

Provides routine and non-routine administrative support to the organization, ensuring operations of the Commission are carried out in an efficient and timely manner. Hired 11/2024



**Richard Sagui**

**Accountant**

Assists the Finance Director in all areas of the Commission's accounting system, and is responsible for Accounts Payable and Receivables. Hired 8/2024



**Zach Beard**

**Transportation Manager**

Responsible for all Transportation programs SAWMPO, HRMPO and Rural Transportation programs and planning for Environmental programs. Hired 1/2019



**Devon Thompson**

**Transit Manager**

Responsible for management and oversight of the region's public transit system (BRITE) and coordinating public transportation planning. Hired 1/2013



**Garreth Bartholomew**

**Transportation Planner**

Provides planning services for localities related to transportation; supports the Staunton-Augusta-Waynesboro and Harrisonburg-Rockingham MPOs. Hired 4/2024



**Danielle Gannon**

**Transit Planner**

Responsible for the public relations as well as support and coordination of the Transit and Rideshare Programs. Hired 8/2024

## Appendix C: CSPDC Commissioner Membership

CSPDC Commission members are appointed by their respective governing bodies. Each member jurisdiction is entitled to at least one representative on the Commission. Larger communities have several members based upon a board member allocation formula based on population.

<b>Locality</b>	<b>Commissioner</b>
Augusta County	Carolyn Bragg, Board of Supervisors
Augusta County	Julia Hensley, Non-Elected Representative
Augusta County	<i>Vacant</i>
Bath County	Lynn Ellen Black, Board of Supervisors
Buena Vista	Jesse Lineberry, City Council
Harrisonburg	Laura Dent, City Council
Harrisonburg	Nasser Alsaadun, City Council
Harrisonburg	Adam Fletcher, Non-Elected Representative
Highland County	Henry Budzinski, Board of Supervisors
Lexington	Frank Friedman (Chair), City Council
Rockbridge County	Chris Slaydon, Non-Elected Representative
Rockbridge County	<i>Vacant</i>
Rockingham County	Joel Hensley, Board of Supervisors
Rockingham County	Sallie Wolfe-Garrison, Board of Supervisors
Rockingham County	Rachel Salatin, Non-Elected Representative
Rockingham County	Kim Sandum, Non-Elected Representative
Staunton	Brad Arrowood, City Council
Staunton	Sharon Angle, Non-Elected Representative
Waynesboro	Terry Short, City Council
Waynesboro	Leslie Tate, Non-Elected Representative

# Appendix D: Notice of Title VI Provisions & ADA Notice



## Notice of Title VI Provisions

Central Shenandoah Planning District Commission (CSPDC) and Virginia Regional Transit (VRT) are committed to ensuring that no person is excluded from participation in, or denied the benefits of transit services on the basis of race, color or national origin, as protected by Title VI of the Civil Rights Act of 1964.

For information on BRITE's Title VI obligations or to access Title VI complaint forms and procedures go to [www.britebus.org](http://www.britebus.org), or contact Bonnie Riedesel, Executive Director, CSPDC, 112 MacTanly Place, Staunton, VA 24401 by mail, 540-885-5174 by phone, or [bonnie@cspdc.org](mailto:bonnie@cspdc.org) by email.

### Spanish:

Central Shenandoah Planning District Commission (CSPDC) y Virginia Regional Transit (VRT) se compromete a garantizar que ninguna persona sea excluida de participar en, o ser negado de los beneficios de sus servicios de tránsito basado en raza, color, origen o nacionalidad, protegida por el Título VI de la Ley de Derechos Civiles de 1964.

Para obtener información sobre las obligaciones del Título VI de BRITE o para acceder a los formularios y procedimientos de queja del Título VI, visite [www.britebus.org](http://www.britebus.org), o comuníquese con Bonnie Riedesel, Directora Ejecutiva, CSPDC, 112 MacTanly Place, Staunton, VA 24401 por correo, 540-885-5174 por teléfono o [bonnie@cspdc.org](mailto:bonnie@cspdc.org) por correo electrónico.

## NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 (ADA), BRITE and Virginia Regional Transit (VRT) will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

**Employment:** BRITE and VRT do not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under Title I of the ADA.

**Effective Communication:** BRITE and VRT will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in BRITE's and VRT's programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

**Modifications to Policies and Procedures:** BRITE and VRT will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, and activities. Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in BRITE and VRT programs, services, or activities, should contact the ADA Coordinator, Bonnie Riedesel at 540-885-5174 or [bonnie@cspdc.org](mailto:bonnie@cspdc.org), as soon as possible but no later than 48 hours before the scheduled event.

The ADA does not require BRITE and VRT to take any action that would fundamentally alter the nature of its programs or services, or impose any undue financial or administrative burden.

Complaints that BRITE and VRT programs, services, or activities are not accessible to persons with disabilities should be directed to the ADA Coordinator, Bonnie Riedesel at 540-885-5174 or [bonnie@cspdc.org](mailto:bonnie@cspdc.org).

BRITE and VRT will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy.

If you believe you have been subjected to discrimination under Title VI based on your race, color, national origin, or any aspect of this policy, you may file a complaint up to 180 days from the date of the alleged discrimination.

The complaint should include the following information:

- Your name, address, and how to contact you (i.e., telephone number, email address, etc.)
- How, when, where, and why you believe you were discriminated against.
- The location, names and contact information of any witnesses.

The complaint may be filed in writing to:

Virginia Regional Transit	or	Central Shenandoah Planning District Comm.
Attn: Title VI Manager		Attn: Title VI Coordinator
109 North Bailey Lane		112 MacTanly Place
Purcellville, Virginia 20132		Staunton, VA 24401

### Spanish:

Si usted cree que ha sido objeto de discriminación bajo el Título VI sobre la base de su raza, color, origen nacional, o cualquier otro aspecto de esta política, puede presentar una queja, hasta 180 días a partir de la fecha de la supuesta discriminación.

La queja debe incluir la siguiente información:

- Su nombre, dirección, y cómo ponerse en contacto con usted (es decir, número de teléfono, dirección de correo electrónico, etc.)
- Cómo, cuándo, dónde y por qué cree que fue discriminado.
- La ubicación, nombres e información de contacto de cualquier testigo.

La queja puede ser presentada por escrito a:

Virginia Regional de Tránsito	or	Central Shenandoah Planning District Comm.
Atención: el Título VI Director		Attn: Title VI Coordinator
109 Norte Bailey Lane		112 MacTanly Place
Purcellville, Virginia 20132		Staunton, VA 24401

**A Title VI complaint may be filed directly with the U.S. Department of Transportation by contacting the Department at:**  
**U.S. Department of Transportation**  
**Federal Transit Administration's Office of Civil Rights**  
**1200 New Jersey Avenue, SE**  
**Washington, D.C. 20590**

## BRITE's and VRT's ADA Grievance Procedure

This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 (ADA). It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by BRITE and VRT.

The Complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant, location, date, and description of the alleged discrimination. Alternative means of filing complaints, such as personal interviews or tape recording of the complaint, will be made available for persons with disabilities upon request.

The complaint should be submitted by the complainant and/or their designee as soon as possible but no later than 60 calendar days after the alleged violation by submitting the ADA complaint form located on the website ([www.britebus.org](http://www.britebus.org)) or to:

Bonnie Riedesel, ADA Coordinator  
112 MacTanly Place  
Staunton, VA 24401  
540-885-5174  
TTY/TDD (for the deaf or hard-of-hearing) 1-800-828-1120 or 711

Within 15 calendar days after receipt of the complaint the ADA Coordinator or their designee will meet with the complainant to discuss the complaint and the possible resolution. Within 15 calendar days of the meeting the ADA Coordinator or their designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille or audio tape. The response will explain BRITE's and VRT's position and offer options for substantive resolution of the complaint.

If BRITE's and VRT's responses do not satisfactorily resolve the issue, the complainant and/or their designee may appeal the decision within 15 calendar days after receipt of the response to the Virginia Department of Rail and Public Transportation.

All written complaints received by the ADA Coordinator or their designee, appeals to the Department of Rail and Public Transportation or their designee, and responses from these two offices will be retained by BRITE and VRT for at least three years.

# Appendix E: Title VI Investigations, Lawsuits & Complaints Log

BRITE Title VI Investigations, Lawsuits, and Complaints

## Complaint Log

	Date Notified	Race	Color	National Origin	Name of Complainant	Date of Occurrence	Location of Occurrence	Date of Closure	Notes and Results
Investigations									
Lawsuits									
Complaints									

## Complaint Tracking

Year	Number of Complaints	Year	Number of Complaints
2021	0	2024	0
2022	0	2025	0
2023	0	2026	0

## Appendix F: Demographic Analysis

The following demographic analysis was completed using the 2020-2024 American Community Survey (ACS) 5-year estimates – the most recent data available at the time this plan was last updated. Disadvantaged groups in the BRITE Transit service area include individuals experiencing poverty, minority populations, disabled populations, and individuals experiencing language access barriers. The following maps in Figures 1-3 outline the geographic distribution of individuals experiencing poverty, minority populations, and disabled populations. Consideration of individuals with language access barriers is addressed in the Four-Factor Analysis located in **Appendix K** of this document.

### Poverty

BRITE staff seek to identify and address the needs of low-income populations with regard to transit services. Individuals and households living below the federal poverty level frequently face compounding barriers to transportation access, including limited vehicle ownership, reduced mobility, and geographic isolation from employment, healthcare, and essential services.

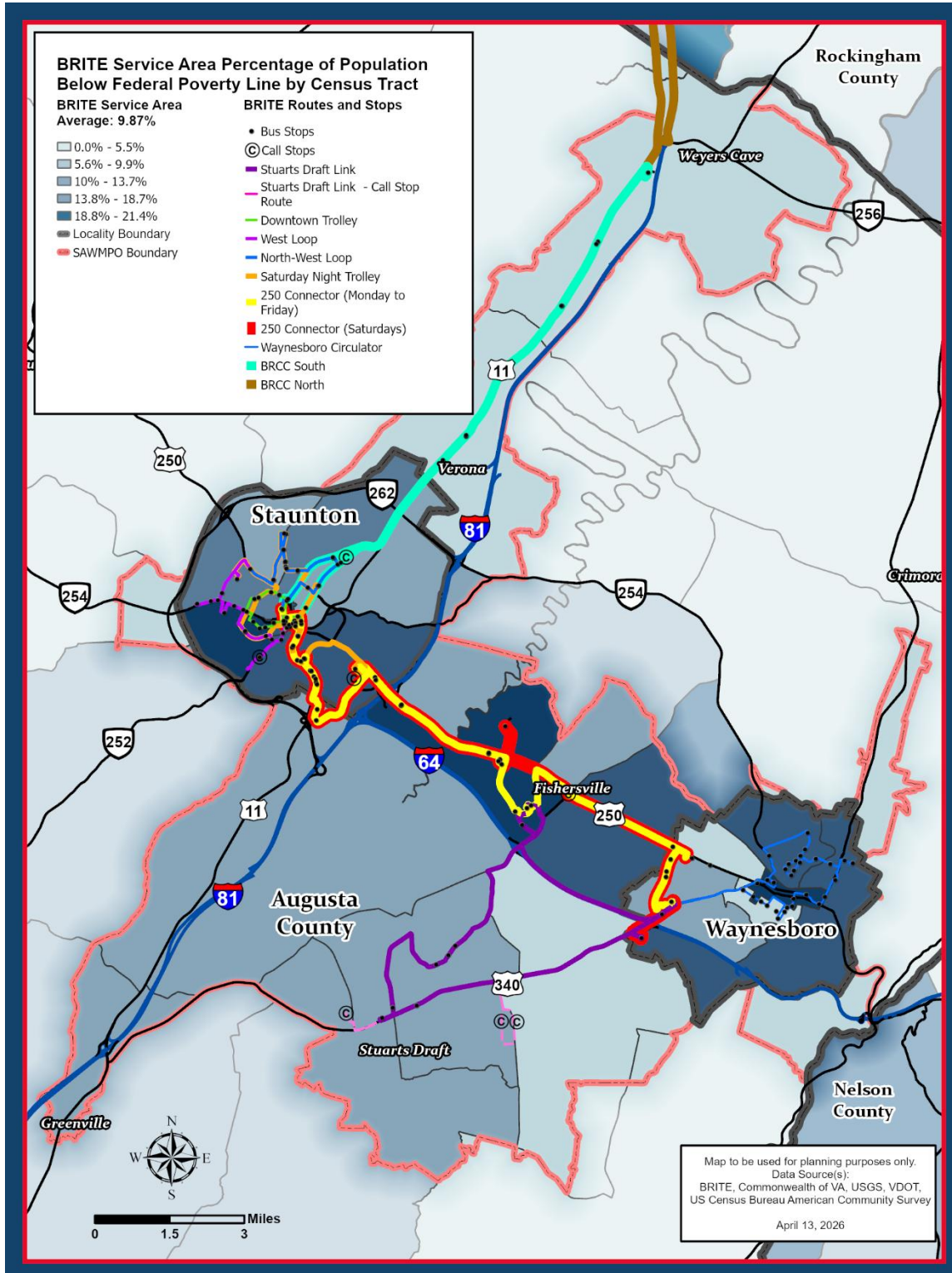
Approximately 8,732 residents, or 9.87% of the population within the BRITE service area, which predominately falls within the SAWMPO, are determined to have incomes below the federal poverty level. The regional average of 9.87% reflects variation across census tracts, and levels of poverty are found throughout all three jurisdictions. **Table 1** provides the percentage of poverty compared to the total population for each city and county within the BRITE service area. The map in **Figure 1** illustrates the concentration of the population living below the federal poverty level by census tract, along with an overlay of the BRITE routes. Notably, BRITE routes correspond appropriately with higher reported poverty levels.

**Table 1. Population Below Poverty Level, BRITE Transit Program Area (2020–2024 ACS 5-Year Estimates)**

Jurisdiction*	Total Population	Population Below Poverty Level	Percentage
Augusta County	75,204	4,993	6.61%
Augusta County (SAWMPO Urbanized Portion)	41,593	3,187	7.66%
City of Staunton	24,234	3,007	12.41%
City of Waynesboro	22,611	2,538	11.22%
<b>SAWMPO Region Total</b>	<b>88,438</b>	<b>8,732</b>	<b>9.87%</b>

\* Poverty counts are scaled proportionally from 2020–2024 ACS 5-Year Estimates at the census tract level. Population totals differ from the full county row because different ACS table universes are used; this difference is expected and does not affect the reported poverty rate.

**Figure 1. BRITE Service Area Percentage of Population Below Federal Poverty Line by Census Tract (2020–2024 ACS 5-Year Estimates)**



## Minority Populations

To ensure equitable access to transit services across all communities served, BRITE staff seek to identify and address the needs of minority populations within the service area. Minority populations include all people who have not identified themselves as White (Non-Hispanic or Latino and Single Race Alone) in U.S. Census race and ethnicity questions.

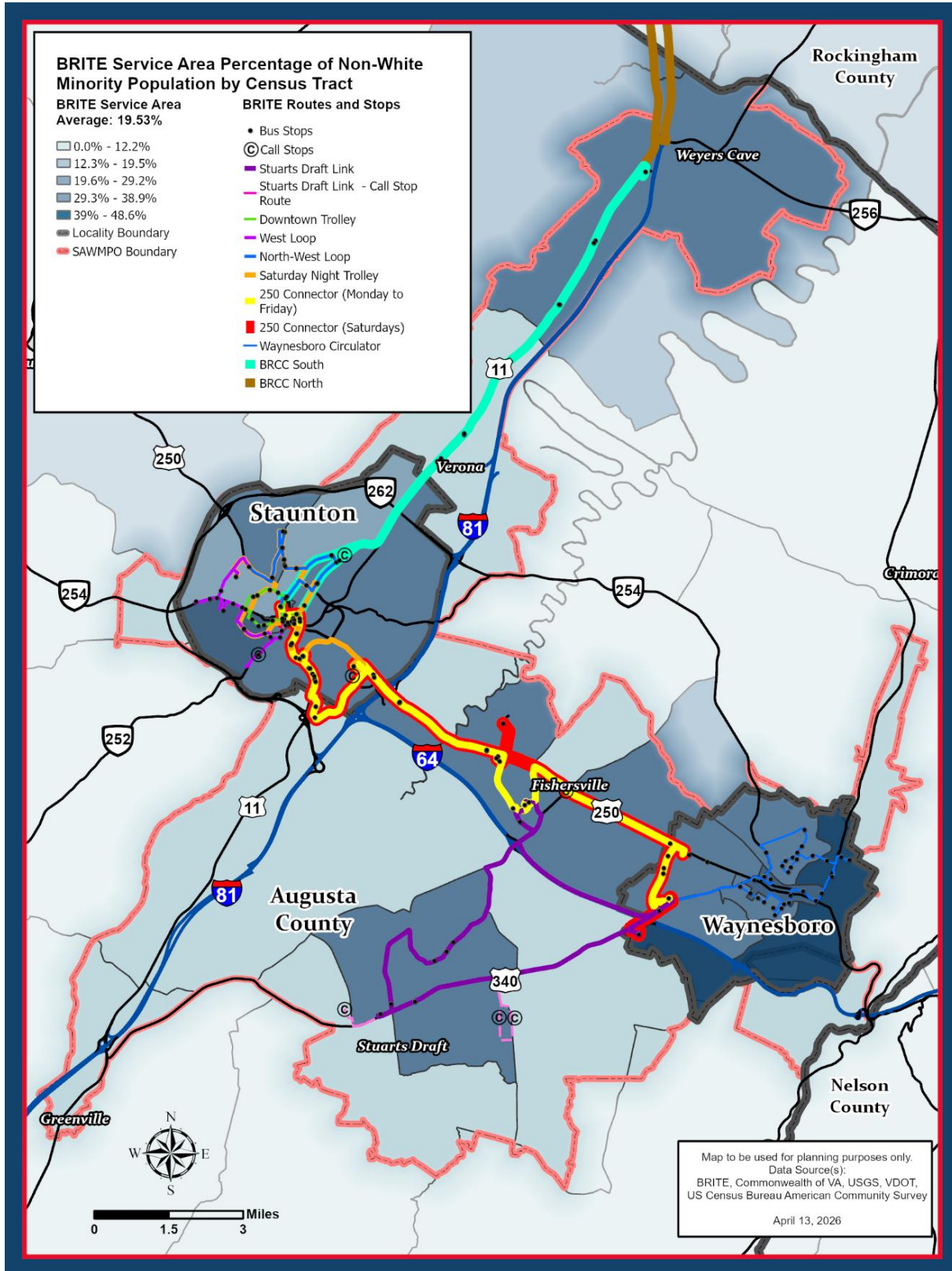
The overall percentage of the minority population within the BRITE service area is 19.53%, with a total minority population of 17,650. The cities of Staunton and Waynesboro have the largest minority populations, and both exceed the total boundary average. **Table 2** provides the minority population percentages compared to the total population for each jurisdiction within the BRITE service area. The map in **Figure 2** illustrates the concentration of minority population by census tract.

**Table 2. Minority Population, BRITE Transit Program Area (2020–2024 ACS 5-Year Estimates)**

Jurisdiction*	Total Population	Minority Population	Percentage of Minority Population
Augusta County	78,033	9,380	12.02%
Augusta County (SAWMPO Urbanized Portion)	41,593	5,542	13.32%
City of Staunton	25,948	5,618	21.65%
City of Waynesboro	22,841	6,490	28.41%
<b>SAWMPO Region Total</b>	<b>90,382</b>	<b>17,650</b>	<b>19.53%</b>

\* Minority Population is defined as Total Population minus the White Alone, Not Hispanic or Latino population. This standard federal method (per FTA and DOT Title VI guidance) captures all five federally recognized minority groups: American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, and Hispanic or Latino of any race, without double-counting individuals who identify as both White and Hispanic. The Augusta County (SAWMPO Urbanized Portion) row reflects a population-weighted estimate using the same tract-level inclusion factors and MPO control total.

**Figure 2. BRITE Service Area Percentage of Non-White Minority Population by Census Tract (2020–2024 ACS 5-Year Estimates)**



## Disabled Populations

The Americans with Disabilities Act (ADA) of 1990 and Section 504 of the Rehabilitation Act of 1973 prohibit discrimination against individuals with disabilities in transportation programs and services receiving federal financial assistance. For Title VI planning purposes, understanding where concentrations of individuals with disabilities exist within the BRITE service area is essential to ensuring that planning regarding transit investments, service, infrastructure improvements, and public participation processes are accessible and equitable.

According to the 2020–2024 American Community Survey (ACS) 5-Year Estimates, approximately 14,363 individuals, or 16.10% of the total civilian noninstitutionalized population within the BRITE service area (SAWMPO region) reported living with a disability. Waynesboro has the highest disability rate of the three jurisdictions at 19.84%, followed by Staunton at 15.20% and the Augusta County urbanized portion of the MPO at 14.60%. **Table 3** below presents the disability population by jurisdiction. The map in **Figure 3** illustrates the concentration of individuals with a disability by census tract within the BRITE service area.

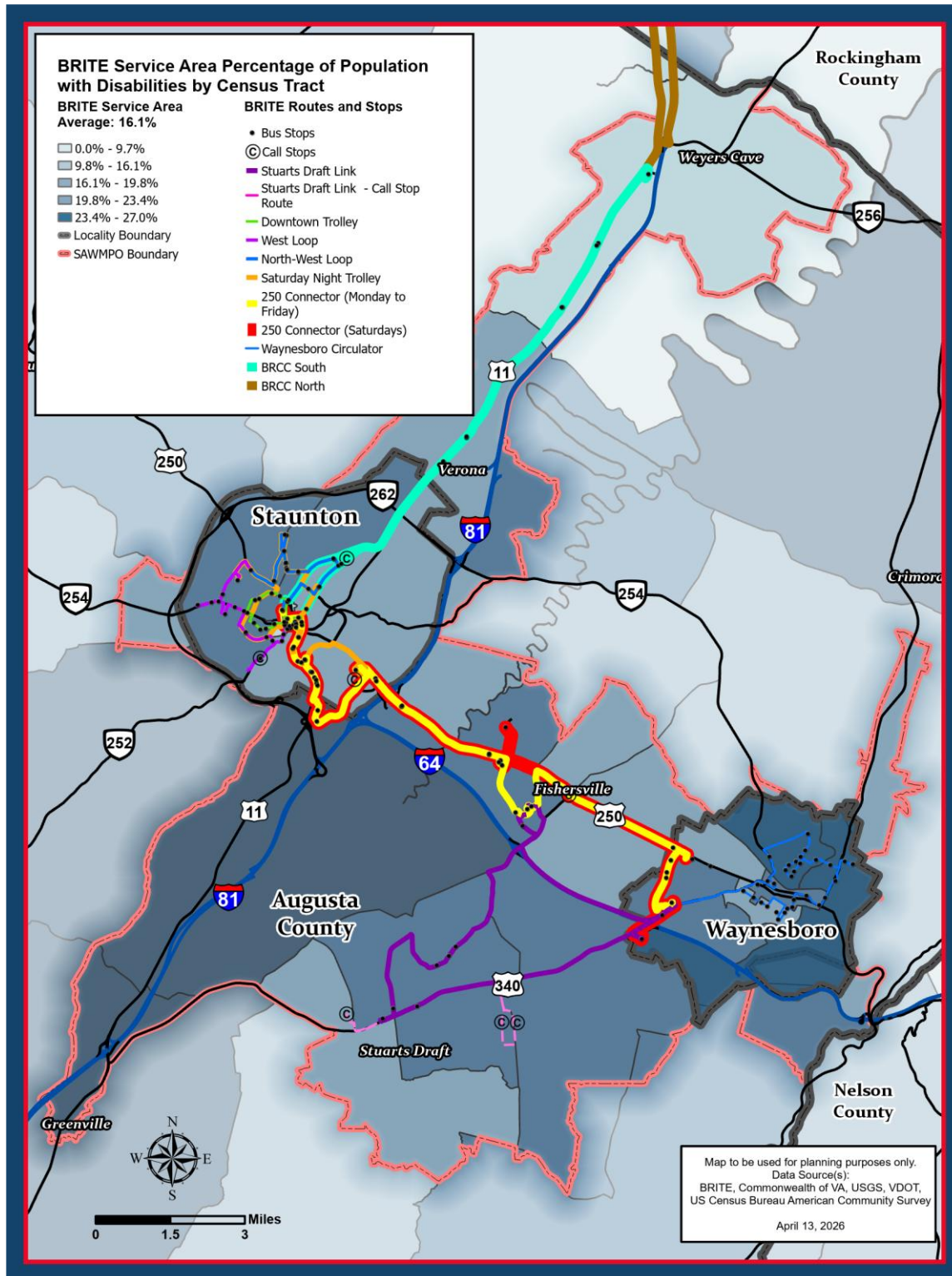
**Table 3. Disabled Population, BRITE Transit Program Area (2020–2024 ACS 5-Year Estimates)**

Jurisdiction*	Total Civilian Non-Institutionalized Population	Population with a Disability	Percentage with a Disability
Augusta County	76,193	12,814	16.80%
Augusta County (SAWMPO Urbanized Portion)	41,593	6,074	14.60%
City of Staunton	25,031	3,805	15.20%
City of Waynesboro	22,606	4,484	19.84%
<b>SAWMPO Region Total</b>	<b>89,230</b>	<b>14,363</b>	<b>16.10%</b>

Source: U.S. Census Bureau, 2020–2024 American Community Survey 5-Year Estimates, ACS Disability by Type (S1810).

\* The Augusta County (SAWMPO Urbanized Portion) row reflects a population-weighted estimate derived from 2020–2024 ACS tract-level data. Area-based inclusion factors were applied to the 15 Augusta County census tracts that intersect the SAWMPO boundary and iteratively scaled so that the estimated Augusta MPO population converges to the SAWMPO control total of 41,593 persons. The disability rate (14.60%) and count (6,074) reflect only the estimated urbanized portion of Augusta County within the MPO boundary. The full Augusta County row uses the countywide ACS estimate (76,193 total civilian noninstitutionalized population; 12,814 with a disability). The slight difference in SAWMPO total population (89,230) versus other population control totals (89,903) reflects the difference between ACS 5-year estimate periods and the point-in-time control figure; this does not affect the reported disability rates.

**Figure 3. BRITE Transit Program Area Percentage of Disabled Population by Census Tract (2020–2024 ACS 5-Year Estimates)**



## Appendix G: SAWMPO Public Participation Plan

The SAWMPO Public Participation Plan is available in print upon request at the CSPDC offices (112 MacTanly Place, Staunton, VA 24401) or on the MPO website at the link below:

**Staunton-Augusta-Waynesboro Metropolitan Planning Organization**

[www.sawmpo.org/public-participation-title-vi](http://www.sawmpo.org/public-participation-title-vi)

## Appendix H: Public Outreach Activities

Event	Month/Year	Event Advertising / Notes
BRITE Transit Advisory Meetings	Ongoing	The BTAC guides CSPDC staff on planning and administrative activities of the BRITE transit service. All meetings are open to the public and include a public comment opportunity. <b>Appendix J</b> contains a listing of BTAC members as of May 2026.
CSPDC Board of Commissioners Meetings	Ongoing	Regular BRITE transit updates are provided at CSPDC Board of Commissioners meetings, which are open to the public.
SAWMPO Policy Board and Technical Advisory Committee Meetings	Ongoing	Regular BRITE transit updates are provided at SAWMPO Policy Board and Technical Advisory Committee meetings, which are open to the public.
Title VI Trainings	Ongoing	CSPDC transit staff annually attend Title VI trainings (virtual or in-person).
Promotional Tabling	Ongoing	BRITE staff table at bus stops to thank riders and promote ridership throughout the year. BRITE staff table at local partner locations to promote public transit services.
Rating/ Feedback Tool	Ongoing	At any time, riders and community members can rate their experience with BRITE and share their feedback through the tools on our BRITE Social PinPoint page, or through paper feedback slips.
Other	Ongoing	CSPDC staff participate in the Augusta Community Health Needs Assessment (CHNA) updates, which brings community agencies, health care providers, stakeholders, and interested citizens together to identify and address the health care needs of our community.
Discover Transit Month Pop-Up Events	Late Summer/Early Fall (Annually)	Event table with resource materials.
Back to School Tabling Events	Late Summer/Early Fall (Annually)	Tabling for local K-12 Schools and local colleges/universities to promote relevant BRITE transit routes. This provides a space for question and answer, and dialogue.
Community/Citizen Academy Class Presentations	Fall (Annually)	Presentation to diverse audience regarding all BRITE services.
Afton Express Rider Survey	Winter (Annually)	Annual electronic rider survey (available by paper when requested).
BRCC Schedule Change Public Outreach Pop-Ups	April 2023	To better align with service demand, the BRCC Shuttles hours of operation decreased in the evening. To account for the impact on the public, BRITE hosted various pop-events along the route to

		provide a chance for public feedback and comments.
Aging in Place/TRIAD Chapter Reinstatement Resource Fair	June 2023	Event table with resource materials.
ARC of Augusta Disability Resource Fair	September 2023	Event table with resource materials.
Augusta Hometown Expo (Resource Fair)	February 2024	Event table with resource materials.
Augusta Hometown Expo (Resource Fair)	March 2025	Event table with resource materials.
Staunton Senior Health Fair (Resource Fair)	April 2025	Event table with resource materials.
Staunton Redevelopment and Housing Authority Family Day (Resource Fair)	July 2025	Event table with resource materials.
Afton Express Schedule Change Public Comment	Fall 2025	Social Pinpoint page to collect public comment on proposed new schedule (survey and rating scale).
LifeWorks JobFest (Resource Fair)	April 2026	Event table with resource materials.
Staunton Senior Health Fair (Resource Fair)	April 2026	Event table with resource materials.

Appendix I: Title VI Complaint Forms



112 MacTanly Place  
Staunton, VA 24401

Phone: (540) 885-5174  
Fax: (540) 885-2687

## Title VI Discrimination Complaint Form

### BRITE Bus Transit Services

<b>Section I:</b>			
<b>Name:</b>			
<b>Address:</b>			
<b>Telephone (Home):</b>		<b>Telephone (Work):</b>	
Electronic Mail Address:			
Accessible Format Requirements?	Large Print		<b>Audio Tape</b>
	TDD		<b>Other</b>
<b>Section II:</b>			
Are you filing this complaint on your own behalf?		Yes*	No
*If you answered "yes" to this question, go to Section III.			
If not, please supply the name and relationship of the person for whom you are complaining:			
Please explain why you have filed for a third party: _____			
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.		Yes	No
<b>Section III:</b>			
I believe the discrimination I experienced was based on (check all that apply):			
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin			
Date of Alleged Discrimination (Month, Day, Year): _____			
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.			
_____			
_____			
<b>Section IV</b>			
Have you previously filed a Title VI complaint with this agency?		Yes	No



112 MacTanly Place  
Staunton, VA 24401

Phone: (540) 885-5174  
Fax: (540) 885-2687

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

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

Signature and date required below:

\_\_\_\_\_

Signature Date

Please submit this form in person at the address below, or mail this form to:

Bonnie S. Riedesel, Title VI Manager  
112 MacTanly Place, Staunton, Virginia, 24401  
Phone 540-885-5174; Email [bonnie@cspdc.org](mailto:bonnie@cspdc.org)



112 MacTanly Place  
Staunton, VA 24401

Phone: (540) 885-5174  
Fax: (540) 885-2687

## Title VI Discrimination Complaint Form

### BRITE Bus Transit Services

<b>Sección I:</b>			
<b>Nombre:</b>			
<b>Dirección:</b>			
<b>Teléfono (Casa):</b>		<b>Teléfono (Trabajo):</b>	
Dirección de Correo Electrónico:			
Requisitos formato accesible?	Letra Grande		<b>Audio Tape</b>
	TDD		<b>Otros</b>
<b>Sección II:</b>			
¿Está presentando esta queja en su propio nombre?		Si*	No
* Si su respuesta es "sí" a esta pregunta, vaya a la Sección III.			
Si no es así, sírvase proporcionar el nombre y la relación de la persona para quien se queja:			
Por favor, explique por qué usted ha presentado para un tercero:			
Por favor, confirma que ha obtenido el permiso de la parte perjudicada, si usted está presentando en nombre de un tercero.		Si	No
<b>Sección III:</b>			
Creo que la discriminación que experimenté fue basado en (marque todo lo que corresponda):			
<input type="checkbox"/> Carrera <input type="checkbox"/> Color <input type="checkbox"/> Origen Nacional			
Fecha de la Discriminación Presunta (mes, día, año): _____			
Explique lo más claramente posible lo que pasó y por qué cree que fue discriminado. Describir todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la persona (s) que lo discriminó (si se conoce), así como los nombres y la información de los testigos en contacto. Si se necesita más espacio, por favor use la parte de atrás de este formulario.			
<hr/> <hr/>			
<b>Sección IV</b>			
¿Ha presentado previamente una queja del Título VI con esta agencia?		Si	No



112 MacTanly Place  
Staunton, VA 24401

Phone: (540) 885-5174  
Fax: (540) 885-2687

<b>Sección V</b>
¿Ha presentado esta queja con cualquier otro, estatal o agencia local Federal, o con cualquier corte federal o estatal? <input type="checkbox"/> Si <input type="checkbox"/> No En caso afirmativo, marque todo lo que corresponda: <input type="checkbox"/> Agencia Federal _____ <input type="checkbox"/> Tribunal Federal _____ <input type="checkbox"/> Agencia Estatal _____ <input type="checkbox"/> Tribunal Estatal _____ <input type="checkbox"/> Agencia Local _____
Sírvanse proporcionar información sobre una persona de contacto en la agencia / tribunal donde se presentó la denuncia.
<b>Nombre:</b>
<b>Título:</b>
<b>Agencia:</b>
<b>Dirección:</b>
<b>Teléfono:</b>
<b>Sección VI</b>
Nombre de la agencia de queja es en contra:
Persona de contacto:
Título:
Número de teléfono:

Puede adjuntar cualquier material escrito o cualquier otra información que usted piensa que es relevante para su queja.

Firma y fecha requerida a continuación

\_\_\_\_\_

Firma Fecha

Por favor, envíe este formulario en persona en la dirección indicada más abajo, o envíe este formulario a:

Bonnie S. Riedesel, Título VI Oficial de Cumplimiento  
112 MacTanly Place, Staunton, Virginia, 24401  
Teléfono: 540-885-5174; Email: [bonnie@cspdc.org](mailto:bonnie@cspdc.org)

## Appendix J: BRITE Transit Advisory Committee Membership

<b>Jurisdiction / Agency</b>	<b>Committee Member</b>	<b>Race</b>	<b>Gender</b>
City of Staunton	Susan Wilson	White	Female
County of Augusta	Julia Hensley	White	Female
City of Waynesboro	Leslie Tate	White	Female
Augusta Health	Krystal Moyers	White	Female
Blue Ridge Community College	Melissa Walker	White	Female
Shenandoah Valley Social Services	Julie-Ann Kent	White	Female
Wilson Workforce & Rehabilitation Center	Mike Kelley	White	Male
Staunton Downtown Development Association	<i>Vacant</i>		
Valley Community Services Board	Tammy DuBose	White	Female
Transit Service Rider – General Public	Becky Messer	White	Female
Transit Service Rider – General Public	Paul Terry	White	Male
Virginia Department of Rail and Public Transportation	Kyle Trissel	White	Male
Contracted Service Provider	Steve Wilson	White	Male

This demographic breakdown is reflective of the service region at-large (see Table and Figure 2 in Appendix F for minority population breakdown). CSPDC/BRITE will continually look for ways to engage minority populations for BTAC appointments.

## Appendix K: Four-Factor Analysis & Demographic Profile

The United States Department of Transportation (USDOT) guidelines require that recipients of federal financial assistance provide “meaningful access to programs and activities” by giving persons with language access barriers adequate and understandable information and allowing them to participate in programs and activities, where appropriate. Individuals who have a limited ability to read, speak, write, or understand English are classified as those with language access barriers. BRITE will take reasonable steps to ensure these individuals have meaningful access to programs, activities, services, and information related to planning processes by providing accommodations when and wherever possible to remove language barriers. Failure to ensure these individuals can meaningfully and effectively participate in federally assisted programs and activities, particularly when an individual’s primary language is not English, may violate the prohibition against national origin discrimination under Title VI of the Civil Rights Act of 1964. While designed to be a flexible, fact-dependent standard, the starting point is an individualized assessment that balances the following four factors:

1. **Demography:** Number and/or proportion of persons with language access barriers and languages spoken in the BRITE service region
2. **Frequency:** Rate of contact with service or program
3. **Importance:** Nature and importance of program/service to people’s lives
4. **Resources:** Available resources, including language assistance services

The four-factor analysis should be used to determine which language assistance services are appropriate to address the identified needs of populations with language access barriers. More information regarding the identification of persons with language access barriers within the community as well as outreach strategies are included within the Public Outreach and Involvement section.

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

### Factor 1: Assessment of the Number and Proportion of Persons with Language Access Barriers Likely to be Served or Encountered in Eligible Service Population

The agency has reviewed Census data on the number of individuals in its service area that have language access barriers, as well as the languages spoken by those individuals.

#### U.S. Census Data – American Community Survey 5-Year Data (2020-2024)

Data from the U.S. Census Bureau’s American Community Survey (ACS) were obtained through [www.census.gov](http://www.census.gov) for the BRITE service region. The 2020–2024 ACS 5-Year Estimates provide detail on the total population with language access barriers, the proportion they represent within each jurisdiction, and a breakdown of the languages spoken by that population. Languages spoken by those with language access barriers are presented below in **Table 4** and indicate the extent to which accommodations may be needed to serve this population.

According to the 2020–2024 ACS 5-Year Estimates, 2.33% of the population within the BRITE Transit service region has a language access barrier. Given the relatively low regional percentage, the need for language assistance is somewhat limited overall; however, Spanish has been identified as the language most spoken by those with a language access barrier, and BRITE's language assistance efforts will prioritize this population accordingly.

**Table 4. Language Use & English-Speaking Ability by Jurisdiction, BRITE Transit Service Area (2020–2024 ACS 5-Year Estimates)**

Jurisdiction*	Population 18+	Total Language Access Barrier Population	% Language Access Barrier	Language Group Breakdown (Population 18+)			
				Spanish	Other Indo-European***	Asian & Pacific Island****	Other Languages
Augusta County	52,441**	438	0.84%	226	96	14	102
Augusta County (SAWMPO Urbanized Portion)	34,718	374	1.08%	213	74	8	79
City of Staunton	20,931	346	1.65%	211	88	28	19
City of Waynesboro	17,734	1,001	5.64%	630	0	371	0
<b>Total</b>	<b>73,383</b>	<b>1,721</b>	<b>2.33%</b>	<b>1,054</b>	<b>162</b>	<b>407</b>	<b>98</b>

\*Augusta County is presented as two rows: the total county population and the population within the Staunton-Augusta-Waynesboro Metropolitan Planning Organization (SAWMPO) boundary, as the BRITE service area falls predominantly within the SAWMPO.

\*\* Augusta County full- county row reflects the 15 census tracts included in the SAWMPO area. Tracts 701 and 704 are excluded as they fall outside the SAWMPO boundary.

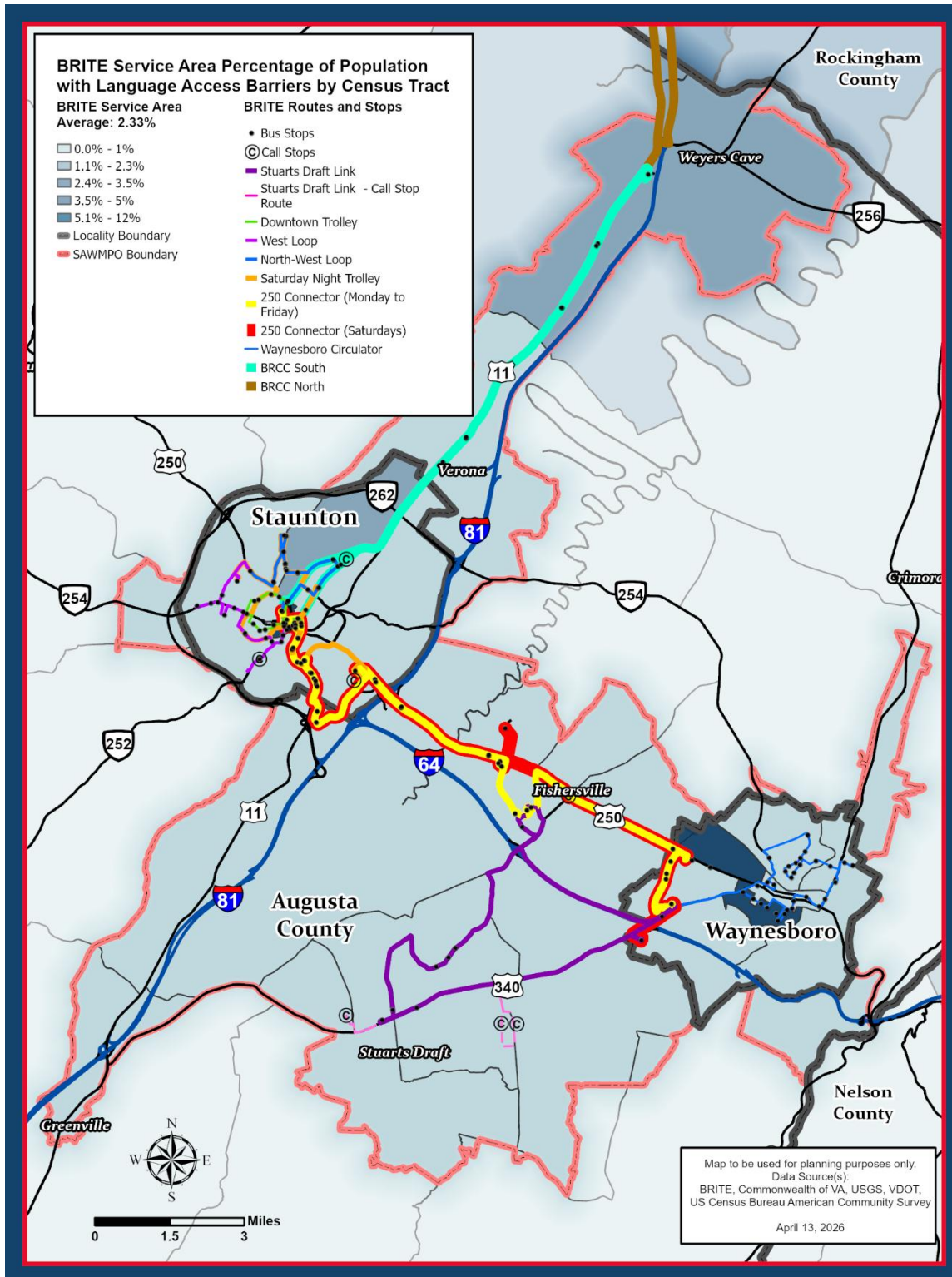
\*\*\* Other Indo-European languages include French, Haitian or Cajun French, German or other West Germanic languages, Russian, Polish, or other Slavic languages, and other Indo-European languages such as Hindi, Portuguese, Italian, Greek, and Persian.

\*\*\*\* Asian and Pacific Island languages include Korean; Chinese (including Mandarin and Cantonese); Vietnamese; Tagalog; and other Asian and Pacific Island languages.

Applying the Title VI Safe Harbor threshold of 5% or 1,000 persons, portions of the City of Waynesboro fall within the scope of language assistance obligations. Specifically, 5.64% of the population aged 18 and older within the jurisdiction — totaling 1,001 persons — face a language access barrier, with 630 of those individuals identifying Spanish as their primary language. To address this need, Spanish-language brochures are currently available for the Waynesboro route, as well as for the system's most utilized route, the 250 Connector, which also serves Waynesboro.

Language assistance will be made available to other individuals with language access barriers as needs are identified.

Figure 4. BRITE Service Area Percentage of Population with Language Access Barriers by Census Tract (2020–2024 ACS 5-Year Estimates)



## Factor 2: Assessment of the Frequency with which Individuals with Language Access Barriers Come into Contact with the Transit Services or System

The CSPDC/BRITE reviewed the relevant benefits, services, and information provided by the agency and determined the extent to which persons with language access barriers have come into contact with these functions through the following channels:

- Calls and visits to the CSPDC offices
- Access to the CSPDC and BRITE websites
- Attendance at community meetings or public hearings hosted by the CSPDC/BRITE
- Contact with BRITE transit vehicle operators and transit supervisory and administrative staff
- Public involvement and public engagement meetings/hearings for projects affecting communities or individuals with language access barriers

BRITE staff, including drivers and dispatchers, report very little contact with persons with language access barriers during operations. BRITE drivers are trained and instructed to use printed materials and maps to assist passengers on the bus to help them understand or point to the routes or destination on the schedule. Community service groups also assist passengers by writing their destination on paper to give to the bus drivers.

The CSPDC/BRITE will continue to identify emerging populations as updated Census and American Community Survey data become available for our service area. In addition, when persons with language access barriers contact our agency, we attempt to identify their language and keep records on contacts to accurately assess the frequency of contact. To assist in language identification, we use a language identification flashcard based on that which was developed by the U.S. Census.

## Factor 3: Assessment of the Nature and Importance of the Transit Services to the Populations with Language Access Barriers

BRITE transit is an important and essential service for many people living in our service area. As the service continues to grow, ongoing, effective communication of the availability of transit service will continue to be a focus of the CSPDC/BRITE. Our goal is to continue to communicate and collaborate with community organizations, human service agencies, medical providers, and the local jurisdictions to identify any persons with language access barriers inability to access or utilize public transit to travel to employment sites, medical services, educational facilities, and quality of life related destinations. The CSPDC/BRITE continues to evaluate and implement effective communication channels for the community, including the population with language access barriers. The BRITE website and some printed material (maps and timetables of service) include information in Spanish and also contact information for those who require additional assistance.

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

The CSPDC provides flexibility in the BRITE transit program and can devote additional funds to language assistance expenses in certain cases that would provide meaningful benefit to populations with language access barriers. This would be determined on an as needed basis related to projects that may impact those identified with language access barriers. Additionally, assistance may be requested by community

organizations, college/university departments, city or county departments, or other agencies that may be able to partner with language assistance services. The CSPDC/BRITE also has access to local translation and interpretation services for public engagement and outreach activities where applicable.

As discussed above, approximately 2% of the BRITE service region residents have language access barriers, with the highest concentration in Waynesboro. Considering the small size and scope of the BRITE transit region, low number of individuals with language access barriers in the region, and limited financial resources, CSPDC/BRITE will provide cost-effective and efficient accommodations as available. The following recommendations were adopted as measures to provide meaningful access to persons with language access barriers.

### **Language Assistance Measures:**

Language assistance measures currently used or are planned to be used:

- Provide instructions to vehicle operators and dispatch who regularly interact with the public on how to respond to a customer with language access barriers as needed. Drivers interviewed said they are usually able to ask another passenger on the bus to help them understand or point to the routes or destination on the schedule. Community service groups also help passengers by writing their destination on paper to give to the bus drivers.
- With advance notice of three (3) business days, provide interpreter services at any meeting or public hearing. Statements regarding interpreter services are placed in notices and publications.
- Place notices of CSPDC's/BRITE's nondiscrimination policies and information on the local and federal complaint process on the website in English and other languages via Google Translate and make notices available at public meetings.
- Translate vital documents in languages other than English (primarily Spanish) when there is potential for impact to communities with language access barriers. These documents are all available on the BRITE website and can be translated if requested. These include:
  - Bus schedules and maps
  - Route service changes
  - Meeting and public hearing notices
  - Transportation planning documents
  - Annual reports

### **Staff Training Plan:**

In an effort to continuously improve the CSPDC's/BRITE's overall compliance posture, nondiscrimination training will be coordinated with FTA, DRPT, and other agencies as identified, and made available to CSPDC/BRITE staff upon hire and on an ongoing basis to ensure up-to-date knowledge of Title VI and other discrimination statutes.

CSPDC/BRITE will distribute information to staff on training programs regarding Title VI and related statutes and will track participation and maintain and update training as necessary.

- **New Hire Training:** All employees receive Title VI training upon hiring, covering program requirements, CSPDC/BRITE obligations, and required data collection and maintenance. BRITE

service delivery new hires also receive training in assisting persons with language access barriers as part of sensitivity and customer service orientation.

- **Ongoing Training:** Staff who regularly interact with customers, including supervisors and management, receive annual refresher training on language access policies and procedures; and additional training is provided whenever these policies or procedures change. All staff are educated to know the rights of those with language access barriers to free language assistance, how to use language access resources, and how to alert the public of accommodation services when available.
- **Contractor Training:** BRITE transit service is operated through a turnkey operations contract, and under the terms of the contract the contractor is required to provide training to all staff members involved in the delivery of BRITE transit service, the BRITE Title VI program, and ensure ongoing training for staff. New hires for the contracted service provider receive education on assisting persons with language access barriers as part of sensitivity training and customer service orientation. Title VI training is conducted upon hiring and during annual/quarterly training meetings.

### **Methods for Monitoring, Evaluating, and Updating:**

The CSPDC/BRITE will update language assistance measures as needed, and at a minimum every three years, as part of the Title VI submission. The data and information will be reviewed annually and updated as a result of the review or when it is clear that higher concentrations of individuals with language access barriers are present in the area served. Monitoring and evaluating will allow the CSPDC/BRITE to track outreach efforts to help improve future efforts. Updates include evaluating updated Census data, evaluating feedback from employees regarding the number of encounters with individuals with language access barriers, and conducting periodic outreach through community organizations to determine changes to language access barrier needs and translations.

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

As the community grows and new groups with language access barriers emerge, CSPDC/BRITE will strive to address the needs for additional language assistance.