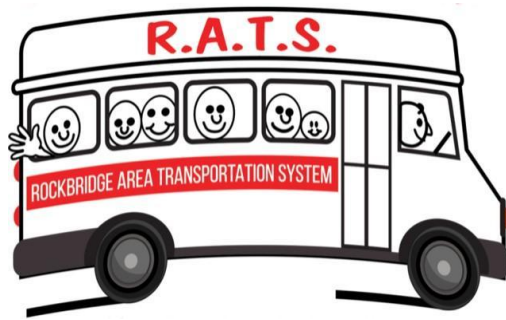




Rockbridge Area Transportation System, Inc. (RATS)

TITLE VI PROGRAM

Including Language Assistance Plan for Persons with Limited English Proficiency (LEP)

Adopted: August 17, 2026

Next Scheduled Update: August 17, 2029

712 N. Main St., Lexington, VA 24450

1. Introduction and Purpose

Rockbridge Area Transportation System, Inc. (RATS) is a recipient of Federal Transit Administration (FTA) financial assistance and is therefore required to comply with Title VI of the Civil Rights Act of 1964, 49 CFR Part 21, and related nondiscrimination authorities. This Title VI Program describes how RATS ensures that no person is excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any RATS program or activity on the basis of race, color, or national origin.

This Program is prepared in accordance with FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients, and is submitted to FTA (through the Virginia Department of Rail and Public Transportation, as applicable) on a triennial basis or as otherwise required.

2. Notice to the Public

RATS provides the following Notice of Nondiscrimination to the public, and posts it at its administrative office, on RATS vehicles, and on any RATS-maintained website or public materials:

“Rockbridge Area Transportation System, Inc. (RATS) operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act of 1964. Any person who believes they have been subjected to discrimination under Title VI may file a complaint with RATS. For more information, or to file a complaint, contact the Title VI Coordinator listed below.”

Title VI Coordinator:

Stephanie RiCharde, Executive Director

712 N. Main St., Lexington, VA 24450 — 540-463-3346 — director@rockbridgetransportation.org.

3. Title VI Complaint Procedures

Any person who believes they have been discriminated against on the basis of race, color, or national origin by RATS may file a written Title VI complaint. The following procedure applies:

1. Complaints should be filed within 180 days of the alleged discriminatory act, in writing, using the RATS Title VI Complaint Form (Section 4) or in a letter that includes the complainant's name, contact information, and a description of the alleged discriminatory action.
2. Complaints may be filed with the RATS Title VI Coordinator at the address, phone number, or email listed in Section 2.
3. RATS will investigate all complaints and will attempt to informally resolve the complaint within 60 days of receipt.
4. RATS will provide a written response to the complainant summarizing the outcome of the investigation.
5. If the complainant is dissatisfied with RATS' resolution, or prefers, the complainant may file a complaint directly with the Federal Transit Administration, Office of Civil Rights, East Building, 5th Floor – TCR, 1200 New Jersey Ave. SE, Washington, DC 20590, or with the Virginia Department of Rail and Public Transportation.

RATS maintains records of all Title VI complaints, investigations, and lawsuits, as summarized in Section 5.

4. Title VI Complaint Form

RATS makes a standard Title VI Complaint Form available upon request at its administrative office and will provide the form in accessible formats consistent with the RATS ADA Notice. The form requests: complainant name and contact information; the basis of the complaint (race, color, or national origin); the date(s) of the alleged discriminatory act; a description of the alleged discrimination; and the names of any witnesses. Complainants who need assistance completing the form, including LEP individuals, may request assistance from the Title VI Coordinator, consistent with the Language Assistance Plan in Section 7.

5. Record of Title VI Investigations, Complaints, and Lawsuits

RATS maintains a log of all Title VI-related investigations, complaints, and lawsuits filed against the agency. As of the date of this Program, RATS has no pending or resolved Title VI investigations, complaints, or lawsuits on record. This section will be updated to reflect any new investigations, complaints, or lawsuits, including the date filed, a summary of the allegation, the status, and the action taken, as they occur.

6. Public Participation Plan

RATS provides notice and a reasonable opportunity for public comment prior to any proposed fare increase or major reduction in transit service, consistent with 49 U.S.C. § 5307(b). Notice is posted at the RATS office and on RATS vehicles, and comments may be submitted to the Title VI Coordinator. RATS has not otherwise established a standing public participation program, given its limited administrative capacity as a small rural transit provider.

7. Language Assistance Plan for Limited English Proficient (LEP) Persons

This Language Assistance Plan (LAP) is prepared in accordance with Executive Order 13166 and DOT/FTA LEP guidance. A Limited English Proficient (LEP) person is someone who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English. This LAP documents RATS' Four Factor Analysis and the steps RATS takes to provide meaningful access to its services for LEP individuals.

7.1 Four Factor Analysis

Factor 1 – The number or proportion of LEP persons in the RATS service area who may be served by or come into contact with RATS. According to U.S. Census Bureau data for the Rockbridge area, the population speaking a language other than English at home is approximately 6.4% in the City of Lexington, 3.5% in Rockbridge County, and 3.3% in the City of Buena Vista; the Hispanic/Latino population, the most likely LEP group in the area, is estimated at roughly 2–5% across these jurisdictions. These figures fall below the DOT “safe harbor” threshold of 5% or 1,000 persons (whichever is less). RATS has not historically served LEP clients; ridership records to date do not reflect any LEP riders. RATS recognizes, however, that it is reasonably possible RATS could encounter an LEP individual, and that any such individual would most likely be a Spanish speaker, consistent with the demographic data above.

Factor 2 – The frequency with which LEP persons come into contact with RATS services. Based on RATS' ridership history, contact with LEP individuals has been rare to nonexistent. RATS will continue to monitor ridership and update this analysis if the frequency of contact with LEP individuals changes.

Factor 3 – The nature and importance of RATS programs to LEP persons' lives. RATS provides public transportation service, which can be an important, and in some cases essential, service for individuals to reach medical appointments, employment, and other daily needs, regardless of English proficiency. Given this importance, RATS provides the language assistance measures described below even though contact with LEP individuals has been infrequent.

Factor 4 – The resources available to RATS and the costs of language assistance. RATS is a small rural transit agency with limited administrative staff and budget. RATS has identified low-cost, readily available language assistance resources appropriate to its size and the low, but non-zero, likelihood of encountering an LEP rider, as described below.

7.2 Language Assistance Measures

Based on the Four Factor Analysis, RATS provides the following language assistance measures, focused on Spanish, the language most likely to be encountered:

- RATS employs an as-needed driver who is fluent in Spanish and has agreed to assist with interpretation and communication for Spanish-speaking riders when scheduled or available.
- RATS may also request interpretation assistance from a Spanish-speaking faculty member at a local university, who has agreed to assist RATS with communication as needed.
- Vital documents — including the Title VI Notice, this summary of complaint procedures, and the Title VI Complaint Form — will be translated into Spanish upon request, or proactively if RATS' LEP contact rate increases in the future.
- Riders or members of the public needing language assistance may contact the RATS Title VI Coordinator, who will coordinate use of the resources above or identify an alternative means of communication.

RATS has not translated all public materials into Spanish as a standard practice, because current and historical ridership and service-area demographic data do not meet the DOT safe harbor threshold and do not reflect regular contact with LEP individuals. RATS will provide translation or interpretation on an as-requested, as-needed basis using the resources identified above.

7.3 Staff Training

RATS will make staff and drivers aware of this Language Assistance Plan and the process for requesting interpretation assistance (via the Spanish-speaking driver or university contact) when an LEP individual is encountered.

7.4 Monitoring and Updating the Plan

RATS will review this Language Assistance Plan at least every three years, in conjunction with the update of this Title VI Program, or sooner if RATS becomes aware of a significant change in the LEP population of its service area or in the frequency with which it encounters LEP individuals. Updated Census or American Community Survey data will be reviewed as part of each update.

8. Minority Representation on Non-Elected Planning and Advisory Bodies

RATS does not currently maintain a non-elected planning board, advisory council, or similar body whose members are selected by RATS. If RATS establishes such a body in the future, RATS will record and report the racial composition of its membership below, along with a description of efforts to encourage

participation by minorities, and will make reasonable efforts to ensure such participation is not denied on the basis of race, color, or national origin, consistent with 49 CFR § 21.5(b)(1)(vii).

Body Name	Total Members	Minority Members
N/A – no non-elected body currently exists	—	—

9. Subrecipient Monitoring

RATS does not currently pass through FTA funds to subrecipients. If RATS begins to do so in the future, RATS will require each subrecipient to submit Title VI information sufficient for RATS to complete a Title VI Program on the subrecipient's behalf, or will require the subrecipient to submit its own Title VI Program, and will describe its monitoring process in this section.

10. Title VI Equity Analysis for Facilities

RATS has not constructed a new vehicle storage facility, maintenance facility, operations center, or similar facility. If RATS undertakes such a construction project in the future, RATS will prepare a Title VI equity analysis prior to selecting a site, consistent with FTA Circular 4702.1B, and will include that analysis in this Program.

11. Board Approval

This Title VI Program, including the Language Assistance Plan for LEP Persons, was reviewed and approved by the RATS Board of Directors on August 17, 2026, as reflected in the board meeting minutes / resolution on file with RATS.



Stephanie RiCharde, Executive Director / Title VI Coordinator

August 17, 2026

Date