

Table of Contents

Plan Statement and General Information.....	1
Complaints Instructions and Procedures.....	2
Notice to the Public.....	3
Limited English Proficiency Plan.....	3
Title VI Investigations, complaints and lawsuits.....	3
Public Participation Plan.....	4
Attachment 1: Policy Statement.....	5
Attachment 2: Notice to the Public.....	7
Attachment 3: Title VI Complaint Form and Procedures	9
Attachment 4: Limited English Proficiency Plan	13
Attachment 5: Title VI Investigations, complaints and lawsuits	19
Attachment 1: Example Letters for Compliant Procedures.....	21

Plan Statement

Barons Bus Inc. operates intercity bus services throughout 10 states in the continental United States. As a condition of receiving Federal Transit Administration (FTA) financial assistance from the U.S. Department of Transportation (DOT) to operate these services, Barons Bus must ensure that its programs, policies, and activities comply with DOT's Title VI regulations. The following program was developed to guide Barons Bus in its administration and management of Title VI-related activities, and details how Barons Bus meets the requirements as set forth in FTA Circular 4702.1B.

Section 601 of Title VI of the Civil Rights Act of 1964 states the following: "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."

Policy

Baron Bus is committed to ensuring that no person on the basis of race, color, or national origin will be excluded from participation or subjected to discrimination in the level and quality of services or related benefits provided by Barons Bus, its employees, affiliates, and contractors. Please see Attachment 1, Policy Statement.

General Reporting Requirements

Chapter III of FTA Circular 4702.1B addresses the general reporting requirements for recipients and subrecipients of Federal Transit Administration (FTA) funding to ensure that their activities comply with DOT Title VI regulations. Below are summaries of each requirement and how Greyhound's Title VI Program fulfills that requirement. 1. REQUIREMENT TO PROVIDE TITLE VI ASSURANCES. In accordance with 49 CFR Section 21.7(a), every application for fi

How to File a Complaint

You may download Barons Bus Title VI Complaint form at www.baronsbus.com or request a copy in writing or by phone. Send to Barons Bus; PO BOX 31088 Independence, OH 44131 888-378-3823

You may file a signed, dated and written complaint no more than 180 days from the date of the alleged incident. The complaint should be on Barons Bus prescribed Complaint Form.

Please submit your complaint to
John Goebel
Title VI Coordinator
PO Box 31088
Independence, OH 44131
888-378-3823
info@baronsbus.com

An example complaint form is included in Attachment 3

How will your complaint be handled?

Barons Bus investigates complaints no more than 180 days after the alleged incident. Barons Bus will process complaints that are complete. Once a completed complaint is received, Barons Bus will review it

to determine if Barons Bus has jurisdiction. The complaint will receive an acknowledgement letter informing him/her whether the complaint will be investigated by Barons Bus.(EXAMPLE ATTACHMENT 6)

Barons Bus will generally complete an investigation within 90 days from the receipt of a completed complaint form. If more information is needed to resolve the case Barons Bus may contact the complainant. Unless a longer period is specified by Barons Bus, the complainant will have ten days from the date of the letter to send requested information to Barons Bus investigators assigned to the case.

If Barons Bus investigators is not contacted by the complainant or does not receive the additional information within the required timeline, Barons Bus may administratively close the case. A case may be administratively closed also if the complainant no longer wishes to pursue the case.

After an investigation is complete, Barons Bus will issue a letter to the complainant summarizing the results of the investigation, stating the findings and advising of any corrective action to be taken as a result of the investigation. If a complainant disagrees with Barons Bus determination, he/she may request reconsideration by submitting a request in writing to Barons Bus, John Goebel Vice President within seven days after the date of Barons Bus letter, stating with specificity the basis for the reconsideration. The Vice President will notify the complainant of their decision either to accept to reject the request for reconsideration within 10 days. In cases where reconsideration is granted the Vice President will issue a determination letter to the complainant upon the completion of the reconsideration review. (EXAMPLE ATTACHMENT 6)

A person may also file a complaint directly with the Federal Transit Administration at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington DC 20590.

If information is needed in another language, then contact Barons Bus at 888-378-3823

Notice to the Public

Notice to the public document is included in ATTACHMENT 2

Limited English Proficiency Programs and Activities

LEP Program activities plan is included in Attachment 4

List of Title VI Investigations, complaints and lawsuits

Per FTA Circular 4702.1B, "All recipients are required to 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
- Complaints naming the recipient

Attachment 5 is listing by year of all information such as date that transit-related Title VI investigation, lawsuit, or complaint was filed; summary of the allegation, status of the investigation, actions taken.

Public Participation Plan

Barons Bus utilizes a variety of methods and forums to solicit community participation. The following is a non-inclusive list. Barons Bus tries to extend its public outreach to develop routes and ridership accessible to all the traveling public.

- Public Notice
- Local Newspapers
- Public Outreach Programs
- Working with other public transportation entities
- Barons Bus website
- Posted in Terminals
- Serving on Transportation Committees

ATTACHMENT 1

Policy Statement

Policy Statement

A. Policy of Nondiscrimination

Barons Bus assures that no person shall on the grounds of race, color, national origin, sex, age, disability or income as provided by Title VI of the Civil Rights Act of 1964 and related authorities, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any Barons Bus sponsored program or activity. Barons Bus further assures every effort will be made to ensure non-discrimination in all of its programs and activities, weather those programs and activities are federally funded or not.

In the event Barons Bus distributes federal aid funds to another entity, Barons Bus will include Title VI language in all written agreements and will monitor for compliance.

Title VI compliance is a condition of receipt for federal funds. Barons Bus President and the Title VI coordinator are authorized to ensure compliance with provisions of this policy and with the law, including the requirements of 23 Code of Federal Regulation CFR 200 and 49 CFR 21.

President

Date

ATTACHMENT 2

Notice to the Public

Title VI

Barons Bus Inc.

Notice to the Public of Rights Under Title VI

Barons Bus Inc. as a recipient of federal funding gives public notice of its policy to fully comply with Title VI of the Civil Rights Act of 1964 and all related laws and statutes. 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 Barons Bus program or activity, as provided by Title VI of the Civil Rights Act of 1964 and as amended, and the Civil Rights Restoration Act of 1987 (P.L. 100.259). Barons Bus operates its programs without regard to race, color, or national origin.

For more information on Barons Bus Title VI program, contact Barons Bus Title VI Coordinator, John Goebel. Any person who believes that he or she has individually, or as a member of any specific class of persons, been excluded from participation in, been denied the benefits of, or otherwise subjected to discrimination under any Barons Bus service, program, or activity, and believes the discrimination is based upon race, color, or national origin has the right to file a Title VI complaint with Barons Bus Title VI Coordinator. All complaints must be filed in writing with Barons Bus within 180 days of the alleged discriminatory act or occurrence. Complaint forms may be obtained through the following contacts:

Barons Bus

Attention: John Goebel

Title VI Coordinator

PO BOX 31088

Independence, OH 44131

- **Email:** info@baronsbus.com
- **Visit our website:** www.baronsbus.com
- **Call Customer Services:** 888-378-3823 for more information
- **Fax:** 440-886-0512

In addition to the Title VI process at Barons Bus Title VI complaints may be filed with the Federal Transit Administration, Office of Civil Rights

If this information is needed in another language, please contact us at 888-378-3823 or 800-255-7688

ATTACHMENT 3

Title VI Complaint Form and Procedures

TITLE VI COMPLAINT FORM

BARONS BUS

Section 601 of Title VI of the Civil Rights Act of 1964 state that “no person in the United State shall, on the ground of race, color, national origin, be excluded from the participation in, be denied the benefits of or be subjected to the discrimination under any program or activity receiving Federal financial assistance.”

If you feel you have been discriminated against, please provide the following information in order to assists Barons Bus in processing your complaint.

Section 1

Name: _____

Address: _____

City: _____ State: _____ Zip: _____

Telephone Number (Home or Cell): _____

Email Address: _____

Section 2

Are you filling this complaint on your own Behalf?: _____

If you answered yes go to section 3.

If not, please supply the information requested below in section 2.

Name of Person Filling:

Address: _____

City: _____ State: _____ Zip: _____

Telephone Number (Home or Cell): _____

Email Address: _____

What is your relationship to the person for whom you are filling? _____

Please confirm that you have obtained the permission of the aggrieved party if you are filling on behalf of a third party. Yes, I have Permission: _____ No, I don't have permission: _____

Section 3

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

Race:_____ Color:_____ National Origin:_____ Other: _____

Date of the Alleged Discrimination:_____

Where did the alleged Discrimination take place?_____

Explain as clearly as possible what happened and why you believe that you were discriminated against.____

Name(s) and Title(s) of the person(s) who I believed discriminated against me:_____

Please list any and all witnesses' names and phone number/contact information._____

What type of corrective action would you like to see taken?_____

Section 4

Have you ever filed a complaint with any other federal, state, or local agency or with any federal or state court? Yes:_____ No:_____

If Yes check all that apply:

Federal Agency:_____ Federal Court:_____ State Agency:_____

State Court:_____ Local Agency:_____ County Court:_____

Please provide information about a contact person at the agency/court where the complaint was filed:

Name/Title:_____ Agency:_____

Address:_____

City: _____ State: _____ Zip: _____

Telephone Number (Home or Cell):_____

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

Signature and date is required:

Signature

Date

Title VI Complaint Procedures

Barons Bus investigates complaints no more than 180 days after the alleged incident. Barons Bus will process complaints that are complete. Once a completed complaint is received, Barons Bus will review it to determine if Barons Bus has jurisdiction. The complaint will receive an acknowledgement letter informing him/her whether the complaint will be investigated by Barons Bus.

Barons Bus will generally complete an investigation within 90 days from the receipt of a completed complaint form. If more information is needed to resolve the case Barons Bus may contact the complainant. Unless a longer period is specified by Barons Bus, the complainant will have ten days from the date of the letter to send requested information to Barons Bus investigators assigned to the case.

If Barons Bus investigators is not contacted by the complainant or does not receive the additional information within the required timeline, Barons Bus may administratively close the case. A case may be administratively closed also if the complainant no longer wishes to pursue the case.

After an investigation is complete, Barons Bus will issue a letter to the complainant summarizing the results of the investigation, stating the findings and advising of any corrective action to be taken as a result of the investigation. If a complainant disagrees with Barons Bus determination, he/she may request reconsideration by submitting a request in writing to Barons Bus, John Goebel Vice President within seven days after the date of Barons Bus letter, stating with specificity the basis for the reconsideration. The Vice President will notify the complainant of their decision either to accept to reject the request for reconsideration within 10 days. In cases where reconsideration is granted the Vice President will issue a determination letter to the complainant upon the completion of the reconsideration review .

A person may also file a complaint directly with the Federal Transit Administration at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington DC 20590.

If information is needed in another language, then contact Barons Bus at 888-378-3823

ATTACHMENT 4

Limited English Proficiency Plan

Barons Bus LEP Plan

Four-Factor Analysis

Limited English Proficiency

Compliance with Title VI includes Limited English Proficient (LEP) persons. The Limited English Proficiency (LEP) portion of this plan addresses Title VI of the Civil Rights Act of 1964, which prohibits discrimination based on race, color or national origin. In 1974, the U.S. Supreme Court affirmed that the failure to ensure a meaningful opportunity for national origin minorities, with limited-English proficiency, to participate in a federally funded program violates Title VI (Federal-Aid Recipient Programs & Activities) regulations. Additionally, requirements are outlined in Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency signed on August 11, 2000. Its purpose is to ensure accessibility to programs and services to eligible persons who have limited proficiency in the English language. Furthermore, the U.S. Department of Transportation (DOT) published Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons in the December 14, 2005 Federal Register Volume 70; Number 239. The guidance explicitly identifies Metropolitan Planning Organizations (MPOs) as organizations that must follow this guidance. The Limited English Proficiency (LEP) Plan must be consistent with the fundamental mission of the organization, though not unduly burdening the organization.

Plan Summary

The Barons Bus has developed this Limited English Proficiency Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency [LEP] who wishes to access services provided by Barons Bus. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available. In order to prepare this plan, Barons Bus undertook the U.S. DOT four-factor LEP analysis which considers the following factors:

Barons Bus Four Factor Analysis

The following four factor analysis will serve as the guide for determining which language assistance measures Barons Bus will undertake to guarantee LEP persons access to Barons Bus 5311(f) transportation program.

1. Number or proportion of LEP persons served or encountered in the eligible service population.

Barons Bus utilized the U.S. Bureau of Census, Census 2010, American fact Finder, Table “B16001” “Language spoken at home by ability to speak English for the population 5 years and over.” The table depicting this data is shown below. Barons Bus did its analysis of the entire state rather than separating by counties served. Barons Bus service offers interlining services which extend beyond our service range and counties served in West Virginia. A large number of the customers served interline from other areas within West Virginia. Understanding this information and extended customer base, we believed this was the most accurate method for gathering the correct data.

Population 5 Years and Over by Language Spoken at home and ability to speak English	West Virginia	Percentage
Total Population 5 Years and Over	1,737,044	100 %
Speak English Only	1,697,042	97 %
Language other than English	40,002	2.3%
Spanish	17,860	1.02 %
Speak English less than “very well”	6,407	.3%
Other Indo-European	9,547	.5%
Speak English less than “very well”	2,116	.12%
Asian and Pacific Island	6,746	.38%
Speak English less than “very well”	2,781	.16%
All Other	3,376	.19%
Speak English less than “very well”	851	Less than .1 %

Based on this data, there is a total under 5% which speak English less than very well, in fact less than 3% speak another language other than English. Spanish has the highest % speaking another language in our service area at 1.02%.

2. The frequency with which LEP persons come in contact with Barons Bus programs, activities or services.

The frequency for which a LEP person comes into contact with Barons Bus programs, activities or services are listed below:

Program, Activity, or Service	Frequency
Fixed-Route Bus Service	Bi-weekly
Purchase of tickets; either through agents, from the driver, over the phone or internet	Weekly
Customers service interactions	Monthly
Ridership Surveys	Every other year

3. The nature and importance of programs, activities or services provided by Barons Bus to the LEP population.

The provision of public transportation is a vital service, especially for people without access to personal vehicles. Barons Bus offers interlining service to Greyhound Lines and other intercity connections providing a vital link for passengers to extend trips seamlessly beyond our service area. Barons Bus services provide a vital link between intercity bus services with connections to local transportation providers. Barons Bus wants to continue to expand ridership opportunities to all members of the communities we serve and the visitors traveling via our services. Transportation systems and public operations activities will impact every person in the community and surrounding areas. Development of a coordinated effort to meet the specific transportation needs of seniors and people with disabilities will often also assist in meeting the needs of LEP persons. Barons Bus will continue to expand our programs, activities and services to ensure meaningful access for LEP persons. Barons Bus services provide critical rides for passenger traveling to medical appointments, work, education, and help to promote tourism. It is important for us to include LEP persons when evaluating our services and assist them to accomplish these same goals.

4. The resources available to Barons Bus and overall cost to provide LEP assistance. A summary of the results of the Barons Bus four-factor analysis is in the following section.

Barons Bus assessed its available resources that could be used for providing LEP assistance, including determining how much a professional interpreter and translation service would cost on an as-needed basis, which of its documents would be the most valuable to be translated if the need should arise, and taking an inventory of available organizations that the Barons Bus could partner with for outreach and translation efforts. The amount of staff and vehicle operating training that might be needed was also considered.

We determined the most effective and important information available to customers is scheduling and purchasing tickets. Barons Bus was proactive is partnering with 3rd party vendors such as Wanderu and Busbud which sell tickets Barons Bus tickets in 15 different languages. Barons Bus has been proactive it assisting passengers with LEP, we have adapted to selling tickets in over 15 languages online through 3rd party vendors. These transactions are made in the customers preferred language and the ticket is printed in English to be easy acceptable to the driver. Barons Bus pays a 5 of each ticket sold to these vendors for such services. These are a great international platform to market our services and create tourism to the locations we serve. Barons Bus also has resources available through Greyhound Lines 1-

800 number, that passengers are able to have questions answered 24 hours a day in a variety of languages. All Barons Bus schedule and pricing information is available through Greyhound Lines. Barons Bus office staffed is trained in assisting customers through language translation software. All Barons Bus tickets and schedule information is easily accessible to any LEP passenger online.

Limited English Proficiency [LEP]

Plan Outline How Barons Bus staff may identify an LEP person who needs language assistance:

- Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events.
- When Barons Bus staffing is in terminals have a staff person greet participants as they arrive. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English.
- Vehicle operators and other front-line staff, like dispatchers, ADA schedulers, and service development planners, will be surveyed annually on their experience concerning any contacts with LEP persons during the previous year. The survey will be conducted once each year.

Staff Training

The following training will be provided to Barons Bus office staffing:

- Information on the Barons Bus Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Documentation of language assistance requests.
- Use of the Greyhound Lines, Wanderu, Busbus, or outside vendor's phone system
- How to handle a potential Title VI/LEP complaint.

Monitoring and Updating the LEP Plan

Barons Bus will update the LEP as required by U.S. DOT. At a minimum, the plan will be reviewed and updated when data from current and future U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in Barons Bus service area. Updates will include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether Barons Bus financial resources are sufficient to fund language assistance resources needed.
- Determine whether the Barons Bus have fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.

Based on the above Four-Factor Analysis, Barons Bus is not required to develop a LEP. However, Barons Bus will make all reasonable attempts to accommodate language access needs of LEP individuals. We will continue to monitor program and take pride in assisting LEP passengers

ATTACHMENT 5

Title VI Investigations, Lawsuits, or Complaints

List of Title VI Investigations, complaints and lawsuits

Per FTA Circular 4702.1B, “All recipients are required to 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
- Complaints naming the recipient

Barons Bus Inc. is not currently the subject of any Title VI investigations, complaints, or lawsuits. Below is the list that will be used for tracking these incidents:

TITLE VI Investigations, Lawsuits, and Complaints

	Date(Month, day Year)	Summary(Include basis of the complaint: Race, color, National Origin)	Status	Action Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

ATTACHMENT 6

Example Letters for Compliant Procedures



P.O. Box 31088
Independence, Ohio
P (888) 378-3823
F (440) 886-0512
Ride Like Royalty
www.baronsbus.com

Today's Date

Letter Acknowledging Receipt of Title VI Complaint

Ms. Jane Doe
12 Main St
Cleveland, OH 44130

Dear Ms. Doe,

This letter is to acknowledge receipt of your complaint against Barons Bus Inc. alleging_____

_____.

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by telephone at 888-378-3823 EXT 206. Or you can write to us at:

Barons Bus
Attn: Title VI Coordinator
PO BOX 31088
Independence, OH 44131

Sincerely,

Barons Bus
Title VI Coordinator



P.O. Box 31088
Independence, Ohio
P (888) 378-3823
F (440) 886-0512
Ride Like Royalty
www.baronsbus.com

Today's Date

Letter of Finding(Notifying Complainant that Complaint is Substantiated)

Ms. Jane Doe
12 Main St
Cleveland, OH 44130

Dear Ms. Doe,

This matter referenced in your letter of _____ (date) against Barons Bus Inc. alleging a Title VI violation has been investigated.

Violation(s) of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

Thank you for calling this important matter to our attention. You were extremely helpful during the review of this matter. You may be hearing from this office, or from the Federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

Barons Bus
Title VI Coordinator



P.O. Box 31088
Independence, Ohio
P (888) 378-3823
F (440) 886-0512
Ride Like Royalty
www.baronsbus.com

Today's Date

Closure Letter(Notifying Complainant that the Complaint is not substantiated)

Ms. Jane Doe
12 Main St
Cleveland, OH 44130

Dear Ms. Doe,

The matter referenced in your letter of _____ (date) against Barons Bus Inc. alleging _____
_____ has been investigated.

The results of the investigation did not indicate that the provisions of Title VI of the Civil Rights Act of 1964 have in fact been violated. As you know, Title VI prohibits discrimination based on race, color, or national origin in any program receiving Federal financial assistance.

Barons Bus has analyzed the materials and facts pertaining to your case for evidence of Barons Bus failure to comply with any of the civil rights laws. There was no evidence found that any of these laws have been violated.

I therefor advise you that your complaint has been substantiated, and that I am closing this matter in our files.

You have the right to appeal this decision within 30 calendar days of receipt of this final written decision from Barons Bus.

Thank you for taking the time to contact us. If I can be of assistance to you in the future, Do not hesitate to contact me.

Sincerely,

Barons Bus
Title VI Coordinator

