
Title VI of the Civil Rights Act of 1964

BLACK AND WHITE CABS OF VIRGINIA BEACH, INC.

Title VI Implementation Plan

Adopted November 2018

Revised November 2021

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I. INTRODUCTION

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

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

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

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

This document details how Black and White Cabs of Virginia Beach, Inc. (hereinafter the "Cab Company" or the "agency"), incorporates nondiscrimination policies and practices in providing services to the public. The Cab Company's Title VI policies and procedures are documented in this plan and its appendices and attachments. This plan will be updated periodically to incorporate changes and additional responsibilities that arise.

II. OVERVIEW OF SERVICES

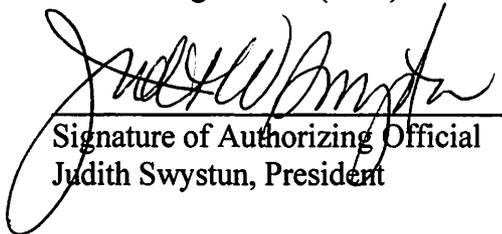
The Cab Company is a full service transportation company with over 14 years' experience. Its drivers provide safe, reliable on-demand taxicab service to the elderly and disabled, as well as consumers, corporations, government and military agencies and tourists throughout its service area. The Cab Company has a written agreement pursuant to which Hampton Roads Transportation, Inc. ("HRTI"), provides administrative and dispatch services for the Cab Company. Thus, depending on the context, references to services and resources herein include the services and resources provided by HRTI under the agreement.

III.POLICY STATEMENT AND AUTHORITIES

Title VI Policy Statement

The Cab Company is committed to ensuring that no person shall, on the grounds of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100-259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, whether those programs and activities are federally funded or not.

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


Signature of Authorizing Official
Judith Swystun, President

1/27/22
Date

Authorities

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance (refer to 49 CFR Part 21). The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of the terms "programs or activities" to include all programs or activities of Federal Aid recipients, sub recipients, and contractors, whether such programs and activities are federally assisted or not.

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

IV. NONDISCRIMINATION ASSURANCE TO DRPT

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

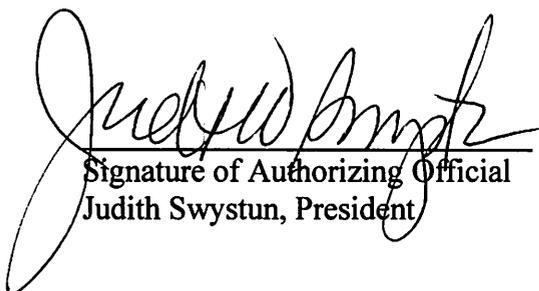
As part of the Certifications and Assurances submitted to DRPT with the Annual Grant Application and all Federal Transit Administration grants submitted to the DRPT, the Cab Company submits a Nondiscrimination Assurance which addresses compliance with Title VI as well as nondiscrimination in hiring (EEO)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

In signing and submitting this assurance, the Cab Company confirms to DRPT the agency's commitment to nondiscrimination and compliance with federal and state requirements.

V. PLAN APPROVAL DOCUMENT

I hereby acknowledge the receipt of the Cab Company's revised Title VI Implementation Plan, which Plan is substantially identical to that previously approved and adopted by the Cab Company's Board of Directors. I am 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 according to Federal Transit Administration (FTA) Circular 4702.1B Title VI requirements and guidelines for FTA sub-recipients.

BLACK AND WHITE CABS OF VIRGINIA BEACH, INC.


Signature of Authorizing Official
Judith Swystun, President

1/27/22
Date

VI. ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES

The Cab Company's Title VI Manager is responsible for ensuring implementation of the agency's Title VI program. Title VI program elements are interrelated and responsibilities may overlap. The specific areas of responsibility have been delineated below for purposes of clarity.

Overall Organization for Title VI

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

Detailed Responsibilities of the Title VI Manager

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

1. Process the disposition of Title VI complaints received.
2. Conduct annual Title VI reviews of agency to determine the effectiveness of program activities at all levels.
3. Conduct Title VI reviews of construction contractors, consultant contractors, suppliers, and other recipients of federal-aid fund contracts administered through the agency, if any.
4. Conduct training programs on Title VI and other related statutes for any agency employees.
5. Prepare a yearly report of Title VI accomplishments and goals, as and when requested by the FTA or DRPT.
6. Develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English.
7. Identify and eliminate discrimination.
8. Establish procedures for promptly resolving deficiency status and writing the remedial action necessary, all within a period not to exceed 90 days.

General Title VI responsibilities of the agency

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

1. Data collection

To ensure that Title VI reporting requirements are met, the Cab Company will maintain:

- A database or log of Title VI complaints received. The investigation of and response to each complaint is tracked within the database or log.
- A log of the public outreach and involvement activities undertaken to ensure that minority and low-income people had meaningful access to these activities.

2. Annual Report and Updates

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

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

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

3. Annual review of Title VI program

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

4. Dissemination of information related to the Title VI program

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

5. Resolution of complaints

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

6. Written policies and procedures

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

7. Internal education

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

Title VI training is the responsibility of the Administration Manager.

8. Title VI clauses in contracts

In all federal procurements requiring a written contract or Purchase Order (PO), the Cab Company’s contract/PO will include appropriate non-discrimination clauses. The Title VI Manager will work with the president or other officer who is/are responsible for procurement contracts and PO’s to ensure appropriate non-discrimination clauses are included.

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

Requirement to Provide a Title VI Public Notice

Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, the Cab Company shall disseminate this information to the public by posting a Title VI notice on the agency's website and in public areas of the agency's office(s), if any, and each vehicle operated in passenger service.

SEE APPENDIX A-Title VI Notice to the Public

SEE APPENDIX B-Title VI Notice to the Public List of Locations

VIII. TITLE VI COMPLAINT PROCEDURES

Requirement to Develop Title VI Complaint Procedures and Complaint Form.

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

Complaint Protocols

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

The Cab Company includes language substantially identical to the following on the agency's website, in public notices, and on notices posted on the interior of each vehicle operated in passenger service:

The Cab Company 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.

For additional information on the Cab Company's nondiscrimination policies and procedures, or to file a complaint, please visit the website at <https://www.coastalride.com/legal/> and view the Civil Rights Notices or contact Robin Webb, Administration Manager, 6304 Sewells Point Road, Norfolk, VA 23513.

Instructions for filing Title VI complaints are posted on the agency's website and in the interior of each vehicle operated in passenger service and the public areas (if any) of the agency's facilities.

SEE APPENDIX C-Title VI Complaint Form

Procedures for Handling and Reporting Complaints/Investigations

Should the Cab Company receive any Title VI complaints, it will follow these procedures:

Procedures

1. Any individual, group of individuals, or entity that believes they have been subjected to discrimination on the basis of race, color, or national origin may file a written complaint with the Title VI Manager. The complaint is to be filed in the following manner:
 - a. A formal complaint must be filed within 180 calendar days of the alleged occurrence.
 - b. The complaint shall be in writing and signed by the complainant(s).
 - c. The complaint should include:
 - the complainant's name, address, and contact information
 - (i.e., telephone number, email address, etc.)
 - the date(s) of the alleged act of discrimination (if multiple days, include the date when the complainant(s) became aware of the alleged discrimination and the date on which the alleged discrimination was discontinued or the latest instance).
 - a description of the alleged act of discrimination
 - the location(s) of the alleged act of discrimination (include vehicle number if appropriate)
 - an explanation of why the complainant believes the act to have been discriminatory on the basis of race, color, and national origin
 - if known, the names and/or job titles of those individuals perceived as parties in the incident
 - contact information for any witnesses
 - indication of any related complaint activity (i.e., was the complaint also submitted to DRPT or FTA?)
 - d. The complaint shall be submitted to the Cab Company's Title VI Manager, Robin Webb, at 6304 Sewells Point Road, Norfolk, VA 23513 or via email at robin.webb@coastalride.com.
 - e. Complaints received by any other employee of the Cab Company will be immediately forwarded to the Title VI Manager.
 - f. In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the Title VI Manager. Under these circumstances, the complainant will be interviewed, and the Administration Manager will assist the complainant in converting the verbal allegations to writing.
2. Upon receipt of the complaint, the Title VI Manager will immediately:
 - a. notify DRPT (no later than 3 business days from receipt)
 - b. notify the Cab Company's president
 - c. ensure that the complaint is entered in the complaint database
3. Within 3 business days of receipt of the complaint, the Title VI Manager will contact the complainant by telephone to set up an interview.

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

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

Transportation-Related Title VI Investigations, Complaints, and Lawsuits

Background

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

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

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

SEE APPENDIX D- Investigations, Lawsuits and Complaints Document

IX. PUBLIC OUTREACH AND INVOLVEMENT

PUBLIC PARTICIPATION PLAN

Introduction

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

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

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

The Cab Company's PPP

The Cab Company is a private, for-profit organization that is authorized by local government to conduct taxicab operations. Pursuant to local law, the Cab Company must provide transportation on demand throughout the entire jurisdiction in which it is authorized to conduct operations. Thus, such transportation is provided without regard to race, color, national origin, gender, age, or disability.

The rates a taxicab may charge are controlled by the local government. In addition, the number of taxicabs the Cab Company can place in service is determined by the local government and/or through economic supply and demand (primarily competing taxicab/rideshare companies and the riding public).

In short, once the decision to provide taxicab service in a given jurisdiction is made, there is virtually no other significant transportation-related decision on which public input would have any bearing. Service locations, rates, and availability of service (wait times/number of taxicabs) are all dictated by local law or straightforward economics.

The Cab Company's outreach is designed to reach all areas of the geographic market – including minorities, the disabled, and low income individuals. It does this through its website, social

media marketing, and participation in community meetings.

As for the disabled community, it has been vocal in seeking on-demand wheelchair accessible transportation in the Cab Company's service area. With the help of DRPT and federal grants, the Cab Company has been able to acquire wheelchair accessible vehicles ("WCVs") to provide this service. The Cab Company monitors usage and response times for WCVs and sends representatives to transportation-related meetings of a number of organizations that include disabled members to identify unmet demand and to obtain feedback on the quality of service.

As to LEP persons, the Cab Company refers such callers to Propio Language Services for assistance in translating transportation requests, including those speaking Spanish (Spanish being the only language spoken by an LEP population in excess of the Safe Harbor Provision (see Section X below).

Accordingly, the Cab Company's PPP consists of the following:

1. Engage minorities and low income persons through Social Media
2. Attend community meetings that address service to the disabled community
3. Maintain Spanish and other language dispatch capability

SEE APPENDIX E-Summary of Outreach Efforts

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

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

Introduction and Legal Basis

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

As required, the Cab Company developed a written LEP Plan (below). Using 2010 and American Community Survey (ACS) Census data, the Cab Company has evaluated data to determine the extent of need for translation services of its vital documents and materials.

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

Assessment of Needs and Resources

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

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

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

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

Data from the U.S. Census Bureau's American Community Survey (ACS) were obtained through www.census.gov by the Cab Company's service area. The agency's service area includes a total of 19,554 (3.08%) persons with Limited English Proficiency (those

persons who indicated that they spoke English less than “very well,” in the 2011-2015 ACS Census). The 2011-2015 ACS data was used due to the lack of LEP by language group data for the 2012-2016 ACS estimates.

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

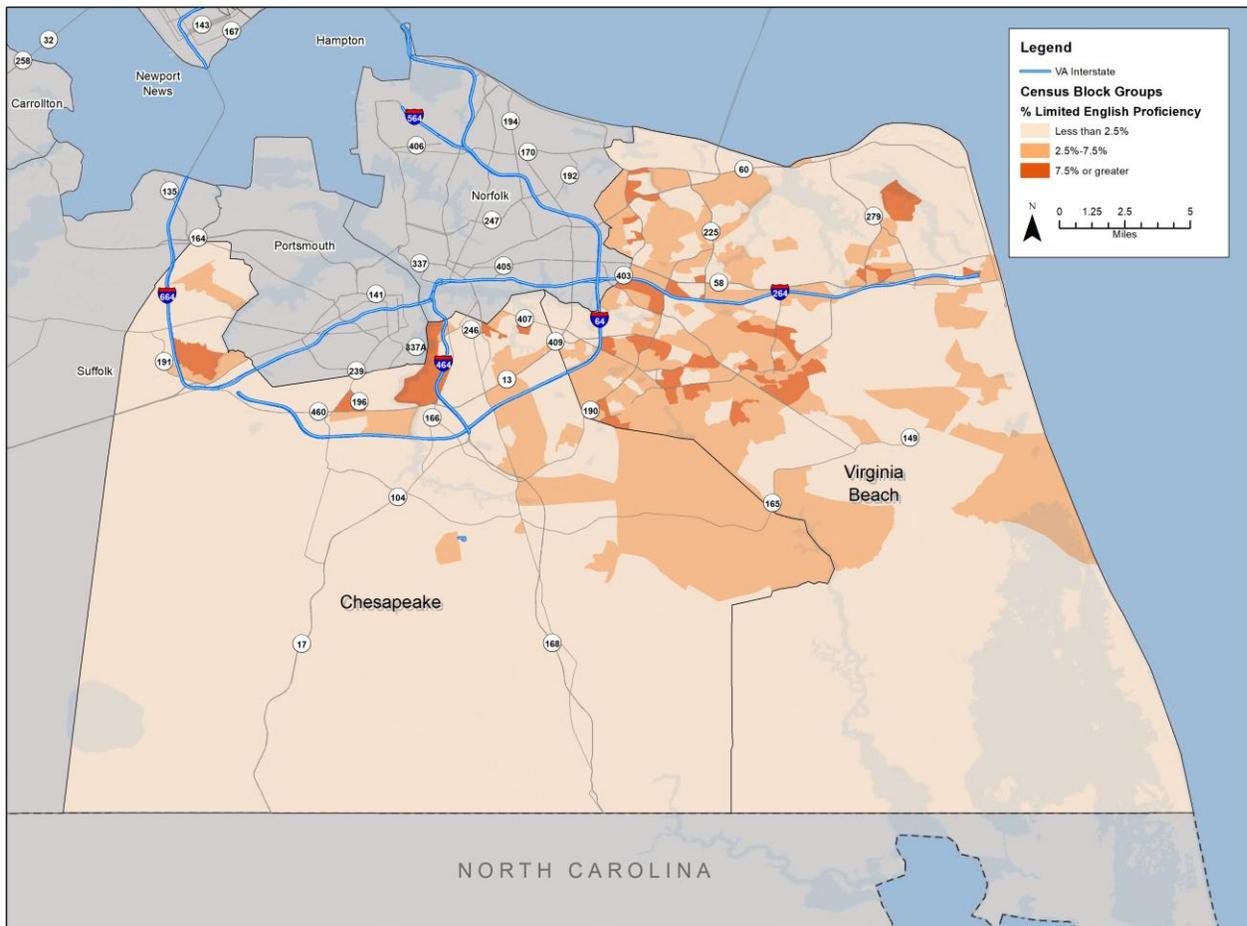
Table 1 – LEP Individuals by Language Spoken

Cab Company Service Area			
Language	Number of LEP Population	Percent of Service Area Population Speaking Language	Percent of LEP Population Speaking Language
Spanish or Spanish Creole	6,681	1.05%	34.17%
Tagalog	4,506	0.71%	23.04%
Chinese	2,013	0.32%	10.29%
Vietnamese	1,016	0.16%	5.20%
Korean	721	0.11%	3.69%
German	506	0.08%	2.59%
French	421	0.07%	2.15%
Japanese	417	0.07%	2.13%
Arabic	363	0.06%	1.86%
Other Pacific Island languages	328	0.05%	1.68%
African languages	325	0.05%	1.66%
Russian	324	0.05%	1.66%
Gujarati	251	0.04%	1.28%
Other Asian languages	191	0.03%	0.98%
Thai	162	0.03%	0.83%
Greek	161	0.03%	0.82%
Hindi	156	0.02%	0.80%
Portuguese or Portuguese Creole	115	0.02%	0.59%
Other Indic languages	113	0.02%	0.58%
Urdu	105	0.02%	0.54%
Italian	102	0.02%	0.52%

Hebrew	93	0.01%	0.48%
Other Indo-European languages	78	0.01%	0.40%
Serbo-Croatian	69	0.01%	0.35%
Other West Germanic languages	67	0.01%	0.34%
Persian	66	0.01%	0.34%
Other Slavic languages	64	0.01%	0.33%
French Creole	61	0.01%	0.31%
Scandinavian languages	21	0.00%	0.11%
Armenian	19	0.00%	0.10%
Other and unspecified languages	14	0.00%	0.07%
Polish	11	0.00%	0.06%
Navajo	6	0.00%	0.03%
Hungarian	4	0.00%	0.02%
Laotian	4	0.00%	0.02%
Total LEP Population	19,554	3.08%	
Total Service Area Population	634,613		

The most spoken language group among LEP individuals is Spanish or Spanish Creole (6,681). Figure 1 maps the percentage of LEP individuals by Census Block Group. Larger percentages of LEP persons are found in western Virginia Beach and northeastern Chesapeake.

Figure 1 – % LEP by Census Block Group



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

The Cab Company reviewed the relevant services and information in an effort to determine the extent to which LEP persons have engaged with taxicab services through the following channels:

- Contact with transit vehicle operators;
- Contact with transit station managers;
- Calls to the dispatch center;
- Participation in public meetings.

The Cab Company determined that such contact arises almost entirely through the dispatch center and the vehicle operators. The Cab Company's dispatch service provider has contracted with Propio Language Services to provide dispatch services for Spanish speaking LEP individuals (and others) seeking taxicab service.

The Cab Company will continue to identify emerging populations as updated Census and American Community Survey data become available for our service area.

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

The Cab Company provides on-demand as well as pre-arranged taxicab service. Based on past experience serving and communicating with LEP persons, such services are important to the non-driving LEP population

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

Costs

The following language assistance measures are currently being provided by the Cab Company:

- *Developing and posting Title VI notices, including directions in Spanish with a contact number where additional information may be obtained.*
- *Maintaining a dispatch service provider that has access to a translation service, Propio Language Services.*

The cost of these measures, although unknown, are not believed to be significant. The Cab Company does not anticipate that these activities and costs will significantly increase.

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

Resources

The Cab Company has access to translation services through Propio Language Services for those LEP speakers who seek transportation services.

There are no additional funds available to provide additional language assistance and that is unlikely to change over time.

Feasible and Appropriate Language Assistance Measures

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

- ***Providing translation services through Propio Language Services for LEP Spanish speakers (and others) who contact the Cab Company for dispatch or other purposes.***

LEP Implementation Plan

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

Providing translation services through Propio Language Services for LEP Spanish speakers (and others) who contact the Cab Company for purposes other than obtaining taxicab service.

Staff who come into contact with LEP persons can access Spanish language services by transferring a call to Propio Language Services.

Responding to LEP Callers

Staff who answer calls from the public respond to LEP customers as follows: LEP Spanish speakers will be transferred/referred to Propio Language Services.

Responding to Written Communications from LEP Persons

The following procedures are followed when responding to written communications from LEP persons: Writings in Spanish will be forwarded to Propio Language Services for translation and action by the appropriate department.

Responding to LEP Individuals in Person

The following procedures are followed when a Spanish-speaking LEP person visits our office: Propio Language Services is contacted to provide translation services.

The following procedures are followed by operators when a Spanish-speaking LEP person has a question on board a Cab Company vehicle: The person will be connected with Propio Language Services to translate for the driver.

Staff Training

As noted previously, staff (including new hires) that routinely come into contact with customers, are notified of available language assistance services.

Providing Notice to LEP Persons

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

- ***The Title VI notice link on our website.***
- ***The Title VI notice posted in our passenger service vehicles.***
- ***The Title VI notice posted in our customer service and administrative offices, if any.***

Monitoring/updating the plan

This plan will be updated on a periodic basis, based on feedback, updated demographic data, and resource availability.

As part of ongoing outreach to community organizations, the Cab Company may solicit feedback on the effectiveness of language assistance provided and unmet needs. In addition, we may conduct periodic internal meetings with staff who assist LEP persons and review updated Census data to evaluate the adequacy and quality of the language assistance provided and determine any changes to LEP needs.

In preparing any update of this plan, the Cab Company may conduct an internal assessment using the Language Assistance Monitoring Checklist provided in the FTA's "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers."

Based on the feedback received from community members and agency employees, the Cab Company may 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 the Cab Company will attempt to identify the most cost-effective approaches.

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

XI. MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES

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

The Cab Company has no planning boards, advisory councils or committees, or similar committees.

SEE APPENDIX F- TABLE MINORITY REPRESENTATION ON COMMITTEES BY RACE

XII. MONITORING TITLE VI COMPLAINTS

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

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

APPENDIX A – TITLE VI NOTICE TO THE PUBLIC

Notifying the Public of Rights under Title VI

BLACK AND WHITE CABS OF VIRGINIA BEACH, INC.

- The Cab Company 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 the Cab Company
- For more information on the Cab Company's civil rights program, and the procedures to file a complaint, write to Title VI Manager, 6304 Sewells Point Road, Norfolk, VA 23513; call (757) 853-1255 ext. 112; or send an email to robin.webb@coastalride.com
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the 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 (757) 853-1255 ext. 112.
Si necesita información en otro idioma, comuníquese con: (757) 853-1255 ext. 112.

APPENDIX B – TITLE VI NOTICE TO THE PUBLIC LIST OF LOCATIONS

- Cab Company website
- Public areas (if any) of the Cab Company's offices
- Each passenger service vehicle

APPENDIX C - TITLE VI COMPLAINT FORM

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party: _____				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
Section III:				
I believe the discrimination I experienced was based on (check all that apply):				
<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.				

Section IV				
Have you previously filed a Title VI complaint with this agency?			Yes	No
Section V				
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?				
<input type="checkbox"/> Yes <input type="checkbox"/> No				

APPENDIX D - INVESTIGATIONS, LAWSUITS AND COMPLAINTS DOCUMENT

SAMPLE List of Investigations, Lawsuits and Complaints

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

APPENDIX E - SUMMARY OF OUTREACH EFFORTS

A. Social Media

- Advertising on Google Ads (periodic)
- Postings on Facebook (periodic)

B. Participation in Public Meetings Addressing Service to the Disabled Community

- Hampton Roads Transit – Paratransit Advisory Committee Meetings
 - Second Wednesday in Feb., Apr., Jun., Aug., Oct. and Dec.

C. Translation Service for Dispatch

- Continuation of contract with Propio Language Services to assist LEP callers seeking transportation services.

APPENDIX F -TABLE MINORITY REPRESENTATION ON COMMITTEES BY RACE

Not applicable. The Cab Company has no planning boards, advisory councils or committees, or similar committees.