



Title VI Program Update FY 2023-2025



RECIPIENT INFORMATION

RECIPIENT: City of Burlington on behalf of Link Transit (Link Transit)

SUBMITTAL DATE: September 26, 2022

PROGRAM UPDATE: October 1, 2022, for the incorporation of Federal Transit Administration policy and Governing Board adoption on a minimum three-year period.

EXPIRATION YEAR: 2025

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**CITY OF BURLINGTON/LINK TRANSIT
ADOPTION OF UPDATED TITLE VI PROGRAM**

WHEREAS, The City of Burlington on behalf of Link Transit (Link Transit) hereby certifies that, as a condition of receiving Federal financial assistance under the Urban Mass Transportation Act of 1964, as amended, it will ensure that:

- a. Link Transit shall submit on an annual basis, its Title VI Assurance, as part of its annual Certifications and Assurances submission to the Federal Transit Administration (FTA).
- b. No person, on the basis of race, color, or national origin, will be subjected to discrimination in the level and quality of transportation services and transit-related benefits.
- c. Link Transit will compile, maintain, and submit in a timely manner, Title VI information required by FTA Circular 4702.1B and in compliance with the Department of Transportation's Title VI Regulation, 49 CFR, Part 21.7, and as amended.
- d. Link Transit will make it known to the public that those persons or persons alleging discrimination on the basis of race, color, or national origin as it relates to the provision of transportation services and transit-related benefits may file a complaint with the Federal Transit Administration and/or the U.S. Department of Transportation (USDOT); and

WHEREAS, Link Transit will update and amend the Title VI Policy and applicable Program as needed to incorporate required FTA and USDOT policies to adhere to the compliances expected for maintaining an FTA approved program policy; and

WHEREAS, the City Council of the City of Burlington recognize the action taken to update the Link Transit Title VI Program is to incorporate the FTA program policies regarding operational service and fare equity analysis requirements for the public transportation services provided to the general public.

NOW THEREFORE BE IT RESOLVED, the City Council of the City of Burlington hereby adopt the Link Transit Title VI Program to incorporate the provisions established by the Federal Transit Administration.

BE IT FURTHER RESOLVED, the City Council of the City of Burlington authorizes the Link Transit Manager to sign the amended Title VI Program.

.....

A motion was made by Councilmember Bob Ward and seconded by Councilmember Ronnie Wall for adoption of the above resolution, and upon being put to a vote was duly adopted on this 6th day of December, 2022.

.....

I, Beverly Smith, City Clerk for the City of Burlington do hereby certify that the above is a true and correct copy of an excerpt for the minutes of a meeting of the City of Burlington on behalf of Link Transit duly held on the 6th day of December, 2022.

Approved:

James R. Butler
James Butler
Mayor

Attest:

Beverly D. Smith
Beverly Smith
City Clerk

Seal:



PROVISION OF TITLE VI ASSURANCES

The City of Burlington on behalf of Link Transit (Link Transit) hereby certifies that, in accordance with 49 CFR Section 21.7(a), it will ensure that:

1. Link Transit shall submit, on an annual basis, its Title VI Assurances, as part of its annual Certification and Assurances submission to the Federal Transit Administration (FTA)
2. No person, on the basis of race, color, or national origin, will be subjected to discrimination in the level and quality of transportation services and transit-related benefits
3. Link Transit will compile, maintain, and submit in a timely manner, Title VI information required by FTA Circular 4702.1B
4. Link Transit will make it known to the public that persons alleging discrimination on the basis of race, color, or national origin as it relates to the provision of transportation services and transit-related benefits may file a complaint with the FTA and/or the U.S. Department of Transportation (USDOT).

I. TITLE VI COMPLIANCE HISTORY

1. There are no outstanding lawsuits or complaints naming Link Transit which allege discrimination on the basis of race, color or national origin with respect to service or other transit benefits.
2. During the course of the last three (3) years, there have not been any civil rights compliance review activities conducted with respect to Link Transit and, to the best of our knowledge, there are not presently any ongoing civil rights compliance review activities being conducted with respect to Link Transit.
3. There are currently no pending construction projects which would negatively impact minority communities being performed by Link Transit.

II. INCORPORATION OF THE PROGRAM

The City of Burlington on behalf of Link Transit (hereinafter referred to as “Link Transit” or “Recipient”) hereby agrees that, as a condition to receiving any Federal financial assistance from the Department of Transportation, it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d-42 U.S.C. 2000d-4 (hereinafter referred to as the “Act”), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation - Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the “Regulations”), and other pertinent directives. 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 Link Transit receives Federal financial assistance from the Department of Transportation, including the Federal Transit Administration, and HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement. This assurance is required by subsection 21.7(a) of the Regulations.

More specifically, and without limiting the above general assurance, Link Transit hereby gives the following specific assurances with respect to its Federal Transit Administration program:

1. That Link Transit agrees that each “program” and each “facility”, as defined in subsections 21.23(e) and 21.23(b) of the Regulations will be (with regard to a “program”) conducted or will be (with regard to a “facility”) operated, in compliance with all requirements imposed by, or

pursuant to, the Regulations.

2. That Link Transit shall insert the following notification in solicitations for sealed bids and request for proposals for large procurements related to work or material subject to the Regulations and made in connection with all Federal Transit Administration programs and, in adapted form in all proposals or negotiated agreements:

The City of Burlington on behalf of Link Transit, in accordance with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d to 2000d-4 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation issued pursuant to such Act, hereby notifies all bidders/proposers that it will affirmatively insure that in any contract entered into pursuant to this advertisement, minority business enterprises will be afforded full opportunity to submit bids in response to the invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award.

3. That Link Transit shall insert the applicable clauses as per the most recent version of the FTA's Best Practices Procurement Manual in every contract subject to this Act and the Regulations.
4. That Link Transit shall include the appropriate clauses as per the most recent version of the FTA's Best Practices Procurement Manual as a covenant running with the land, in any deed from the United States affecting a transfer of real property, structures, or improvements thereon, or interest herein.
5. That where Link Transit receives Federal financial assistance to construct a facility, or part of a facility, the assurance shall extend to the entire facility and facilities operated in connection therewith.
6. That where Link Transit receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the assurance shall extend to rights to space on, over or under such property.
7. That Link Transit shall include the appropriate clauses as per the most recent version of the FTA's Best Practices Procurement Manual as a covenant running with the land, in any future deeds, leases, permits, licenses, and similar agreements entered into by Link Transit with other parties: (a) for the subsequent transfer of real property acquired or improved under Federal Transit Administration programs; and (b) for the construction or use of, or access to, space on, over, or under real property acquired, or improved under Federal Transit Administration programs.
8. That this assurance obligates Link Transit for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of personal property or real property or interest therein or structures or improvements thereon, in which case the assurance obligates Link Transit or any transferee for the longer of the following periods: (a) the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or (b) the period during which Link Transit retains ownership or possession of the property.
9. Link Transit shall provide for such methods of administration for the programs as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority

to give reasonable guarantee that it, other interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations and this assurance.

10. Link Transit agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Act, the Regulations, and this assurance.
11. Link Transit assures that the level and quality of transit service and related benefits are provided in a manner consistent with the Title VI of the Civil Rights Act of 1964.
12. Link Transit assures that the public will be given notice and engaged in a public hearing for service and fare adjustments in accordance with the adopted Link Transit policy.

THESE ASSURANCES are given in consideration of, and for the purpose of, obtaining any and all Federal grants, loans, contracts, property, discounts or other Federal financial assistance extended after the date hereof to the City of Burlington on behalf of Link Transit by the United States Department of Transportation under the Federal Administration and is binding on it, other recipients, subgrantees, contractors, transferees, successors in interest and other participants in the Federal Transit Administration programs.

The person whose signature appears below is authorized to sign these assurances on behalf of Link Transit.



John C. Andoh III
Interim Transit Manager

October 20, 2022
Date

GENERAL GUIDELINES/REQUIREMENTS

I. Annual Certification and Assurance

As stated in Section I, Link Transit shall submit annually, its Title VI assurance, as part of its annual Certification and Assurance submission to the FTA. The most recent submission for Link Transit was executed and submitted to the FTA on _____.

II. Complaint Procedures

In compliance with 49 CFR Section 21.9(b), Link Transit has developed procedures for investigating and tracking Title VI complaints filed against them. Such procedures shall be made available to the public upon request. Link Transit's complaint procedures and complaint form are contained herein as [APPENDIX A](#).

III. Record Title VI Activities

In compliance with 49 CFR Section 21.9(b), Link Transit shall prepare and maintain a list of any active investigations conducted by entities other than the FTA, lawsuits, or complaints naming Link Transit that allege discrimination on the basis of race, color, or nation origin. contained herein as [APPENDIX B](#). Such list shall include:

1. Date the investigation, lawsuit, or complaint was filed
2. Summary of the allegation(s)
3. The status of the investigation, lawsuit, or complaint
4. Actions taken by Link Transit in response to the investigation, lawsuit or complaint

IV. Access for LEP Persons

Link Transit shall take steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP). Link Transit will assist persons with limited English proficiency to participate in the transportation planning process. Link Transit Staff will make every effort to provide translators and document translation, where feasible, upon request. Link Transit's LEP Plan is contained herein as [APPENDIX D](#).

V. Public Notification

In compliance with 49 CFR Section 21.9(d), Link Transit shall provide information to the public regarding its Title VI obligations and apprise members of the public of the protections against discrimination afforded to them by Title VI by the following notice:

NOTICE of RIGHTS UNDER TITLE VI

The City of Burlington on behalf of Link Transit (Link Transit) operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Link Transit. It is Link Transit's objective to:

- **Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin**

- **Promote the full and fair participation of all affected populations in transportation decision-making**
- **Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations**
- **Ensure meaningful access to programs and activities by persons with limited English proficiency**

For more information Link Transit’s civil rights program and the procedures to file a complaint, call 336.222.7351; email info@linktransit.org; visit our website, www.linktransit.org; or visit our administrative office at 234 East Summit Avenue, Burlington, NC 27215. Any complaint must be in writing and submitted to the Link Transit Manager (as the Title VI Coordinator) within one hundred eighty (180) days following the date of the alleged unlawful discriminatory practice.

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

**If information is needed in another language, contact 336.222.7351.
Si necesita información en otro idioma, contacto 336.222.7351.**

The Link Transit Notice of Rights under Title VI to the public, shown above, is posted in the Link Transit Administrative Offices and on buses, shown online at www.linktransit.org, and within the Link Transit Rider’s Guide.

VI. Additional Information

Link Transit acknowledges that, at the discretion of the FTA, information other than that which is required by FTA C 4702.1B, may be requested in writing of Link Transit, to investigate complaints of discrimination or to resolve concerns about possible noncompliance with Title VI.

VII. Timely Submission

Link Transit acknowledges that its Title VI submissions and/or updates thereto, shall be supplied to its FTA Office of Civil Rights once every three (3) years. The submission shall include but is not limited to:

1. A summary of public outreach and involvement activities undertaken since the last submission and a description of any steps taken to ensure that minority and low-income people had meaningful access to these activities (note: during the period of 2019 and 2022 Covid greatly affected the amount and subject matter of our outreach efforts) [APPENDIX C](#)
2. Link Transit’s process for persons with Limited English Proficiency (LEP)
3. Title VI complaint and Tracking procedures
4. A list of any Title VI investigations, complaints or lawsuits filed since the latest submission.
5. A copy of Link Transit’s public notice regarding Title VI compliance and public access and instructions to Link Transit Title VI complaint procedures.

VIII. Environmental Analysis of Construction Projects

Link Transit shall integrate an environmental justice analysis into its National Environmental Policy Act (NEPA) documentation of construction projects of which require NEPA. If a Categorical Exclusion (CE) is performed, Link Transit shall complete the FTA’s standard CE checklist which includes a section on community disruption and environmental justice. While preparing an Environmental Assessment (EA)

or Environmental Impact Statement (EIS), Link Transit shall integrate into its documents, the following:

1. A description of the low-income and minority population within the study area affected by the project, and a discussion of the method used to identify this population
2. A discussion of all adverse effects that would affect the identified minority and low-income population
3. A discussion of all positive effects that would affect the identified minority and low-income population
4. A description of all mitigation and environmental enhancement actions incorporated into the project to address the adverse effects, including, but not limited to, any special features of the relocation program that go beyond the requirements of the Uniform Relocation Act and address adverse community effects such as separation or cohesion issues, and the replacement of the community resources destroyed by the project

And if applicable:

5. A discussion of the remaining effects, if any, and why further mitigation is not proposed
6. For projects that traverse predominantly minority and low-income and predominantly non-minority and non-low-income areas, a comparison will be completed of mitigation and environmental enhancement actions between the two stated areas. If there is no basis for such a comparison, Link Transit shall describe why this is the case.

IX. Public Participation

Link Transit shall seek out and consider viewpoints of minority, low-income and LEP populations in the course of conducting public outreach and involvement activities in regard to proposed transportation decisions. Link Transit shall make every effort to include the following practices, consistent with the Burlington-Graham Metropolitan Planning Organization adopted Public Involvement Plan (available <https://bgmpo.org/Projects-Plans/MPO-Plans/Public-Involvement-Plan>); not withholding the public participation plan adopted by the Burlington City Council:

1. Coordination with individuals, institutions, or organizations and implementing community-based public involvement strategies to reach out to members in the affected minority and/or low-income communities
2. Provision of opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments
3. Utilization of locations, facilities and meeting times that are convenient and accessible to low-income and minority communities
4. Utilization of different meeting sizes or formats, or varying the type and number of news media used to announce public participation opportunities
5. Implementation of USDOT's policy guidance regarding Link Transit's responsibilities to LEP persons

The following public outreach activities occurred during the last Title VI Program period:

- Reduced Link Transit service by one trip due to novel Coronavirus pandemic – March 2020
- Implemented shuttle services for COVID-19 testing April 2020
- Launching Link Transit fare free service – June 2021
- Restoring full Link Transit service – July 2021
- Implement evening service – to be determined – approved by City Council August 2021

- Added Saturday service – October 2021
- Implemented shuttle service to Burlington Sock Puppets – June 2022
- Implement evening service – to be determined – approved by City Council August 2021

Each time Link Transit implemented changes to its operations, public outreach activities were designed and accomplished to ensure the public was aware of such changes. For fare and route adjustments, changes to service announcements were made 30 days prior to the adjustment to encourage feedback from passengers and a draft of the route schedule was posted to the website. A survey or communication channel was established for passengers to provide their feedback and then those comments were analyzed and taken into consideration. The public was made aware of changes through various channels including public notice on website, notice in newspaper (as necessary), social media announcements, email announcements, text messages, signage at bus stops, and flyers on buses. Final adjustments were then prepared and, if necessary and required, presented to the Link Transit Public Transit Advisory Commission for information and feedback and ultimately the Burlington City Council to have a vote and establish the date the adjustments to become effective.

We encourage the public to attend any Link Transit Public Transit Advisory Commission and Burlington City Council meeting. A two (2) to three (3) week period of time was provided for passengers to see the final adjustments, ask questions, and understand the adjustments prior to it becoming effective. Announcements of final adjustments were made through similar channels as the initial announcement to encourage passengers to review the adjustments.

See [APPENDIX C](#) for a summary list of dates over the past three (3) years that Link Transit has adjusted routes or fares.

X. Public Hearing Process for Service and Fare Changes

Link Transit will advertise in accordance with the Link Transit Policy regarding public participation to conduct any public hearing when considering proposed fare and major service changes. Public hearings are a key element of the decision-making process used by the Burlington City Council to assess the potential impact proposals that may have on Link Transit riders and residents of Burlington, Gibsonville and Alamance County.

Policy

Public Hearings will be scheduled by the Burlington City Council for fare and major service change proposals except as otherwise provided below.

Definitions

A major service or fare change is any change or series of changes that directly affect:

1. 25 percent or more reduction of transit route revenue hours of Link Transit system-wide service.
2. 50 percent or more reduction of transit route revenue hours of a single Link Transit route computed on an annual basis.
3. The implementation of a new transit route.
4. 25 percent or more on the implementation of a passenger fare adjustment on an annual basis.

Procedure

Proposed major service changes and fare and fare media pricing shall be evaluated for compliance with the Federal Transit Administration's (FTA) Office of Civil Rights guidance regarding potential discriminatory impacts on minority and low-income populations. The evaluation will include proposed actions the Link Transit may apply to minimize, mitigate, or offset the adverse effects the changes could have on these populations, as described in FTA Circular 4702.1B, "Title VI and Title VI-Dependent Guidelines."

Prior to the institution of a fare change or major service change, a notice of intent to hold a public hearing will be published following the Burlington City Council adopted public participation plan. The notice will also be published in newspapers oriented to specific groups or neighborhoods that may be affected.

The notice will be published at least 30 days prior to the hearing.

The notice will contain descriptions of the changes and the time and place of the hearing.

Link Transit shall ensure that all programs, services, activities, and benefits are implemented without discrimination. Any person who believes that he or she, individually, or as a member of any specific class or persons, has been subjected to discrimination on the basis of race, color, national origin, or other protected class interests, may file a signed written complaint with Link Transit or FTA at the addresses listed below:

- Link Transit Manager
City of Burlington on behalf of Link Transit
234 East Summit Avenue
Burlington, NC 27215
Email: info@linktransit.org
Fax: 336.222.5004
- Federal Transit Administration Office of Civil Rights
Title VI Program Coordinator
East Building, 5th Floor – TCR
1200 New Jersey Avenue, SE
Washington, DC 20590

If you are unable or incapable of providing a written statement and desire Link Transit or the FTA to investigate alleged discrimination, a verbal complaint of discrimination may be made. You may call Link Transit at 336.222.7351. The complainant will be interviewed by the Link Transit Manager to receive complaints. If necessary, the official will assist the complainant in converting verbal complaints in writing. All Complaints must be signed by the complainant or his/her representative.

Exceptions

1. Changes in fares and fare media pricing are subject to public hearing requirements with the exception of the following:
 - Reduced fare for less than 180 days
 - Free-fare promotions
2. Service changes are subject to public hearing requirements with the exception of the following:

- Standard seasonal variations.
- Changes instituted in response to an emergency situation in effect for 90 days or less.
- Experimental service changes instituted for 180 days or less.

Nothing in this section precludes the Burlington City Council from setting a public hearing on any matter associated with fares and service that it chooses.

Furthermore, all changes contemplated by Link Transit will be reviewed by the Link Transit Public Transit Advisory Commission prior to submission to the Burlington City Council.

XI. Plan Monitoring and Evaluation

Evaluation of the success of any involvement efforts must be result-oriented. It is never safe to assume that just because people don't come to an event that they are uninterested in the project. The goal is to educate and include the public at all levels of planning, not just to invite them. Evaluation, then, must be two-fold. The first part is to track what efforts are being made, and the results of those efforts, and the second part is to make regular assessments of the success of a technique within a given program, and to strategize for future successes.

Tracking Efforts and Success

In order to track our public participation efforts, it is necessary that the individuals involved record their efforts.

1. Link Transit will keep records of outreach activities. See a summary in [APPENDIX C](#).
2. Copies should be kept of any print ads, and transcripts of any public service announcements.
3. Notes should be made after meetings regarding the overall tone of the meetings and any ideas or observations made regarding the process.

Efforts of Monitoring and Evaluation of the LEP Plan

1. Provide day-to-day administration of Link Transit's LEP Plan, ensuring compliance and correct implementation.
2. Seek feedback from LEP communities, including customers and community-based organizations, about the effectiveness of Link Transit's LEP Plan.
3. Translate Link Transit's Title VI complaint procedure and form in multiple languages.
4. Establish a Link Transit procedure that requires all written translation requests be routed through and managed by the Title VI coordinator to ensure consistency.
5. Create one-stop LEP information center for Link Transit riders.
6. Conduct an evaluation every three (3) years of Link Transit's LEP Plan to gauge its effectiveness and determine if updates are needed. Link Transit staff will lead the evaluation with the help of staff familiar with Title VI language access requirements and the LEP Plan. The evaluation may include the following:
 - Determine the number of LEP individuals in Link Transit's service area.
 - Assess whether existing language assistance services are meeting the needs of LEP persons.
 - Assess whether staff members understand Link Transit's LEP Plan, how to carry

them out, and whether language assistance resources and arrangements for those resources are still current and accessible.

XI. Monitoring Subrecipients

Link Transit does not have any sub-recipients. So, no oversight is needed in this area.

XII. Minority Representation on Planning and Advisory Bodies

**Public Transit Advisory Commission (PTAC)
Membership as of October 2022**

- Moses Corbett Burlington (Expires 2023)
- John Mathewson Burlington (Expires 2025)
- Mike Mills Burlington (Expires 2024)
- Roger Meisenbach Burlington (Expires 2023)
- Bonita Brown Burlington (Expires 2024)
- Steve Harrison Gibsonville (Expires 2025)
- Steve Carter Alamance County (Expires 2024)
- Vacant Burlington Alternate (Expires 2023)
- Joyce Harris Gibsonville Alternate (Expires 2023)
- Peter Murphy Alamance County Alternate (Expires 2025)

Race	Quantity
White	6
African American	3
Asian/Pacific Islander	0
American Indian or Alaskan Native	0
Native Hawaiian or Other Pacific Islander	0
Multi Race	0
Hispanic	0

XIII. Title VI Equity Analysis

Link Transit has not constructed a facility such as a vehicle storage facility, maintenance facility, or operations center. Should this be constructed, an equity analysis will be prepared.

XIV. Service Standards

Vehicle Load Standard

Link Transit operates local bus transportation services throughout the Cities of Burlington and Graham, the towns of Elon and Gibsonville, as well as portions of unincorporated Alamance County. The average of all loads during the peak and off-peak operating periods should not exceed a load factor of 1.4. Refer to chart below for current standards:

Vehicle Type	Average Passenger Capacities			
	Seated	Standing	Total	Load Factor
28' LTV cutaway	23	9	32	1.4
30' low floor bus	23	18	41	1.4

Vehicle Headways

Link Transit service operates to and from the temporary transit hub located in downtown Burlington on Worth Street.

Weekdays & Saturday	AM Peak	Midday	PM Peak	Evening
Local Routes	90 min	90 min	90 min	90 min

*Peak 6 am – 9 am, 3 pm – 6 pm, Off-Peak 9 am – 3 pm, Evening 6 pm – 9:15 pm;
 “—” = no service.*

On-Time Performance Standard

Link Transit routes are to be considered on time if they are no more than “0” minute early and no more than “5.5” minutes late leaving a time-point on a scheduled trip. The on-time performance goal is set at 90% or greater. Link Transit will continuously monitor the various routes throughout the system to maintain this standard.

Service Availability Standard

Link Transit routes are designed to connect Burlington, Gibsonville, portions of unincorporated Alamance County and Alamance Community College. This includes serving portions of Elon and Graham. Link Transit provides access to major employment centers, central business districts, schools, universities and hospitals throughout those abovementioned jurisdictions. Access is made available through the use of designated stops with connections to PART Express bus service, as well as Alamance County Transportation Authority demand response service. Stops are generally spaced every ¼ to ½ mile along the routes.

XV. Service Policies

Link Transit Amenities Policy

Policy: In accordance with Title VI of the Civil Rights Act, as amended it shall be the policy of the City of Burlington on behalf of Link Transit to assign amenities without regard to race, color, ethnicity and national origin. Amenity assignment refers to the process of placing amenities along various routes within the Link Transit system.

Procedures: The installation of transit amenities shall be primarily based on the number of passenger boarding’s at bus stops and Park & Ride Lots along the route. These amenities include but are not limited to the following: seating, benches, shelters, informational signs, maps and schedules, digital and electronic signs, solar lighting and waste receptacles. Additional requirements for placement include safety, proper zoning approval if necessary and meeting all applicable building and construction laws. Request for transit amenities can be submitted through our Call Center or at info@linktransit.org. Each request will be reviewed in a timely manner.

Link Transit Vehicle Assignment Policy

Policy: In accordance with Title VI of the Civil Rights Act, as amended it shall be the policy of the City of Burlington on behalf of Link Transit to assign vehicles without regard to race, color, ethnicity and national origin.

Procedures: All commuter bus routes are ADA accessible and are equipped with a voice announcement stop announcement system, wheelchair ramps or lifts, bus kneeling feature, bicycle racks, air- conditioning and destination signage.

Bus assignments consider the operating characteristics such as length, width, height and the turning radius of the bus. The physical route requirements are taken into consideration when assigning buses.

Related Documents

FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients

The person whose signature appears below is authorized to sign on behalf of Link Transit.



John C. Andoh III
Interim Transit Manager

October 20, 2022
Date

APPENDIX A : TITLE VI COMPLAINT PROCEDURES

Title VI Information, Limited English Proficient (LEP) information and Complaint Process

(Printed materials, website, and other mediums upon request)

The City of Burlington on behalf of Link Transit grants all citizens equal access to all its transportation services. It is further the intent of Link Transit that all citizens are aware of their rights to such access. This is designed to serve as an educational tool for citizens so that they may understand one of the civil rights laws that protect their benefits of Link Transit's programs and services, specifically, as it relates to Title VI of the Civil Rights Act of 1964.

What is Title VI? Title VI is a section of the Civil Rights Act of 1964 requiring that "No person in the United States shall on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance." Note that Title VI does not address gender discrimination. It only covers race, color and national origin. Other Civil Rights laws prohibit gender discrimination.

What is LEP? As part of Title VI requirements, Link Transit has developed a Limited English Proficiency (LEP) Plan to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to Link Transit services as required by the Federal Transit Administration "Improving Access to Services for Persons with Limited English Proficiency." A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

Link Transit's Complaint and Investigation Procedures These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990, for alleged discrimination in any program or activity administered by Link Transit. These procedures do not deny the right of the complainant to file formal complaints with other State or Federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and Link Transit may be utilized for resolution. Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited under Title VI and related statutes may file a complaint.

The following measures will be taken to resolve Title VI complaints:

Title VI Complaint Procedure

Title VI complaint forms may download from www.linktransit.org or requested from (Link Transit).

The complainant may also submit a written statement that contains all the following information:

1. Name, address, and telephone number of the complainant.
2. The basis of the complaint (race, color, national origin).
3. The date or dates on which the alleged discriminatory event or events occurred.
4. The nature of the incident that led the complainant to feel discrimination was a factor.

5. Names, addresses and telephone numbers of persons who may have knowledge of the event.
6. Other agencies or courts where complaint may have been filed and a contact name.
7. Complainant's signature and date.

If the complainant is unable to write a complaint, Link Transit staff will assist the complainant. If requested by complainant, Link Transit will provide a language or sign interpreter.

Complainants have the right to complain directly to the appropriate federal agency. Complaints must be filed within one-hundred eighty (180) calendar days of the alleged incident.

Link Transit will begin an investigation within fifteen (15) working days of receipt of a complaint.

Link Transit will contact the complainant in writing no later than thirty (30) working days after receipt of complaint for additional information, if needed. If the complainant fails to provide the requested information in a timely basis, Link Transit may administratively close the complaint.

Link Transit will complete the investigation within ninety (90) days of receipt of the complaint. If additional time is need for investigation, complainant will be contacted. A written investigation report will be prepared by the investigator. This report shall include a summary description of the incident, findings and recommended corrective action.

A closing letter will be provided to the complainant and the respondent or respondent department. Parties will have five (5) working days from receipt of the closing letter to appeal. If neither party appeals, the complaint will be closed.

If required, the investigation report will be forwarded to the appropriate federal agency.

Federal Transit Administration Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor-TCR
1200 New Jersey Avenue, SE
Washington, DC 20590

FTA complaint procedures can also be found on the FTA web site at: www.fta.dot.gov. These procedures are also outlined in FTA Circular 4702.1B, Chapter IX.

A Title VI complaint must be submitted in writing. Link Transit strongly encourages the use of the **Link Transit Title VI Complaint Form** or sending an email when filing official complaints. Upon completion of a Link Transit Title VI Complaint Form, send it to: email info@linktransit.org or by mail to: **234 East Summit Avenue, Burlington, NC 27215, Attn: Link Transit Manager. It can also be faxed to 336.222.5004.**



TITLE VI COMPLAINT FORM

The City of Burlington on behalf of Link Transit operates its programs and services without regard to race, color and national origin in accordance with Title VI of the Civil Rights Act of 1964. Any person who believes that she or he has been aggrieved by any unlawful discriminatory practice under Title VI must file a complaint within 180 days of the alleged occurrence to any of the following by mail, in person, fax and/or email as explained at the end of the form.

Section I:		
Name:		
Address:		
Telephone (Home):	Telephone (Work):	
Electronic Mail Address:		
Accessible Format Requirements?	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other
Section II:		
Are you filing this complaint on your own behalf?	<input type="checkbox"/> Yes*	<input type="checkbox"/> No
<i>*If you answered "yes" to this question, go to Section III.</i>		
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.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Section III:		
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 <input type="checkbox"/> Disability
Date of Alleged Discrimination (Month, Day, Year): _____		
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.		

Section VI:		
Have you previously filed a discrimination complaint with this agency?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

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

You may attach any written materials or other information that you think is relevant to your complaint. Your signature and date are required below

Signature

Date

Mail, fax, email or deliver completed form to:

- City of Burlington, Attn: Transit Manager, 234 East Summit Avenue, Burlington, NC 27215, fax to: 336.222.5004 or email to: info@linktransit.org.
- Federal Transit Administration (FTA), Office of Civil Rights, Attn: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave, SE, Washington, DC 20590.

If any transit related information is needed in an alternative language, contact the Link Transit Manager at 234 East Summit Avenue, Burlington, NC 27215, call to: 336.222.7351, fax to: 336.222.5004 or email to: info@linktransit.org.



CIUDAD DE BURLINGTON (LINK TRANSIT) TÍTULO VI FORMULARIO DE QUEJA

La Ciudad de Burlington opera sus programas y servicios sin distinción de raza, color y origen nacional de acuerdo con el Título VI de la Ley de Derechos Civiles de 1964. Cualquier persona que crea que ha sido perjudicada por alguna práctica discriminatoria ilegal bajo el Título VI debe presentar una queja dentro de los 180 días de la supuesta ocurrencia a cualquiera de los siguientes por correo, en persona, fax y / o correo electrónico como se explica al final del formulario.

Sección I:		
Nombre:		
Teléfono (Casa):		
Telephone (Home):	Teléfono (Trabajo):	
Dirección de correo electrónico:		
Requisitos de formato accesible?	<input type="checkbox"/> Impresión grande	<input type="checkbox"/> Cinta de audio
	<input type="checkbox"/> TDD	<input type="checkbox"/> Otro
Sección II:		
¿Está presentando esta queja en su propio nombre?	<input type="checkbox"/> Sí *	<input type="checkbox"/> No
* Si respondió "sí" a esta pregunta, vaya a la Sección III.		
De lo contrario, proporcione el nombre y la relación de la persona por la que se queja.		
Explique por qué ha solicitado un tercero:		
Confirme que ha obtenido el permiso de la parte perjudicada si está presentando una demanda en nombre de un tercero	<input type="checkbox"/> Sí	<input type="checkbox"/> No
Sección III:		
Creo que la discriminación que experimenté se basó en (marque todo lo que corresponda): <input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen nacional <input type="checkbox"/> Discapacidad		
Fecha de presunta discriminación (mes, día, año): _____		
Explique con la mayor claridad posible qué sucedió y por qué cree que fue discriminado. Describe a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la persona (s) que lo discriminó (si lo conoce), así como los nombres y la información de contacto de los testigos. Si necesita más espacio, utilice la parte de atrás de este formulario.		

Sección VI:		
¿Ha presentado anteriormente una queja por discriminación con esta agencia?	<input type="checkbox"/> Sí	<input type="checkbox"/> No
En caso afirmativo, proporcione cualquier información de referencia con respecto a su queja anterior.		

Sección V:	
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?	
<input type="checkbox"/> Sí <input type="checkbox"/> No	
En caso afirmativo, marque todo lo que corresponda: <input type="checkbox"/> Tribunal Federal:	
<input type="checkbox"/> Tribunal Federal: _____	<input type="checkbox"/> Agencia Estatal: _____
<input type="checkbox"/> Tribunal estatal: _____	<input type="checkbox"/> Agencia local: _____
Proporcione información sobre una persona de contacto en la agencia / tribunal donde se presentó la queja.	
Nombre: _____	
Título: _____	
Agencia: _____	
Dirección: _____	
Teléfono: _____	
Sección VI:	
El nombre de la queja de la agencia está en contra: _____	
La queja del nombre de la persona es contra: _____	
Título: _____	
Ubicación: _____	
Número de teléfono (si está disponible): _____	

Puede adjuntar cualquier material escrito u otra información que considere relevante para su reclamo. Su firma y fecha son requeridas a continuación

Firma

Fecha

Envíe por correo, fax, correo electrónico o entregue el formulario completo a:

- City of Burlington, Attn: Transit Manager, 234 East Summit Avenue, Burlington, NC 27215, fax to: 336.222.5004 or email to: info@linktransit.org.
- Federal Transit Administration (FTA), Office of Civil Rights, Attn: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave, SE, Washington, DC 20590.

If any transit related information is needed in an alternative language, contact the Link Transit Manager at 234 East Summit Avenue, Burlington, NC 27215, call to: 336.222.7351, fax to: 336.222.5004 or email to: info@linktransit.org.

APPENDIX B: LIST OF INVESTIGATIONS, LAWSUITS AND COMPLAINTS

	<u>Date</u> <u>(Month,</u> <u>Day, Year)</u>	Summary (include basis of complaint: race, color, or national origin)	<u>Status</u>	<u>Action(s)</u> <u>Taken</u>
<u>Investigations</u>	None	None	None	None
<u>Lawsuits</u>	None	None	None	None
<u>Complaints</u>	None	None	None	None

APPENDIX C: SERVICE CHANGES AND OUTREACH SUMMARY

Fare and Service Changes:

1. Reduced Link Transit service by one trip due to novel Coronavirus pandemic – March 2020
2. Implemented shuttle services for COVID-19 testing April 2020
3. Launching Link Transit fare free service – June 2021
4. Restoring full Link Transit service – July 2021
5. Implement evening service – to be determined – approved by City Council August 2021
6. Added Saturday service – October 2021
7. Implemented shuttle service to Burlington Sock Puppets – June 2022
8. Implement evening service – to be determined – approved by City Council August 2021

Public Outreach:

During the FFY 20-22 period, there was no face-to-face outreach due primarily to the novel coronavirus pandemic. The months of this period which occurred before the pandemic shutdown had no face- to-face outreach.

Throughout FFY 20-22, Link Transit depended on the Link Transit website, social media outlets, direct emails and communication with passengers at the temporary transit hub and onboard buses.

1. Public outreach for all service adjustments throughout FFY 20-22 were made a month in advance when planning was possible and included direct email to customers on e-mailing lists for effected routes, Link Transit website, social media and passenger apps.
2. Occasionally driver shortages did not allow for 30 days' notice that a certain trip or trips on one or more routes would be cancelled for a particular period. Nonetheless outreach to notify the public included direct email to customers on e-mailing lists for effected routes, Link Transit website, social media and passenger app announcements
3. Announcements for inclement weather were announced via the Link Transit website, passenger apps, social media and emails when the weather effected service delivery.
4. Periodic announcements on the federal mask mandate for transit passengers and staff were made throughout the pandemic via social media and email. The mandate was posted on buses and at all Link Transit facilities and the Link Transit website.
5. Outreach was made ahead of the for free rides via email, rider alerts, flyers, brochures, website and social media.
6. Holiday service levels were announced via the Link Transit website, passenger apps, social media and emails. A calendar of holiday service levels is posted on Link Transit fixed route vehicles, on the website and in public areas of Link Transit facilities.
7. Customer surveys took place during in the latter part of FFY 2022 in partnership with the Piedmont Triad bus operators. The survey in May/June 2022 were offered electronically and in paper format. All surveys were announced through social media, direct email and the Link Transit website. The May/June surveys included a paper option made available to passengers on bus and at passenger facilities.
8. Changes in passenger apps were announced via electronic means and printed signs on Link Transit vehicles and facilities.

APPENDIX D: LIMITED ENGLISH PROFICIENCY (LEP) PLAN

Introduction

The Link Transit system, operated by the City of Burlington, understands that transportation is critically important to the daily lives of our community members. The purpose of this limited English proficiency plan is to comply with Link Transit's responsibilities to limited English proficient (LEP) persons consistent with Title VI of the Civil Rights Act of 1964 and its implementing regulations. Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations, provides that no person shall be subjected to discrimination on the basis of race, color or national origin under any program or activity that receives federal financial assistance.

In cooperation with the Cities of Burlington, Town of Gibsonville, Alamance County and Alamance Community College, Link Transit provides services to connect residents and visitors to quality-of-life opportunities. Link Transit is a direct recipient of Sections 5307 and 5339 funds to urbanized areas and fully implements the provisions of federal and state guidance to meet the requirements to provide public transit services. Link Transit may also apply for discretionary funds via North Carolina Department of Transportation (NCDOT) processes for Sections 5310 and 5339 funds.

Purpose

The purpose of this policy plan is to ensure compliance with Title VI of the Civil Rights Act of 1964. "Improving Access to Services for Persons with Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Different treatment based upon a person's inability to speak, read, write, or understand English may be a type of national origin discrimination.

Applicability

All federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies such as the City of Burlington on behalf of Link Transit, private and non-profit entities, and sub recipients.

Plan Summary

Link Transit has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to Link Transit services as required by the Federal Transit Administration. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available, and information for future plan updates.

Definitions

Limited English Proficiency (LEP) individual – Any prospective, potential, or actual recipient of services from Link Transit who cannot speak, read, write or understand the English language at a level that permits them to interact effectively with Link Transit staff.

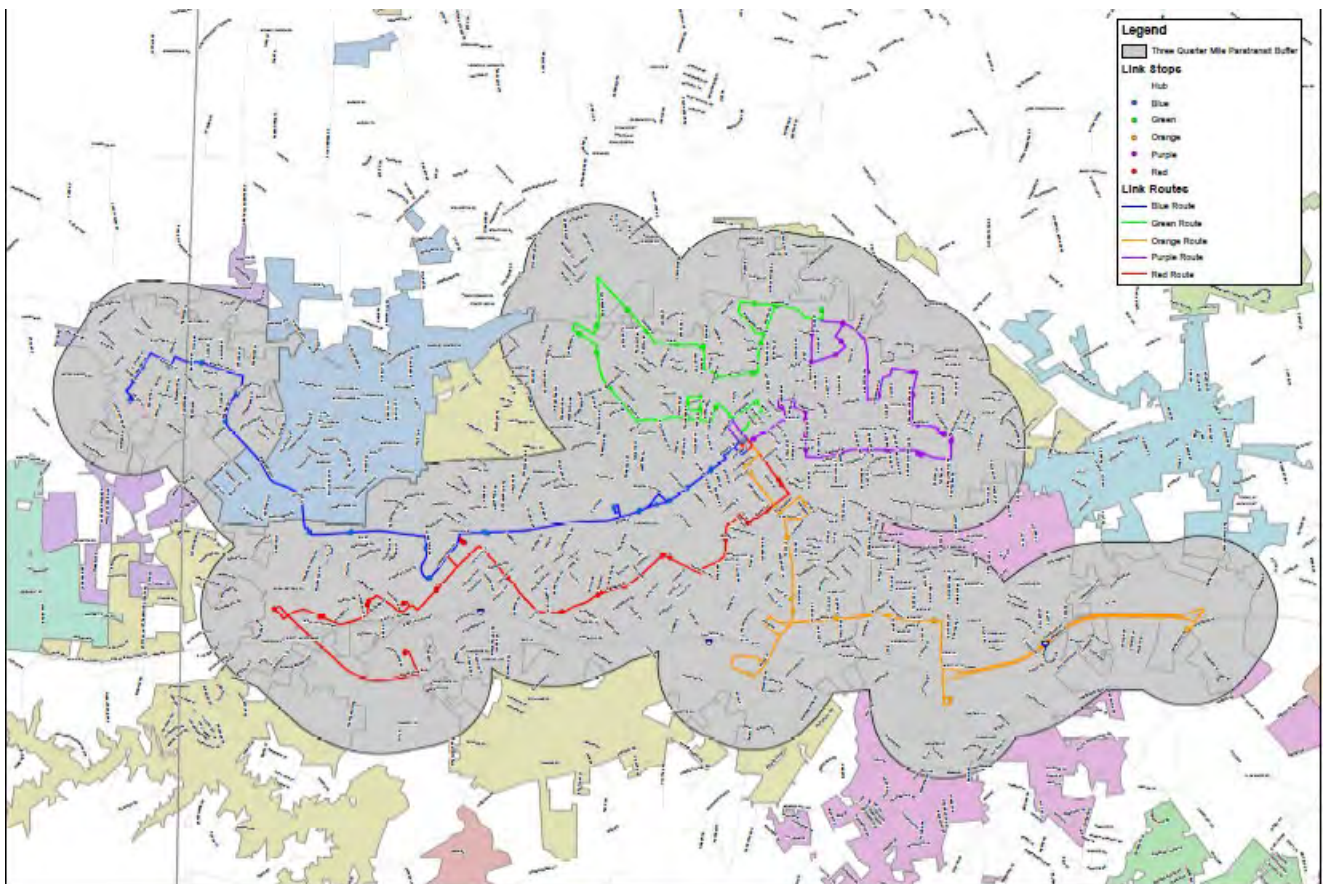
Vital Documents – Forms that include, but are not limited to; applications consent forms, letters containing important information regarding participation in a program, notices pertaining to the reduction, denial, or termination of services, the right to appeal such actions, or that require a response from notices advising LEP persons of the availability of free language assistance, and other outreach materials.

Title VI Compliance Officer – The Link Transit point of contact concerning Title VI related items, who is the Transit Manager.

Substantial number of LEP (Safe Harbor Threshold) – 5% or 1,000 people, whichever is smaller, are prospective, potential or actual recipients of service and speak a primary language other than English and have Limited English Proficiency or who cannot read, write or understand the English language at a level that permits them to interact effectively with English-only speaking members of Link Transit staff.

Demography

The City of Burlington on behalf of Link Transit operates transit services within and between the Cities of Burlington and Graham, Towns of Gibsonville and Elon, and portions of Alamance County. The following information is based on 2020 US Census information. See below for the service area including the routes for Link Transit. The overall square miles are 48.75 of the 90.4 square miles in the Burlington-Graham Urbanized Area. The data presented below relates to the Burlington-Graham Urbanized Area as Link Transit services primarily operate within the UZA.



The Link Transit service area (or ride-shed) has a population of 96,968 of the 141,788 individuals based on the U.S. Census Bureau, 2021 American Community Survey.

Racial Breakdown – 22% service area’s population is African American. 56% is White/Caucasian. 14% is Hispanic. The next largest racial group is Two or more Races at 4%.

Spoken Language – The following data includes the Link Transit service area, those persons 5 years of age or older and both Native- and Foreign-born persons (U.S. Census Bureau, 2021 American Community Survey). 84% of the population speaks only English, leaving 16% that can speak a language other than English. 13% of that number is Spanish speakers. Of that population 5.4% indicate that they speak English less than “very well.”

Looking only at all persons who speak English less than “very well”, Spanish speakers make up the largest group at 4.1%

Household Language by Linguistic Isolation – A "limited English-speaking household" is a household in which no household member 14 years old and older (1) speaks only English or (2) speaks a non-English language and speaks English "very well." In other words, all members 14 years old and over have at least some difficulties speaking English. These residents have a particular challenge navigating American transit, and transit systems have a challenge providing a simple, no-hassle rider experience to members of these households.

Additional details on the demographics of the Link Transit service area are shown below at the end of the LEP.

Action Steps

The following pages lists the details of implementing, maintaining, and monitoring Link Transit’s LEP program plan to ensure federal compliance and meaningful service available to all non-English speakers using Link Transit services.

Link Transit will use the USDOT four factor LEP analysis to determine the LEP language groups present in the area and specific language services that are needed. The four factor analysis considers the following: 1) The number or proportion of LEP persons eligible in the Link Transit service area who may be served or likely to encounter a Link Transit program, activity, or service; 2) the frequency with which LEP individuals come in contact with a Link Transit service; 3) the nature and importance of the program, activity or service provided by Link Transit to the LEP population; and 4) the resources available to Link Transit and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

Four Factor Analysis

- 1. The number or proportion of LEP persons eligible in Link Transit service territory who may be served or likely to encounter a Link Transit program, activity, or service.**

Link Transit has examined American Community Survey data table C16001 from US Census to determine the demographic makeup of the community. To get specific data related to prospective, potential, or actual recipient of services from Link Transit who cannot speak, read, write or understand the English language at a level that permits them to interact effectively with agency staff, Link Transit has utilized the geographic area that constitutes its service area and 0.75-mile buffer on all other Link Transit stops. The total area covered is 48.75 square miles with a total population of 96,978.

Based on review of the data and calculating the Safe Harbor Threshold, Link Transit has identified the LEP population languages in the area as Spanish. There are over 1,000 individuals in the Link Transit service area who speak English less than very well and are fluent in Spanish.

2. The frequency with which LEP individuals come in contact with a Link Transit program, activity, or service.

While we understand anecdotally that LEP persons use Link Transit services, the frequency is low. This is based on the low numbers of complaints, requests, and failed communication efforts experienced by the Link Transit staff.

Language Spoken at Home for Those Who Speak English Less Than 'Very Well'.

Language	# Of Individuals
Spanish	13,183
French, Haitian, Cajun	196
German, West Germanic	90
Russian, Polish, Slavic	84
Other Indo-European	708
Korean	441
Chinese	479
Vietnamese	580
Tagalog, Filipino	76
Other Asian Pacific	888
Arabic	242
Other	395

U.S. Census Bureau, 2021 American Community Survey 5-Year Estimates (Table C16001)

Link Transit will assess the frequency at which staff, Link Transit drivers, and customer service employees have or could possibly have contact with LEP persons. This includes documenting phone inquiries and verbally surveying Link Transit drivers. Link Transit had no requests for interpreters, and no requests for translated documents in FFY 2020-2022.

Survey Results – Link Transit completed an Onboard Passenger survey in 2017. 64 persons completed the survey. While Link Transit’s ridership has consistently been predominantly white and black the percentages vary. We could infer a low percentage of LEP persons currently using the system. When compared to the entire service area, ridership does not closely match the demographics of the service area. A demographic survey will be conducted sometime in FY 2023-2024 to obtain additional demographic data.

Due to the low impact from the Hispanic community, this presents a great opportunity for outreach to the LEP population. As our communities grow and interactions with LEP persons increases Link Transit wishes to ensure appropriate measures are taken to communicate effectively with persons needing language assistance.

3. The nature and importance of the program, activity, or service provided by Link Transit to the LEP community.

Link Transit understands that transportation is critically important to the daily lives of our community members. Certain aspects of our services are of critical importance and this plan will be used to meet the needs of the LEP community. Link Transit provides important transportation services to the public throughout its service area. Link Transit connects the major cities and towns of the Burlington-Graham Urbanized Area to quality-of-life opportunities. Link Transit also provides services to connect to Amtrak station in Burlington. Link Transit riders utilize services to commute to work, going to school/universities, occasionally for special events and also in lieu of reliance on a personal automobile.

4. The resources available to Link Transit and costs.

Link Transit has identified in-house staff with language abilities apart from English, and this staff has some availability to assist with requests related to Link Transit services, including transit. This is the case with the City of Burlington and the Link Transit contractor staff. Link Transit has also identified some businesses and technological solutions that provide translation and interpretative services, these services would be utilized on as needed basis. To make public meetings available to LEP persons, volunteer translators are available through University of North Carolina - Greensboro (UNCG). This resource could also be used to provide translation for written materials in Spanish or other languages. Details on this program is here: <https://cnnc.uncg.edu/interpreter-access-project/>

Link Transit website has the capability to translate all the information to multiple languages including Spanish through Google Translate.

Based on the Four Factor Analysis, Link Transit determined to have a Language Assistance Plan for the Spanish Population.

Burlington, NC Urbanized Area

Urban Area in: [United States](#)

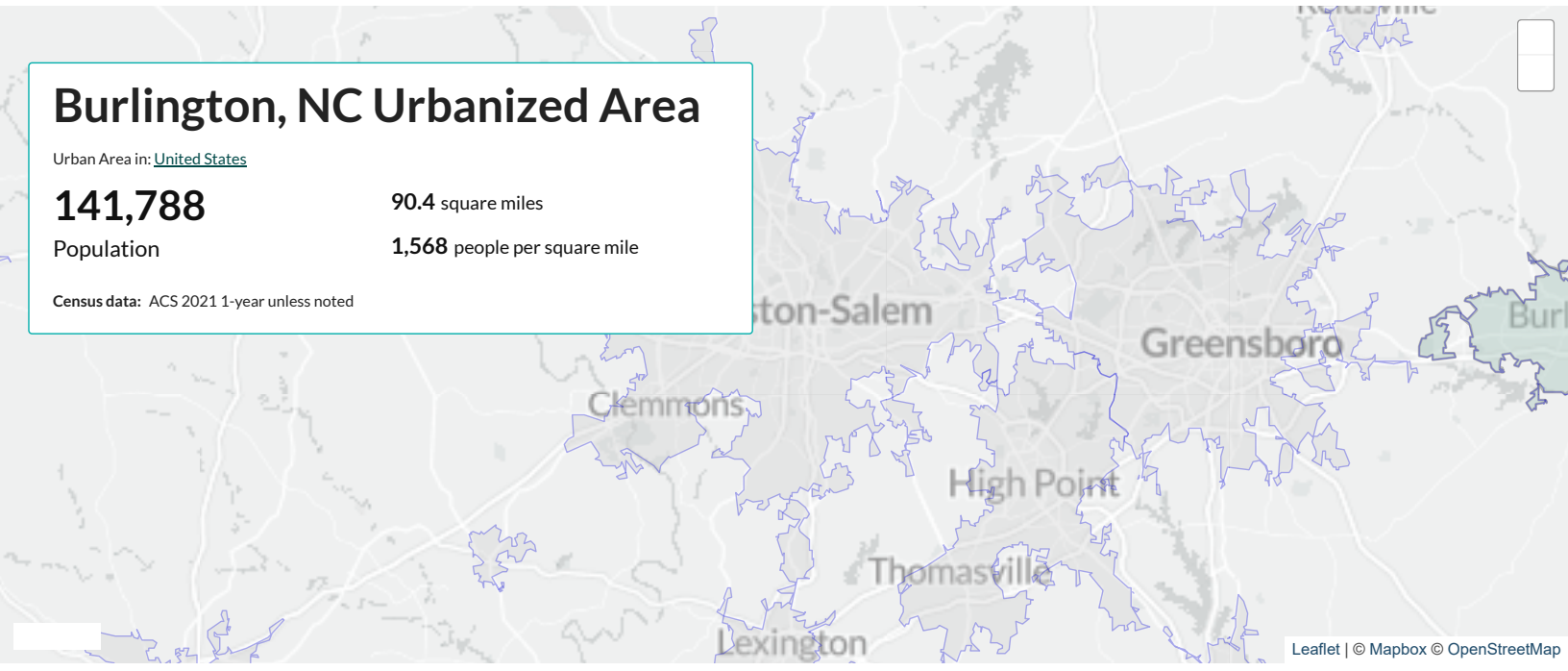
141,788

Population

90.4 square miles

1,568 people per square mile

Census data: ACS 2021 1-year unless noted



Leaflet | © Mapbox © OpenStreetMap

Find data for this place

Hover for margins of error and contextual data.

Demographics

† Margin of error is at least 10 percent of the total value. Take care with this statistic.

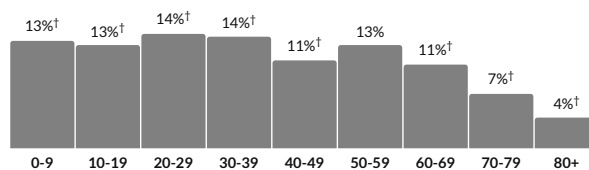
Age

36.2

Median age

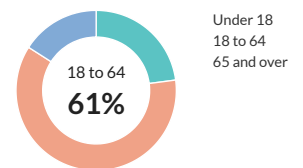
about 90 percent of the figure in United States: 38.8

Population by age range



Show data / Embed

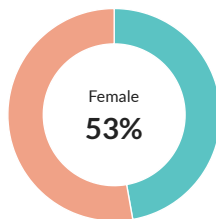
Population by age category



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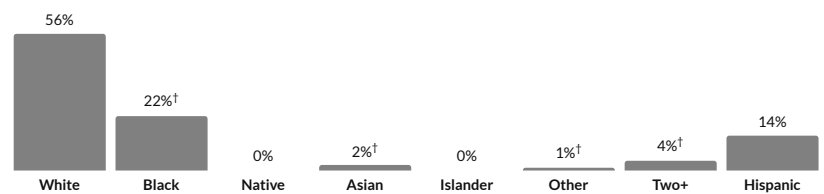
† Margin of error is at least 10 percent of the total value. Take care with this statistic.

Sex



Male
Female

Race & Ethnicity



Show data / Embed

* Hispanic includes respondents of any race. Other categories are non-Hispanic.

Show data / Embed

Economics

† Margin of error is at least 10 percent of the total value. Take care with this statistic.

Income

\$30,137

Per capita income

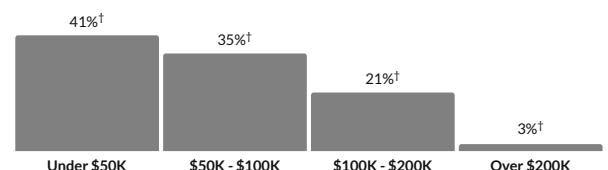
about 80 percent of the amount in United States: \$38,332

\$60,361

Median household income

about 90 percent of the amount in United States: \$69,717

Household income



Show data / Embed

Poverty

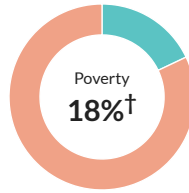
† Margin of error is at least 10 percent of the total value. Take care with this statistic.

12.6%

Persons below poverty line

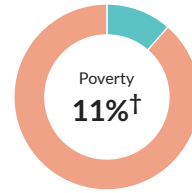
about the same as the rate in United States: 12.8%

Children (Under 18)



Poverty
Non-poverty

Seniors (65 and over)



Poverty
Non-poverty

Show data / Embed

Show data / Embed

Transportation to work

† Margin of error is at least 10 percent of the total value. Take care with this statistic.

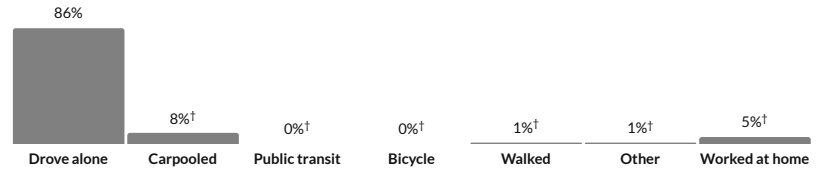
23.6 minutes

Mean travel time to work

* ACS 2020 5-year data

about 90 percent of the figure in United States: 26.9

Means of transportation to work



* Universe: Workers 16 years and over

Show data / Embed

Families

Households

56,094

Number of households

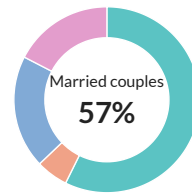
United States: 127,544,730

2.5

Persons per household

a little less than the figure in United States: 2.5

Population by household type

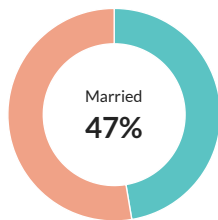


Married couples
Male householder
Female householder
Non-family

Show data / Embed

Marital status

† Margin of error is at least 10 percent of the total value. Take care with this statistic.

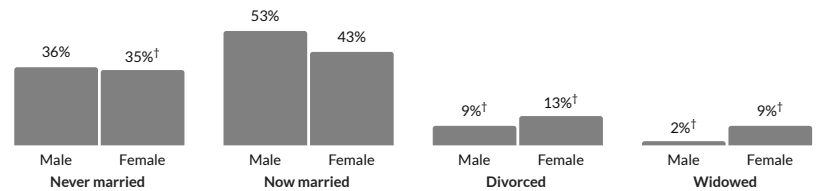


Married
Single

* Universe: Population 15 years and over

Show data / Embed

Marital status, by sex



Show data / Embed

Fertility

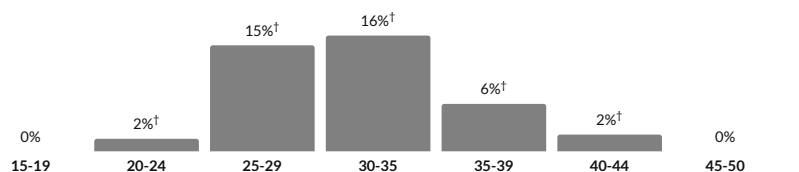
† Margin of error is at least 10 percent of the total value. Take care with this statistic.

5.7%

Women 15-50 who gave birth during past year

about 10 percent higher than the rate in United States: 5.1%

Women who gave birth during past year, by age group



* Universe: Women 15 to 50 years

Show data / Embed

Housing

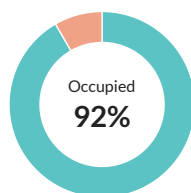
Units & Occupancy

61,207

Number of housing units

United States: 142,148,050

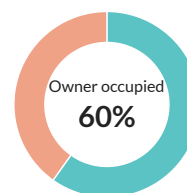
Occupied vs. Vacant



Occupied
Vacant

Show data / Embed

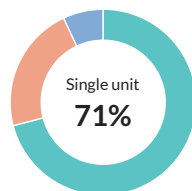
Ownership of occupied units



Owner occupied
Renter occupied

Show data / Embed

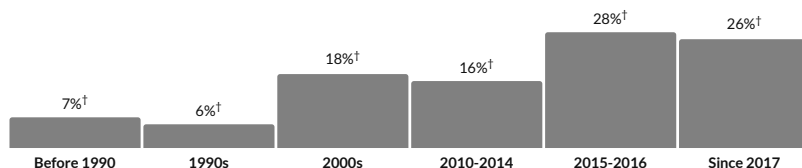
Types of structure



Single unit
Multi-unit
Mobile home
Boat, RV, van, etc.

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Year moved in, by percentage of population



Show data / Embed

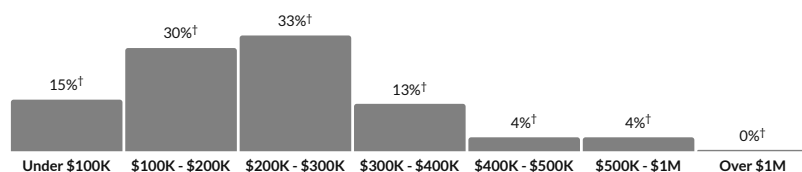
Value

\$213,700

Median value of owner-occupied housing units

about three-quarters of the amount in United States: \$281,400

Value of owner-occupied housing units



Show data / Embed

† Margin of error is at least 10 percent of the total value. Take care with this statistic.

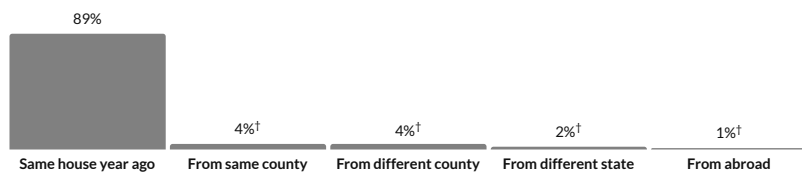
Geographical mobility

11%

Moved since previous year

about 90 percent of the rate in United States: 12.8%

Population migration since previous year



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† Margin of error is at least 10 percent of the total value. Take care with this statistic.

Social

Educational attainment

88.2%

High school grad or higher

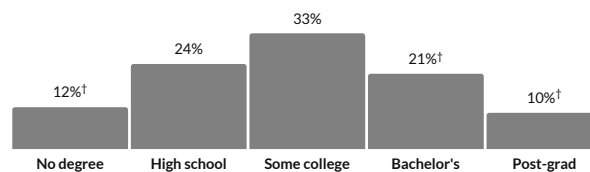
about the same as the rate in United States: 89.4%

31.4%

Bachelor's degree or higher

about 90 percent of the rate in United States: 35%

Population by highest level of education



* Universe: Population 25 years and over

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† Margin of error is at least 10 percent of the total value. Take care with this statistic.

Language

N/A

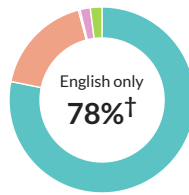
Persons with language other than English spoken at home

* ACS 2020 5-year data

Language at home, children 5-17

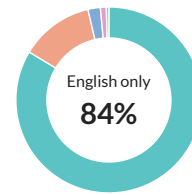
Language at home, adults 18+

† Margin of error is at least 10 percent of the total value. Take care with this statistic.



English only
Spanish
Indo-European
Asian/Islander
Other

Show data / Embed



English only
Spanish
Indo-European
Asian/Islander
Other

Hide data / Embed

Language at home, adults 18+ (Table B16007) [View table](#)

Column	Burlington, NC		United States					
English only	83.6%	±2.3%	91,396	±4,782	78.3%	±0.1%	202,355,308	±144,991.6
Spanish	12.8%†	±1.6%	13,948	±1,812.9	12.8%	±0%	33,136,131	±91,241.9
Indo-European	2.2%†	±0.8%	2,345	±885.1	3.9%	±0%	10,140,516	±74,685.4
Asian/Islander	1%†	±0.5%	1,113	±494.3	3.7%	±0%	9,671,724	±54,463.1
Other	0.5%†	±0.5%	494	±510.4	1.2%	±0%	3,114,788	±48,256.8

Hide data

Place of birth

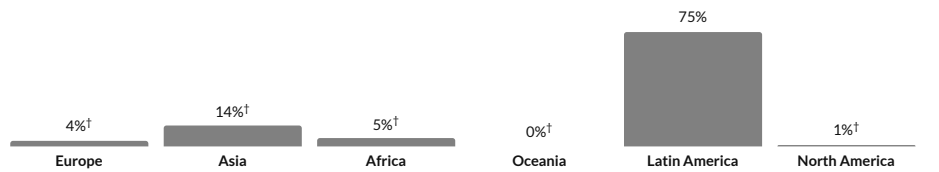
† Margin of error is at least 10 percent of the total value. Take care with this statistic.

9.7%

Foreign-born population

about two-thirds of the rate in United States: 13.6%

Place of birth for foreign-born population



* ACS 2020 5-year data

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Veteran status

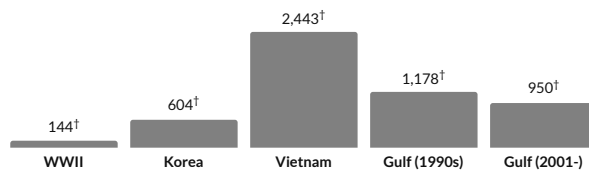
† Margin of error is at least 10 percent of the total value. Take care with this statistic.

6.7%

Population with veteran status

a little higher than the rate in United States: 6.4%

Veterans by wartime service



* Civilian veterans who served during wartime only; ACS 2020 5-year data

7,286 Total veterans
6,684 Male
602 Female

Hover for margins of error and contextual data.

This profile displays data from more than one ACS release. Charts not derived from ACS 2021 1-year data are noted with an *.

Citation: U.S. Census Bureau (2021). *American Community Survey 1-year estimates*. Retrieved from *Census Reporter Profile page for Burlington, NC Urbanized Area* <<http://censusreporter.org/profiles/40000US11728-burlington-nc-urbanized-area/>>

Citation: U.S. Census Bureau (2020). *American Community Survey 5-year estimates*. Retrieved from *Census Reporter Profile page for Burlington, NC Urbanized Area* <<http://censusreporter.org/profiles/40000US11728-burlington-nc-urbanized-area/>>

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LANGUAGE ASSISTANCE PLAN

Implementation Methods

How to Identify an LEP Person who Needs Language Assistance – These methods may be used to help identify persons who may need language assistance:

1. Communicate and coordinate with the Burlington Graham Metropolitan Planning Organization.
2. Examine records requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings.
3. When public meetings are held, have a staff member greet and briefly speak to each attendee. To informally gauge the attendee's ability to speak and understand English, ask a question that requires a full sentence reply.

Language Assistance Measures - Link Transit may implement the following LEP procedures as appropriate:

1. Link Transit has identified in-house staff with other language abilities and this staff has some availability to assist with requests related to Link Transit services, including transit.
2. Public notice, publications, and other material, including webpage content, may be made available in other languages.
3. Utilize translators at select public meetings; and
4. Use a telephone translation service such as Language Line, and web translation applications such as Google Translate.

Training – Link Transit implements training for Link Transit front-line contracted employees on Title VI and LEP considerations through the contractor. These training opportunities occur on planned schedules and include opportunities for virtual training seminars provided from the video session from LEP.gov. Front-line employees or contractors who come in contact with LEP individuals are Bus Operators, Customer Service Representatives and Road Supervisors. LEP training include understanding Title VI responsibilities, what procedures to follow when encountering an LEP person and how to potentially handle a Title VI complaint.

Outreach – Specific outreach efforts will be evaluated on a case-by-case basis. Some or all the following methods may be used:

1. Posters and brochures will be made available through local Universities and Community Colleges, City and Town offices, and other locations.
2. Link Transit website will indicate ways in which LEP persons can access information about our services.
3. The Link Transit Notice of Rights under Title VI to the public is available at the Link Transit office, on buses, online at www.linktransit.org, and within the Ride Guide.
4. If staff knows that they will be presenting a topic that could be of importance to an LEP individual or if staff will be hosting a meeting or a workshop in a geographic location with a known concentration of LEP persons, meeting notices, fliers, advertisements, and agendas will be available in an alternative language, based on known LEP population in the area.

Monitoring, Evaluating and Updating the LEP & LAP Plans

This plan is designed to be flexible and is one that can be easily updated. At a minimum, Link Transit

will follow the Title VI Program update schedule for the LEP plan. Future plan updates will include the most current data available. The results may change based on the timing of the plan update.

Each update will examine all plan components such as:

1. How many LEP persons were encountered?
2. Were their needs met?
3. What is the current LEP population in Link Transit service area?
4. Has there been a change in the types of languages where translation services are needed?
5. Is there still a need for continued language assistance for any previously identified Link Transit programs? Are there other programs that should be included?
6. Have Link Transit's available resources, such as technology, staff, and financial costs changed?
7. Has Link Transit fulfilled the goals of the LEP Plan?
8. Were any complaints received?

Dissemination of the LEP & LAP Plans

Copies of the LEP plan will be on file at the Link Transit office. The LEP plan will be provided, on request, to any person(s) requesting the document via phone, in person, by mail or email. LEP persons may obtain copies/translations of the plan upon request. The plan will also be available on the Link Transit website.

Any questions or comments regarding this plan should be directed to the City of Burlington, Attn: Transit Manager, 234 East Summit Avenue, Burlington, NC 27215, fax to: 336.222.5004 or email to: info@linktransit.org.