



**VERMONT**

**AGENCY OF TRANSPORTATION**

**Federal Transit Administration  
Title VI / Environmental Justice  
Program  
2023**

**Vermont Agency of Transportation  
Office of Civil Rights & Labor Compliance  
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Barre, VT 05641  
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**Submitted By:  
Patricia Martin, Title VI Coordinator**

**FEDERAL TRANSIT ADMINISTRATION  
TITLE VI / ENVIRONMENTAL JUSTICE PROGRAM 2023**

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# I. VTrans Title VI Nondiscrimination Statement



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Barre, VT 05641  
vtrans.vermont.gov

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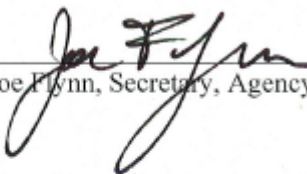
Agency of Transportation

## VTrans Title VI Nondiscrimination Statement

It is the policy of the Vermont Agency of Transportation (VTrans) to effectuate Title VI of the Civil Rights Act of 1964, as amended, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all federal programs and activities. Pursuant to this obligation,

VTrans requires that no person shall, on the grounds of race, color, national origin, sex, age or disability be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination in any federally-assisted program or activity; neither shall they be denied any service, financial aid or other benefit provided under its programs or experience distinctions in the quality, quantity or manner in which a benefit is provided, suffer segregation or separate treatment in any part of a program, restriction in the enjoyment of any advantages, privileges or other benefits provided to others, different standards or requirements for participation, methods of administration that, directly or through contractual relationships would defeat or substantially impair the accomplishments of effective nondiscrimination, discrimination in any activities related to highway and infrastructure or a facility built or repaired in whole or in part with federal funds and discrimination in any employment resulting from a program, the primary purpose of which is to provide employment.

In addition, VTrans will ensure the monitoring and enforcement of all sub-recipients and participants of federally-assisted projects and activities. VTrans further assures that every effort will be made to ensure nondiscrimination in all of its programs and operations, regardless of the funding source.

  
\_\_\_\_\_  
Joe Flynn, Secretary, Agency of Transportation

April 26, 2023  
\_\_\_\_\_  
Date



## II. Notification of Title VI Protections

In addition to statement of policy shown on the previous page and maintained on the VTrans [website](#), VTrans has the following notification that is incorporated into all VTrans public notices.



**AGENCY OF TRANSPORTATION**

### **VTrans Office of Civil Rights and Labor Compliance**

#### **NOTIFICATION OF YOUR CIVIL RIGHTS**

The Vermont Agency of Transportation (VTrans) operates its programs without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes they have been harmed by any unlawful discriminatory practice under Title VI by VTrans or the public transit providers who receive funding from VTrans may file a complaint with the Vermont Agency of Transportation.

For more information on VTrans' Civil Rights program and the obligations and procedures to file a complaint, call (802) 595-6959. For more information, visit the [VTrans Civil Rights Title VI](#) page.

Notice to comply with Title VI is also made available in contractual documents, and made known to all of Vermont's towns and municipalities by distribution through the Vermont League of Cities and Towns and the Municipal Assistance Bureau.

In addition, Title VI notice is provided to the public by working collaboratively with the agency's subrecipient transit and regional partners on continuing efforts to monitor subrecipient activities, train external staff, and to provide guidance and assistance to partner entities as they work to develop and implement their respective Title VI programs. The subrecipient transit providers post Title VI notifications on every transit vehicle in service.

### **III. Title VI Complaint Procedures and Form**

#### **Vermont Agency of Transportation Title VI Complaint Procedure**

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, national origin, sex, age, limited English proficiency, or disability may file a complaint with the Vermont Agency of Transportation's Office of Civil Rights and Labor Compliance.

Complaints related to Title VI Program discrimination may be submitted online via the [Title VI Complaint form](#). Once submitted, the AOT Title VI Coordinator will contact the complainant. To submit a Title VI complaint by mail, email, or phone, the contact information is as follows:

Patricia Martin, Title VI Coordinator  
Vermont Agency of Transportation  
Office of Civil Rights and Labor Compliance  
219 North Main Street  
Barre, VT 05641  
Email: [patricia.martin@vermont.gov](mailto:patricia.martin@vermont.gov)  
Phone: (802) 595-6959

Written complaints must be signed by the complainant. Complaints submitted by telephone or e-mail, or unsigned written complaints must be followed by a complaint in writing, signed by the complainant or his/her representative within 10 business days of the initial verbal / electronic/ unsigned complaint. If the complainant requires assistance to submit a written document, a member of the AOT Office of Civil Rights will interview the complainant and assist the person in converting a verbal complaint to one in writing. This document must be signed by the complainant or his/her representative. Federal and State laws require that the complaint be filed within 180 days of the alleged incident of discrimination.

Once the complaint has been submitted in writing, AOT will take the following steps to address the complaint:

The complaint will be logged on the AOT Title VI Complaint Log maintained by the AOT Office of Civil Rights, identifying the complainant's name, date of the incident, alleged harm, and pertinent demographic information about the complainant.

1. The AOT Title VI Coordinator will complete a Title VI Complaint Form.
2. Essential information on the form includes the following:
  - a. Date of the incident that is the subject of the complaint;
  - b. Time of the incident;
  - c. Location of the incident; and
  - d. Circumstances of the incident in as much detail as is available, including description of the issues and the names and job titles of those individuals perceived as parties in the complaint.
3. The completed form, along with the initial complaint letter and a summary of any other communication, will be submitted to the Civil Rights and Labor Compliance Chief for review. The Chief will determine the jurisdiction and acceptability of the complaint and any need for additional information. After any additional information is procured, the Chief will determine whether to accept or reject the complaint.
4. The complainant will be provided with a written notification that VTrans has either accepted or rejected the complaint.

5. A complaint may be rejected for the following reasons:
  - a. More than 180 days passed between the alleged incident and the filing of the initial complaint.
  - b. The allegation does not involve a basis covered under Title VI, such as race, color, or national origin.
  - c. The allegation does not involve VTrans or one of its subrecipients of FTA funds.
  - d. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
  - e. The complainant cannot be located after reasonable attempts.
6. An accepted complaint will be assigned a case number and be logged in a database maintained by the Office of Civil Rights identifying the complainant's name, date of incident, alleged harm, and the race, color, or national origin of the complainant.
7. The Title VI Coordinator, assisted by other members of the Office of Civil Rights who are trained in compliance investigations, will initiate an investigation of the complaint and complete a report within 90 days of the acceptance of the complaint. The report shall include a narrative description of the incident, identification of the persons interviewed, findings, and recommendations for disposition.
8. The report will be reviewed by the Civil Rights and Labor Compliance Chief and referred to the Legal section of VTrans, if deemed appropriate. The Chief will accept or reject the recommendation for disposition, in consultation with the Legal Officer, and if the individuals involved are found to be in noncompliance with Title VI, remedial actions will be determined.
9. The results of the investigation and the Chief's determination will be mailed to the complainant. Notice shall include information regarding appeal rights of the complainant and instructions for initiating such an appeal. Notice of appeals are as follows:
  - a. VTrans will reconsider the determination if new facts come to light.
  - b. If the complainant is dissatisfied with the determination and/or resolution set forth by VTrans, the same complaint may be submitted to FTA for investigation. The complainant will be advised to contact the Federal Transit Administration, Office of Civil Rights, 1200 New Jersey Ave SE 5<sup>th</sup> Floor, TRC East Building, Washington, DC 20590. (202) 366-4043.
10. A copy of the complaint and VTrans' investigation report, letter of finding and remedial action plan will be submitted to FTA within 120 days of the initial receipt of the complaint.
11. A summary of the complaint resolution will be added to the database in the Office of Civil Rights and this information will be included as part of the next Title VI update to FTA.



AGENCY OF TRANSPORTATION

## VTrans Office of Civil Rights and Labor Compliance

### Vermont Agency of Transportation Title VI Complaint Form

#### Section I

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone (Cell/Home): \_\_\_\_\_ Telephone (Work): \_\_\_\_\_

Email: \_\_\_\_\_

Accessible Format Requirements? Large Print \_\_\_\_\_ Audio Tape \_\_\_\_\_ TDD \_\_\_\_\_

Other (Explain) \_\_\_\_\_

#### 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 you answered "No," please provide the following information:*

Name of person for whom you are filing: \_\_\_\_\_

Relationship: \_\_\_\_\_

Please explain why you are filing this complaint for a third party: \_\_\_\_\_

If you are filing on behalf of someone else, have you have obtained that person's permission to file this complaint? Yes \_\_\_\_\_ No \_\_\_\_\_

#### Section III

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

Race \_\_\_\_\_ Color \_\_\_\_\_ National Origin \_\_\_\_\_ Date of Alleged Discrimination: \_\_\_\_\_

Explain as clearly as possible what happened and why you believe you were discriminated against. 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 you need more space, please attach a separate sheet of paper.

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**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? Yes\* \_\_\_\_\_ No \_\_\_\_\_

*\*If you answered "Yes," check all that apply:*

Federal Agency \_\_\_\_\_ Federal Court \_\_\_\_\_ State Agency \_\_\_\_\_ State Court \_\_\_\_\_ Local Agency \_\_\_\_\_

Please provide information for the contact person at the agency/court where you filed the complaint.

Name: \_\_\_\_\_ Title: \_\_\_\_\_

Agency: \_\_\_\_\_ Agency Telephone: \_\_\_\_\_

Agency Address: \_\_\_\_\_

**Section VI**

Name of Agency complaint is against: \_\_\_\_\_

Contact person: \_\_\_\_\_ Title: \_\_\_\_\_

Telephone number: \_\_\_\_\_

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

\_\_\_\_\_  
Signature Date

**Please either submit this form in person to the address below, mail, or email:**

Patricia Martin, Title VI Coordinator  
Vermont Agency of Transportation  
219 North Main Street  
Barre, VT 05641  
Phone: (802) 595-6959  
Email: [patricia.martin@vermont.gov](mailto:patricia.martin@vermont.gov)



#### **IV. Record of Title VI Investigations, Complaints, or Lawsuits**

VTrans has no active lawsuits at this time. Since the last Title VI program, it has received one complaint that was originally filed under Title VI. Upon examination, it was determined that there was no Title VI basis for this complaint and that it was simply a service complaint unrelated to any Title VI considerations.

- Date Submitted: March 12, 2023
- Complainant: H. Fisher of South Burlington
- Nature of Complaint: SSTA Bus arrived late and could not accommodate two wheelchairs so delayed their departure.
- Findings: The complainant was upset about the inconvenience, cancelled the ride, and felt discriminated against, so he submitted the Title VI complaint and indicated national origin only because he didn't know what to select. The complainant was travelling with an aid, also in a wheelchair and the SSTA bus could not accommodate them both.
- Actions Taken: The dispatcher called back on their own and scheduled the second ride the same day which the complainant accepted. SSTA's Executive Director spoke with the complainant and stated he will be working with the operations team to see if they can manage the scheduling any better to prevent delays. The VTrans Title VI Coordinator also reached out to the complainant, confirmed he spoke with SSTA's Director and agreed he should be treated fairly and respectfully but since this isn't an issue of national origin, and it doesn't entail any discrimination that would qualify as a Title VI complaint.

## V. Public Participation Plan

Public participation is an essential component of the planning process. From short-term service changes to long-range vision documents and investment strategies, input from the public about policies and services that affect them is critical to their successful implementation. The Vermont Agency of Transportation conducts ongoing planning activities as well as periodic programming and planning projects. Each of these has a public participation component as described below.

### Ongoing Planning Efforts

**Transportation Planning Initiative.** VTrans has a consultative planning and public outreach relationship statewide through the Transportation Planning Initiative (TPI). Regional Transportation Planning Coordinators carry out the TPI in working partnership with the ten non-metropolitan Regional Planning Commissions (RPCs) of the state and the Chittenden County Regional Planning Commission (CCRPC), Vermont's only Metropolitan Planning Organization. The Coordinators work directly with these regional commissions to solicit local input, identify community needs, hold public meetings, develop regional transportation plans and transportation improvement programs, and provide planning capacity and expertise on an ongoing basis. In addition, the coordinators play a key role in the Agency's public outreach efforts, working collaboratively with the RPCs and other state agencies, VTrans program managers, and an array of public and private organizations to inform the public on important transportation issues, programs, projects, planning activities, and to facilitate the flow of accurate planning information impacting the local population during the planning process.

**The State Transportation Improvement Program.** Each year, the Agency of Transportation adopts a State Transportation Improvement Program (STIP). The STIP is a three-year, financially constrained plan for obligation of Federal transportation funds. It is closely linked to, and must be consistent with, a five-year capital budget for expenditures, forwarded by the Agency of Transportation to the Vermont legislature annually. Public involvement in the development of the STIP is achieved in a number of ways.

(a) Once each year during June and July, or as soon as possible thereafter following adjournment of the legislature, the Agency of Transportation, in cooperation with the regional planning commissions, holds a public meeting to solicit public comment on the STIP. Accommodation will be made for members of the public who request them including translation services for LEP persons. The public meetings discuss 1) needed amendments to the current year's STIP, arising either from legislative action or from other causes; 2) input and comment on the coming year's STIP. In addition to soliciting comment from the general public, notice for this meeting also solicits comment from affected public agencies, affected public jurisdictions, employee representatives of the Vermont Agency of Transportation (including the Title VI coordinator of the Civil Rights Section) and other affected agencies, private transportation providers, and public transportation providers. Two weeks prior to the meeting, the draft STIP is printed and a public notice about its availability is issued statewide. The notice provides information on how copies of the draft STIP may be obtained, solicits comments on the draft STIP, and provides a schedule for the public meetings. Written comments on the draft STIP are accepted for two weeks following the public meeting. All comments are carefully considered in the development of the final STIP. After publication of the final STIP, documentation on how comments were explicitly addressed is available to the public upon request.

(b) If necessary, each year during November or December, or otherwise as necessary, any major changes to the STIP will be made using a public involvement process similar to that found in part (a), above. Major changes shall consist of the

addition of new large projects (over \$2,000,000) to the STIP, or cumulative changes which would drop a large project out of the STIP. The process shall be the same as found above, excepting that one meeting will be held in a suitable central location and comments will be accepted for three days after the meeting. Affected regional planning commissions will be notified directly in writing of proposed major STIP changes one week prior to the meeting.

**The Long-Range Transportation Plan.** The Agency of Transportation prepares a Long-Range Transportation Plan, updated at intervals of no more than five years. Public involvement efforts related to this will include: questionnaires regarding transportation issues, distributed to a statistically valid sample of Vermont residents to assure both demographic and geographic coverage; a number of regional meetings to be held in cooperation with the ongoing regional transportation planning effort; and an overall project Steering Committee containing representation from a diverse spectrum of Vermont residents and interests. VTrans will seek to include representatives from organizations advocating for minorities, immigrants, and low-income Vermonters on the Steering Committee.

**Public Transit Policy Plan.** VTrans last updated the Public Transit Policy Plan in 2020. This document incorporated the federally-required Human Service Transportation Coordination Plan. This project included extensive public outreach with eleven regional forums, two interactive online surveys with more than 3,300 total responses, stakeholder interviews, and numerous presentations to regional and statewide committees.

**Other Planning Efforts.** VTrans conducts other periodic statewide planning efforts related to public transportation. Separate public involvement plans are developed for each of these planning projects in cooperation with contractors who perform the studies.

## **Public Outreach Plan**

VTrans published its comprehensive [Public Involvement Guide](#) in June 2017.

The Guide has four main sections and 13 appendices:

1. Quick Guide: Outreach by Project Phase
2. Why Does Outreach Matter?
3. Preparing for Outreach
4. Engaging the Public

Chapters 2 and 4 have sections that deal specifically with Title VI-related issues and groups. Section 2.2 lays out the federal laws and regulations that affect outreach, including Title VI and Environmental Justice. This section contains the following statement:

Title VI should be considered throughout the planning, project development, and environmental review process. As with all project development issues, early identification of Title VI concerns increases the likelihood of successful resolution. All VTrans staff should be proactive in identifying and addressing possible Title VI issues, and VTrans Civil Rights specialists should be actively engaged to provide input on areas of potential concern. (p. 20)

Section 4.1 provides specific guidance on preparations for public meetings and states the following:

Ensure that special efforts are made and documented relative to the involvement of minority and low-income communities and that appropriate Title VI language is used in all letters and public notices. Consult with Civil Rights staff for more information. (p. 38)

The document also includes the maps of Title VI-protected groups and linguistically isolated individuals from the last Title VI program (2014). As this guide is disseminated and put into effect, public outreach efforts in the state should become yet more inclusionary and compliant with federal regulations.

## **Transportation Equity Framework**

As described on [this webpage](#) within the VTrans website, the agency has been working since 2021 on a Transportation Equity Framework. In response to executive orders from the Biden administration (EO 14008 and EO 13895), the Vermont Legislature directed VTrans “to undertake a comprehensive analysis of the Agency’s existing transportation practices and develop an equity framework to guide all future activities.”

Project documents define a Transportation Equity Framework as follows:

A Transportation Equity Framework is a tool to help decision makers plan for and prioritize projects, ensure accurate representation in decision making, and enhance the equitable delivery of services. The framework will help us answer questions like:

- Who may not be meeting their needs due to current inequities in the transportation system?
- What projects or programs are needed to make our transportation system more equitable?
- Which projects or programs should be funded and in what order?
- How are all Vermonters involved in the decision-making process and how are their voices and concerns heard?
- How can services and the delivery of the Agency’s work be carried out in a respectful, equitable, and fair manner that respects our differences and elevates those already underserved and overburdened?

The work is still in progress, but a [Gaps and Needs Analysis](#) study has been completed and an [online mapping tool](#) has been made available so that anyone can understand the spatial distribution of Title VI-protected populations. The Transportation Equity Framework can be understood as a positive extension of Title VI in that not only is discrimination against minorities, foreign-born people and low-income people prohibited, but future investments should be directed to rectify past discrimination and inequities and ensure that representation in decision making leads to a more equitable transportation system in the future.

## **Measures to Ensure Minority, Low-Income and LEP Participation**

As public transportation is perhaps disproportionately relevant to the daily lives of Title VI-protected groups and low-income Vermonters, VTrans will ensure that groups that represent these populations are included in these outreach efforts and that representatives of these organizations are invited to participate in project steering committees.

All public meetings held as part of this public involvement process will be properly noticed in accordance with the requirements of Title VI of the civil rights act of 1964 and the Vermont public meeting law (Vermont Title 1, section 310 et seq., as annotated), including public announcement of all meetings at least 24 hours before the meeting. Notes are taken at all meetings so that members of the public are not required to submit written comments in order to have their opinions recorded.

VTrans and the regional planning commissions maintain contact with organizations that represent the interests of low-income, immigrant, and minority groups and notify them of upcoming public outreach activities. Many of these organizations are concentrated in

Chittenden County, due to the large percentage of Vermont's minority and immigrant communities that live there.

Meeting times and locations are designed to maximize accessibility for low-income and minority groups. A mix of daytime and early evening meetings are scheduled and transit access to the meeting is guaranteed, including an extension of service span, if necessary, to provide rides home at the end of the meeting.

The Office of Civil Rights at VTrans verifies that the meeting locations for VTrans planning projects are in locations that are conveniently situated with respect to minority and low-income populations within each region. The table below shows all of the public meetings held over the past three years for VTrans planning projects and their relationship to areas with concentrations of minorities and low-income individuals as illustrated in the maps in Section VIII below.

| <b>Public Meeting</b>                               | <b>Date</b> | <b>Location</b>  | <b>Title VI Concentration</b>                            |
|---|-------------|--|--|
| Statewide E&D Summit                                | 6/24/20     | Virtual meeting  | N/A  |
| Public Transit Advisory Council, open to the public | 6/25/20     | Virtual meeting  | N/A  |
| Public Transit Advisory Council, open to the public | 9/17/20     | Virtual meeting  | N/A  |
| Public Transit Advisory Council, open to the public | 12/17/20    | Virtual meeting  | N/A  |
| Public Transit Advisory Council, open to the public | 3/25/21     | Virtual meeting  | N/A  |
| Public Transit Advisory Council, open to the public | 6/17/21     | Virtual meeting  | N/A  |
| Statewide E&D Summit                                | 6/18/21     | Virtual meeting  | N/A  |
| Public Transit Advisory Council, open to the public | 9/16/21     | Virtual meeting  | N/A  |
| Public Transit Advisory Council, open to the public | 12/16/21    | Virtual meeting  | N/A  |
| Public Transit Advisory Council, open to the public | 3/17/22     | Virtual meeting  | N/A  |
| Statewide E&D Summit                                | 6/3/22      | Downtown Burlington                                      | Core Chittenden County minority and low-income residents |
| Public Transit Advisory Council, open to the public | 6/16/22     | Virtual meeting  | N/A  |
| Public Transit Advisory Council, open to the public | 9/15/22     | Virtual meeting  | N/A  |
| Public Transit Advisory Council, open to the public | 12/15/22    | Virtual meeting with option to attend at VTrans in Barre | Montpelier and Barre minority and low-income residents   |
| Public Transit Advisory Council, open to the public | 3/16/23     | Virtual meeting with option to attend at VTrans in Barre | Montpelier and Barre minority and low-income residents   |

In addition to these meetings, VTrans attends monthly meetings of the Vermont Public Transportation Association, and the coordinators in the public transit section attend monthly board meetings of all of the subrecipient transit providers.

In 2023 and beyond, VTrans will continue to encourage the participation of Title VI-protected groups in public outreach activities. Notices for public meetings will include a statement in Spanish and French that translation services languages are available upon request and a telephone number for more information about the meeting. In Chittenden County, the same statements will also be included in Nepali, Arabic, Ukrainian, Serbo-Croatian, Chinese, and Vietnamese. “I Speak” cards will be made available at all public meetings.

At least two weeks, but preferably one month prior to any public meeting held by VTrans for a statewide planning effort, the project manager will contact organizations representing low-income, minority and LEP individuals in the region where the meeting will be held. The project manager will discuss specific steps to encourage participation by these Title VI-protected groups.

In its oversight of transit providers, VTrans will require that the providers contact these representative organizations in their service area at least two weeks and preferably one month in advance of any public meetings or hearings being held regarding service changes, fare changes, or any other planning efforts. VTrans will maintain a master list of these organizations statewide and communicate these to the providers. VTrans will also coordinate with the regional planning commissions through the TPI, to ensure outreach to Title VI-protected groups.

Upon the completion of the Transportation Equity Framework, these measures may be amended to incorporate recommendations of that project that go beyond what is stated here.

## **VI. Access to Services by Persons with LEP**

### ***Introduction***

On Aug. 11, 2000, President Clinton signed Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency, to clarify Title VI of the Civil Rights Act of 1964. The executive order was issued to ensure accessibility to programs and services to otherwise eligible individuals not proficient in the English language.

The executive order stated that individuals with a limited ability to read, write, speak, and understand English are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit, or encounter. These individuals are referred to as being limited in their ability to speak, read, write, or understand English, hence the designation, “LEP,” or Limited English Proficient.

The USDOT published “Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficiency” in the Dec. 14, 2005, Federal Register. The guidance explicitly identifies state agencies such as VTrans as organizations required to follow Executive Order 13166.

The guidance applies to all DOT funding recipients, which include state departments of transportation, state motor vehicle administrations, airport operators, metropolitan planning organizations, and regional, state, and local transit operators, among many others. Coverage extends to a recipient’s entire program or activity; i.e., to all parts of a recipient’s operations.

To meet Title VI and LEP requirements of the FTA, VTrans will evaluate, on a continuing basis, activities that would be appropriate for compliance with LEP requirements.

### ***A. Four Factor Analysis***

The DOT guidance outlines four factors’ recipients should apply to the various kinds of contacts they have with the public to assess language needs and decide what reasonable steps they should take to ensure meaningful access for LEP persons:

1. The number and proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
2. The frequency with which LEP individuals come in contact with the program.
3. The nature and importance of the program, activity, or service provided by the recipient to the LEP community.
4. The resources available to VTrans and overall cost.

### **Factor 1 – Prevalence of LEP Persons**

According to the 2017-2021 American Community Survey, 7,705 residents of the state of Vermont ages 5 or older spoke English less than very well, representing 1.26% of the population. The largest language-group among these LEP persons was French with 1,570 LEP individuals, reflecting French-Canadians who are most-commonly represented in rural areas across the northern tier of Vermont. Other Indic Language speakers were the second largest group, with 1,205 LEP individuals, reflecting the large influx of Bhutanese refugees into the Burlington metropolitan area over the past 15 years. Spanish speakers were the third largest group, with 1,200 LEP individuals. Many of the Spanish speakers are migrant farmworkers in the rural areas of the state. The only other language group with more than 500 individuals is Chinese, with 737. Maps and tables presented below show the number and percentages of LEP persons by tract for all languages combined, and then by tract for each of the top four languages with LEP. Other efforts to identify LEP persons besides the use of Census data are described below.



Within the realm of public transportation, VTrans interacts with LEP persons in two primary ways. In terms of direct experience, VTrans may come in contact with LEP individuals at public meetings or public hearings associated with planning efforts. VTrans has two primary periodic planning efforts wholly within or related to public transportation that entail public review and comment:

- Long Range Transportation Business Plan
- Public Transit Policy Plan/Human Service Transportation Coordination Plan

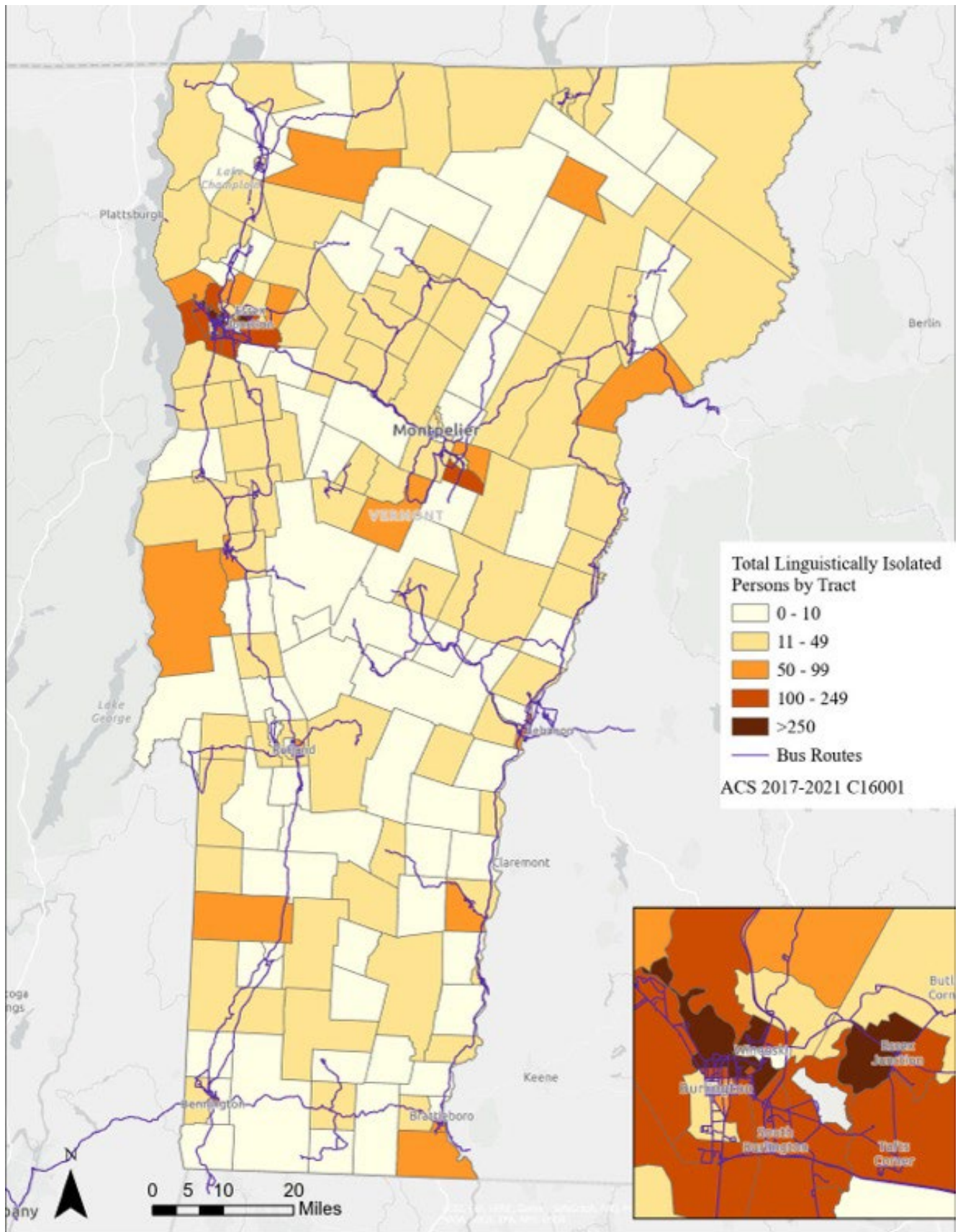
At public meetings for these projects, it is incumbent upon VTrans to provide a means for LEP individuals to participate in a meaningful way. In advertising the meetings, VTrans indicates that translation services are available upon request. Given the very low prevalence of LEP individuals, this service has not been requested at a meeting in the past three years. For projects located in an area with a higher prevalence of LEP persons—central Chittenden County—VTrans and the CCRPC (if applicable) also collaborate with community organizations representing immigrant populations to encourage participation and facilitate communication.

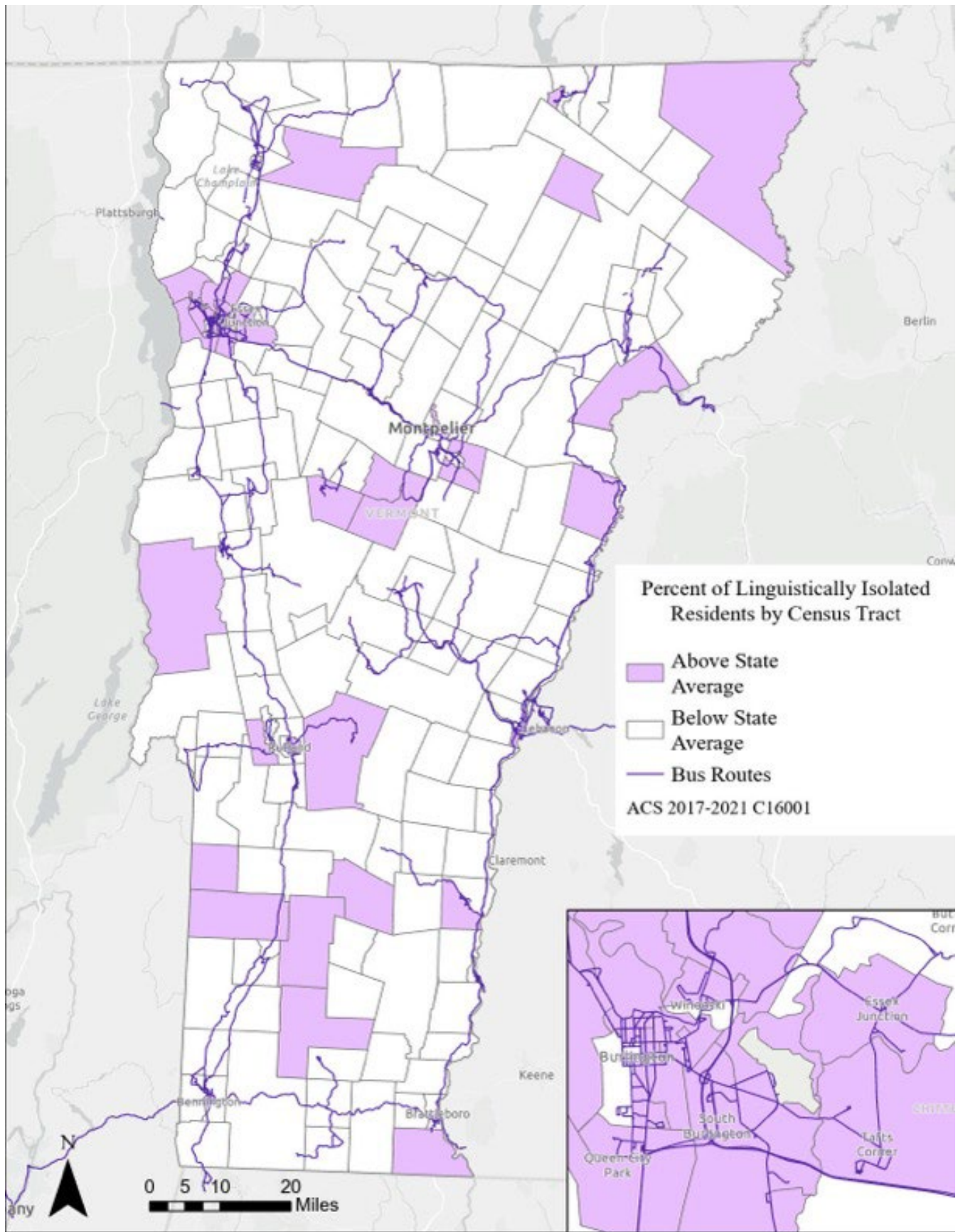
Other than these outreach efforts, there is little reason for the general public to contact VTrans directly about public transportation issues. Thus, the other primary form of interaction of LEP individuals with VTrans is through subrecipients. The seven public transit providers in Vermont have more direct contact with LEP persons than VTrans, though the degree of interaction varies across the state. It is the responsibility of the providers—which include one transit authority, one transit district, and five private non-profit agencies—to deploy the resources necessary to ensure that LEP individuals have fair access to the available services. However, it is VTrans' responsibility as the FTA grant recipient to monitor the efforts of the providers and ensure compliance with Executive Order 13166.

The forms of LEP interaction experienced by the transit providers include the following:

- Providing basic information on how to use public transit services in the area
- Purchasing fare media
- Making reservations on demand-response services such as ADA paratransit, Elders and Persons with Disabilities transportation, and general public dial-a-ride
- Handling passenger complaints
- Gathering data such as on-board customer surveys.

The maps presented on pages 15-16 illustrate where LEP individuals reside in the state of Vermont. The maps use Census tracts and are based on 2017-2021 American Community Survey data, the most recent available at the tract level. The first map shows the number of individuals by tract who speak English “less than very well.” In 35 of the 192 Census tracts in Vermont, there are zero people who are “linguistically isolated” (i.e., speaking English less than very well). In another 37 tracts, there are between 1 and 10 linguistically isolated individuals. The LEP guidance from DOT indicates lower requirements for recipients that serve “very few” LEP individuals; the Safe Harbor provision in FTA Circular C 4702.1B (page III - 9) indicates 50 individuals is the threshold for reduced requirements. In total, 154 of Vermont's 192 tracts (80%) have fewer than 50 LEP individuals. There were only eight tracts with 200 or more LEP individuals; all of these were in Chittenden County. The second map shows tracts where the percentage of LEP individuals is higher than the 2017-2021 statewide average of 1.26%; i.e., “concentrations” of LEP individuals.





It is clear from the data, as well as from the experience of the transit providers, that LEP is not a widespread issue in Vermont. Outside of the core of Chittenden County, there are only two tracts where there are 100 or more people who don't speak English very well: one in Barre Town and one in the center of Bennington. Note that the Census data do not reflect recent influxes of refugees from Afghanistan (2021-2022) or Ukraine (2022-2023).

The next step in the analysis was to consider specific language groups and where there are concentrations of individuals who do not speak English well. In the maps above, it can be seen that at the tract level, other than in the core of Chittenden County, the numbers of people who do not speak English well are small. When these groups are broken down further into specific languages, the numbers become even smaller.

The maps on the pages 19-26 display the number of persons who speak English "less than very well" and whose primary language is French, Spanish, Other Indo-European Languages, Chinese, Other Asian and Pacific Islander (primarily Burmese), Russian/Polish/Slavic, Vietnamese, and Korean. Statewide, these are the only languages (besides "Other and Unspecified") that have more than 100 individuals who speak English less than very well.

On the French map (1,619 total linguistic isolates), the highest numbers of linguistic isolates are in the center of Chittenden County and Barre Town. A pattern in prior Title VI patterns of a high incidence of French speakers among the northern tier has dissipated to some extent, as these tracts in northern Essex County and Orleans County now have between 20 and 35 linguistic isolates whereas in previous data sets had more than 40. This trend could represent older residents with ties to Quebec passing on in the intervening years. The higher numbers in Barre and the Burlington area likely reflect recent immigration from Haiti rather than legacy ties to Quebec. Indeed, the highest absolute numbers and highest percentages of French speakers are in the South End of Burlington, the southern part of Barre Town and the eastern part of South Burlington.

Compared to prior Census data, LEP individuals who speak Spanish are spread over a wider area with fewer concentrations. In 2015, there were three tracts with percentages well over 2 percent, but in the current data, only Tract 104 in Franklin County crosses that threshold at 2.07%. The highest absolute number in any tract is 72, in the Old North End of Burlington. Concentrations in prior analyses were attributed to migrant farmworkers. It is possible that there were fewer such farmworkers during the pandemic.

Other Indo-European Languages, spoken by 1,748 linguistically isolated individuals, mostly comprises Nepali, Marathi, or other Indic languages (1,205 of the 1,748) reflecting the many refugees from Bhutan that settled in Chittenden County from 2008 to 2017 (see Factor 2 below). The great majority of these individuals are located in the core of Chittenden County, in Winooski, the western part of Essex Junction and the Intervale neighborhood of Burlington. The percentages of total population in these tracts range from 3.7% in the Intervale to 11.4% in the western part of Winooski. The central part of Bennington has 103 linguistic isolates in this language group (2.45% of the population), but the Census data do not provide more detailed information on which specific language is spoken by these individuals.

On the Chinese map (737 total linguistic isolates), it can be seen that linguistically isolated Chinese speakers are clustered almost exclusively in tracts in Chittenden County. Earlier data sets showed a wider distribution. The highest concentrations are in the Route 116 corridor in South Burlington, the northern part of Williston, and the portion of Burlington containing UVM.

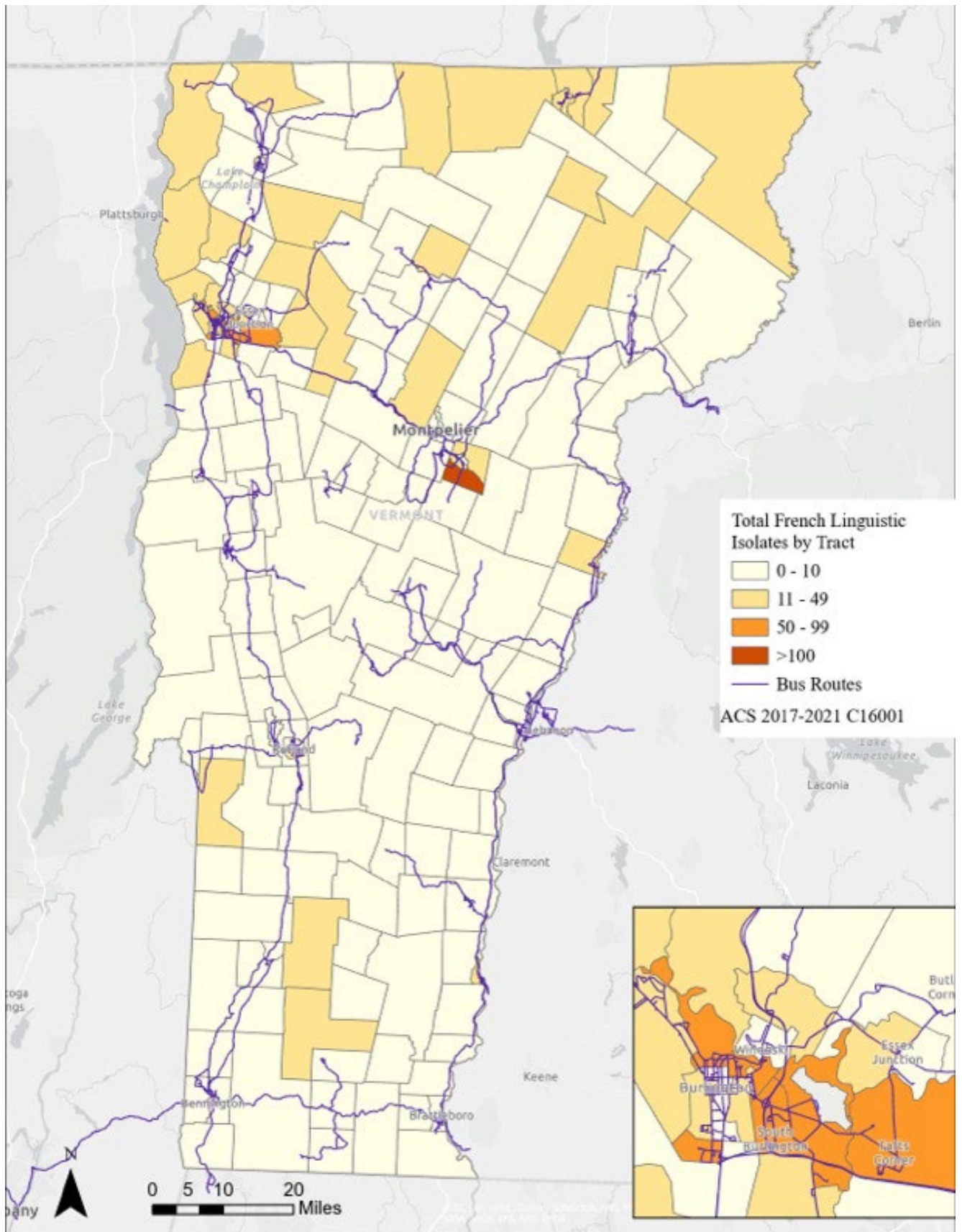
Other Asian and Pacific Islander languages reflect primarily Burmese refugees who have settled in Chittenden County. There are scattered other tracts in St. Johnsbury, Hartford, Guilford and Northfield where there are clusters of speakers of these languages.

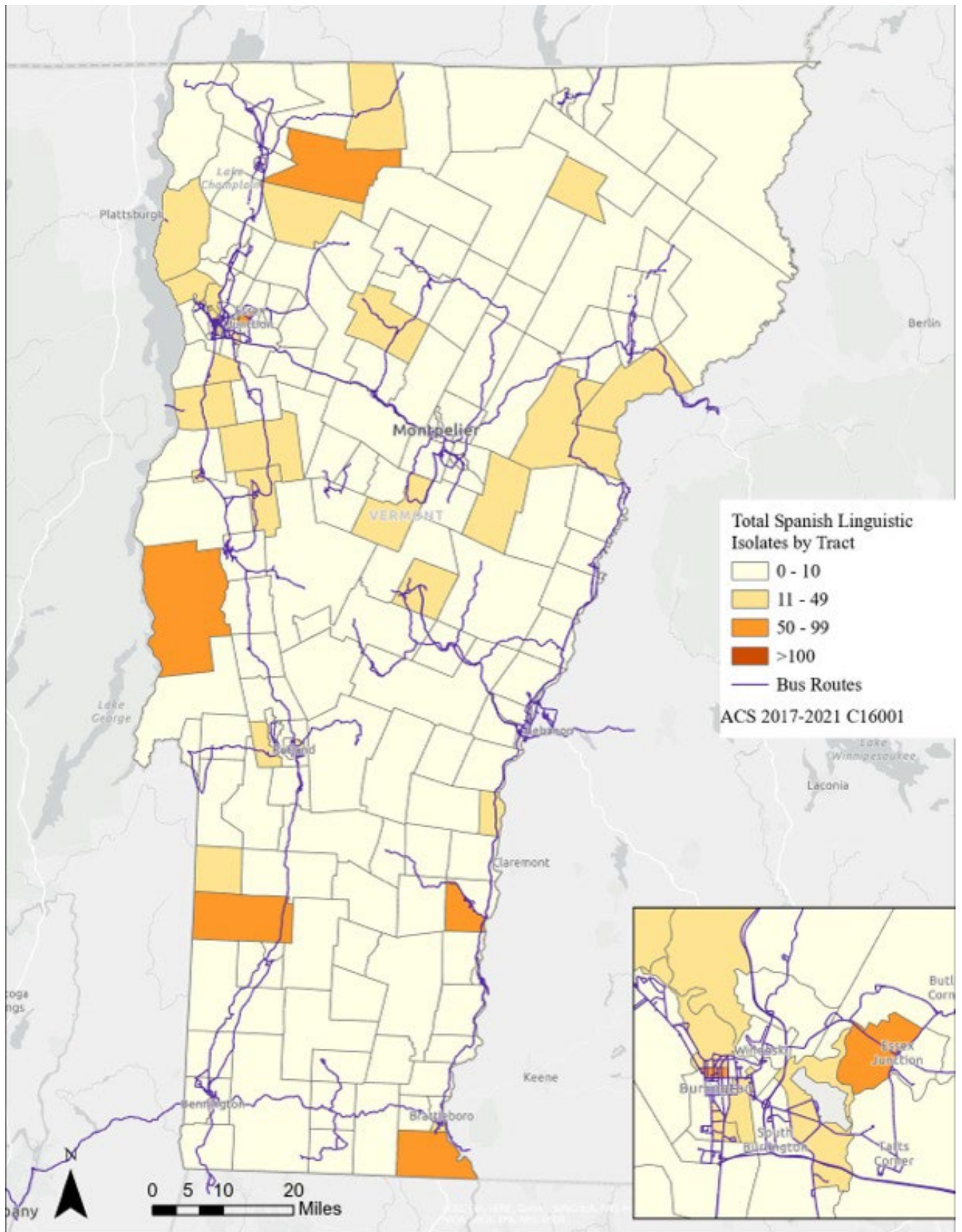


Speakers of Slavic languages also reflect an influx of refugees, this time Bosnians who speak Serbo-Croatian and arrived in Chittenden County more than a decade ago. There are other tracts as well, including Middlebury, Rutland, Northfield, Barre and Newbury, among others.

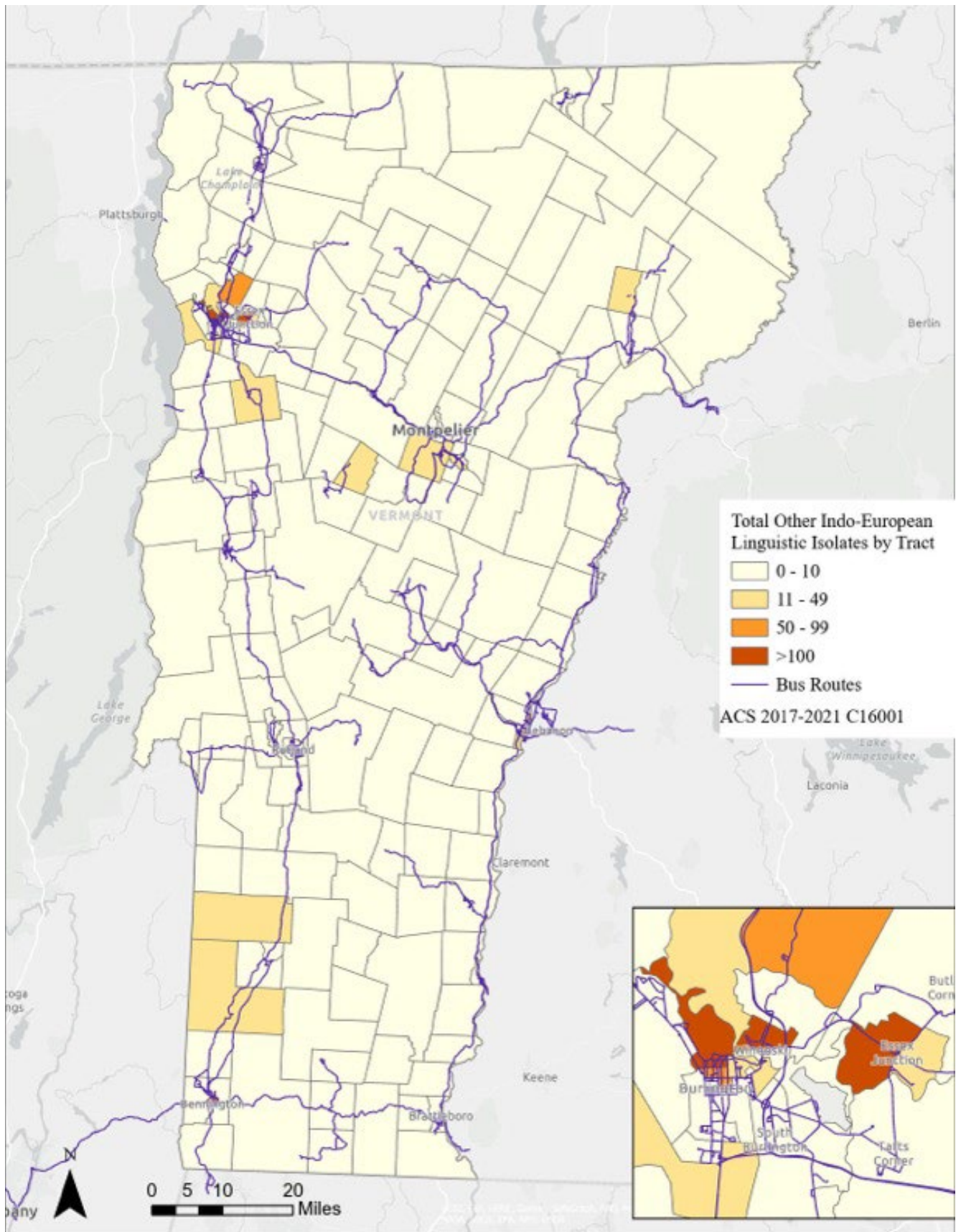
Vietnamese and Korean have relatively fewer speakers in Vermont, with fewer than 200 speaking English less than very well. Vietnamese speakers are almost exclusively in the New North End of Burlington, as well as some in Essex Junction. Tracts with Korean speakers are spread over the state, with no significant clusters visible.

Information about all other languages spoken in Vermont is shown on the multi-page tables following the maps. This information, as well as the data for the maps, is drawn from the 2017-2021 American Community Survey from the US Census.

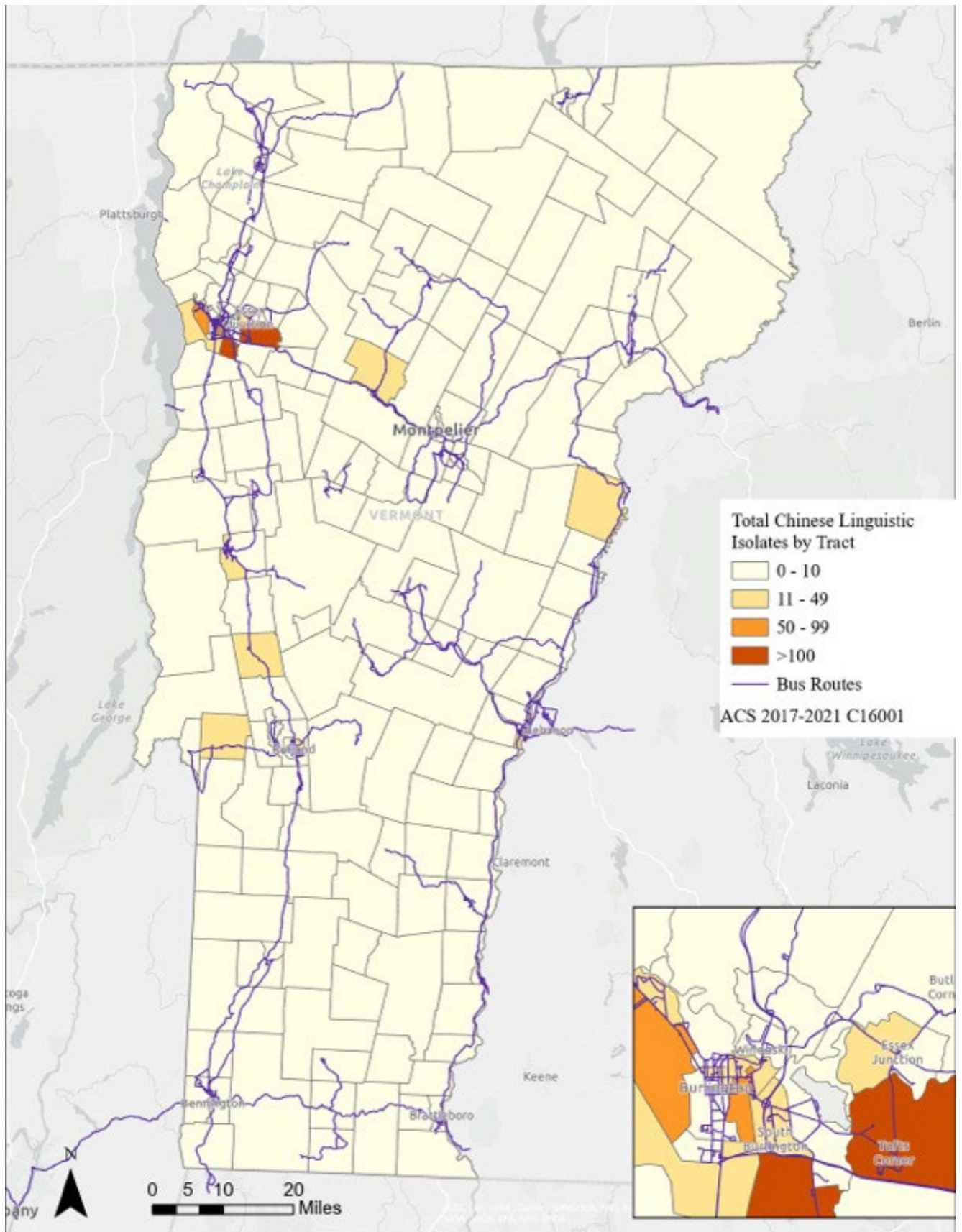






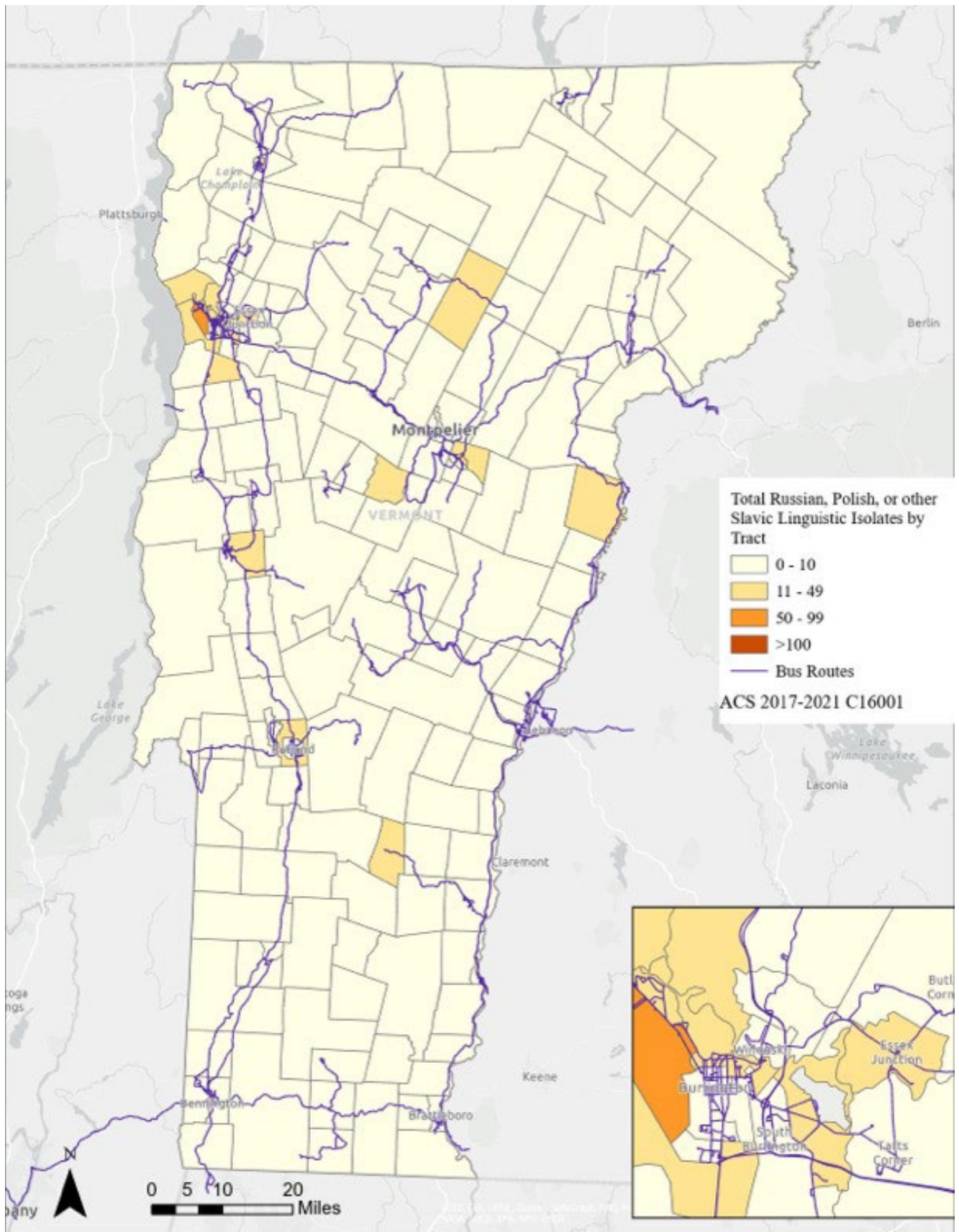


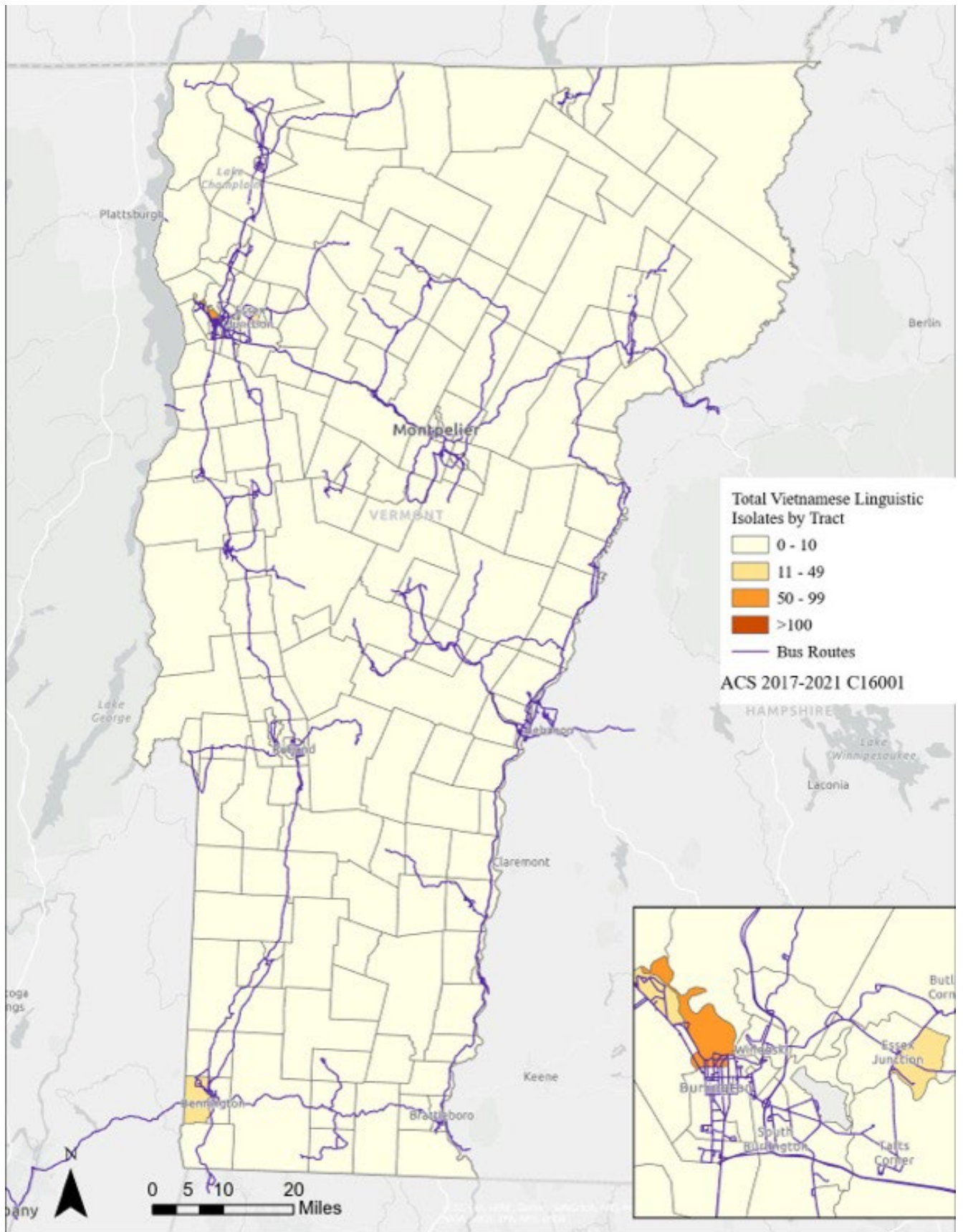




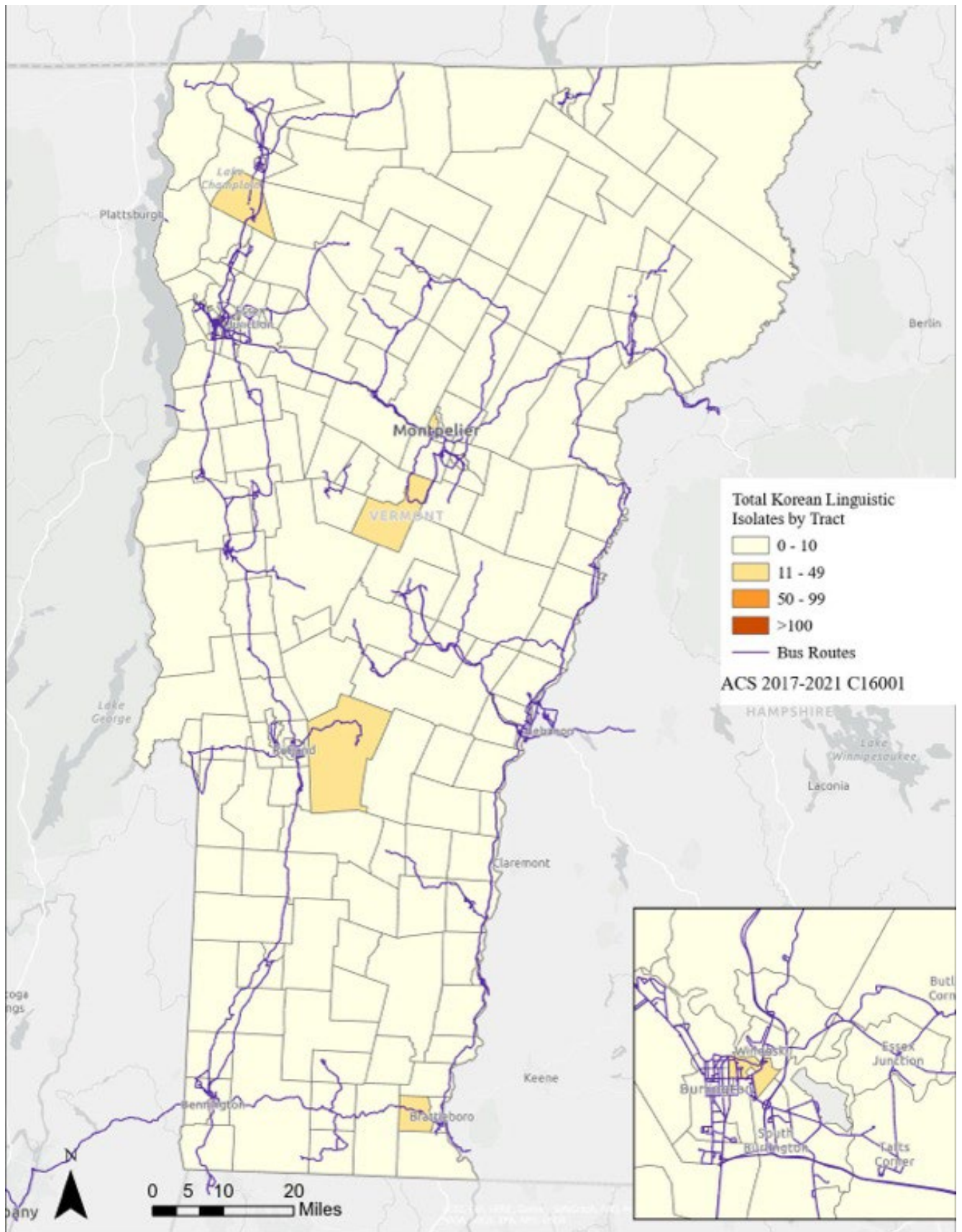












**Number of Individuals Who Speak English Less than Very Well by Language and Tract**

| County     | Tract   | Description   | Total: | Spanish | French, Haitian, or Cajun | German | Slavic languages | Other Indo-European languages | Korean | Chinese | Vietnamese | Tagalog | Other Asian and Pacific Is. languages | Arabic | Other and unspecified languages | Total Linguistic Isolates |
|------------|---------|---|--------|---------|---------------------------|--------|------------------|-------------------------------|--------|---------|------------|---------|---------------------------------------|--------|---------------------------------|---------------------------|
| Addison    | 9601    | Monkton, Starksboro                                   | 3,765  | 11      | -                         | 4      | 2                | -                             | -      | 4       | -          | -       | -                                     | -      | -                               | 21                        |
| Addison    | 9602    | Ferrisburgh   | 2,514  | -       | 1                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 1                         |
| Addison    | 9603    | Vergennes   | 2,531  | 11      | 6                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 17                        |
| Addison    | 9604    | Panton, Addison, Weybridge, New Haven, Waltham        | 4,819  | 9       | 7                         | -      | -                | 4                             | -      | -       | -          | -       | 1                                     | -      | -                               | 21                        |
| Addison    | 9605    | Bristol   | 3,642  | 44      | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 44                        |
| Addison    | 9606    | Lincoln, Ripton, Granville, Hancock, Goshen           | 2,817  | -       | -                         | -      | -                | -                             | -      | 4       | -          | -       | -                                     | -      | -                               | 4                         |
| Addison    | 9607    | Middlebury East                                       | 3,702  | -       | -                         | -      | 16               | -                             | -      | -       | -          | -       | -                                     | -      | 12                              | 28                        |
| Addison    | 9608    | Middlebury West                                       | 5,115  | 7       | 1                         | -      | -                | -                             | -      | 29      | 7          | -       | -                                     | -      | 7                               | 51                        |
| Addison    | 9609    | Cornwall, Bridport, Shoreham, Whiting, Orwell         | 4,686  | 65      | 2                         | 2      | -                | 1                             | -      | -       | -          | 2       | -                                     | -      | -                               | 72                        |
| Addison    | 9610    | Salisbury   | 2,202  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Bennington | 9704.01 | Manchester  | 2,099  | -       | -                         | -      | 4                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 4                         |
| Bennington | 9704.02 | Manchester northeast                                  | 2,016  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Bennington | 9705    | Peru, Winhall   | 1,265  | -       | 18                        | -      | -                | 7                             | -      | -       | -          | -       | 4                                     | -      | -                               | 29                        |
| Bennington | 9706.01 | Glastenbury, Woodford, Searsburg, Readsboro, Stamford | 1,952  | -       | -                         | 3      | -                | -                             | -      | -       | -          | -       | 5                                     | -      | -                               | 8                         |
| Bennington | 9708    | Shaftsbury  | 3,453  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Bennington | 9709    | Bennington Northeast                                  | 2,272  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Bennington | 9710    | Bennington West                                       | 3,296  | 2       | -                         | -      | -                | -                             | -      | -       | 14         | -       | -                                     | -      | -                               | 16                        |
| Bennington | 9711    | Bennington Southeast                                  | 4,890  | 9       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 9                         |
| Bennington | 9712    | Bennington Central                                    | 4,205  | -       | -                         | -      | -                | 103                           | -      | -       | -          | -       | -                                     | -      | -                               | 103                       |
| Bennington | 9713    | Pownal  | 3,172  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Bennington | 9714    | Dorset, Rupert  | 2,616  | 52      | -                         | -      | -                | 14                            | 1      | -       | -          | -       | -                                     | -      | -                               | 67                        |
| Bennington | 9716    | Sunderland, Sandgate, Arlington                       | 4,256  | -       | 4                         | -      | 2                | 25                            | -      | 7       | -          | -       | -                                     | -      | -                               | 38                        |
| Caledonia  | 9570    | Walden, Stannard, Wheelock, Sheffield, Sutton, Newark | 4,067  | 7       | 12                        | -      | 3                | -                             | -      | 4       | -          | -       | -                                     | -      | -                               | 26                        |
| Caledonia  | 9571    | Burke, Kirby  | 2,065  | -       | 2                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 2                         |
| Caledonia  | 9572    | Lyndon East   | 2,214  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Caledonia  | 9573    | Lyndon West   | 3,059  | -       | -                         | -      | -                | 13                            | -      | -       | -          | -       | -                                     | -      | -                               | 13                        |
| Caledonia  | 9574    | St. Johnsbury West                                    | 3,584  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | 18                                    | -      | -                               | 18                        |
| Caledonia  | 9575    | St. Johnsbury East                                    | 3,518  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Caledonia  | 9576    | Danville  | 2,059  | -       | -                         | 4      | -                | 8                             | -      | -       | -          | -       | -                                     | -      | -                               | 12                        |
| Caledonia  | 9577    | Hardwick  | 2,797  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Caledonia  | 9578    | Ryegate, Groton, Peacham                              | 2,928  | 16      | -                         | -      | -                | 7                             | -      | -       | -          | -       | 1                                     | -      | -                               | 24                        |
| Caledonia  | 9579    | Barnet, Waterford                                     | 2,721  | 48      | 4                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 52                        |
| Chittenden | 1       | Burlington NNE East                                   | 4,366  | -       | 48                        | -      | 43               | 4                             | -      | 14      | 20         | -       | -                                     | 6      | 109                             | 244                       |
| Chittenden | 2       | Burlington NNE West                                   | 5,345  | -       | 44                        | -      | 94               | -                             | -      | 53      | -          | -       | -                                     | -      | -                               | 191                       |
| Chittenden | 3       | Burlington Intervale                                  | 4,854  | 19      | 65                        | -      | 20               | 179                           | -      | -       | 88         | -       | -                                     | -      | 20                              | 391                       |
| Chittenden | 6       | Burlington Northeast                                  | 4,319  | -       | 81                        | -      | 36               | 18                            | 35     | 41      | -          | -       | -                                     | -      | 68                              | 279                       |
| Chittenden | 8       | Burlington South Central                              | 2,488  | 32      | 7                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 39                        |
| Chittenden | 9       | Burlington Maple St                                   | 2,517  | 1       | 4                         | -      | -                | -                             | -      | -       | -          | -       | 49                                    | -      | -                               | 54                        |
| Chittenden | 10      | Burlington Downtown/Waterfront                        | 2,346  | 1       | 26                        | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 27                        |
| Chittenden | 11      | Burlington South End                                  | 2,128  | -       | 89                        | -      | -                | -                             | -      | -       | -          | -       | -                                     | 42     | 35                              | 166                       |
| Chittenden | 21.01   | Miton West  | 2,713  | -       | 12                        | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 12                        |
| Chittenden | 21.03   | Milton East   | 3,817  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Chittenden | 21.04   | Milton Southwest                                      | 3,583  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Chittenden | 22.01   | Colchester South                                      | 3,141  | 7       | 35                        | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 42                        |
| Chittenden | 22.02   | Colchester Northeast                                  | 4,606  | -       | -                         | -      | -                | 75                            | -      | -       | -          | -       | -                                     | -      | -                               | 75                        |
| Chittenden | 23.01   | Colchester North                                      | 1,355  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Chittenden | 23.03   | Colchester Northwest                                  | 4,637  | 14      | 40                        | -      | 44               | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 98                        |
| Chittenden | 23.04   | Colchester Village                                    | 2,965  | 13      | 42                        | -      | 43               | 23                            | -      | -       | -          | -       | -                                     | -      | -                               | 121                       |

## Number of Individuals Who Speak English Less than Very Well by Language and Tract

| County     | Tract  | Description                        | Total: | Spanish | French, Haitian, or Cajun | German | Slavic languages | Other Indo-European languages | Korean | Chinese | Vietnamese | Tagalog | Other Asian and Pacific Is. languages | Arabic | Other and unspecified languages | Total Linguistic Isolates |
|------------|--------|------------------------------------|--------|---------|---------------------------|--------|------------------|-------------------------------|--------|---------|------------|---------|---------------------------------------|--------|---------------------------------|---------------------------|
| Chittenden | 24     | Winooski West                      | 3,232  | 1       | -                         | -      | -                | 367                           | -      | -       | -          | -       | 198                                   | -      | 53                              | 619                       |
| Chittenden | 25.01  | Winooski East                      | 2,235  | -       | -                         | -      | -                | 223                           | -      | -       | -          | -       | -                                     | 22     | -                               | 245                       |
| Chittenden | 25.02  | Winooski South                     | 2,169  | -       | -                         | -      | -                | -                             | -      | -       | 4          | -       | -                                     | -      | -                               | 4                         |
| Chittenden | 26.01  | Essex Junction West                | 5,641  | 62      | 19                        | -      | 31               | 327                           | -      | 28      | -          | -       | -                                     | -      | -                               | 467                       |
| Chittenden | 26.02  | Essex Junction East                | 4,145  | -       | -                         | -      | 37               | 23                            | -      | -       | 42         | -       | -                                     | 3      | 14                              | 119                       |
| Chittenden | 27.01  | Essex Town West                    | 5,824  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | 48                              | 48                        |
| Chittenden | 27.02  | Essex Town East                    | 5,183  | 9       | -                         | -      | 6                | 10                            | -      | -       | -          | -       | 33                                    | -      | -                               | 58                        |
| Chittenden | 28     | Jericho                            | 4,758  | -       | 12                        | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 12                        |
| Chittenden | 29     | Westford, Underhill, Bolton        | 6,299  | -       | 18                        | 3      | -                | -                             | -      | -       | -          | -       | 13                                    | -      | -                               | 34                        |
| Chittenden | 30     | Richmond                           | 3,917  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Chittenden | 31.01  | Williston North                    | 7,633  | 4       | 84                        | -      | -                | -                             | -      | 112     | -          | -       | -                                     | -      | -                               | 200                       |
| Chittenden | 31.02  | Williston South                    | 1,948  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Chittenden | 33.01  | South Burlington 116               | 4,248  | 8       | 13                        | 9      | -                | -                             | -      | 101     | -          | -       | 9                                     | -      | -                               | 140                       |
| Chittenden | 33.04  | South Burlington US 7              | 6,238  | 8       | -                         | -      | 23               | 41                            | -      | 23      | -          | -       | 20                                    | -      | -                               | 115                       |
| Chittenden | 34.01  | Shelburne East                     | 5,091  | 19      | -                         | -      | 15               | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 34                        |
| Chittenden | 34.02  | Shelburne West                     | 2,283  | -       | 17                        | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 17                        |
| Chittenden | 35.01  | Charlotte                          | 3,703  | 24      | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 24                        |
| Chittenden | 35.02  | Hinesburg, St. George              | 5,119  | -       | -                         | -      | -                | 12                            | -      | -       | -          | -       | -                                     | -      | -                               | 12                        |
| Chittenden | 35.03  | Huntington, Buels Gore             | 1,732  | -       | 4                         | -      | -                | -                             | -      | -       | -          | -       | 4                                     | -      | -                               | 8                         |
| Chittenden | 36     | South Burlington Dorset            | 4,711  | -       | 53                        | -      | -                | -                             | -      | 19      | -          | -       | 169                                   | -      | -                               | 241                       |
| Chittenden | 39     | Burlington UVM                     | 7,695  | 31      | 14                        | 3      | -                | 2                             | -      | 88      | -          | -       | 14                                    | -      | -                               | 152                       |
| Chittenden | 40.02  | South Burlington East              | 3,965  | 20      | 87                        | -      | 49               | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 156                       |
| Chittenden | 41     | Burlington Main to Pearl Central   | 2,672  | -       | 9                         | -      | -                | 58                            | -      | 29      | -          | -       | -                                     | -      | -                               | 96                        |
| Chittenden | 42     | Burlington ONE                     | 4,322  | 72      | -                         | -      | 9                | 58                            | -      | 47      | -          | -       | 11                                    | -      | -                               | 197                       |
| Essex      | 9501   | Northern Essex Cty                 | 1,570  | -       | 32                        | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 32                        |
| Essex      | 9502   | Brighton                           | 1,084  | -       | 4                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 4                         |
| Essex      | 9505   | Southern Essex Cty                 | 3,076  | 7       | 9                         | -      | -                | -                             | -      | 7       | -          | -       | -                                     | -      | -                               | 23                        |
| Franklin   | 101.01 | Highgate                           | 3,335  | -       | 13                        | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 13                        |
| Franklin   | 101.02 | Franklin, Sheldon                  | 3,377  | -       | -                         | -      | -                | -                             | -      | 3       | -          | -       | -                                     | -      | -                               | 3                         |
| Franklin   | 102    | Berkshire, Enosburg                | 3,937  | 12      | 6                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 18                        |
| Franklin   | 103    | Richford, Montgomery               | 3,354  | -       | 23                        | -      | -                | -                             | -      | 1       | -          | -       | -                                     | -      | -                               | 24                        |
| Franklin   | 104    | Fairfield, Bakersfield             | 3,382  | 70      | 4                         | -      | -                | 10                            | -      | -       | -          | -       | -                                     | -      | -                               | 84                        |
| Franklin   | 105    | Swanton                            | 6,338  | -       | -                         | 4      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 4                         |
| Franklin   | 106    | St. Albans Town                    | 6,419  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Franklin   | 107    | St. Albans West                    | 3,318  | -       | 33                        | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 33                        |
| Franklin   | 108    | St. Albans East                    | 3,125  | -       | -                         | -      | 15               | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 15                        |
| Franklin   | 109    | Georgia                            | 4,602  | -       | -                         | -      | -                | -                             | 24     | -       | -          | -       | -                                     | -      | -                               | 24                        |
| Franklin   | 110    | Fairfax, Fletcher                  | 5,708  | 11      | 13                        | 10     | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 34                        |
| Grand Isle | 201    | North Hero, Alburgh, Isle La Motte | 3,374  | 6       | 17                        | -      | -                | -                             | -      | 8       | -          | -       | -                                     | -      | -                               | 31                        |
| Grand Isle | 202    | South Hero, Grand Isle             | 3,559  | 20      | 14                        | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 34                        |
| Lamoille   | 9530   | Eden, Belvidere, Waterville        | 2,066  | -       | -                         | -      | 4                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 4                         |
| Lamoille   | 9531   | Cambridge                          | 3,566  | -       | -                         | -      | -                | 1                             | -      | -       | -          | -       | -                                     | -      | -                               | 1                         |
| Lamoille   | 9532   | Johnson                            | 3,337  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | 5                               | 5                         |
| Lamoille   | 9533   | Hyde Park                          | 2,884  | -       | 20                        | -      | -                | 2                             | -      | -       | -          | -       | -                                     | -      | -                               | 22                        |
| Lamoille   | 9534   | Wolcott, Elmore                    | 2,626  | 5       | 4                         | -      | 14               | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 23                        |
| Lamoille   | 9535   | Morristown                         | 5,281  | 9       | 4                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 13                        |
| Lamoille   | 9536   | Stowe                              | 4,948  | 17      | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 17                        |

**Number of Individuals Who Speak English Less than Very Well by Language and Tract**

| County     | Tract   | Description                             | Total | Spanish | French, Haitian, or Cajun | German | Slavic languages | Other Indo-European languages | Korean | Chinese | Vietnamese | Tagalog | Other Asian and Pacific is. languages | Arabic | Other and unspecified languages | Total Linguistic isolates |
|------------|---------|---|-------|---------|---------------------------|--------|------------------|-------------------------------|--------|---------|------------|---------|---------------------------------------|--------|---------------------------------|---------------------------|
| Orange     | 9590    | Newbury                                 | 1,871 | -       | -                         | -      | 13               | -                             | -      | 12      | -          | -       | -                                     | -      | -                               | 25                        |
| Orange     | 9591.01 | Orange, Washington                      | 1,963 | 15      | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 15                        |
| Orange     | 9591.02 | Topsham, Corinth                        | 2,413 | -       | 3                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 3                         |
| Orange     | 9592    | Williamstown                            | 3,421 | 3       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 3                         |
| Orange     | 9593    | Brookfield, Braintree                   | 2,266 | -       | -                         | 9      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 9                         |
| Orange     | 9594    | Randolph                                | 4,493 | 22      | -                         | 2      | -                | 9                             | -      | -       | -          | -       | -                                     | -      | -                               | 33                        |
| Orange     | 9595    | Chelsea, Veshire, Tunbridge, Strafford  | 4,443 | 3       | 4                         | -      | 8                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 15                        |
| Orange     | 9596    | Thetford                                | 2,674 | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Orange     | 9597    | Fairlee, West Fairlee                   | 1,785 | -       | -                         | 2      | -                | 5                             | -      | -       | -          | -       | 5                                     | -      | -                               | 12                        |
| Orange     | 9598    | Bradford                                | 2,637 | 9       | 20                        | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 29                        |
| Orleans    | 9511    | Charleston, Morgan, Holland             | 2,214 | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Orleans    | 9512    | Derby East                              | 2,657 | -       | 21                        | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 21                        |
| Orleans    | 9513    | Derby West                              | 1,608 | -       | 20                        | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 20                        |
| Orleans    | 9514    | Newport East                            | 2,200 | -       | 13                        | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 13                        |
| Orleans    | 9515    | Newport West                            | 2,151 | -       | 37                        | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 37                        |
| Orleans    | 9516    | Jay, Westfield, Troy, Newport Town      | 4,313 | -       | 17                        | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 17                        |
| Orleans    | 9517    | Lowell, Irasburg, Albany, Craftsbury    | 4,010 | -       | 4                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 4                         |
| Orleans    | 9518    | Barton                                  | 2,727 | 24      | 17                        | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | 29                              | 70                        |
| Orleans    | 9519    | Westmore, Brownington, Coventry         | 2,353 | -       | 5                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 5                         |
| Orleans    | 9520    | Greensboro, Glover                      | 1,781 | -       | 3                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 3                         |
| Rutland    | 9621    | Chittenden, Pittsfield                  | 1,825 | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | 4      | -                               | 4                         |
| Rutland    | 9622    | Brandon                                 | 3,955 | -       | -                         | -      | -                | -                             | 18     | -       | -          | -       | 7                                     | -      | -                               | 25                        |
| Rutland    | 9623    | Sudbury, Hubbardton, Benson, West Haven | 2,451 | -       | -                         | -      | -                | 2                             | -      | -       | -          | -       | -                                     | -      | -                               | 2                         |
| Rutland    | 9624    | Pittsford                               | 2,755 | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Rutland    | 9625    | Proctor                                 | 1,758 | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Rutland    | 9626    | West Rutland                            | 2,199 | 23      | -                         | 5      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 28                        |
| Rutland    | 9627    | Rutland Town                            | 3,776 | -       | -                         | 11     | -                | -                             | -      | -       | -          | -       | -                                     | -      | 1                               | 12                        |
| Rutland    | 9628    | Killington, Mendon, Shrewsbury          | 3,051 | 6       | -                         | 11     | -                | 21                            | 5      | -       | -          | -       | -                                     | -      | -                               | 43                        |
| Rutland    | 9630    | Rutland Northeast                       | 4,313 | 11      | -                         | -      | -                | -                             | 25     | -       | 25         | -       | -                                     | -      | -                               | 61                        |
| Rutland    | 9631    | Rutland Central                         | 3,388 | 60      | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 60                        |
| Rutland    | 9632    | Rutland Northwest                       | 2,656 | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Rutland    | 9633    | Rutland South                           | 4,933 | -       | 26                        | -      | -                | 3                             | -      | -       | -          | -       | -                                     | -      | -                               | 29                        |
| Rutland    | 9634    | Clarendon                               | 2,351 | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Rutland    | 9635    | Middletown Springs, Ira, Tinmouth       | 1,707 | 2       | 2                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 4                         |
| Rutland    | 9636    | Castleton                               | 4,507 | -       | 3                         | -      | -                | -                             | 11     | -       | -          | -       | -                                     | -      | -                               | 14                        |
| Rutland    | 9637    | Fair Haven                              | 2,533 | -       | -                         | -      | 7                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 7                         |
| Rutland    | 9638    | Poultney, Wellstown                     | 3,834 | -       | 12                        | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 12                        |
| Rutland    | 9640    | Mount Holly, Wallingford                | 3,572 | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Rutland    | 9642    | Mount Tabor, Danby                      | 1,322 | 3       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 3                         |
| Rutland    | 9643    | Pawlet                                  | 1,181 | 16      | -                         | -      | -                | -                             | 3      | -       | -          | -       | -                                     | -      | -                               | 19                        |
| Washington | 9540    | Cabot, Marshfield, Plainfield           | 4,467 | 4       | 4                         | -      | -                | -                             | -      | -       | -          | 3       | 3                                     | -      | -                               | 14                        |
| Washington | 9541    | Woodbury, Calais                        | 2,545 | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | 3      | -                               | 3                         |
| Washington | 9542    | Worcester, Middlesex                    | 2,692 | 10      | 12                        | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 22                        |
| Washington | 9543    | Waterbury                               | 4,845 | -       | -                         | -      | -                | -                             | 17     | -       | -          | -       | -                                     | -      | -                               | 17                        |
| Washington | 9544    | Duxbury, Moretown                       | 2,820 | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Washington | 9545    | Berlin                                  | 2,633 | -       | 9                         | -      | -                | 12                            | -      | -       | -          | -       | -                                     | -      | -                               | 21                        |
| Washington | 9546    | Montpelier Northwest                    | 2,062 | -       | -                         | -      | -                | -                             | 11     | -       | -          | -       | -                                     | -      | -                               | 11                        |
| Washington | 9547    | Montpelier Northeast                    | 1,686 | 6       | -                         | -      | 7                | -                             | 9      | -       | -          | -       | -                                     | -      | -                               | 22                        |
| Washington | 9548    | Montpelier Downtown                     | 2,122 | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Washington | 9549    | Montpelier South                        | 1,901 | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Washington | 9550    | East Montpelier                         | 2,391 | -       | 7                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 7                         |



## Number of Individuals Who Speak English Less than Very Well by Language and Tract

| County     | Tract   | Description                                    | Total: | Spanish | French, Haitian, or Cajun | German | Slavic languages | Other Indo-European languages | Korean | Chinese | Vietnamese | Tagalog | Other Asian and Pacific Is. languages | Arabic | Other and unspecified languages | Total Linguistic Isolates |
|------------|---------|--|--------|---------|---------------------------|--------|------------------|-------------------------------|--------|---------|------------|---------|---------------------------------------|--------|---------------------------------|---------------------------|
| Washington | 9551    | Barre City North                               | 4,359  | -       | -                         | -      | 14               | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 14                        |
| Washington | 9552    | Barre City South                               | 3,791  | -       | 18                        | -      | -                | 13                            | -      | -       | -          | -       | -                                     | -      | -                               | 31                        |
| Washington | 9553    | Barre Town North                               | 3,818  | -       | 33                        | -      | 17               | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 50                        |
| Washington | 9554    | Barre Town South                               | 3,792  | -       | 143                       | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 143                       |
| Washington | 9555.01 | Northfield West                                | 2,257  | -       | 4                         | -      | 15               | -                             | -      | -       | -          | -       | 17                                    | -      | -                               | 36                        |
| Washington | 9555.02 | Northfield Southeast                           | 4,651  | 17      | 4                         | -      | -                | 5                             | 22     | 9       | -          | -       | 25                                    | -      | -                               | 82                        |
| Washington | 9556    | Warren   | 1,571  | -       | -                         | 20     | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 20                        |
| Washington | 9557    | Waitsfield                                     | 1,634  | -       | -                         | -      | -                | 13                            | -      | -       | -          | -       | -                                     | -      | -                               | 13                        |
| Washington | 9558    | Fayston  | 933    | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Windham    | 9670    | Bellows Falls                                  | 2,631  | -       | 31                        | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 31                        |
| Windham    | 9671    | Rockingham                                     | 2,031  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Windham    | 9672    | Windham, Grafton, Athens, Townshend, Brookline | 3,581  | 2       | 10                        | -      | 10               | 3                             | -      | -       | -          | -       | -                                     | -      | -                               | 25                        |
| Windham    | 9673    | Londonderry                                    | 1,852  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Windham    | 9674    | Jamaica  | 856    | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Windham    | 9675    | Wardsboro, Stratton, Somerset                  | 1,218  | -       | 17                        | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 17                        |
| Windham    | 9676    | Westminster                                    | 2,936  | 1       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 1                         |
| Windham    | 9677    | Putney   | 2,554  | 4       | 10                        | -      | -                | 2                             | -      | -       | -          | -       | -                                     | -      | -                               | 16                        |
| Windham    | 9678    | Newfane  | 1,714  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Windham    | 9679    | Dover  | 1,101  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Windham    | 9680    | Wilmington                                     | 1,724  | -       | 4                         | -      | -                | 10                            | 1      | -       | -          | -       | -                                     | -      | -                               | 15                        |
| Windham    | 9681    | Whitingham                                     | 1,510  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | 4                                     | -      | -                               | 4                         |
| Windham    | 9682    | Marlboro, Halifax                              | 2,086  | -       | 2                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 2                         |
| Windham    | 9683    | Dummerston                                     | 2,079  | 9       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 9                         |
| Windham    | 9684    | West Brattleboro                               | 3,569  | -       | -                         | -      | -                | -                             | 17     | 1       | -          | -       | -                                     | -      | -                               | 18                        |
| Windham    | 9685    | Brattleboro South                              | 5,474  | 18      | -                         | -      | -                | -                             | -      | -       | -          | -       | 46                                    | -      | -                               | 64                        |
| Windham    | 9686    | Brattleboro North                              | 2,437  | -       | -                         | -      | 6                | 2                             | -      | 2       | -          | -       | -                                     | -      | -                               | 10                        |
| Windham    | 9687    | Guilford, Vernon                               | 4,477  | 55      | -                         | 5      | -                | -                             | -      | -       | -          | 6       | 17                                    | 15     | -                               | 98                        |
| Windsor    | 9650    | Norwich  | 3,313  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | 12                              | 12                        |
| Windsor    | 9651    | Royalton                                       | 2,470  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Windsor    | 9654    | Stockbridge, Barnard, Pomfret, Sharon          | 4,100  | -       | 4                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 4                         |
| Windsor    | 9655.01 | South Hartford                                 | 3,402  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | 28                                    | -      | -                               | 28                        |
| Windsor    | 9655.02 | North Hartford                                 | 2,560  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Windsor    | 9656    | White River Junction/Wilder                    | 4,257  | -       | -                         | -      | -                | 37                            | -      | 13      | -          | -       | 34                                    | -      | -                               | 84                        |
| Windsor    | 9657    | Harland  | 3,303  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Windsor    | 9658    | Woodstock                                      | 2,902  | -       | -                         | -      | 4                | -                             | -      | -       | -          | 10      | -                                     | -      | 5                               | 19                        |
| Windsor    | 9659.01 | Bridgewater, Plymouth                          | 1,326  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Windsor    | 9659.02 | Reading, West Windsor                          | 1,695  | -       | -                         | -      | -                | 2                             | -      | -       | -          | -       | -                                     | -      | -                               | 2                         |
| Windsor    | 9660    | Windsor  | 3,338  | 20      | -                         | -      | -                | 9                             | -      | -       | -          | -       | -                                     | -      | -                               | 29                        |
| Windsor    | 9661    | Weathersfield                                  | 2,759  | -       | 10                        | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 10                        |
| Windsor    | 9662    | Cavendish, Baltimore                           | 1,671  | -       | 1                         | -      | -                | 2                             | -      | -       | -          | -       | -                                     | -      | -                               | 3                         |
| Windsor    | 9663    | Ludlow   | 1,735  | -       | -                         | -      | 12               | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 12                        |
| Windsor    | 9665.01 | Chester  | 2,929  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Windsor    | 9665.02 | Andover, Weston                                | 1,313  | 4       | 7                         | -      | 8                | 2                             | -      | -       | -          | -       | -                                     | -      | 3                               | 24                        |
| Windsor    | 9666    | Springfield South                              | 4,522  | 70      | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 70                        |
| Windsor    | 9667    | Springfield North                              | 4,347  | -       | 3                         | -      | 2                | 9                             | -      | -       | -          | 35      | -                                     | -      | -                               | 49                        |
| Windsor    | 9668    | Bethel, Rochester                              | 3,174  | -       | 3                         | -      | -                | -                             | -      | -       | 5          | -       | -                                     | -      | -                               | 8                         |
|            |         |  |        | 1200    | 1619                      | 91     | 649              | 1748                          | 149    | 737     | 180        | 81      | 738                                   | 92     | 421                             | 7705                      |

Source: 2017-2021 American Community Survey Report C16001

## Percentage of Population that Speaks English Less than Very Well by Language and Tract

| County     | Tract   | Description   | Spanish | French, Haitian, or Cajun | German | Slavic languages | Other Indo-European languages | Korean | Chinese | Vietnamese | Tagalog | Other Asian and Pacific Is. languages | Arabic | Other and unspecified languages | Total Linguistic isolates |
|------------|---------|---|---------|---------------------------|--------|------------------|-------------------------------|--------|---------|------------|---------|---------------------------------------|--------|---------------------------------|---------------------------|
| Addison    | 9601    | Monkton, Starksboro                                   | 0.3%    | -                         | 0.1%   | 0.1%             | -                             | -      | 0.1%    | -          | -       | -                                     | -      | -                               | 0.6%                      |
| Addison    | 9602    | Ferrisburgh   | -       | 0.0%                      | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 0.0%                      |
| Addison    | 9603    | Vergennes   | 0.4%    | 0.2%                      | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 0.7%                      |
| Addison    | 9604    | Panton, Addison, Weybridge, New Haven, Waltham        | 0.2%    | 0.1%                      | -      | -                | 0.1%                          | -      | -       | -          | -       | 0.0%                                  | -      | -                               | 0.4%                      |
| Addison    | 9605    | Bristol   | 1.2%    | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 1.2%                      |
| Addison    | 9606    | Lincoln, Ripton, Granville, Hancock, Goshen           | -       | -                         | -      | -                | -                             | -      | 0.1%    | -          | -       | -                                     | -      | -                               | 0.1%                      |
| Addison    | 9607    | Middlebury East                                       | -       | -                         | -      | 0.4%             | -                             | -      | -       | -          | -       | -                                     | -      | 0.3%                            | 0.8%                      |
| Addison    | 9608    | Middlebury West                                       | 0.1%    | 0.0%                      | -      | -                | -                             | -      | 0.6%    | 0.1%       | -       | -                                     | -      | 0.1%                            | 1.0%                      |
| Addison    | 9609    | Cornwall, Bridport, Shoreham, Whiting, Orwell         | 1.4%    | 0.0%                      | 0.0%   | -                | 0.0%                          | -      | -       | -          | 0.0%    | -                                     | -      | -                               | 1.5%                      |
| Addison    | 9610    | Salisbury   | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Bennington | 9704.01 | Manchester  | -       | -                         | -      | 0.2%             | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 0.2%                      |
| Bennington | 9704.02 | Manchester northeast                                  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Bennington | 9705    | Peru, Winhall   | -       | 1.4%                      | -      | -                | 0.6%                          | -      | -       | -          | -       | 0.3%                                  | -      | -                               | 2.3%                      |
| Bennington | 9706.01 | Glastenbury, Woodford, Searsburg, Readsboro, Stamford | -       | -                         | 0.2%   | -                | -                             | -      | -       | -          | -       | 0.3%                                  | -      | -                               | 0.4%                      |
| Bennington | 9708    | Shaftsbury  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Bennington | 9709    | Bennington Northeast                                  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Bennington | 9710    | Bennington West                                       | 0.1%    | -                         | -      | -                | -                             | -      | 0.4%    | -          | -       | -                                     | -      | -                               | 0.5%                      |
| Bennington | 9711    | Bennington Southeast                                  | 0.2%    | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 0.2%                      |
| Bennington | 9712    | Bennington Central                                    | -       | -                         | -      | -                | 2.4%                          | -      | -       | -          | -       | -                                     | -      | -                               | 2.4%                      |
| Bennington | 9713    | Pownal  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Bennington | 9714    | Dorset, Rupert  | 2.0%    | -                         | -      | -                | 0.5%                          | 0.0%   | -       | -          | -       | -                                     | -      | -                               | 2.6%                      |
| Bennington | 9716    | Sunderland, Sandgate, Arlington                       | -       | 0.1%                      | -      | 0.0%             | 0.6%                          | -      | 0.2%    | -          | -       | -                                     | -      | -                               | 0.9%                      |
| Caledonia  | 9570    | Walden, Stannard, Wheelock, Sheffield, Sutton, Newark | 0.2%    | 0.3%                      | -      | 0.1%             | -                             | -      | 0.1%    | -          | -       | -                                     | -      | -                               | 0.6%                      |
| Caledonia  | 9571    | Burke, Kirby  | -       | 0.1%                      | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 0.1%                      |
| Caledonia  | 9572    | Lyndon East   | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Caledonia  | 9573    | Lyndon West   | -       | -                         | -      | -                | 0.4%                          | -      | -       | -          | -       | -                                     | -      | -                               | 0.4%                      |
| Caledonia  | 9574    | St. Johnsbury West                                    | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | 0.5%                                  | -      | -                               | 0.5%                      |
| Caledonia  | 9575    | St. Johnsbury East                                    | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Caledonia  | 9576    | Darville  | -       | -                         | 0.2%   | -                | 0.4%                          | -      | -       | -          | -       | -                                     | -      | -                               | 0.6%                      |
| Caledonia  | 9577    | Hardwick  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Caledonia  | 9578    | Ryegate, Groton, Peacham                              | 0.5%    | -                         | -      | -                | -                             | 0.2%   | -       | -          | -       | 0.0%                                  | -      | -                               | 0.8%                      |
| Caledonia  | 9579    | Barnet, Waterford                                     | 1.8%    | 0.1%                      | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 1.9%                      |
| Chittenden | 1       | Burlington NNE East                                   | -       | 1.1%                      | -      | 1.0%             | 0.1%                          | -      | 0.3%    | 0.5%       | -       | -                                     | 0.1%   | 2.5%                            | 5.6%                      |
| Chittenden | 2       | Burlington NNE West                                   | -       | 0.8%                      | -      | 1.8%             | -                             | -      | 1.0%    | -          | -       | -                                     | -      | -                               | 3.6%                      |
| Chittenden | 3       | Burlington Intervale                                  | 0.4%    | 1.3%                      | -      | 0.4%             | 3.7%                          | -      | -       | 1.8%       | -       | -                                     | -      | 0.4%                            | 8.1%                      |
| Chittenden | 6       | Burlington Northeast                                  | -       | 1.9%                      | -      | 0.8%             | 0.4%                          | 0.8%   | 0.9%    | -          | -       | -                                     | -      | 1.6%                            | 6.5%                      |
| Chittenden | 8       | Burlington South Central                              | 1.3%    | 0.3%                      | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 1.6%                      |
| Chittenden | 9       | Burlington Maple St                                   | 0.0%    | 0.2%                      | -      | -                | -                             | -      | -       | -          | -       | 1.9%                                  | -      | -                               | 2.1%                      |
| Chittenden | 10      | Burlington Downtown/Waterfront                        | 0.0%    | 1.1%                      | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 1.2%                      |
| Chittenden | 11      | Burlington South End                                  | -       | 4.2%                      | -      | -                | -                             | -      | -       | -          | -       | -                                     | 2.0%   | 1.6%                            | 7.8%                      |
| Chittenden | 21.01   | Milton West   | -       | 0.4%                      | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 0.4%                      |
| Chittenden | 21.03   | Milton East   | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Chittenden | 21.04   | Milton Southwest                                      | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Chittenden | 22.01   | Colchester South                                      | 0.2%    | 1.1%                      | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 1.3%                      |
| Chittenden | 22.02   | Colchester Northeast                                  | -       | -                         | -      | -                | 1.6%                          | -      | -       | -          | -       | -                                     | -      | -                               | 1.6%                      |
| Chittenden | 23.01   | Colchester North                                      | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                     | -      | -                               | -                         |
| Chittenden | 23.03   | Colchester Northwest                                  | 0.3%    | 0.9%                      | -      | 0.9%             | -                             | -      | -       | -          | -       | -                                     | -      | -                               | 2.1%                      |
| Chittenden | 23.04   | Colchester Village                                    | 0.4%    | 1.4%                      | -      | 1.5%             | 0.8%                          | -      | -       | -          | -       | -                                     | -      | -                               | 4.1%                      |

**Percentage of Population that Speaks English Less than Very Well by Language and Tract**

| County     | Tract  | Description                        | Spanish | French, Haitian, or Cajun | German | Slavic languages | Other Indo-European languages | Korean | Chinese | Vietnamese | Tagalog | Other Asian and Pacific Island languages | Arabic | Other and unspecified languages | Total Linguistic Isolates |
|------------|--------|------------------------------------|---------|---------------------------|--------|------------------|-------------------------------|--------|---------|------------|---------|--|--------|---------------------------------|---------------------------|
| Chittenden | 24     | Winooski West                      | 0.0%    | -                         | -      | -                | 11.4%                         | -      | -       | -          | -       | 6.1%                                     | -      | 1.6%                            | 19.2%                     |
| Chittenden | 25.01  | Winooski East                      | -       | -                         | -      | -                | 10.0%                         | -      | -       | -          | -       | -  | 1.0%   | -                               | 11.0%                     |
| Chittenden | 25.02  | Winooski South                     | -       | -                         | -      | -                | -                             | -      | 0.2%    | -          | -       | -  | -      | -                               | 0.2%                      |
| Chittenden | 26.01  | Essex Junction West                | 1.1%    | 0.3%                      | -      | 0.5%             | 5.8%                          | -      | 0.5%    | -          | -       | -  | -      | -                               | 8.3%                      |
| Chittenden | 26.02  | Essex Junction East                | -       | -                         | -      | 0.9%             | 0.6%                          | -      | -       | 1.0%       | -       | -  | 0.1%   | 0.3%                            | 2.9%                      |
| Chittenden | 27.01  | Essex Town West                    | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -  | -      | 0.8%                            | 0.8%                      |
| Chittenden | 27.02  | Essex Town East                    | 0.2%    | -                         | -      | 0.1%             | 0.2%                          | -      | -       | -          | -       | 0.6%                                     | -      | -                               | 1.1%                      |
| Chittenden | 28     | Jericho                            | -       | 0.3%                      | -      | -                | -                             | -      | -       | -          | -       | -  | -      | -                               | 0.3%                      |
| Chittenden | 29     | Westford, Underhill, Bolton        | -       | 0.3%                      | 0.0%   | -                | -                             | -      | -       | -          | -       | 0.2%                                     | -      | -                               | 0.5%                      |
| Chittenden | 30     | Richmond                           | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -  | -      | -                               | -                         |
| Chittenden | 31.01  | Williston North                    | 0.1%    | 1.1%                      | -      | -                | -                             | -      | 1.5%    | -          | -       | -  | -      | -                               | 2.6%                      |
| Chittenden | 31.02  | Williston South                    | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -  | -      | -                               | -                         |
| Chittenden | 33.01  | South Burlington 116               | 0.2%    | 0.3%                      | 0.2%   | -                | -                             | -      | 2.4%    | -          | -       | 0.2%                                     | -      | -                               | 3.3%                      |
| Chittenden | 33.04  | South Burlington US 7              | 0.1%    | -                         | -      | 0.4%             | 0.7%                          | -      | 0.4%    | -          | -       | 0.3%                                     | -      | -                               | 1.8%                      |
| Chittenden | 34.01  | Shelburne East                     | 0.4%    | -                         | -      | 0.3%             | -                             | -      | -       | -          | -       | -  | -      | -                               | 0.7%                      |
| Chittenden | 34.02  | Shelburne West                     | -       | 0.7%                      | -      | -                | -                             | -      | -       | -          | -       | -  | -      | -                               | 0.7%                      |
| Chittenden | 35.01  | Charlotte                          | 0.6%    | -                         | -      | -                | -                             | -      | -       | -          | -       | -  | -      | -                               | 0.6%                      |
| Chittenden | 35.02  | Hinesburg, St. George              | -       | -                         | -      | -                | 0.2%                          | -      | -       | -          | -       | -  | -      | -                               | 0.2%                      |
| Chittenden | 35.03  | Huntington, Buels Gore             | -       | 0.2%                      | -      | -                | -                             | -      | -       | -          | -       | 0.2%                                     | -      | -                               | 0.5%                      |
| Chittenden | 36     | South Burlington Dorset            | -       | 1.1%                      | -      | -                | -                             | -      | 0.4%    | -          | -       | 3.6%                                     | -      | -                               | 5.1%                      |
| Chittenden | 39     | Burlington UVM                     | 0.4%    | 0.2%                      | 0.0%   | -                | 0.0%                          | -      | 1.1%    | -          | -       | 0.2%                                     | -      | -                               | 2.0%                      |
| Chittenden | 40.02  | South Burlington East              | 0.5%    | 2.2%                      | -      | 1.2%             | -                             | -      | -       | -          | -       | -  | -      | -                               | 3.9%                      |
| Chittenden | 41     | Burlington Main to Pearl Central   | -       | 0.3%                      | -      | -                | 2.2%                          | -      | 1.1%    | -          | -       | -  | -      | -                               | 3.6%                      |
| Chittenden | 42     | Burlington ONE                     | 1.7%    | -                         | -      | 0.2%             | 1.3%                          | -      | 1.1%    | -          | -       | 0.3%                                     | -      | -                               | 4.6%                      |
| Essex      | 9501   | Northern Essex Cty                 | -       | 2.0%                      | -      | -                | -                             | -      | -       | -          | -       | -  | -      | -                               | 2.0%                      |
| Essex      | 9502   | Brighton                           | -       | 0.4%                      | -      | -                | -                             | -      | -       | -          | -       | -  | -      | -                               | 0.4%                      |
| Essex      | 9505   | Southern Essex Cty                 | 0.2%    | 0.3%                      | -      | -                | -                             | -      | 0.2%    | -          | -       | -  | -      | -                               | 0.7%                      |
| Franklin   | 101.01 | Highgate                           | -       | 0.4%                      | -      | -                | -                             | -      | -       | -          | -       | -  | -      | -                               | 0.4%                      |
| Franklin   | 101.02 | Franklin, Sheldon                  | -       | -                         | -      | -                | -                             | -      | 0.1%    | -          | -       | -  | -      | -                               | 0.1%                      |
| Franklin   | 102    | Berkshire, Enosburg                | 0.3%    | 0.2%                      | -      | -                | -                             | -      | -       | -          | -       | -  | -      | -                               | 0.5%                      |
| Franklin   | 103    | Richford, Montgomery               | -       | 0.7%                      | -      | -                | -                             | 0.0%   | -       | -          | -       | -  | -      | -                               | 0.7%                      |
| Franklin   | 104    | Fairfield, Bakersfield             | 2.1%    | 0.1%                      | -      | -                | 0.3%                          | -      | -       | -          | -       | -  | -      | -                               | 2.5%                      |
| Franklin   | 105    | Swanton                            | -       | -                         | 0.1%   | -                | -                             | -      | -       | -          | -       | -  | -      | -                               | 0.1%                      |
| Franklin   | 106    | St. Albans Town                    | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -  | -      | -                               | -                         |
| Franklin   | 107    | St. Albans West                    | -       | 1.0%                      | -      | -                | -                             | -      | -       | -          | -       | -  | -      | -                               | 1.0%                      |
| Franklin   | 108    | St. Albans East                    | -       | -                         | -      | 0.5%             | -                             | -      | -       | -          | -       | -  | -      | -                               | 0.5%                      |
| Franklin   | 109    | Georgia                            | -       | -                         | -      | -                | -                             | 0.5%   | -       | -          | -       | -  | -      | -                               | 0.5%                      |
| Franklin   | 110    | Fairfax, Fletcher                  | 0.2%    | 0.2%                      | 0.2%   | -                | -                             | -      | -       | -          | -       | -  | -      | -                               | 0.6%                      |
| Grand Isle | 201    | North Hero, Alburgh, Isle La Motte | 0.2%    | 0.5%                      | -      | -                | -                             | -      | 0.2%    | -          | -       | -  | -      | -                               | 0.9%                      |
| Grand Isle | 202    | South Hero, Grand Isle             | 0.6%    | 0.4%                      | -      | -                | -                             | -      | -       | -          | -       | -  | -      | -                               | 1.0%                      |
| Lamoille   | 9530   | Eden, Belvidere, Waterville        | -       | -                         | -      | 0.2%             | -                             | -      | -       | -          | -       | -  | -      | -                               | 0.2%                      |
| Lamoille   | 9531   | Cambridge                          | -       | -                         | -      | -                | 0.0%                          | -      | -       | -          | -       | -  | -      | -                               | 0.0%                      |
| Lamoille   | 9532   | Johnson                            | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -  | -      | 0.1%                            | 0.1%                      |
| Lamoille   | 9533   | Hyde Park                          | -       | 0.7%                      | -      | -                | 0.1%                          | -      | -       | -          | -       | -  | -      | -                               | 0.8%                      |
| Lamoille   | 9534   | Wolcott, Elmore                    | 0.2%    | 0.2%                      | -      | 0.5%             | -                             | -      | -       | -          | -       | -  | -      | -                               | 0.9%                      |
| Lamoille   | 9535   | Morristown                         | 0.2%    | 0.1%                      | -      | -                | -                             | -      | -       | -          | -       | -  | -      | -                               | 0.2%                      |
| Lamoille   | 9536   | Stowe                              | 0.3%    | -                         | -      | -                | -                             | -      | -       | -          | -       | -  | -      | -                               | 0.3%                      |

**Percentage of Population that Speaks English Less than Very Well by Language and Tract**

| County     | Tract   | Description                             | Spanish | French, Haitian, or Cajun | German | Slavic languages | Other Indo-European languages | Korean | Chinese | Vietnamese | Tagalog | Other Asian and Pacific languages | Arabic | Other and unspecified languages | Total Linguistic Isolates |
|------------|---------|---|---------|---------------------------|--------|------------------|-------------------------------|--------|---------|------------|---------|-----------------------------------|--------|---------------------------------|---------------------------|
| Orange     | 9590    | Newbury                                 | -       | -                         | -      | 0.7%             | -                             | -      | 0.6%    | -          | -       | -                                 | -      | -                               | 1.3%                      |
| Orange     | 9591.01 | Orange, Washington                      | 0.8%    | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 0.8%                      |
| Orange     | 9591.02 | Topsham, Corinth                        | -       | 0.1%                      | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 0.1%                      |
| Orange     | 9592    | Williamstown                            | 0.1%    | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 0.1%                      |
| Orange     | 9593    | Brookfield, Braintree                   | -       | -                         | 0.4%   | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 0.4%                      |
| Orange     | 9594    | Randolph                                | 0.5%    | -                         | 0.0%   | -                | 0.2%                          | -      | -       | -          | -       | -                                 | -      | -                               | 0.7%                      |
| Orange     | 9595    | Chelsea, Vershire, Tunbridge, Strafford | 0.1%    | 0.1%                      | -      | 0.2%             | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 0.3%                      |
| Orange     | 9596    | Thetford                                | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | -                         |
| Orange     | 9597    | Fairlee, West Fairlee                   | -       | -                         | 0.1%   | -                | 0.3%                          | -      | -       | -          | -       | 0.3%                              | -      | -                               | 0.7%                      |
| Orange     | 9598    | Bradford                                | 0.3%    | 0.8%                      | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 1.1%                      |
| Orleans    | 9511    | Charleston, Morgan, Holland             | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | -                         |
| Orleans    | 9512    | Derby East                              | -       | 0.8%                      | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 0.8%                      |
| Orleans    | 9513    | Derby West                              | -       | 1.2%                      | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 1.2%                      |
| Orleans    | 9514    | Newport East                            | -       | 0.6%                      | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 0.6%                      |
| Orleans    | 9515    | Newport West                            | -       | 1.7%                      | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 1.7%                      |
| Orleans    | 9516    | Jay, Westfield, Troy, Newport Town      | -       | 0.4%                      | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 0.4%                      |
| Orleans    | 9517    | Lowell, Irasburg, Albany, Craftsbury    | -       | 0.1%                      | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 0.1%                      |
| Orleans    | 9518    | Barton                                  | 0.9%    | 0.6%                      | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | 1.1%                            | 2.6%                      |
| Orleans    | 9519    | Westmore, Brownington, Coventry         | -       | 0.2%                      | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 0.2%                      |
| Orleans    | 9520    | Greensboro, Glover                      | -       | 0.2%                      | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 0.2%                      |
| Rutland    | 9621    | Chittenden, Pittsfield                  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                 | 0.2%   | -                               | 0.2%                      |
| Rutland    | 9622    | Brandon                                 | -       | -                         | -      | -                | -                             | 0.5%   | -       | -          | -       | 0.2%                              | -      | -                               | 0.6%                      |
| Rutland    | 9623    | Sudbury, Hubbardton, Benson, West Haven | -       | -                         | -      | -                | 0.1%                          | -      | -       | -          | -       | -                                 | -      | -                               | 0.1%                      |
| Rutland    | 9624    | Pittsford                               | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | -                         |
| Rutland    | 9625    | Proctor                                 | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | -                         |
| Rutland    | 9626    | West Rutland                            | 1.0%    | -                         | -      | 0.2%             | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 1.3%                      |
| Rutland    | 9627    | Rutland Town                            | -       | -                         | -      | 0.3%             | -                             | -      | -       | -          | -       | -                                 | -      | 0.0%                            | 0.3%                      |
| Rutland    | 9628    | Killington, Mendon, Shrewsbury          | 0.2%    | -                         | 0.4%   | -                | -                             | 0.7%   | 0.2%    | -          | -       | -                                 | -      | -                               | 1.4%                      |
| Rutland    | 9630    | Rutland Northeast                       | 0.3%    | -                         | -      | -                | -                             | -      | 0.6%    | -          | 0.6%    | -                                 | -      | -                               | 1.4%                      |
| Rutland    | 9631    | Rutland Central                         | 1.8%    | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 1.8%                      |
| Rutland    | 9632    | Rutland Northwest                       | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | -                         |
| Rutland    | 9633    | Rutland South                           | -       | 0.5%                      | -      | -                | 0.1%                          | -      | -       | -          | -       | -                                 | -      | -                               | 0.6%                      |
| Rutland    | 9634    | Clarendon                               | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | -                         |
| Rutland    | 9635    | Middletown Springs, Ira, Tinmouth       | 0.1%    | 0.1%                      | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 0.2%                      |
| Rutland    | 9636    | Castleton                               | -       | 0.1%                      | -      | -                | -                             | -      | 0.2%    | -          | -       | -                                 | -      | -                               | 0.3%                      |
| Rutland    | 9637    | Fair Haven                              | -       | -                         | -      | 0.3%             | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 0.3%                      |
| Rutland    | 9638    | Poultney, Wellstown                     | -       | 0.3%                      | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 0.3%                      |
| Rutland    | 9640    | Mount Holly, Wallingford                | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | -                         |
| Rutland    | 9642    | Mount Tabor, Danby                      | 0.2%    | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 0.2%                      |
| Rutland    | 9643    | Pawlet                                  | 1.4%    | -                         | -      | -                | -                             | -      | 0.3%    | -          | -       | -                                 | -      | -                               | 1.6%                      |
| Washington | 9540    | Cabot, Marshfield, Plainfield           | 0.1%    | 0.1%                      | -      | -                | -                             | -      | -       | -          | 0.1%    | 0.1%                              | -      | -                               | 0.3%                      |
| Washington | 9541    | Woodbury, Calais                        | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | 0.1%                              | -      | -                               | 0.1%                      |
| Washington | 9542    | Worcester, Middlesex                    | 0.4%    | 0.4%                      | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 0.8%                      |
| Washington | 9543    | Waterbury                               | -       | -                         | -      | -                | -                             | -      | 0.4%    | -          | -       | -                                 | -      | -                               | 0.4%                      |
| Washington | 9544    | Duxbury, Moretown                       | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | -                         |
| Washington | 9545    | Berlin                                  | -       | 0.3%                      | -      | -                | 0.5%                          | -      | -       | -          | -       | -                                 | -      | -                               | 0.8%                      |
| Washington | 9546    | Montpelier Northwest                    | -       | -                         | -      | -                | -                             | 0.5%   | -       | -          | -       | -                                 | -      | -                               | 0.5%                      |
| Washington | 9547    | Montpelier Northeast                    | 0.4%    | -                         | -      | 0.4%             | -                             | 0.5%   | -       | -          | -       | -                                 | -      | -                               | 1.3%                      |
| Washington | 9548    | Montpelier Downtown                     | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | -                         |
| Washington | 9549    | Montpelier South                        | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | -                         |
| Washington | 9550    | East Montpelier                         | -       | 0.3%                      | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 0.3%                      |

**Percentage of Population that Speaks English Less than Very Well by Language and Tract**

| County     | Tract   | Description                                    | Spanish | French, Haitian, or Cajun | German | Slavic languages | Other Indo-European languages | Korean | Chinese | Vietnamese | Tagalog | Other Asian and Pacific languages | Arabic | Other and unspecified languages | Total Linguistic Isolates |
|------------|---------|--|---------|---------------------------|--------|------------------|-------------------------------|--------|---------|------------|---------|-----------------------------------|--------|---------------------------------|---------------------------|
| Washington | 9551    | Barre City North                               | -       | -                         | -      | 0.3%             | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 0.3%                      |
| Washington | 9552    | Barre City South                               | -       | 0.5%                      | -      | -                | 0.3%                          | -      | -       | -          | -       | -                                 | -      | -                               | 0.8%                      |
| Washington | 9553    | Barre Town North                               | -       | 0.9%                      | -      | 0.4%             | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 1.3%                      |
| Washington | 9554    | Barre Town South                               | -       | 3.8%                      | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 3.8%                      |
| Washington | 9555.01 | Northfield West                                | -       | 0.2%                      | -      | 0.7%             | -                             | -      | -       | -          | -       | 0.8%                              | -      | -                               | 1.6%                      |
| Washington | 9555.02 | Northfield Southeast                           | 0.4%    | 0.1%                      | -      | -                | 0.1%                          | 0.5%   | 0.2%    | -          | -       | 0.5%                              | -      | -                               | 1.8%                      |
| Washington | 9556    | Warren   | -       | -                         | 1.3%   | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 1.3%                      |
| Washington | 9557    | Waitsfield                                     | -       | -                         | -      | -                | 0.8%                          | -      | -       | -          | -       | -                                 | -      | -                               | 0.8%                      |
| Washington | 9558    | Fayston  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | -                         |
| Windham    | 9670    | Bellows Falls                                  | -       | 1.2%                      | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 1.2%                      |
| Windham    | 9671    | Rockingham                                     | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | -                         |
| Windham    | 9672    | Windham, Grafton, Athens, Townshend, Brookline | 0.1%    | 0.3%                      | -      | 0.3%             | 0.1%                          | -      | -       | -          | -       | -                                 | -      | -                               | 0.7%                      |
| Windham    | 9673    | Londonerry                                     | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | -                         |
| Windham    | 9674    | Jamaica  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | -                         |
| Windham    | 9675    | Wardsboro, Stratton, Somerset                  | -       | 1.4%                      | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 1.4%                      |
| Windham    | 9676    | Westminster                                    | 0.0%    | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 0.0%                      |
| Windham    | 9677    | Putney   | 0.2%    | 0.4%                      | -      | -                | 0.1%                          | -      | -       | -          | -       | -                                 | -      | -                               | 0.6%                      |
| Windham    | 9678    | Newfane  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | -                         |
| Windham    | 9679    | Dover  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | -                         |
| Windham    | 9680    | Wilmington                                     | -       | 0.2%                      | -      | -                | 0.6%                          | 0.1%   | -       | -          | -       | -                                 | -      | -                               | 0.9%                      |
| Windham    | 9681    | Whitingham                                     | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | 0.3%                              | -      | -                               | 0.3%                      |
| Windham    | 9682    | Marlboro, Halifax                              | -       | 0.1%                      | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 0.1%                      |
| Windham    | 9683    | Dummerston                                     | 0.4%    | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 0.4%                      |
| Windham    | 9684    | West Brattleboro                               | -       | -                         | -      | -                | -                             | 0.5%   | 0.0%    | -          | -       | -                                 | -      | -                               | 0.5%                      |
| Windham    | 9685    | Brattleboro South                              | 0.3%    | -                         | -      | -                | -                             | -      | -       | -          | -       | 0.8%                              | -      | -                               | 1.2%                      |
| Windham    | 9686    | Brattleboro North                              | -       | -                         | -      | 0.2%             | 0.1%                          | -      | 0.1%    | -          | -       | -                                 | -      | -                               | 0.4%                      |
| Windham    | 9687    | Guilford, Vernon                               | 1.2%    | -                         | 0.1%   | -                | -                             | -      | -       | -          | 0.1%    | 0.4%                              | 0.3%   | -                               | 2.2%                      |
| Windsor    | 9650    | Norwich  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | 0.4%                            | 0.4%                      |
| Windsor    | 9651    | Royallton                                      | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | -                         |
| Windsor    | 9654    | Stockbridge, Barnard, Pomfret, Sharon          | -       | 0.1%                      | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 0.1%                      |
| Windsor    | 9655.01 | South Hartford                                 | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | 0.8%                              | -      | -                               | 0.8%                      |
| Windsor    | 9655.02 | North Hartford                                 | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | -                         |
| Windsor    | 9656    | White River Junction/Wilder                    | -       | -                         | -      | -                | 0.9%                          | -      | 0.3%    | -          | -       | 0.8%                              | -      | -                               | 2.0%                      |
| Windsor    | 9657    | Harland  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | -                         |
| Windsor    | 9658    | Woodstock                                      | -       | -                         | -      | 0.1%             | -                             | -      | -       | -          | 0.3%    | -                                 | -      | 0.2%                            | 0.7%                      |
| Windsor    | 9659.01 | Bridgewater, Plymouth                          | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | -                         |
| Windsor    | 9659.02 | Reading, West Windsor                          | -       | -                         | -      | -                | 0.1%                          | -      | -       | -          | -       | -                                 | -      | -                               | 0.1%                      |
| Windsor    | 9660    | Windsor  | 0.6%    | -                         | -      | -                | 0.3%                          | -      | -       | -          | -       | -                                 | -      | -                               | 0.9%                      |
| Windsor    | 9661    | Weathersfield                                  | -       | 0.4%                      | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 0.4%                      |
| Windsor    | 9662    | Cavendish, Baltimore                           | -       | 0.1%                      | -      | -                | 0.1%                          | -      | -       | -          | -       | -                                 | -      | -                               | 0.2%                      |
| Windsor    | 9663    | Ludlow   | -       | -                         | -      | 0.7%             | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 0.7%                      |
| Windsor    | 9665.01 | Chester  | -       | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | -                         |
| Windsor    | 9665.02 | Andover, Weston                                | 0.3%    | 0.5%                      | -      | 0.6%             | 0.2%                          | -      | -       | -          | -       | -                                 | -      | 0.2%                            | 1.8%                      |
| Windsor    | 9666    | Springfield South                              | 1.5%    | -                         | -      | -                | -                             | -      | -       | -          | -       | -                                 | -      | -                               | 1.5%                      |
| Windsor    | 9667    | Springfield North                              | -       | 0.1%                      | -      | 0.0%             | 0.2%                          | -      | -       | -          | 0.8%    | -                                 | -      | -                               | 1.1%                      |
| Windsor    | 9668    | Bethel, Rochester                              | -       | 0.1%                      | -      | -                | -                             | -      | -       | 0.2%       | -       | -                                 | -      | -                               | 0.3%                      |

**Source: 2017-2021 American Community Survey Report C16001**

It can be seen that within any tract, no language group surpasses 400 individuals, however, there are three tracts in Chittenden County where linguistic isolates in one language surpass 5% of the population. These cases involve refugees from Bhutan and Burma in Tract 24, and additional Bhutanese refugees in Tract 25.01 and Tract 26.01. As described below, Green Mountain Transit has engaged in direct outreach to these populations, assisted by the US Committee on Refugees and Immigrants – Vermont (formerly Vermont Refugee Resettlement Program). The Title VI Program of the Chittenden County Regional Planning Commission, the metropolitan planning organization for the urbanized area, also covers these concentrations of linguistically isolated individuals.

At the statewide level, French, Nepali and Spanish have more than 1,000 individuals, but as stated above, the French speakers are spread across the entire northern tier of the state with some newer concentrations in Chittenden County, and Spanish speakers are spread among many tracts. Refugees from Bhutan who speak Nepali are more concentrated and outreach activities in the central part of Chittenden County should always include outreach and accommodation of this population.

On the occasions when VTrans holds public meetings on statewide projects, it offers translation services upon request (see below for more information). It would not be an effective use of resources to prepare all vital documents in Spanish and French without a direct request to do so from one or more individuals. If, in the future, there are requests for statewide documents to be translated into French or Spanish (or other languages), VTrans will honor those requests either by providing the written translation, or contacting those individuals to provide oral translation services to answer their questions.

## **Factor 2 – Frequency of Contact with LEP Persons**

As indicated in discussion of Factor 1, VTrans is most likely to have direct contact with LEP individuals at public meetings associated with public transportation planning efforts. VTrans operates no transit service. VTrans staff does handle occasional phone calls and e-mails from the public for its vanpool/rideshare program, Go Vermont, though its contractor, Commute with Enterprise, handles most of the public interaction. Though in ten years there have been no LEP people calling in to use this service, on call translation via telephone is available if anyone should do so (see table at the end of this section).

The following is a list of all public meetings held by VTrans over the past three years that were related to FTA-funded activities.

| <b>Public Meeting</b>                               | <b>Date</b> | <b>Location</b>  | <b>Agency</b> |
|---|-------------|--|---------------|
| Statewide E&D Summit                                | 6/24/20     | Virtual meeting  | All Vermont   |
| Public Transit Advisory Council, open to the public | 6/25/20     | Virtual meeting  | All Vermont   |
| Public Transit Advisory Council, open to the public | 9/17/20     | Virtual meeting  | All Vermont   |
| Public Transit Advisory Council, open to the public | 12/17/20    | Virtual meeting  | All Vermont   |
| Public Transit Advisory Council, open to the public | 3/25/21     | Virtual meeting  | All Vermont   |
| Public Transit Advisory Council, open to the public | 6/17/21     | Virtual meeting  | All Vermont   |
| Statewide E&D Summit                                | 6/18/21     | Virtual meeting  | All Vermont   |
| Public Transit Advisory Council, open to the public | 9/16/21     | Virtual meeting  | All Vermont   |
| Public Transit Advisory Council, open to the public | 12/16/21    | Virtual meeting  | All Vermont   |
| Public Transit Advisory Council, open to the public | 3/17/22     | Virtual meeting  | All Vermont   |
| Statewide E&D Summit                                | 6/3/22      | Downtown Burlington                                      | All Vermont   |
| Public Transit Advisory Council, open to the public | 6/16/22     | Virtual meeting  | All Vermont   |
| Public Transit Advisory Council, open to the public | 9/15/22     | Virtual meeting  | All Vermont   |
| Public Transit Advisory Council, open to the public | 12/15/22    | Virtual meeting with option to attend at VTrans in Barre | All Vermont   |
| Public Transit Advisory Council, open to the public | 3/16/23     | Virtual meeting with option to attend at VTrans in Barre | All Vermont   |

At none of these meetings were there LEP individuals who were not able to participate because of inadequate English skills. VTrans received no advance request for translation services at any of these meetings. VTrans will continue to advertise the availability of translation services in the languages most likely to be encountered in any area, including on its website. These languages will be selected based on continued monitoring of Census data and, more importantly, discussions with community organizations representing immigrant populations.

On an ongoing basis, the seven transit providers who are the subrecipients of FTA funds are more likely to have direct contact with LEP individuals. See section D below for more discussion of VTrans' oversight of LEP compliance of its subrecipients.

### **Factor 3 – Importance to LEP Persons of Program, Activities and Services**

Many LEP persons, at least in the short term, rely on public transportation for mobility. The seven public transit providers are responsible for ensuring that LEP individuals are not hindered from using local transit systems because of the inability to speak English well. VTrans must ensure through its oversight activities that the providers are upholding this responsibility.

In addition, as the state transportation agency responsible for coordinating the statewide transportation planning process, VTrans must make sure that all segments of the population, including LEP persons, have the opportunity to be involved with the planning process. The impact of proposed transportation investments on underserved and underrepresented population groups is part of the evaluation process. VTrans provides oversight and ensures in its own planning projects that LEP and other protected classes of persons are not overlooked.

In its ongoing communication with organizations representing immigrant and low-income populations, VTrans will make sure that the state and its subrecipients are carrying out these LEP responsibilities effectively. Within state government, the [State Refugee Office](#) within the Agency of Human Services coordinates relief and resettlement efforts. It works with the [US Committee on Refugees and Immigrants](#), the [Ethiopian Community Development Council](#) and the [Association of Africans Living in Vermont](#), three nonprofit agencies working to support refugees in Vermont. The table on the next page shows the number of refugee arrivals in Vermont by origin country over the past 25 years.

### **Factor 4 – Resources Available and Cost**

Because of the very low incidence of LEP persons in Vermont overall, the cost to accommodate them has not been burdensome. VTrans provides in-person and telephone translation services for all VTrans activities and VTrans subrecipients. It is not foreseen that the resources available or the cost of translation services will hinder the accommodation of the needs of Vermont's LEP population. The transit providers were explicitly added to the Telelanguage (Now Propio Language Services) contract in June of 2017. Each provider was assigned a department code number and given instructions on how to use the service. See the [VTrans Civil Rights Office LEP webpage](#) for more information.

#### ***B. Providing Language Assistance***

VTrans provides oral and written translation; written interpretation and translation; and sign language, as requested, or as a result of an LEP analysis on any given project or projected program. VTrans will continue to examine its services and survey its employees and subrecipients to determine the extent of contact or the possibility of contact with LEP individuals as needed.

The State's Office of Racial Equity has published the [2023 Language Access Report](#), with more information and recommendations for making all state services accessible to Vermonters no matter their ability to speak and read English.

#### ***C. Providing Notice to LEP Persons***

After LEP populations have been identified, strategies are developed to provide notice of a program, service, or activity, using appropriate media, including brochures (also in languages other than English). Community groups serving LEP populations are contacted, as well as schools, church groups, chambers of commerce, and other relevant entities.

#### ***D. Monitoring, Evaluating and Updating the LAP***

Through monitoring news reports and communication with the State Refugee Office, VTrans stays abreast of changes in the composition of language access needs in Vermont. Of course, the update of this Title VI Program every three years necessitates the downloading of new data from



**SUMMARY OF VERMONT REFUGEE  
RESETTLEMENTS 2012 - 2022**

| <b>Country \ FFY</b> | <b>2012</b> | <b>2013</b> | <b>2014</b> | <b>2015</b> | <b>2016</b> | <b>2017</b> | <b>2018</b> | <b>2019</b> | <b>2020</b> | <b>2021</b> | <b>2022</b> |
|----------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| Afghanistan          |             |             |             |             |             |             |             |             |             |             | 269         |
| Bhutan               | 297         | 256         | 171         | 189         | 217         | 86          | 54          |             |             |             |             |
| Burma                | 42          | 17          | 24          | 7           | 4           | 5           | 3           | 15          | 4           | 2           | 2           |
| Burundi              |             |             |             | 6           | 5           | 48          |             | 8           |             | 6           |             |
| Congo                |             |             |             | 1           |             |             |             |             |             |             |             |
| Dem. Rep. Congo      |             | 1           | 15          | 31          | 75          |             | 76          | 89          | 14          | 31          | 42          |
| Eritrea              |             | 1           | 1           |             |             |             |             |             |             |             |             |
| Ethiopia             |             |             |             |             |             | 2           |             |             |             |             |             |
| Guatemala            |             |             |             |             |             |             |             |             |             |             | 3           |
| Iran                 |             |             |             |             | 3           |             |             |             |             |             |             |
| Iraq                 | 10          | 18          | 47          | 20          | 1           | 18          |             |             |             | 5           |             |
| Nepal                | 1           |             | 2           | 3           | 1           | 2           |             | 1           |             | 3           |             |
| Rwanda               |             | 1           |             |             |             |             |             |             |             |             |             |
| Somalia              |             | 25          | 47          | 55          | 80          | 59          |             | 1           | 5           |             | 2           |
| Sudan                |             | 3           | 10          |             |             | 1           |             |             |             |             | 33          |
| Syria                |             |             |             |             |             | 14          |             |             |             |             |             |
| Ukraine              |             |             |             |             |             |             |             |             |             |             | 100         |
| <b>Total</b>         | <b>350</b>  | <b>322</b>  | <b>317</b>  | <b>312</b>  | <b>386</b>  | <b>235</b>  | <b>133</b>  | <b>114</b>  | <b>23</b>   | <b>47</b>   | <b>451</b>  |

Data provided by the [Refugee Processing Center of the US Department of State](#) and the Vermont State Refugee Office. Fiscal years begin on October 1 of the previous calendar year. Figures include refugees resettled by USCRI – Vermont and Ethiopian Community Development Council (Brattleboro) as well as humanitarian parolees from Afghanistan and Ukraine who are not officially refugees according to government definitions. The figures do not account for people who moved to or from Vermont after initial resettlement.

the Census, which also indicates any new populations which may face language barriers. VTrans also works closely with its subrecipients, which have more direct interactions with immigrants, to update its information regarding LEP needs (see the following chart “Summary of Vermont Refugee Resettlements 2012 - 2022”).

### ***E. Training Staff and Others***

All VTrans staff involved in public outreach and public involvement receive training on identifying LEP populations and providing LEP translation and interpretation. Subrecipients and the CCRPC must provide LEP services to be in compliance with Title VI and Executive Order 12898. Sub-recipient reviews are conducted to ensure compliance with this executive order.

### ***Oversight of Subrecipients’ LEP Programs***

Each of the transit providers which are subrecipients of FTA funds has an LEP plan in place as part of its Title VI Program. VTrans requires that all subrecipients submit a Title VI Program at least every three years, and these programs must contain an LAP that is compliant with federal regulations. Validity of the LAP is part of the triennial reviews that VTrans conducts. The transit providers track interactions with LEP persons that result in not addressing the needs of that individual, whether it occurred in the field (on the bus) or in the course of contact with office staff (i.e., a reservation specialist or a front-desk employee answering questions in person or on the phone). The providers will also be responsible for maintaining contact with local organizations that represent immigrant populations to stay abreast of changes in the mix of languages in their service areas.

As of 2023, GMT is the most likely agency to come into contact with LEP persons, and its procedures are discussed in more detail in its Title VI program. SEVT’s MOOver system publishes its “How to Ride” guides in Spanish, Pashto and Dari and the agency does direct outreach and travel training for refugees, mainly from Afghanistan, in the Brattleboro area in coordination with the Ethiopian Community Development Council. Winter seasonal staff at Mount Snow for the MOOver are able to communicate in Spanish. RCT has periodically published its schedule book in French.

Resources, language service providers and point-to-your-language poster are available via the [VTrans Civil Rights Office LEP webpage](#).

## **VII. Composition of Boards and Councils**

The only ongoing committee that is convened by the Vermont Agency of Transportation is the Public Transit Advisory Committee. This committee consists of representatives from the transit providers, various State agencies (such as Human Services and Community Development), regional planning commissions, private bus companies, and the legislature. The composition of the committee is determined by state law (24 VSA Section 5084) as shown below. Only one member of this committee (line 14) is not a designee of an agency or organization. This committee is currently 100% Caucasian.

### **§ 5084. Public transit advisory council**

(a) A public transit advisory council shall be created by the secretary of transportation under 19 V.S.A. § 7(f)(5), to consist of the following members:

- (1) the secretary of transportation or designee;
- (2) the executive director of the Vermont public transportation association;
- (3) three representatives of the Vermont public transportation association;
- (4) a representative of the Chittenden County transportation authority;
- (5) the secretary of human services or designee;
- (6) the commissioner of employment and training or designee;
- (7) the secretary of commerce and community development or designee;
- (8) a representative of the Vermont center for independent living;
- (9) a representative of the council of Vermont elders;
- (10) a representative of private bus operators and taxi services;
- (11) a representative of Vermont intercity bus operators;
- (12) a representative of the Vermont association of planning and development agencies;
- (13) a representative of the Vermont league of cities and towns;
- (14) a citizen appointed by the governor;
- (15) a member of the senate, appointed by the committee on committees; and
- (16) a member of the house of representatives, appointed by the speaker.

## **VIII. Monitoring of Compliance by Subrecipients**

An essential responsibility of VTrans as the direct recipient of FTA funds is to monitor the compliance of its subrecipients, the eight transit providers. The governing document of VTrans' oversight is its [State Management Plan](#). The section of the SMP regarding Title VI is reproduced below. It was most recently updated in January 2020 and is due to be updated in December 2024.

### **Title VI Program Requirements**

Title VI program requirements vary for states and subrecipients, and urban areas above and below the threshold of 200,000 residents.

“Each transportation provider must sign an assurance that they will not discriminate on the grounds of race, color or national origin, exclude from participation in, deny the benefits of, or subject to discrimination any person within the program or activity receiving federal financial assistance.” This assurance is found in the VTrans program application and is part of the signed agreement between VTrans and the sub-recipient.

VTrans requires all applicants and/or subrecipients to provide information as described in FTA Circular 4702.1B. In addition to requirements outlined in the circular, subrecipients must report to VTrans on compliance at least once every three years of operation during the management review or when compliance changes such as when a complaint is received.

VTrans is required to among other things, provide the FTA with Title VI assurances in the annual Certs and Assurance; to provide a Title VI program every 3 years; to develop Title VI complaint procedures; to record any complaints, investigations and lawsuits; to notify recipients of their rights; and to develop meaningful access to those with limited English proficiency. In order to meet these requirements, further guidance is provided in 4702.1B. VTrans conducted a statewide assessment of minority and low-income populations and language usage in Vermont and will continue to do so with each census.

VTrans conducted the statewide assessment and mapping of minority, low-income and language usage in Vermont in 2017 and used it to develop their Limited English Proficiency plan (LEP). LEP is a part of the Title VI program. VTrans submitted their LEP plan to the FTA and to the sub-recipients so they could adapt their programs as necessary including any special outreach to those who were less than proficient in English. VTrans also made their state contract with Language Line available at no charge to all the transit providers in 2012. This provides phone (oral) and written translation services to all subrecipients.

Each transportation provider must sign an assurance that they will follow the provisions mentioned above. The provisions also apply to employment and business opportunities including subcontracting. These requirements are considered an addition to and not in lieu of the provisions of Title VI. This assurance is found in the VTrans application packet, and as part of the signed agreement between VTrans and the transportation provider.

The table below lists the dates of the most recent management reviews for each of the providers and the date of the next scheduled review. Updates of the transit providers' Title VI Programs will coincide with their management reviews if they have not separately filed programs within the past two years. It also shows that none of the providers were found to be in violation of Title VI provisions, and that none had open Title VI complaints pending.

| <b>Subrecipient</b> | <b>Date of management review</b> | <b>Most recent Title VI Program Submission</b> | <b>Location of services and facilities, non-discriminatory?</b> | <b>Civil Rights Discrimination complaints since last review?</b> | <b>Next scheduled review</b> |
|---------------------|----------------------------------|--|---|--|------------------------------|
| AT                  | 12/2022                          | 4/2020   | Yes   | No   | 8/2025                       |
| GMCN                | 6/2020                           | 4/2020   | Yes   | No   | 7/2023                       |
| GMT                 | 10/2021                          | 5/2020   | Yes   | No   | 10/2024                      |
| MVRTD               | 6/2020                           | 4/2020   | Yes   | No   | 7/2023                       |
| RCT                 | 4/2022                           | 4/2020   | Yes   | No   | 4/2025                       |
| SEVT                | 7/2022                           | 9/2020   | Yes   | Yes  | 7/2025                       |
| TVT                 | 9/2020                           | 7/2020   | Yes   | No   | 9/2023                       |
| VABVI               |                                  | 4/2020   | N/A   |  |                              |
| VPTA                |                                  | 4/2020   | N/A   |  |                              |

In addition to the regular periodic reviews, VTrans staff frequently attend meetings of transit providers. The transit coordinators generally attend monthly board meetings of each of the transit providers. On the next few pages are the Title VI-related results of selected management reviews undertaken over the past three years.

## ***SEVT/The MOOVER – July 2022***

### **TITLE VI – NONDISCRIMINATION IN THE DELIVERY OF SERVICE**

|   |  |            |
|---|--|------------|
| 1. What is the racial composition of your service area?   | Only 5.3% of residents are either Hispanic or some race other than White. People in poverty are more prevalent, with 11.3% of residents having incomes below the federal poverty level.  |            |
| 2. Do you provide service to areas with minority populations?   | Yes  |            |
| Is it the same level and quality of service that is provided areas without minority populations?  | Yes  |            |
| 3. Please describe the location of transit services and facilities. Have you ensured that decisions on the location of transit services and facilities are made without regard to race, color, creed, national origin, sex, age, or disability?   | Fixed route transit services are provided along major corridors. E&D and Medicaid service is provided throughout the entire SEVT service area.<br>Yes  |            |
| 4. Please review the Title VI general reporting information submitted with the last application. List all complaints alleging discrimination in the delivery of service that were reported. Follow up on the status of the complaints. Do the complaints indicate that the grantee may discriminate in the delivery of service? |  |            |
|   | Complaint Description  | Date Filed |
|   | Status   |            |
| N/A   |  |            |
| 5. Who investigates complaints?   | General Manager  |            |
| 6. Have any complaints concerning discrimination in the delivery of service been received? If yes:  | No   |            |
| a) How were the complaints identified and resolved?   | N/A  |            |
| b) Were complaints reported to VTrans? How long after receipt of the complaint?   | N/A  |            |
| 7. How are individuals provided opportunities to participate in the transit planning and decision-making processes without regard to race, color, creed, national origin, sex, age, disability, or marital status?  | Public meetings properly noticed. SEVT uses a wide variety of methods for public outreach, including outreach with its human service partners whom we meet monthly. Working with Regional Planning Commissions who maintain contact with organizations that represent the interests of low income and minority groups. Meeting times and locations designed to maximize accessibility. Interpreters are provided if requested. |            |
| 8. Have representatives of these groups expressed a need for transportation improvements? If yes, please describe.  | No   |            |
| 9. How do you promote your service to minority populations?   | Public meetings, media releases, social media, and partner outreach.   |            |
| 10. Is the company Title VI policy clearly posted in the transit facility in locations  | Yes  |            |

|  |   |
|--|---|
| with easy access to staff and the general public   |   |
| 11. Is the policy posted on all transit vehicles.  | Yes   |
| 12. Does your agency use the Four Factor Analysis to determine the specific language services that are appropriate for your service areas?   | Yes   |
| If yes:<br>(1) Does the analysis identify the number or proportion of LEP persons eligible to be served or likely to be encountered by the program?                                      | Yes   |
| a) How does the LEP persons interact with the agency?  | Inquiries regarding basic info; making reservations for demand-response services; handling passenger complaints; gathering data such as on-board customer surveys.  |
| b) Does analysis identify the LEP communities and assess the number or proportion of LEP persons from each language group for the appropriate language services for each language group? | Yes   |
| c) Does it identify the literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice?              | Yes   |
| d) Does it determine whether LEP persons are underserved by the recipient due to language barriers?  | No, while some of our towns are slightly higher concentration, overall our service area has a low percentage of LEP persons. In those towns we have how to ride guides in different languages, as well as translation services available. |
| (2) Does the analysis identify the frequency with which LEP persons come into contact with the program?  | Yes   |
| (3) Does the analysis identify the nature and importance of the program, activity, or service provided by the program to people's lives?   | Yes   |
| (4) Does the analysis identify the resources available to the transit provider for LEP outreach, as well as the costs associated with that outreach?                                     | LEP Plan is in place  |

## ***Rural Community Transportation, Inc. – April 2022***

### **TITLE VI – NONDISCRIMINATION IN THE DELIVERY OF SERVICE**

|   |  |        |
|---|--|--------|
| 1. What is the racial composition of your service area?   | Caledonia County – 94.8% white<br>Essex County – 95.4% white<br>Orleans County – 95.1% white<br>Lamoille County – 96.7% white  |        |
| 2. Do you provide service to areas with minority populations?   | Yes.   |        |
| Is it the same level and quality of service that is provided areas without minority populations?  | The minority population is spread throughout the general population.   |        |
| 3. Please describe the location of transit services and facilities. Have you ensured that decisions on the location of transit services and facilities are made without regard to race, color, creed, national origin, sex, age, or disability?   | RCT does not have transit facilities. Transit services are commuter and shopping and are based on population density without regard to race, color, creed, national origin, sex, age, or disability. |        |
| 4. Please review the Title VI general reporting information submitted with the last application. List all complaints alleging discrimination in the delivery of service that were reported. Follow up on the status of the complaints. Do the complaints indicate that the grantee may discriminate in the delivery of service? |  |        |
| Complaint Description   | Date Filed   | Status |
| None  |  |        |
| 5. Who investigates complaints?   |  |        |
| 6. Have any complaints concerning discrimination in the delivery of service been received? If yes:  |  |        |
| a) How were the complaints identified and resolved?   |  |        |
| b) Were complaints reported to VTrans? How long after receipt of the complaint?   |  |        |
| 7. How are individuals provided opportunities to participate in the transit planning and decision-making processes without regard to race, color, creed, national origin, sex, age, disability, or marital status?  | Public hearings  |        |
| 8. Have representatives of these groups expressed a need for transportation improvements? If yes, please describe.  | Yes. Our Route 14/15 Commuter service was established based on public input.   |        |
| 9. How do you promote your service to minority populations?   | Via our website.   |        |
| 10. Is the company Title VI policy clearly posted in the transit facility in locations with easy access to staff and the general public   | Yes  |        |



|  |  |
|--|--|
| 11. Is the policy posted on all transit vehicles.  | Yes  |
| <p>12. Does your agency use the Four Factor Analysis to determine the specific language services that are appropriate for your service areas?</p> <p>If yes:</p> <ul style="list-style-type: none"> <li>(1) Does the analysis identify the number or proportion of LEP persons eligible to be served or likely to be encountered by the program? <ul style="list-style-type: none"> <li>a) How does the LEP persons interact with the agency?</li> <li>b) Does analysis identify the LEP communities and assess the number or proportion of LEP persons from each language group for the appropriate language services for each language group?</li> <li>c) Does it identify the literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice?</li> <li>d) Does it determine whether LEP persons are underserved by the recipient due to language barriers?</li> </ul> </li> </ul> | We have not encountered riders requiring translation services. |

## **IX. Statewide Planning Process Compliance**

Title VI and the executive order on Environmental Justice prohibit discrimination on the basis of race, color and national origin and direct transportation agencies to avoid system investments that would impose “disproportionately high and adverse effects” on minority or low-income communities. In order to determine how well VTTrans and its subrecipients are complying with these requirements, it is necessary to determine the locations of the individuals who are covered by these mandates.

### ***A. Demographic Profile***

#### **Minorities**

Using the most recent available data, the series of maps on the following pages was produced. The first pair of maps show the locations of minority persons, defined as those identifying themselves as something other than “white alone” in the 2017-2021 American Community Survey. The first map shows the absolute number of minorities by Census tract, and the second map shows those tracts where the percentage of minority residents exceeds the statewide average.

The tracts with the greatest number of minorities are located in the Intervale section of Burlington and the western portion of Middlebury, as well as the section of Burlington where UVM is located. Other tracts with more than 1,000 minority individuals are located in the western part of Winooski, the US 7 corridor in South Burlington, the western part of Essex Junction and the northeastern section of Burlington. The next tier of tracts, with between 500 and 1,000 minority individuals includes much of the rest of the core of Chittenden County as well as the tract containing Roxbury and the eastern part of Northfield, Bellows Falls, and Morristown. Most tracts in the state have greater than 100 non-white individuals, though many of those tracts are large and encompass several towns. Lower numbers of minorities are found in parts of Bennington and Windham counties and the far northeast corner of the state, which is very sparsely populated.

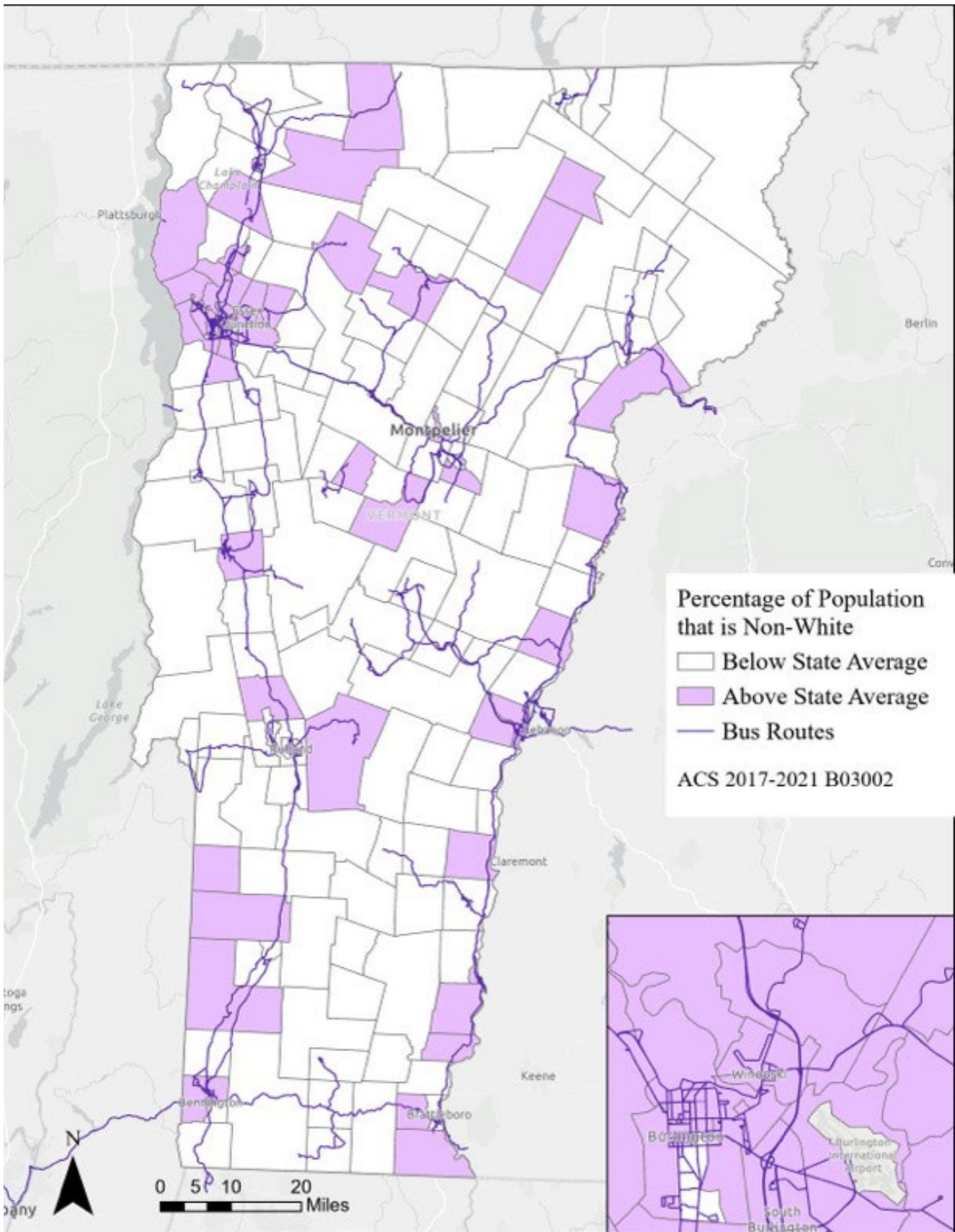
The concentrations of minority persons (percentages above the statewide average) can be found in the core of Chittenden County, tracts along the New Hampshire border, northwestern Bennington County and portions of Washington, Lamoille and Franklin counties.

#### **Non-Native Born National Origin**

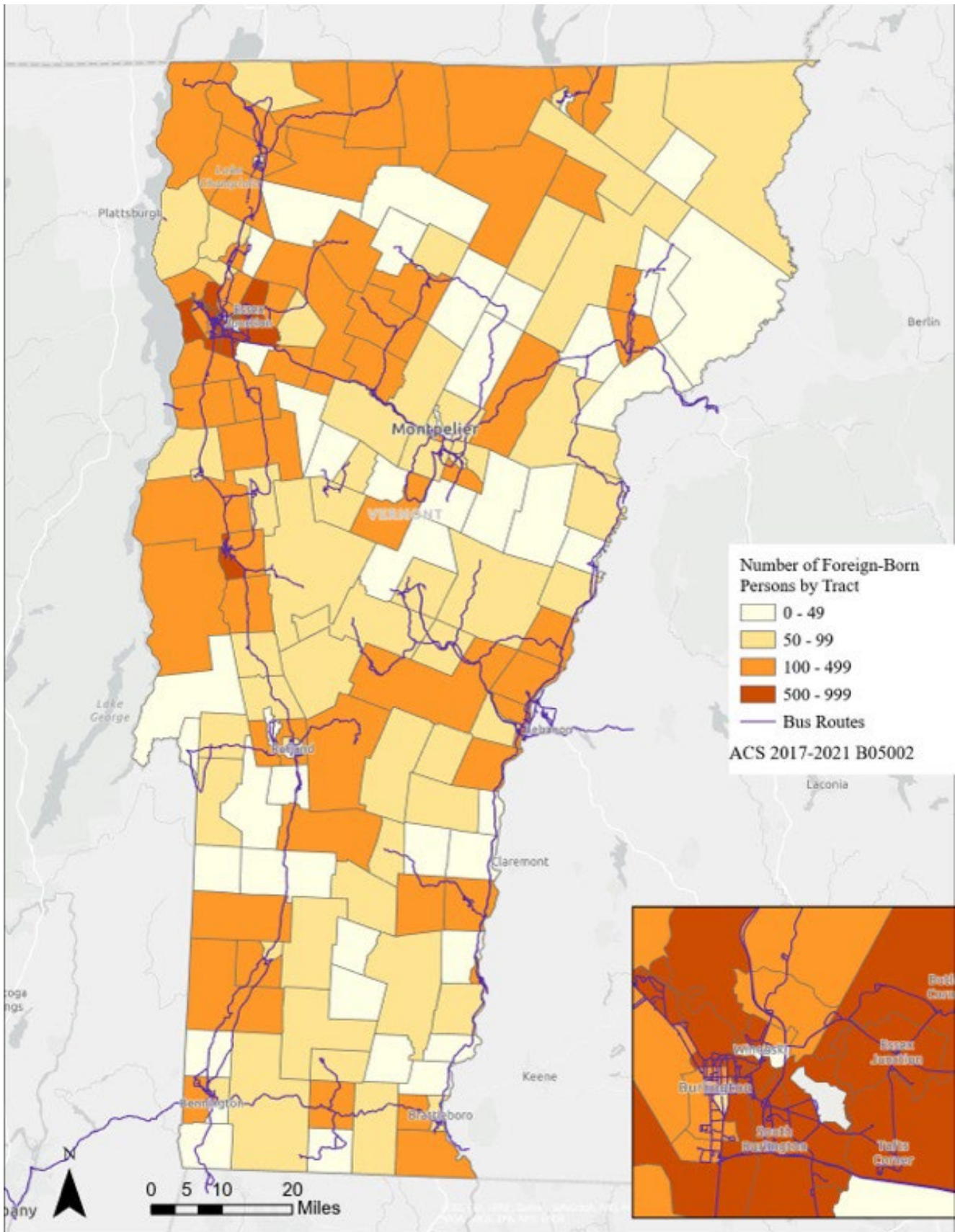
The two maps representing data on the national origin of Vermont residents are similar in many ways to the maps of minorities. The core of Chittenden County again has the highest totals and the whole northwestern sector has higher numbers than most of the rest of the state. The western portion of Middlebury is the only tract in the top 20 that is not in Chittenden County. Almost the entire northern tier along the Canadian border between Newport and Highgate shows up with moderate numbers of foreign-born individuals, reflecting a higher representation of French Canadians.

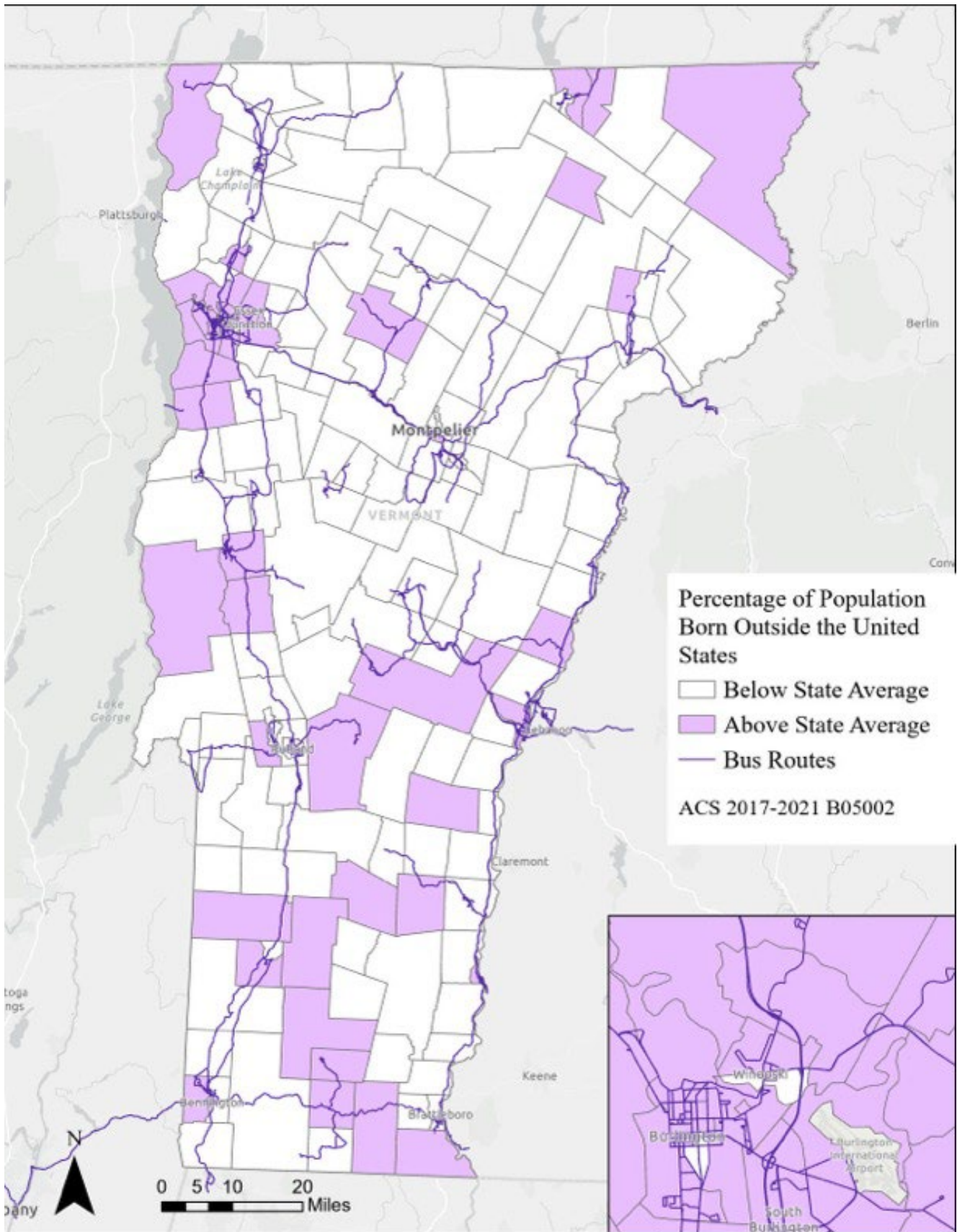
The map of concentrations of foreign-born residents shows that almost all of the tracts in the core of Chittenden County (other than the airport) have concentrations of non-natives, due mainly to the refugee resettlement program (see section on LEP for more discussion) and much of Addison County has concentrations of non-natives. A spine of tracts from Chester south to Guilford through Bennington and Windham counties have higher-than-average percentages of foreign-born individuals.











## **Low-Income**

As a rural state without a large base of high-paying jobs—outside of Chittenden County—poverty is much more widespread in Vermont than any of the other factors considered in the Title VI program. In the 2021 American Community Survey data, 10.5% of the population in the state are in households with income below the federal poverty level. In comparison, less than 1.3% of residents are not able to speak English very well, 8.1% of residents are minorities, and 4.4% of residents were not born in the United States.

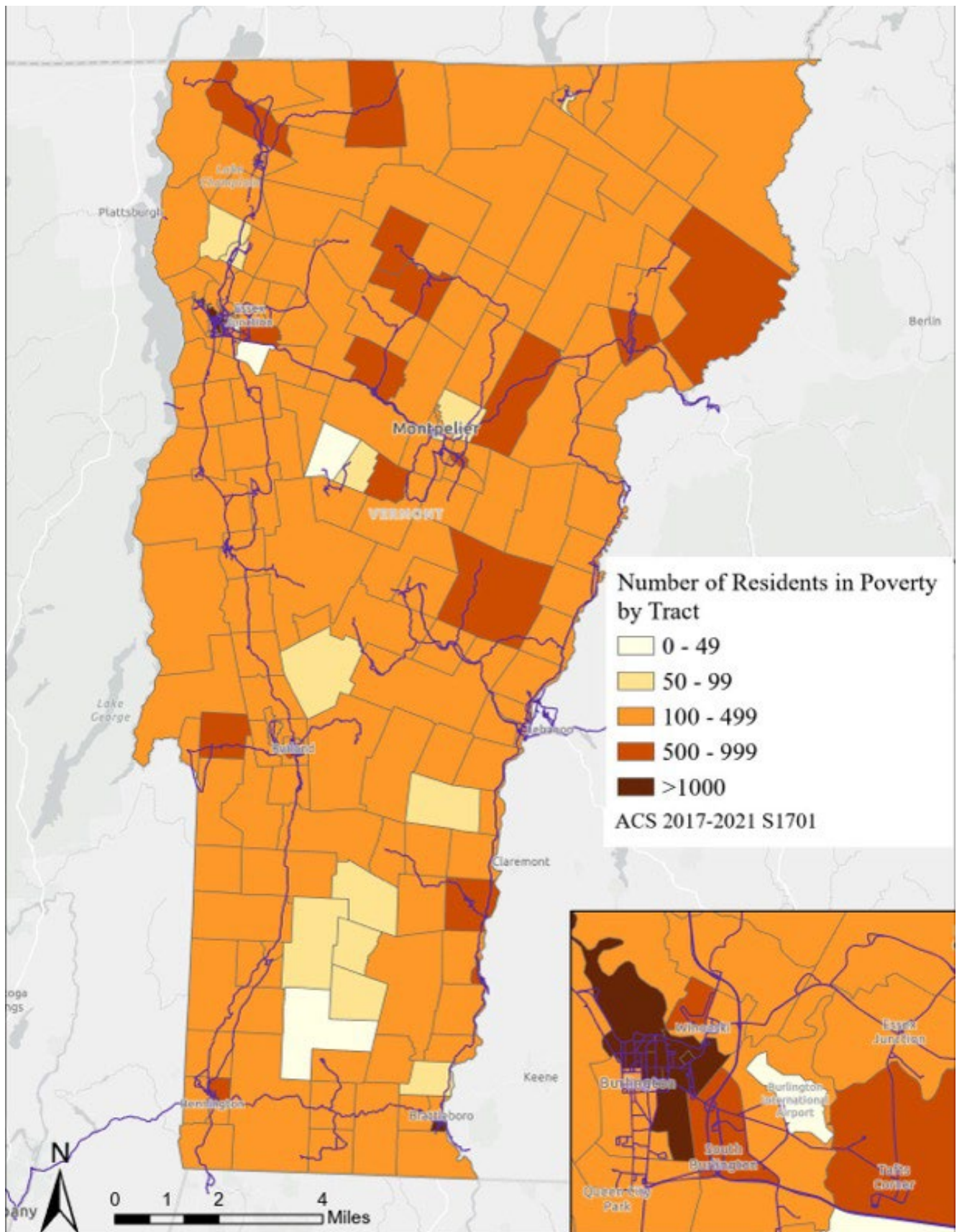
The analogous maps of low-income individuals show many of the same patterns as seen in the previous maps, though many more tracts fall into the higher categories. Tracts with over 1,000 people in poverty include five in the central and northern parts of Burlington, though the southern part of Brattleboro has the highest number of any tract in Vermont. Every county but Addison, Grand Isle and Orleans has a tract with at least 500 people in poverty, and there are very few tracts that have fewer than 100 people in poverty.

In spite of the high numbers in Burlington and Winooski, the percentages of people in poverty in most of communities surrounding the urban core is below the state average. As mentioned above, Chittenden County offers the highest concentration of well-paid jobs in the state due to the presence of large employers such as the University of Vermont, the UVM Medical Center, Global Foundries, State agencies, and many financial institutions.

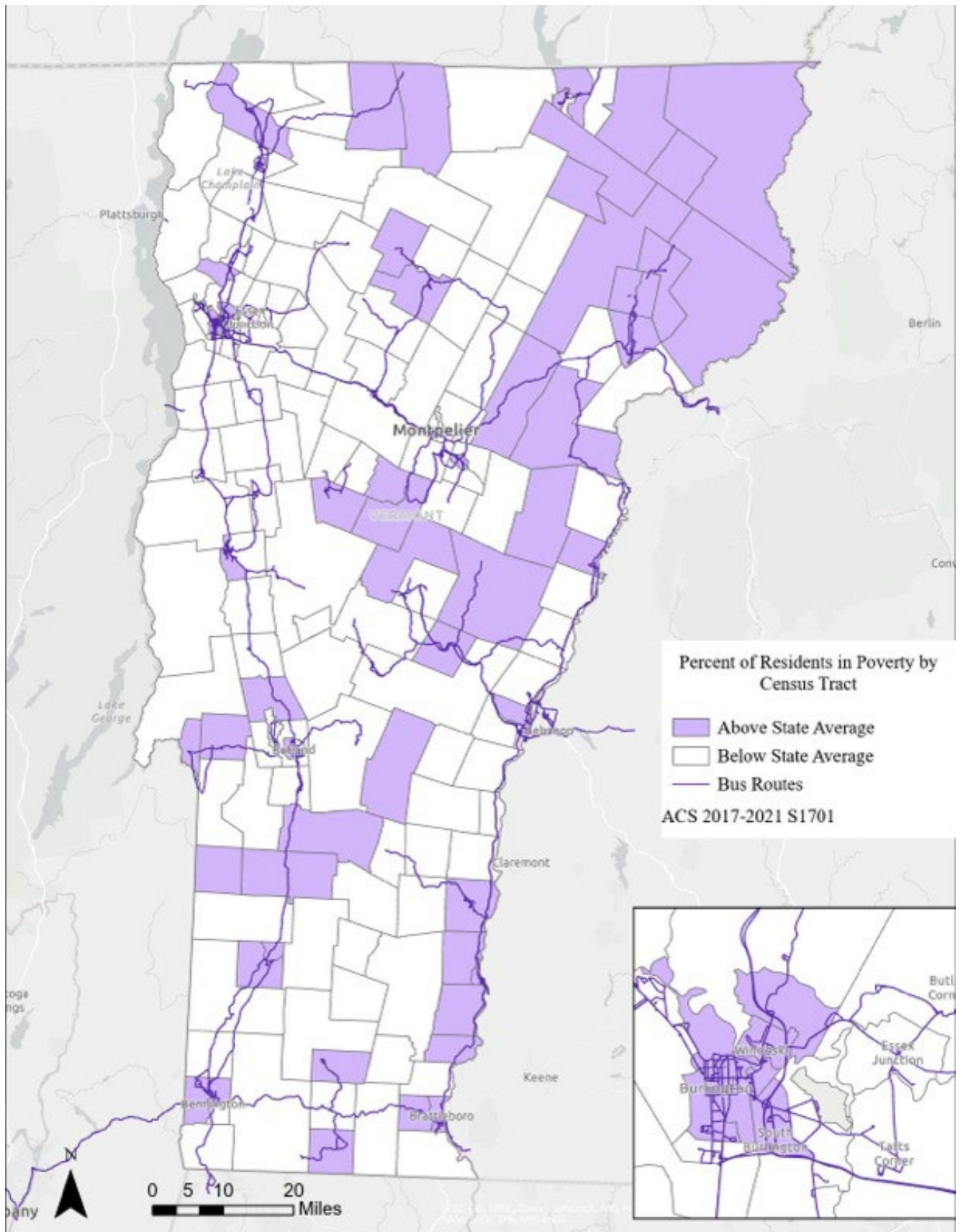
Proximity to the large employment center in the Hanover-Lebanon area has helped to keep poverty below average in southern Orange County and most of eastern Windsor County. Similarly, State jobs and insurance companies have helped to keep most of Washington County out of poverty status.

The Northeast Kingdom, however, and much of Orange County and the Connecticut River Valley south of the Town of Windsor, show concentrations of persons below the poverty line. Many of the larger towns and small cities also show concentrations, including Bennington, Brattleboro, Rutland, Barre, and St. Johnsbury.









## **B. Funding Distribution Analysis**

Maps on the next two pages display the percentages of the minority population and the white-only population by Census tract. In Vermont, Census tracts in rural areas can encompass whole towns or even groups of towns. In the more populated cities and towns, the minor civil divisions are broken into several different tracts.

For the purpose of this analysis, only funding for bus operations was considered. The service area of a bus route is reasonably well defined, but demand response service essentially covers the entire state. From the perspective of a given transit provider, bus route operations funding covers the area within a 3/4-mile buffer of its bus routes (since most providers in Vermont operate route deviation service with that much of a buffer around the defined route).

The maps include an overlay of the service area of the bus routes operated by transit providers in Vermont. It is important to note that several routes are operated jointly by neighboring providers. In order to avoid double counting, the service area was typically split at the county boundary or at another point based on the level of service operated by each agency.

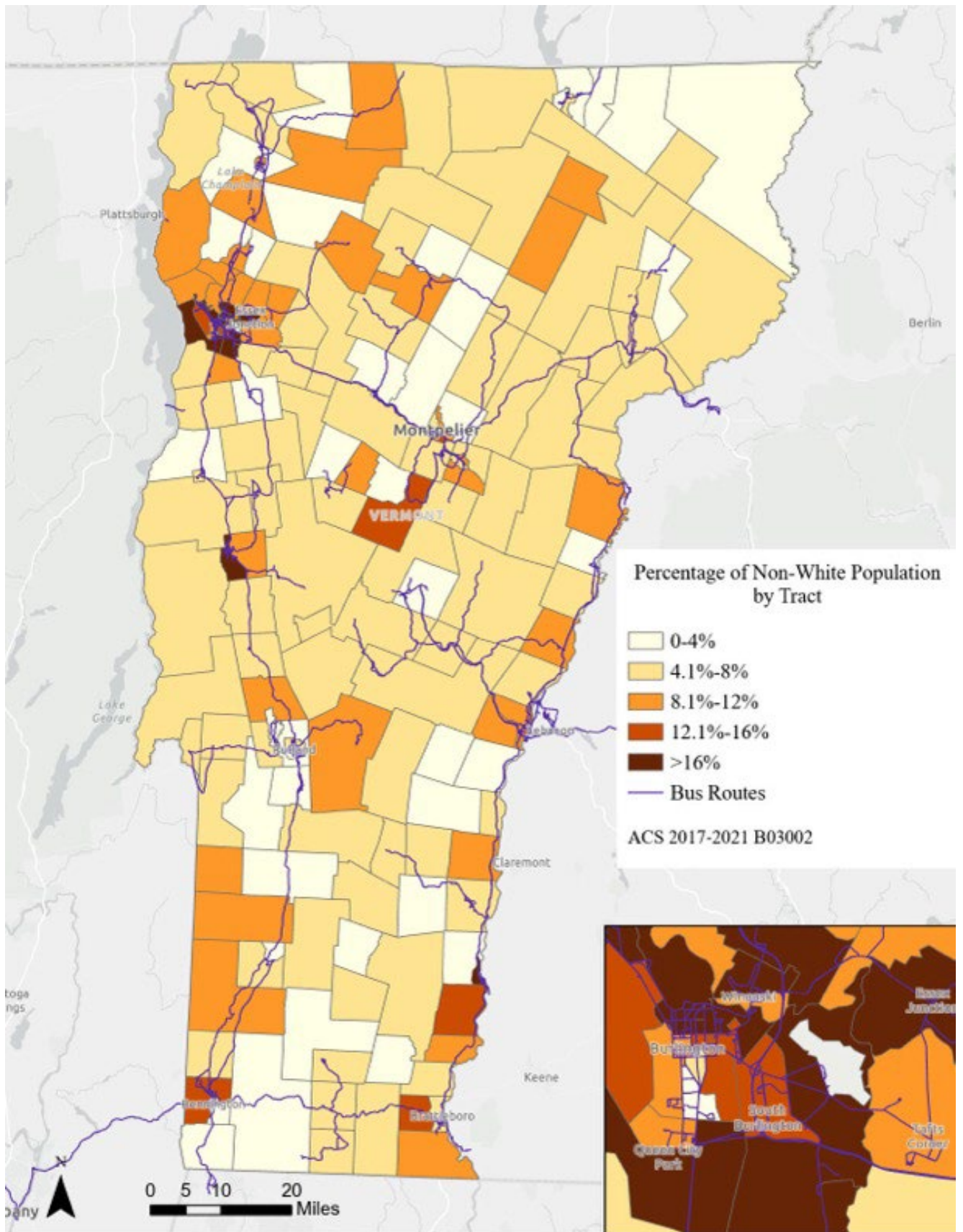
Vermont overall is overwhelmingly white. According to the 2017-2021 American Community Survey, 92% of the statewide population is “white only.” Of the 192 Census tracts in the state, only 39 of them have minority percentages higher than 10%, and 22 of these are in the core of Chittenden County.

The table below compares the amount of funding for bus operations with the minority populations in their respective service areas.

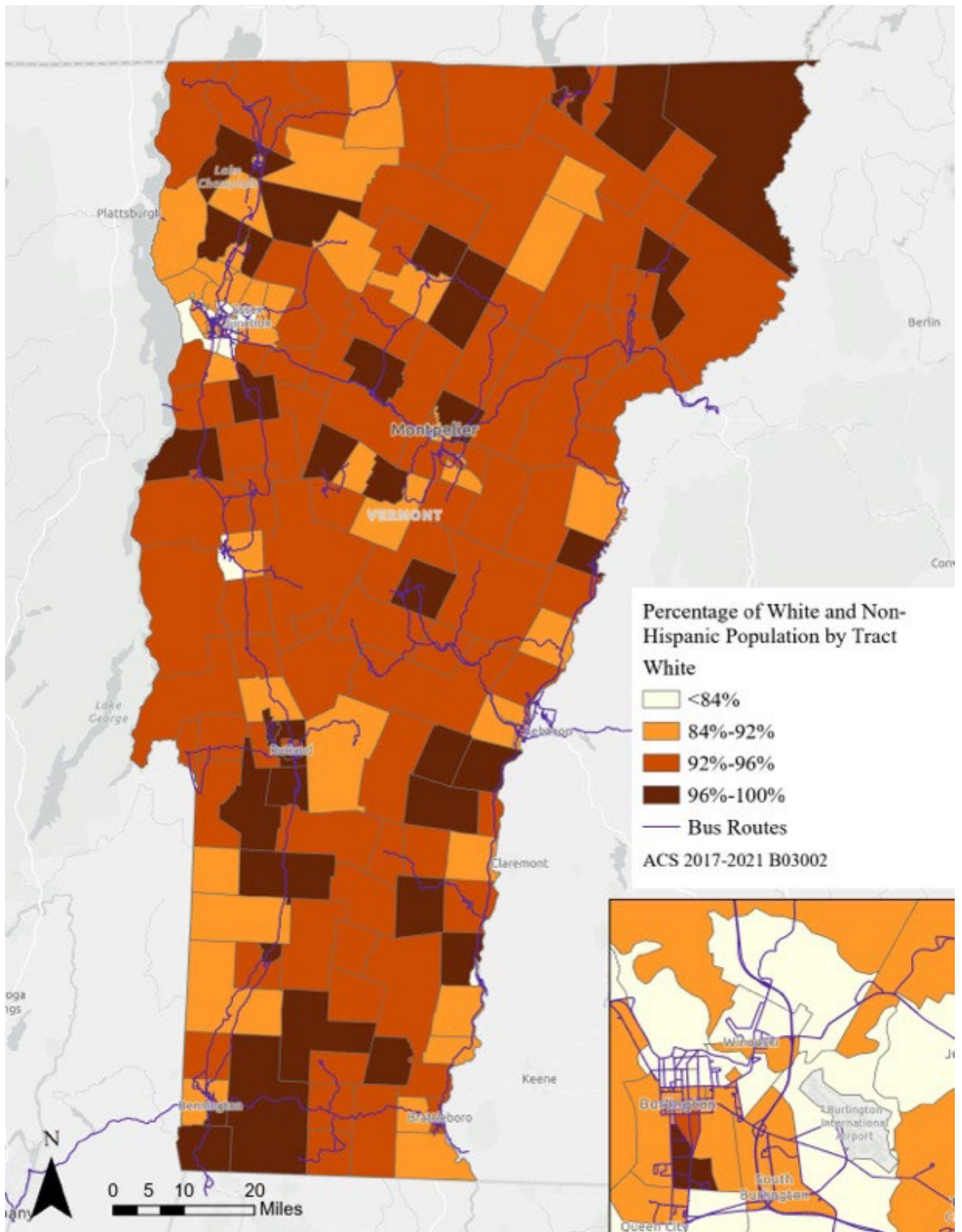
### **Bus Route Service Area Racial Breakdown and Funding**

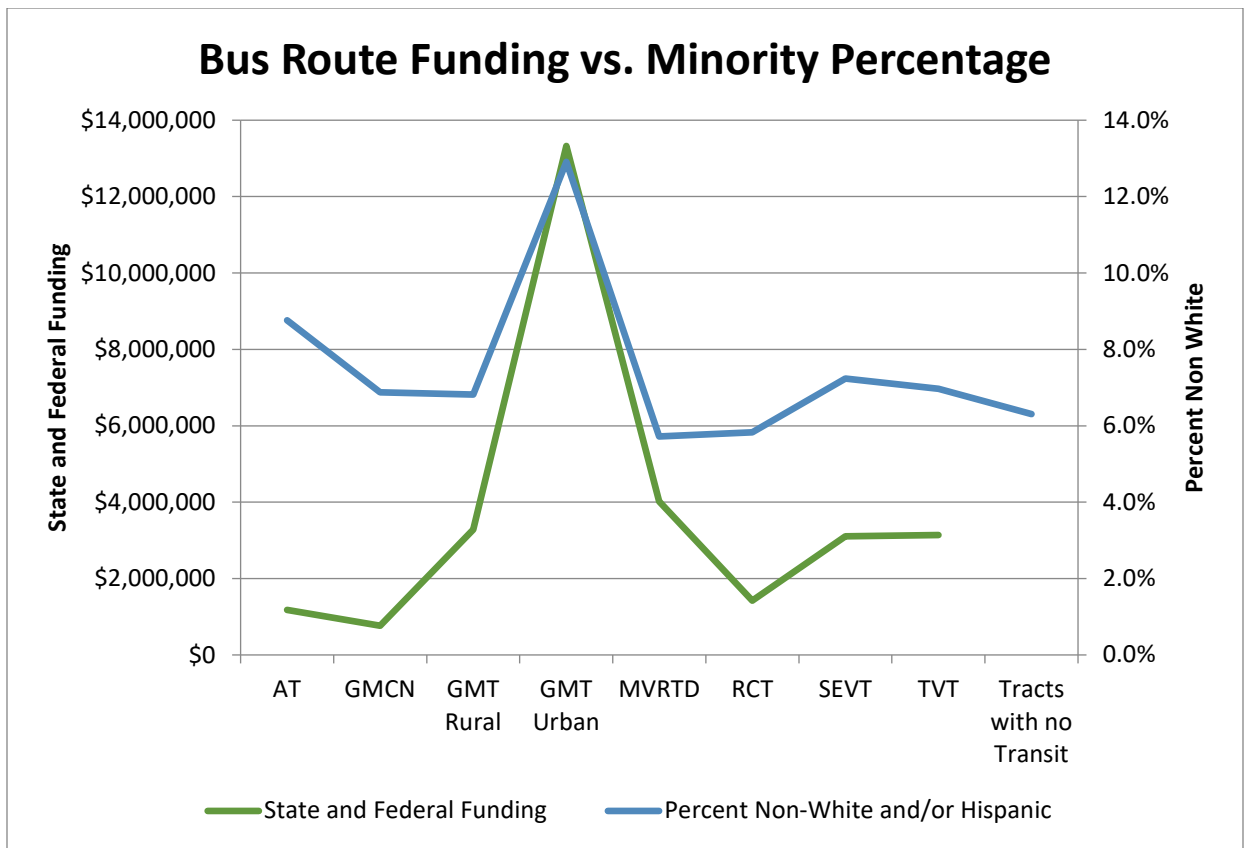
| <b>Agency</b>    | <b>Bus Route Service Area Population</b> | <b>White Only</b> | <b>Non-White</b> | <b>Percentage White</b> | <b>Percentage Non-White</b> | <b>State and Federal Funding</b> |
|------------------|--|-------------------|------------------|-------------------------|-----------------------------|----------------------------------|
| <b>AT</b>        | 14,188                                   | 12,945            | 1,243            | 91.2%                   | 8.8%                        | \$1,175,776                      |
| <b>GMCN</b>      | 35,945                                   | 33,472            | 2,473            | 93.1%                   | 6.9%                        | \$764,920                        |
| <b>GMT Rural</b> | 106,787                                  | 99,509            | 7,278            | 93.2%                   | 6.8%                        | \$3,283,275                      |
| <b>GMT Urban</b> | 152,873                                  | 133,138           | 19,735           | 87.1%                   | 12.9%                       | \$13,324,781                     |
| <b>MVRTD</b>     | 54,911                                   | 51,770            | 3,141            | 94.3%                   | 5.7%                        | \$4,018,285                      |
| <b>RCT</b>       | 56,077                                   | 52,807            | 3,270            | 94.2%                   | 5.8%                        | \$1,418,198                      |
| <b>SEVT</b>      | 63,086                                   | 58,521            | 4,565            | 92.8%                   | 7.2%                        | \$3,104,210                      |
| <b>TVT</b>       | 61,411                                   | 57,133            | 4,278            | 93.0%                   | 7.0%                        | \$3,140,256                      |
| <b>None</b>      | 96,359                                   | 90,280            | 6,079            | 93.7%                   | 6.3%                        |                                  |
| <b>TOTALS</b>    | 641,637                                  | 589,575           | 52,062           | 91.9%                   | 8.1%                        | \$30,229,701                     |

The data in the table above is presented in the following chart, following the maps.









### C. Disparate Impacts Analysis

The first thing to notice about the figures in the table and chart is that the percentages of non-white population vary very little across the service areas of the various providers. Among the bus route service areas, the non-white percentage ranges from 5.7% to 12.9%. Excluding GMT-Urban, the range is only 5.7% to 8.8%. Compared to other areas of the country, that range represents hardly any variation at all. Given the lack of variation, it would be difficult to identify any disparate impacts of funding decisions based on race, color, or national origin even if they existed.

However, examining the chart above, the funding distribution by provider in general lines up very well with the distribution of minority individuals across the state. With respect to bus route funding, the State and Federal dollars distributed are higher for those providers with higher percentages of non-white residents and lower for those with lower percentages. The only exception to this is Advance Transit, which receives relatively little funding from Vermont, as most of its service area is in New Hampshire. MVRTD serves the relatively populous area of Rutland, and thus receives the second highest funding amount in the state (after CCTA), but the Rutland area, for various historical reasons, has one of the lowest minority percentages in the state.

One final note is that the portion of the state with no bus route service (“None” in the table and chart) has close to the lowest percentage of minority individuals among all of the service areas (6.3%). The fact that the area with no bus service has the lowest percentages of minorities is further evidence that there are no disparate impacts based on race, color, or national origin.

The conclusion of this analysis, based on the fact that there is very little variation in the percentage of minorities across the different service areas in Vermont, and when there is variation, the areas with the higher percentages of minorities generally receive greater funding,

is that there are no disparate impacts of funding decisions with respect to race, color, or national origin.

#### ***D. Planning Process***

VTrans staff engages in several statewide planning efforts related to public transportation on a regular cycle. These include the following:

- Long-Range Transportation Business Plan
- Public Transit Policy Plan (PTPP)
- Human Service Transportation Coordination Plan (HSTCP)

In its most recent cycle, the PTPP was integrated with the HSTCP into a single document, following the reasoning that the majority of public transit in Vermont's rural areas (comprising more than 60% of the state's population) is human service transportation. The combined PTPP/HSTCP includes extensive analysis on the needs of low-income populations including Medicaid recipients, minorities, and families below the poverty line. The intent of this analysis is to inform statewide policies on transportation provision and funding and serve as the backdrop to service planning and analysis that takes place in internal planning efforts on the part of the transit providers.

In all of these statewide planning efforts, it is VTrans policy to conduct them in a non-discriminatory way. The public involvement components of these efforts are inclusive and participation from groups protected under Title VI and Environmental Justice is strongly encouraged (see section IV for more discussion). Meeting locations, facilities, and times are set so that they are maximally accessible by members of protected groups. As noted earlier in section IV, Vermont is in the process of developing a Transportation Equity Framework to go beyond the minimum requirements of non-discrimination in this Title VI program.

With respect to the benefits and burdens of the FTA investments in Vermont, these investments are mapped against the locations by census tract or block group for residents with disabilities; residents over 65; low-income residents mapped multiple ways including poverty line, auto less households, and Medicaid residents; jobs availability; and minority populations. This analysis, conducted periodically by VTrans as part of its oversight process, demonstrates the effort to specifically target those populations and focus programmatic transportation efforts on better meeting the needs of minority, low-income, and disabled populations. The next section on financial assistance discusses in greater detail the efforts to ensure that the needs of protected groups are met.

#### ***E. Pass-Through of FTA Financial Assistance***

The majority of FTA funding that passes through VTrans to its subrecipients consists of §5311 non-urbanized area funding and §5310 elders and persons with disabilities funding. The following language is an excerpt from the VTrans [State Management Plan](#) detailing the manner in which projects are selected for VTrans funding:

##### **Project Selection Criteria**

Funds, including all formula programs and flexed funds are distributed competitively. Criteria considered in the distribution are population category needs, the need for employment, the reduction of congestion, geographic balance, cost of service, the current administrative and legislative goals, and economic development potential.



Requirements include coordination, management capacity as determined by successful management reviews (new providers must be reviewed), availability of match, program compliance issues such as drug and alcohol testing, lack of ridership in previous routes, etc.

Upon formal application submittal, the Public Transit Section staff reviews, screens and informally ranks the formal applications on content and on “need”. The available funding determines how many of the highest ranked applicants are approved for funding. VTrans maintains a file for each grant year that contains a list of approved and rejected applicants and projects. This list also identifies which applicants are minorities or provide service to minorities. (To date VTrans has not had any applicants who are minorities)

The program of projects developed by VTrans reflects projects that will use any increased funding to support the expansion of transit services to areas not currently served, to improve the level of service in areas which have minimal service and to promote transportation linkages to other public transportation providers.

VTrans’ interpretation of need has to do with various indicators of transit dependency and the lack of mobility including income, race, and automobile ownership. VTrans tracks the requests for funding from the nine transit providers in Vermont and ensures over time that these funds are distributed fairly with respect to protected groups.

VTrans oversees a competitive grant process for New Services projects, funded by the federal Congestion Mitigation/Air Quality program. In this occasional process (depending on the availability of such funds from year to year), VTrans has twenty criteria. Although none of these specifically state service to minority or low-income communities, applicants must identify the intended market or need being addressed by the proposed service and demonstrate how it relates to state public transportation goals. By statute, the most important goal of public transportation in Vermont is “provision for basic mobility for transit-dependent persons” which is targeted directly at groups protected under Title VI and Environmental Justice.

On a routine basis, the grant agreements signed by v and the transit providers govern most of the FTA money that passes through VTrans. These grant agreements contain specific language regarding Title VI, as shown below:

#### **Title VI - Civil Rights Act of 1964**

1. Subrecipient agrees for itself, its assignees, and successors in interest (hereinafter collectively referred to as Subrecipient) that Subrecipient shall comply with the regulations governing nondiscrimination in Federally-assisted programs of DOT, as set forth in 49 CFR, Part 21, as they may be amended from time to time and hereinafter referred to as Regulations. Regulations are hereby incorporated by reference and made a part of this Agreement. Subrecipient shall not discriminate on the grounds of race, color, or national origin in selecting and retaining subcontractors, including procurements of materials and leases of equipment.
2. Subrecipient shall not participate, either directly or indirectly, in discrimination prohibited by Section 21.5 of the Regulations, including employment practices, when the Agreement covers a program set forth in Appendix B of the Regulations.
3. In all solicitations, either by competitive bidding or negotiation, made by Subrecipient for work to be performed under a subcontract, including procurements of materials or leases of equipment, each potential subcontractor or supplier shall be notified by Subrecipient of Subrecipient’s obligations under this Agreement and the Regulations relative to

nondiscrimination on the grounds of race, color, or national origin.

4. Subrecipient shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its accounts, books, records, other sources of information, and its facilities as may be determined by the State or the Federal Government to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of Subrecipient is in the exclusive possession of another who fails or refuses to furnish this information, Subrecipient shall so certify to the State or the Federal Government as appropriate, and shall set forth what efforts it has made to obtain the information.
5. In the event of Subrecipient's noncompliance with the nondiscrimination provision of this Agreement, State shall impose such contract sanctions as it or the Federal Government may determine to be appropriate, including, but not limited to withholding of payments to Subrecipient under the Agreement until Subrecipient complies, and/or, cancellation, termination or suspension of the Agreement, in whole or in part.
6. Subrecipient shall include the provisions of these paragraphs 35.1) through 35.6) in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. Subrecipient shall take such action with respect to any subcontract or procurement as State or the Federal Government may direct as a means of enforcing such provisions including sanctions for noncompliance; provided, however, that, in the event Subrecipient becomes involved in, or is threatened with, litigation with a subcontractor or supplier as a result of such direction, Subrecipient may request State to enter into such litigation to protect the interests of State, and, in addition, Subrecipient may request the Federal Government to enter into such litigation to protect the interests of the Federal Government.
7. Subrecipient shall comply with the applicable provisions of Executive Order 11246 of September 24, 1965, Title VI of the Civil Rights Act of 1964, and the rules, regulations, and relevant orders of the Secretary of Transportation and the Secretary of Labor. In the event of Subrecipient's non-compliance with the nondiscrimination clauses of the Agreement or with any of the rules, regulations or orders, this Agreement may be canceled, terminated or suspended, in whole or in part, and Subrecipient may be declared ineligible for further Federally-assisted contracts, or State-assisted contracts, in accordance with procedures authorized in Executive Order 11246 of September 24, 1965, and such other sanctions may be imposed and remedies invoked as provided in Executive Order 11246 of September 24, 1965, or by rule, regulation or order of the Secretary of Labor, or as otherwise provided by law.

Through these stipulations and processes of passing financial assistance through to subrecipients, VTrans ensures that FTA are allocated among subrecipients in a non-discriminatory way, and then are used by those subrecipients in a non-discriminatory way as well.

### ***F. Providing Assistance***

Together, the VTrans Civil Rights Office and the VTrans Public Transit Division provide guidance and technical assistance to subrecipients related to Title VI in a number of ways. VTrans provides training on Title VI regulations and materials to help subrecipients fulfill their Title VI obligations. Over the past three years, VTrans has offered consultant services to subrecipients as well.

VTrans occasionally makes funds available to its subrecipients for planning studies or technical assistance. Requests from subrecipients for assistance related to Title VI and Environmental Justice population segments receive special consideration from VTrans.

The following describes various assistance and training activities that VTrans has pursued over the past three years:

- **Website Resources:** The [VTrans Civil Rights and Labor Compliance Title VI website](#) contains a wealth of information and resources for its subrecipients on the [Subrecipient Center page](#). This includes links to a [data collection tool kit](#) (a systematic guide to data collection and links to multiple resources) and [Environmental Justice Policy Guidance for FTA Recipients](#) found on the FTA website.
- **Technical Support:** The VTrans Title VI Program Coordinator has reviewed and provided feedback to the public transit providers about their Title VI program plans.
- **Language Assistance:** VTrans has an ongoing contract with a translation service. Materials and instructions on how to access this new service are provided to the transit providers.
- **Other Technical Assistance Provided by VTrans Consultant:** VTrans works with a consultant who provides training and technical assistance to transit providers with respect to their Title VI and EEO Programs. He has provided the following assistance:

|               |   |
|---------------|---|
| June 2020     | Equity Analysis for TVT Bradford Facility               |
| August 2020   | Title VI Program for SEVT                               |
| February 2022 | Equity Analysis for GMT Berlin Corners Facility         |
| July 2022     | Reviewed Title VI Compliance Checks                     |
| Summer 2023   | Updates of Title VI Programs for numerous subrecipients |

In providing technical assistance to its subrecipients, VTrans follows the following procedure to ensure that the process is non-discriminatory.

1. Review prevalence of low-income and minority groups served by each subrecipient.
2. Itemize types of assistance available to subrecipients other than financial pass-through assistance including, but not limited to:
  - a. Technical assistance with planning studies
  - b. Training on following federal and state regulations
  - c. Training on computer software
  - d. Coordination of public involvement activities
3. Ensure that those subrecipients with concentrations of Title VI and Environmental Justice populations receive no less than their fair share of assistance proportional to service area population, and more if possible.