



Greyhound Lines, Inc. Title VI Program

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This document was prepared in accordance with the FTA Circular 4702.1B, dated October 1, 2012.



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The Civil Rights Act of 1964 (Title VI) Plan Executive Summary

Greyhound Lines Inc., a Delaware corporation maintaining its principal place of business in Dallas, Texas. Greyhound is a wholly owned subsidiary of First Group America and is the largest provider of intercity bus transportation serving more than 3,800 destinations with 13,000 daily departures across North America. Greyhound has participated in the FTA Section 5311(f) program for over 20 years and has received funding for operating assistance and capital improvements through more than 20 state programs. It has allowed the company to provide additional service to rural communities, upgraded facilities, ADA accessibility improvements and new buses to improve passenger experience and support rural intercity bus transportation needs.



Greyhound Lines, Inc. Title VI Program

Plan Statement

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

Section 601 of Title VI of the Civil Rights Act of 1964 states the following: No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

Policy

Greyhound is committed to ensuring that no person on the basis of race, color, or national origin will be excluded from participation or subjected to discrimination in the level and quality of services or related benefits provided by Greyhound, its employees, affiliates, and contractors.

Greyhound Title VI Coordinator:

Tricia A. Martinez

General Counsel

214-849-7170

tricia.martinez@greyhound.com

Governing Board

Greyhound is governed by a Board of Directors of which its Chief Executive Officer is a member.

General Reporting Requirements

Chapter III of FTA Circular 4702.1B addresses the general reporting requirements for recipients and subrecipients of Federal Transit Administration (FTA) funding to ensure that their activities comply with DOT Title VI regulations. Below are summaries of each requirement and how Greyhound's Title VI Program fulfills that requirement.

1. REQUIREMENT TO PROVIDE TITLE VI ASSURANCES.

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with DOT's Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances to FTA.



Greyhound Lines, Inc. annually submits its Certifications and Assurances to FTA.

2. REQUIREMENT TO PREPARE AND SUBMIT A TITLE VI PROGRAM.

FTA requires that all direct and primary recipients document their compliance with DOT's Title VI regulations by submitting a Title VI Program to their FTA regional civil rights officer once every three years or as otherwise directed by FTA. For all recipients (including sub-recipients), the Title VI Program must be approved by the recipient's board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA. Sub-recipients shall submit Title VI Programs to the primary recipient from whom they receive funding in order to assist the primary recipient in its compliance efforts.

Greyhound's Board of Directors approved this Title VI Program by resolution ([Appendix 1](#)).

3. REQUIREMENT TO NOTIFY BENEFICIARIES OF PROTECTION UNDER TITLE VI

The Title VI Program shall include recipients Title VI notice of the public that the recipient complies with Title VI and informs members of the public of the protections against discrimination afforded to them by Title VI. It shall also include a list of locations where the notice is posted.

Greyhound has developed a public Title VI Notice to Beneficiaries following the guidelines of Circular FTA C 4702.1B, Appendix B. A copy of this notice is found in [Appendix 2](#) of this Title VI Program. The notice is displayed in public areas at Greyhound's physical locations, including the reception desk at its corporate headquarters, and will also be posted at www.greyhound.com. This notice will be translated into languages other than English as needed.

4. REQUIREMENT TO HAVE TITLE VI COMPLAINT PROCEDURES AND A COMPLAINT FORM *All recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. Recipients must also develop a Title VI complaint form, and the form and procedure for filing a complaint shall be available on the recipient's website*

Greyhound has developed a Title VI complaint procedure and form. In this Title VI Program, [Appendix 3](#) outlines Greyhound's Title VI Complaint Procedures, and [Appendix 4](#) is a copy of Greyhound's Title VI Complaint form.

The complaint procedures and form will be available in English and Spanish on Greyhound's website, www.greyhound.com. Individuals who do not have access to the internet may request that Greyhound mail them a paper copy of the procedures and form available at the following: (<https://www.greyhound.com/en/help-and-info/travel-info/your-rights-rules-on-board>).

5. REQUIREMENT TO RECORD AND REPORT TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

In order to comply with the reporting requirements of 49 CFR Section 21.9(b), FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the

basis of race, color, or national origin: active investigations conducted by entities other than FTA; lawsuits; and complaints naming the recipient. This list shall include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to the investigation, lawsuit, or complaint.

Greyhound will maintain a list of all investigations, lawsuits and complaints naming Greyhound according to the guidelines of Circular FTA C 4702.1B, Appendix E. A copy of this list is provided in [Appendix 5](#) of this Title VI Program. In addition, Greyhound will maintain records of all related documents as required by law. Reporting processes are in place in the instance that complaints are made. Copies of complaints received by Greyhound will be provided to the relevant local or state jurisdiction within 10 days of receipt.

6. REQUIREMENT TO PROMOTE INCLUSIVE PUBLIC PARTICIPATION

The content and considerations of Title VI, the Executive Order on LEP, and the DOT LEP Guidance shall be integrated into each recipients established public participation plan or process (i.e., the document that explicitly describes the proactive strategies, procedures, and desired outcomes that underpin the recipient's public participation activities).

Greyhound's public participation policy is shown in [Appendix 6](#) of this Title VI Program. Greyhound ensures that minority and LEP populations, as with all members of the public, will be empowered to participate in decisions involved with Greyhound's intercity bus services.

7. REQUIREMENT TO PROVIDE MEANINGFUL ACCESS TO LEP PERSONS.

Consistent with Title VI of the Civil Rights Act of 1964, DOT's implementing regulations and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121, Aug. 11, 2000), recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited-English proficient (LEP).

Please see Greyhound's [Language Assistance Plan](#) attached to this Title VI Program ([Appendix 16](#)). Greyhound's Four Factor Analysis and action plan are contained therein.

8. MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES.

Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, "deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program." Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

Greyhound shall ensure proper minority representation on such boards or councils. [Appendix 7](#) shows Greyhound's draft Table Depicting Minority Representation on Committees and Councils Selected by Greyhound Lines, Inc. This table will be completed as boards, councils, or committees are established.

9. REQUIREMENT TO PROVIDE ASSISTANCE TO SUBRECIPIENTS

Title 49 CFR Section 21.9(b) states that if “a primary recipient extends Federal financial assistance to any other recipient, such other recipient shall also submit such compliance reports to the primary recipient as may be necessary to enable the primary recipient to carry out its obligations under his par Primary recipients should assist their subrecipients in complying with DOT’s Title VI regulations, including the general reporting requirements. Assistance shall be provided to the subrecipient as necessary and appropriate by the primary recipient.

In the event that Greyhound utilizes a subrecipient, it shall assist with general reporting requirements and provide:

- a. Sample notices to the public informing beneficiaries of their rights under DOT s Title VI regulations, procedures on how to file a Title VI complaint, and Greyhound’s Title VI Complaint form.**
- b. Sample procedures for tracking and investigating Title VI complaints filed with a subrecipient and when Greyhound expects the subrecipient to notify Greyhound of complaints received.**
- c. Demographic information on the race and English proficiency of residents served by the subrecipient. This information will assist the subrecipient in assessing the level and quality of service it provides to communities within its service area and in assessing the need for language assistance.**
- d. Other data such as travel patterns and surveys obtained by Greyhound that will assist the subrecipient in complying with Title VI.**

10. REQUIREMENT TO MONITOR SUBRECIPIENTS

In accordance with 49 CFR 21.9(b), and to ensure that subrecipients are complying with the DOT Title VI regulations, primary recipients must monitor their subrecipients for compliance with the regulations. Importantly, if a subrecipient is not in compliance with Title VI requirements, then the primary recipient is also not in compliance.

In order to ensure that any subrecipient is in compliance with Title VI requirements, Greyhound will do the following:

- 1. Document Greyhound’s process for ensuring that the subrecipient is complying with the general reporting requirements of FTA Circular 4702.1B. In the event of a subrecipient’s noncompliance, Greyhound may impose sanctions such as the withholding of payments and/or the cancellation, termination, or suspension of a project agreement.**
- 2. Collect electronic file of the subrecipients Title VI Program and review programs for compliance. Following submission of the initial Title VI Program, subrecipients are required**

to resubmit very three years based on a schedule provided by Greyhound. If Greyhound identifies that modifications are needed, subrecipients must provide updated versions of their Title VI Programs within 30 days of being notified of necessary modifications.

3. At the request of FTA, in response to a complaint of discrimination, or as otherwise deemed necessary by Greyhound, it shall request that the subrecipient verify that their level and quality of service is provided on an equitable basis.

11. DETERMINATION OF SITE OR LOCATION OF FACILITIES.

Title 49 CFR Section 21.9(b)(3) states, "In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or his part." Title 49 CFR part 21, Appendix C, Section (3)(iv) provides, "The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin." For the purposes of this requirement "facilities" does not include bus shelters as these are transit amenities and are covered in Chapter IV, nor does it include transit stations, power substations, etc. as those are evaluated during project development and the NEPA process. Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc.

Greyhound will ensure that both environmental analysis and Title VI environmental justice requirements are incorporated into the scope of work for all facilities projects.

- a. Greyhound will complete a Title VI equity analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. Greyhound will engage in outreach to persons potentially impacted by the siting of facilities. The Title VI equity analysis will compare the equity impacts of various siting alternatives, and the analysis will occur before selection of the preferred site.
- b. When evaluating locations of facilities, Greyhound will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis will be done at the Census tract or block group where appropriate to ensure that proper perspective is given to localized impacts.
- c. If Greyhound determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, Greyhound will only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. Greyhound will show how both tests are met and will consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

12. REQUIREMENT TO PROVIDE ADDITIONAL INFORMATION UPON REQUEST.

FTA may request, at its discretion, information other than that required by this Circular from a recipient in order for FTA to investigate complaints of discrimination or to resolve concerns about possible noncompliance with DOT's Title VI regulations.

Greyhound will fully cooperate with any FTA investigation of discrimination complaints to the extent required by Title VI regulations.

Title VI Requirements for Intercity Bus Service Providers:

Under FTA C 9040.1G, Chapter I(1), intercity bus service, while transportation available to the public, is neither public transportation fixed-route or demand-response service (see C 9040.1G Chapter I(4)(bb)). FTA C 9040.1G, Chapter 1, paragraph 4(o) defines intercity bus as: regularly scheduled bus service for the general public that operates with limited stops over fixed routes connecting two or more urban areas not in close proximity, that has the capacity for transporting baggage carried by passengers, and that makes meaningful connections with scheduled intercity bus service to more distant points if such service is available. Therefore, Greyhound Lines, Inc., Title VI Requirements are limited to C 4702.1B, Chapter III.

Please refer to the Greyhound's System-Wide Service Standards ([Appendix 8](#)) and System-Wide Service Policies ([Appendix 9](#)).

Additional Information about nondiscrimination and Title VI

To request additional information regarding Title VI and related federal and state nondiscrimination obligations, please contact Greyhound's Title VI Coordinator:

Tricia A. Martinez
General Counsel
315 Continental Ave.
Dallas, TX 75207
tricia.martinez@greyhound.com

For additional information about nondiscrimination in transportation, you may contact the FTA at:

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



Appendix 1: Board of Directors Resolution Approval

Unanimous Written Consent Resolution of the Board of Directors of Greyhound Lines, Inc.

September 24, 2022

The undersigned, being all of the Directors of Greyhound Lines, Inc., a Delaware Corporation ("Greyhound"), do hereby consent, in accordance with the laws of the State of Delaware, to the adoption of the following resolutions of each and every action affected thereby:

WHEREAS, Greyhound operates intercity bus services through the continental United States. As a condition of receiving Federal Transit Administration ("FTA") financial assistance from the U.S. Department of Transportation ("DOT") to operate these services, Greyhound must ensure that its programs, policies and activities comply with DOT's Title VI regulations;

WHEREAS, Greyhound is authorized to act on its own behalf;

NOW, THEREFORE BE IT RESOLVED, that the Board of Directors of Greyhound hereby approves the foregoing resolutions upon unanimous written consent:

RESOLVED, that effective immediately, Greyhound formally appoints the Title VI Program in order to ensure compliance with the DOT's programs, policies and activities;

RESOLVED, that this resolution shall remain in effect until rescinded, or replaced with a new resolution, and it is:

FURTHER RESOLVED, that any and all actions heretofore or hereafter taken by such officer or officers of Greyhound with the terms of the foregoing resolution, including delegating the authority to perform the task outlined in the above resolved be, and hereby are, ratified and confirmed as the act and deed of Greyhound.

IN WITNESS WHEREOF, each of the undersigned being all of the directors of Greyhound entitled to vote on the foregoing matters, hereby waive notice of a formal meeting and hereby execute the Unanimous Written Consent, which shall be filed as part of the minutes of the Corporation as of September 24, 2022.

Kadir Boysan, CEO

William C. Blankenship, President and COO

Nathan Oujezdsky, Director

Being all of the Directors of Greyhound Lines, Inc.



Appendix 2: Title VI Notice to Beneficiaries

Greyhound Lines, Inc. operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Greyhound Lines, Inc.

For more information on Greyhound's civil rights program and the procedures to file a complaint, you may contact the Legal Department message line at 214-849-7420, go online to www.greyhound.com or visit our corporate headquarters at 315 Continental Ave., Dallas, Texas, 75207.

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

Complaints may also be filed with local and state agencies. For a list of these agencies, see Appendix 15.

If information is needed in another language, contact 214-849-7420.

Si se necesita información en otro idioma, llame al 214-849-7420.



Que son todos los directores de Greyhound Lines, Inc.

Apéndice 2: Aviso a los beneficiarios del Título VI

Greyhound Lines, Inc. opera sus programas y servicios sin importar la raza, el color y el origen nacional de acuerdo con el Título VI de la Ley de Derechos Civiles. Cualquier persona que crea que ha sido agraviada por cualquier práctica discriminatoria ilegal conforme al Título VI puede presentar una queja ante Greyhound Lines, Inc.

Para obtener más información sobre el programa de derechos civiles de Greyhound y los procedimientos para presentar quejas, puede comunicarse con la línea de mensajes del Departamento Legal al 214-849-7420, visitar www.greyhound.com visitar nuestras oficinas centrales en 315 Continental Ave., Dallas, Texas, 75207.

Puede presentar una queja directamente ante la Administración Federal de Tránsito dirigida a la Oficina de Derechos Civiles, Atención: Coordinadora del Programa del Título VI, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington DC 20590.

También puede presentar una queja ante agencias locales y estatales. Para obtener una lista de estas agencias, consulte el Apéndice 14.

Si necesita información en otro idioma, comuníquese al 214-849-7420. Si se necesita información en otro idioma, llame al 214-849-7420.



Appendix 3: Title VI Complaint Procedures

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by Greyhound Lines, Inc. hereinafter referred to as Greyhound may file a Title VI complaint by completing and submitting the Title VI Complaint Form. Greyhound investigates complaints received no more than 180 days after the alleged incident. Greyhound will process complaints that are complete.

All Title VI and related complaints are considered formal; there is no informal process. Complaints must be in writing and signed by the complainant on the form provided. Complaints must include the complainant's name address and phone number and include details sufficient to specify all issues and circumstances of the alleged discrimination. Allegations must be based on issues involving race, color, or national origin. Title VI Complaints of discrimination may be filed with:

Greyhound Lines, Inc.
Attn: Title VI Coordinator
315 Continental Ave.
Dallas, TX 75207

Once the complaint is received, Greyhound will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by Greyhound.

Greyhound has 30 days to investigate the complaint. If more information is needed to resolve the case, Greyhound may contact the complainant. The complainant has 15 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or if Greyhound does not receive the additional information within 15 business days, Greyhound can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has 30 days after the date of the closure letter or the LOF to do so.

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

If information is needed in another language, contact 214-849-7420.

Si se necesita información en otro idioma, llame al 214-849-7420.

Apéndice 3: Procedimientos para la presentación de quejas conforme al Título VI

Cualquier persona que crea que Greyhound Lines, Inc. la ha discriminado por motivos de raza, color u origen nacional, en lo sucesivo, Greyhound puede completar y enviar el Formulario para la presentación de quejas conforme al Título VI para presentar la queja. Greyhound investiga las quejas recibidas en un plazo de 180 días después del presunto incidente. Greyhound procesará las quejas que estén completas. Todas las quejas conforme al Título VI y relacionadas se consideran formales; no hay un proceso informal. Las quejas deben realizarse por escrito y deben estar firmadas por el reclamante en el formulario provisto. Las quejas deben incluir el nombre, la dirección y el número de teléfono del reclamante y detalles suficientes para especificar todos los problemas y circunstancias de la supuesta discriminación. Las acusaciones deben basarse en cuestiones relacionadas con la raza, el color o el origen nacional. Las quejas por discriminación conforme al Título VI pueden presentarse ante:

Greyhound Lines, Inc.
Atención: Coordinadora del Título VI
315 Continental Ave.
Dallas, TX 75207

Una vez que se reciba la queja, Greyhound la revisará para determinar si nuestra oficina tiene jurisdicción. El reclamante recibirá una carta de acuse de recibo que le informará si Greyhound investigará la queja.

Greyhound tiene 30 días para investigar la queja. Si se necesita más información para resolver el caso, Greyhound puede comunicarse con el reclamante. El reclamante tiene 15 días hábiles a partir de la fecha de la carta para enviar la información solicitada al investigador asignado al caso. Si el reclamante no se comunica con el investigador, o si Greyhound no recibe la información adicional dentro de los 15 días hábiles, Greyhound puede cerrar el caso administrativamente. También se puede cerrar un caso administrativamente si el reclamante ya no desea continuar con este.

Después de que el investigador revise la queja, enviará una de dos cartas al reclamante: una carta de cierre o una carta de conclusión (LOF). Una carta de cierre resume las acusaciones y establece que no hubo una violación del Título VI y que el caso se cerrará. Una LOF resume las acusaciones y las entrevistas con respecto al presunto incidente y explica si se llevará a cabo alguna acción disciplinaria, una capacitación adicional del miembro del personal u otra acción. Si el reclamante desea apelar la decisión, tiene 30 días después de la fecha de la carta de cierre o la LOF para hacerlo.

Una persona puede presentar una queja directamente ante la Administración Federal de Tránsito dirigida a la Oficina de Derechos Civiles, Atención: Coordinadora del Programa del Título VI, East Building, 5th Floor-TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590.

Si necesita información en otro idioma, comuníquese al 214-849-7420. Si se necesita información en otro idioma, llame al 214-849-7420.



Appendix 4: Title VI Complaint Form

Section 601 of Title VI of the Civil Rights Act of 1964 states that “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. **If you feel you have been discriminated against, please provide the following information in order to assist Greyhound in processing your complaint.**

If information is needed in another language, contact 214-849-7420. Si se necesita información en otro idioma, llame al 214-849-7420.

SECTION 1 (Please print clearly):

Name: _____
Address: _____
City, State, Zip Code: _____
Telephone Number: _____ (Home) _____ (Work)
Accessible format requirements? ____ (Large print) ____ (Audiotape) ____ (TDD) ____ (Other)

SECTION 2

Are you filing this complaint on your own behalf? ____ (Yes) ____ (No) If you answered yes to this question, go to Section 3.

If not, please supply the name and relationship of the person for whom you are complaining:

Name: _____ Relationship: _____

Please explain why you have filed for a third party: _____ Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of the third party. ____ (Yes) ____ (No)

SECTION 3

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

____ Race ____ Color ____ National Origin

Date and Place of Occurrence: _____

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

The action or decision which caused me to believe I was discriminated against is as follows:

(Please include a description of what happened and how your benefits were denied, delayed, or affected):



Please list any and all witnesses' names and phone numbers

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

SECTION 4

Have you previously filed a Title VI complaint with Greyhound? _____(Yes)_____ (No)

SECTION 5

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State Court? _____(Yes)_____ (No)

If yes, check all that apply:

Federal Agency _____ Federal Court _____ State Agency _____ State Court _____ Local Agency _____

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

Name: _____ Title: _____

Agency: _____

Address: _____

Telephone Number: _____

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

I believe the above information is true and correct to the best of my knowledge. Signature and date required below:

Signature

Printed Name

Date

Please submit this form in person at the address below or mail this form to:

Greyhound Lines, Inc.

ATTN: Title VI Coordinator

315 Continental Ave.

Dallas, TX 75207

Apéndice 4: Formulario para la presentación de quejas conforme al Título VI

La sección 601 del Título VI de la Ley de Derechos Civiles de 1964 establece que "A ninguna persona en los Estados Unidos se le negará, sobre la base de la raza, el color o el origen nacional, la participación en un programa o actividad que reciba asistencia económica federal, no se le negarán los beneficios de estos ni estará sujeta a discriminación conforme a estos. Si cree que lo han discriminado, proporcione la siguiente información para ayudar a Greyhound a procesar su queja.

Si necesita información en otro idioma, comuníquese al 214-849-7420. Si se necesita información en otro idioma, llame al 214-849-7420.

SECCIÓN 1 (Escriba claro):

Nombre: _____

Dirección: _____

Ciudad, Estado, Código postal: _____

Número de teléfono: _____ (Casa) _____ (Trabajo) _____

¿Requisitos de formato accesible? _____ (Letra grande) _____ (Cinta de audio) _____

(Dispositivo de telecomunicación para sordos) _____ (Otro) _____

SECCIÓN 2

¿Está presentando esta queja en su propio nombre? _____ (Sí) _____ (No) En caso afirmativo, pase a la Sección 3.

De lo contrario, proporcione el nombre y la relación de la persona por la que se queja:

Nombre: _____ Relación: _____

Explique por qué ha presentado una queja en nombre de un tercero: _____

Confirme que ha obtenido el permiso de la parte agraviada si presenta la solicitud en nombre de un tercero. _____ (Sí) _____ (No)

SECCIÓN 3

Creo que la discriminación que experimenté se basó en (marque todo lo que corresponda):

_____ Raza _____ Color _____ Origen nacional

Fecha y lugar del hecho: _____

Nombres y títulos de las personas que creo que me discriminaron: _____

La acción o decisión que me hizo creer que fui discriminado es la siguiente: (Incluya una descripción de lo que sucedió y cómo se denegaron, retrasaron o afectaron sus beneficios): _____

Indique los nombres y números de teléfono de todos los testigos

¿Qué tipo de acción correctiva le gustaría que se tomara?

SECCIÓN 4

¿Ha presentado anteriormente una queja conforme al Título VI ante Greyhound? _____(Sí) _____(No)

SECCIÓN 5

¿Ha presentado esta queja ante cualquier otra agencia federal, estatal o local, o ante algún tribunal federal o estatal? _____(Sí) _____(No)

En caso afirmativo, marque todas las opciones que correspondan:

Agencia federal _____ Tribunal federal _____ Agencia estatal _____ Tribunal estatal _____ Agencia local _____

Proporcione información sobre una persona de contacto en la agencia/tribunal donde se presentó la queja.

Nombre: _____ Cargo: _____

Agencia: _____

Dirección: _____

Número de teléfono: _____

Puede adjuntar cualquier material escrito u otra información que considere relevante para su queja.

Creo que la información anterior es verdadera y correcta según mi leal saber y entender.

Firme e indique la fecha a continuación:

Firma

Nombre en letra de imprenta

Fecha

Presente este formulario en persona a la dirección a continuación o envíelo a:

Greyhound Lines, Inc.

AT: Coordinadora del Título VI

315 Continental Ave.

Dallas, TX 75207

Appendix 5: List of Title VI Investigations, Complaints, and Lawsuits

Per FTA Circular 4702.1B all recipients are required to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin:

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

Below is the list that will be used for tracking these incidents:

Title VI Investigations, Lawsuits and Complaints

INCIDENT DATE	INCIDENT CITY/ST	BASIS OF CLAIM	STATUS	TYPE	NOTES

Appendix 6: Public Participation Plan

Policy

Greyhound shall use outreach methods suited for a particular community to engage minority and limited English proficiency populations. The methods may be different for each community.

Promoting Inclusive Public Participation

Efforts to involve minority and LEP populations in public participation activities include public notices as well as targeted measures to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in a recipient's decision-making process.

Efforts vary depending on the community and may include meetings convenient and accessible for minority and LEP communities and coordinating with community organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities.

Greyhound community engagement efforts include some of the following:

- Serve and participate on focus groups for specific public projects
- Attend and serve as a stakeholder on public facility and transportation board and council meetings
- Collaborate with local community programs providing transportation for disadvantaged and transportation dependent groups

Participate in public events providing outreach and informational materials for communities

Changes to Intercity Bus Services & Increases in Fares

Changes in services or fares are posted on Greyhound's webpage www.greyhound.com and are available in any Greyhound terminal. Notices will be provided in English and Spanish.



Appendix 7: Table Depicting Minority Representation on Committees and Councils Selected by Greyhound Lines, Inc.

Greyhound Lines, Inc. does not have any planning boards, advisory councils, committees or similar bodies, the membership of which is selected by Greyhound Lines, Inc. Below is a table that Greyhound Lines, Inc. - uses in the event that committees and councils are selected by Greyhound. Greyhound would strongly encourage participation of minorities on such committees.

Membership of Boards, Councils, and Committees Broken Down by Race

Body	Caucasian	Latino	African American	Asian American	Native American
Population	<i>To be completed when applicable.</i>				
Non-elected Planning Board					
Advisory Council					
Committee					

Appendix 8: System-Wide Service Standards

The Federal Transit Administration (FTA) requires that all fixed route public transit providers develop *quantitative* standards for the following indicators that are applicable specifically to the transit provider's system. They apply agency-wide rather than industry-wide.

1. Vehicle load for each mode

Vehicle load can be expressed as a ratio of passengers to the number of seats on a vehicle, relative to the vehicle's maximum load point.

Greyhound will strive to have vehicle loads not exceed vehicles' achievable capacities which are generally 50-55 seats per standard 45-foot coach. Greyhound does not allow passengers to stand for safety reasons.

2. Vehicle headway for each mode

Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given line or combination of lines. Vehicle headways are measured in minutes; service frequency is measured in vehicles per hour. Headways and frequency of service are general indications of service provided along a route.

Greyhound's fixed route vehicle headways vary according to number of passengers who purchase tickets for a particular schedule, which dictates the number of coaches required to service the passengers. This applies to both peak and off-peak service.

3. On-time performance for each mode

On-time performance is a measure of runs completed as scheduled.

Below are Greyhound's performance standards for all fixed routes:

On-Time Departures:

Greyhound buses shall depart no more than 5 minutes late from any scheduled and published departure time. Greyhound shall strive to meet a minimum of 95% of bus departures within zero to 5 minutes after published or scheduled times.

Operating Ahead of Schedule:

No bus shall depart a designated time point prior to its scheduled departure time.

Missed Trips:

Greyhound shall complete 100% of all scheduled trips to the extent reasonably possible.

Failure to Pick up Passenger:

Contractor shall not fail to pick up any properly ticketed passenger waiting at the designated location.

4. Service availability for each mode

Service availability is a general measure of the distribution of routes within a transit provider's service area.

Greyhound services 3,800 destinations throughout the continental U.S. Greyhound also has interline relationships with numerous other intercity bus carriers which service smaller communities where Greyhound does not go. Finally, Greyhound services rural communities with its Greyhound Connect product and interlines with rural feeder carriers who also serve communities where Greyhound does not operate. Greyhound provides valuable in-kind match to many of these rural feeders who receive funding under 49 U.S.C. 5311(f).

Appendix 9: System-Wide Service Policies

The Federal Transit Administration (FTA) requires that all fixed route public transit providers develop *qualitative* standards for the following indicators that are applicable specifically to the transit provider system. They apply agency-wide rather than industry wide.

Transit Amenities Policy

Transit amenities refer to items of comfort, convenience, and safety that are available to the general riding public. Fixed route transit providers must set a policy to ensure equitable distribution of transit amenities across the system. This requirement applies after a transit provider has decided to fund an amenity. Transit amenities may include: seating (benches, seats at stops/stations); bus shelters; printed information (signs, system maps, schedules; digital equipment i.e.: NextBus software; Waste receptacles including trash and recycling).

Greyhound determines equitable locations of all transit amenities throughout the Greyhound system. Locations of terminal improvements are distributed equitably throughout all routes. Terminals will be given priority at locations that receive higher numbers of boarding and alighting or may need ADA-improvements, but these will be made on a variety of routes throughout Greyhound during each improvement cycle.

Vehicle Assignment Policy

Vehicle assignment refers to the process by which transit vehicles are placed into service in depots and on routes throughout the transit provider's system.

Transit vehicles will be assigned to routes based on ridership, type of route, and operating characteristics of buses, including bus length and turning radius.

Greyhound will maintain its fleet and replace vehicles as required by FTA's minimum service life policy. Greyhound operates a centralized dispatching system to ensure the company's resources are utilized efficiently. Buses are assigned to pools which generally serve geographic regions. Each pool consists of several hundred buses of varying ages and conditions and licensing required for cross border travel. Any bus in the pool may be assigned to any schedule in that region. In certain circumstances, individual equipment may be assigned to schedules based on the characteristics of the schedule. Assignments to schedules may be based on the vehicle mileage vs. the mileage of the route and as well as access to maintenance facilities. Buses are not assigned based on the demographics of the populations served.

All buses are equipped with wheelchair lifts. In addition, all buses have air conditioning.



Appendix 10: Employee Education Form

Title VI Policy

No person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

All employees of Greyhound, Lines, Inc., and its affiliates are expected to consider, respect, and observe this policy. Customer questions or complaints shall be directed to Greyhound Lines, Inc.'s Title VI Coordinator.



Appendix 11: Acknowledgement of Receipt of Title VI Plan

I hereby acknowledge receipt of Greyhound Lines, Inc.'s Title VI Plan. I have read the plan and am committed to ensuring that no person is excluded from participation in, or denied the benefits or services delivered by Greyhound Lines, Inc. on the basis of race, color, or national origin, as protected by Title VI.

Your signature

Print your name

Date



Appendix 12: Letter Acknowledging Receipt of Title VI Complaint

Today's Date

Ms. Jane Doe
1234 Main St.
City, State 12345

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against Greyhound Lines, Inc. alleging

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by telephoning 214- 849-7420 or write to us at:

Greyhound Lines, Inc.
Attn: Title VI Coordinator
315 Continental Ave.
Dallas, TX 75207

Sincerely,

Greyhound Lines, Inc. Title VI Coordinator



Appendix 13: Letter of Finding (Notifying Complainant that Complaint Is Substantiated)

Today's Date

Ms. Jane Doe
1234 Main St.
City, State 12345

Dear Ms. Doe:

The matter referenced in your letter of _____(date) against Greyhound Lines, Inc. alleging a Title VI violation has been investigated.

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

Thank you for calling this important matter to our attention. You were extremely helpful during our review of this matter. ***(If a hearing is requested, the following sentence may be appropriate.)*** You may be hearing from this office, or from Federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

Greyhound Lines, Inc.
Title VI Coordinator



Appendix 14: Closure Letter (Notifying Complainant that the Complaint Is Not Substantiated)

Today's Date

Ms. Jane Doe
1234 Main St.
City, State 12345

Dear Ms. Doe:

The matter referenced in your complaint of _____ (date) against Greyhound Lines, Inc. alleging _____ has been investigated.

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

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

I therefore advise you that your complaint has not been substantiated, and that I am closing this matter in our files.

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

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

Sincerely,

Greyhound Lines, Inc.
Title VI Coordinator



Appendix 15: State and Local Agency Contact Information for Filing Complaints

ARIZONA

ADOT

ATTN: Title VI Program Manager
206 S. 17TH Ave MD 155A RM: 183
Phoenix AZ, 85007 FTA

TEXAS

TxDOT

Attn: PTN
125 E. 11th Street
Austin, TX 78701

or

FTA Region VI
819 Taylor Street
Room 8A36
Fort Worth, TX 76102

Appendix 16: Greyhound's Title VI Limited English Proficiency Plan – Language Access Plan

LIMITED ENGLISH PROFICIENCY PLAN
LANGUAGE ACCESS PLAN

Greyhound Lines, Inc.
315 Continental Ave.
Dallas, Texas 75207



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LIMITED ENGLISH PROFICIENCY PLAN

The Greyhound Lines, Inc. ("Greyhound") Limited English Proficiency Plan has been prepared to address Greyhound's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. Individuals who have a limited ability to read, write, speak, or understand English are Limited English Proficient or "LEP". Greyhound is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities to individuals who are LEP. Greyhound utilized the U.S. Department of Transportation's (DOT) LEP Guidance Handbook and performed a four-factor analysis to develop its LEP Plan.

Four Factor Analysis

1) The number or proportion of LEP persons in the service area. Greyhound's service area is essentially the 48 contiguous United States. Not all areas of the country are directly serviced by Greyhound. Greyhound interlines with a number of interlining partners to provide service to geographic areas it does not directly service. LEP data was gathered from the following sources to identify information on persons who do speak languages other than English at home and who speak English less than well or not at all and would be classified as an LEP person: (1) 2000 Census Data; (2) Census Bureau's American Community Survey and Fact Finder Surveys; and Department of Labor LEP Special Tabulation website.

A review of the aforementioned data concerning the numbers of LEP persons, revealed that the highest percentage of the total population five years of age and over that speaks a language other than English at home are Spanish speakers. The second highest percentage of the total population five years of age and over that speak a language other than English at home are Chinese speakers. The remaining languages identified which represent the top 20 languages most frequently spoken at home for the population five years and over are: French; German; Tagalog; Vietnamese; Italian; Korean; Russian; Polish; Arabic; Portuguese; Japanese; French Creole; Greek; Hindi; Persian; Urdu; Gujarati; and Armenian.

2) The frequency with which LEP individuals come into contact with the service. Greyhound serves LEP persons daily via our fixed route intercity bus service. Greyhound is currently evaluating the frequency which Greyhound personnel identify and serve LEP persons, and in the geographic regions of the service area. Of those LEP persons who ride Greyhound buses, Greyhound will seek to determine the needs of the top six LEP languages identified.

3) The nature and importance of service provided by Greyhound. Greyhound provides important intercity transportation services to the public through its fixed route system. Greyhound is the largest intercity bus company in the United States and provides 75% of the intercity bus service in the country.

4) The resources available to the recipient of the federal funds to assure meaningful access to the service by LEP persons. Greyhound ensures that information is available in Spanish where required regarding services, programs and activities including customer service, fare and schedule information and information provided via its websites. Greyhound's Customer Information Center (CIC) is a telephone-based information service that manages customer inquiries primarily concerning bus transit trip generation. The CIC is a procured service.

Documents that are determined to be vital are translated into Spanish where required. Vital documents are defined as those documents without which a person would be unable to access services and include documents such as travel brochures that contain services, policies, and procedures for traveling on an intercity bus and using terminal facilities. These vital documents also include information related to complaints or comments as well as accessibility options for passengers. These documents may be translated into other languages upon request.

Implementation Plan

Based on the four-factor analysis, Greyhound has identified the language needs and services required to provide meaningful access to information for the LEP customers of Greyhound. Greyhound will review its LEP Plan on an annual basis and incorporate an LEP data gathering venture, such as surveys, to further identify additional language area-specific needs for the top languages identified. Since July 2012, Greyhound has included as part of its Limited English Proficiency Plan programs, activities and services that are being offered or will be offered by Greyhound including Spanish speaking telephone agents to provide customer service, fare and schedule information, and Spanish websites.

Safe Harbor

FTA Circular 4702.1B, Chapter III.9(c) creates a Safe Harbor Provision where "DOT has adopted DOJ's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP populations. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those

written materials, free of cost.”

“These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. A recipient may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures. For example, a recipient may determine that a large number of persons in that language group have low literacy skills in their native language and therefore require oral interpretation. In such cases, background documentation regarding the determination shall be provided to FTA in the Title VI Program.”

Because the geographic area served by Greyhound is generally the continental U.S. and specifically 3,800 locations, rather than rely solely on the standard Limited English Proficiency (LEP) Four Factor Analysis, Greyhound has chosen to identify separately the languages identified in the census data to determine which LEP groups the company may not be adequately marketing to, and what documents need to be translated into what languages. (See Greyhound Language Access Plan). As a result of this effort, Greyhound Lines, Inc., is and will comply with the Safe Harbor Provision which outlines circumstances that can provide a “safe harbor” for recipients regarding translation of written materials for LEP populations. The “safe harbor” means that if a recipient provides written translation under these circumstances, such action will be considered strong evidence of compliance with the recipient’s written translation obligations under Title VI of the Civil Rights Act of 1964 (Title VI). More specifically, Greyhound utilizes competent bilingual staff and informal interpreters in addition to the written translation services for “frequently encountered Limited English Proficiency group who is currently using our services. Greyhound terminal and operations staff also utilize competent and accurate translators for individuals identified in need of written documents in their language.

While Greyhound indicated under its four-factor analysis that it would determine the needs of the top six LEP language groups identified, the Safe Harbor Provision provides, and current data indicates, there is only one LEP language group for specialized translation needs. Therefore, until another LEP language group is identified, by future data, that meets the threshold identified in the Safe Harbor Provision, only Spanish Language group translation of vital documents will be provided.

Data collected by Greyhound from its 2019 Calendar Year Customer Care Center Language Survey indicate the number of calls per preferred language group as follows: English (5,624,866); Spanish (439,035); French (22,692); Mandarin (7); Portuguese (3); Cantonese (2); Haitian Creole (2); Japanese (2); Polish (1); Russian (1); and Vietnamese (1). Greyhound continues to monitor calls for language preference of its customers and will update the information as it is available and adjust its LEP and LAP Plans and Programs as needed.

LANGUAGE ACCESS PLAN

Introduction and Purpose

Greyhound is committed to complying with all civil rights laws, including Title VI which requires Greyhound to make sure individuals with limited English proficiency have meaningful access to our services. The term LEP doesn't refer to people who are bilingual, but rather individuals who have a limited ability to read, write, or understand English well or at all.

The purpose of this plan is to ensure that we provide individuals with LEP meaningful access to our services. In preparation for writing this plan and in order to identify the specific needs for LEP individuals, we conducted a needs assessment using the four-factor analysis. In accordance with this four-factor analysis, Greyhound's assessment balanced the following:

- 1) The number or proportion of LEP persons served or encountered in the eligible service population. (As instructed in the guidance for the purpose of determining those LEP persons "served or encountered", we included those persons who would be served or encountered if the persons received adequate outreach and we provided sufficient language services);
- 2) The frequency with which LEP persons come into contact with Greyhound;
- 3) The nature and importance of the service provided by Greyhound; and
- 4) The resources available and costs. Please note that to the extent possible, we have tried to reduce costs by identifying the resources available throughout our company and making them available to each location.

LEP Populations to be Served or Encountered and the Frequency of Encounters

The geographic area served by Greyhound is generally the continental U.S and specifically, 3,800 locations, which is quite extensive. However, upon review of the guidance, we do not construe our obligation to provide language assistance quite so broadly. Rather we determined the LEP populations to be served are based on the following: 1) census data; 2) a review of current customers' language needs; and 3) conversations with agencies in the geographic areas where our company-operated terminals are located. We have chosen to identify separately the languages identified in the census data to determine which LEP groups we may not be adequately marketing to, and what documents we need to translate into which languages.

Greyhound recognizes its staff has and will continue to have significant contact with LEP persons who speak various languages, largely Spanish (other than English),

throughout the provision of service beginning with ticket purchasing. This includes the following:

- 1) The ticketing process, including telephone communication and assistance in purchasing a ticket;
- 2) Standard interactions with a customer, including but not limited to, customer-service related questions;
- 3) The travel process; and, if applicable;
- 4) Follow-up customer-service issues.

We also recognize that based on the four-factor analysis we conducted our marketing efforts need to reach LEP persons who speak Spanish.

Language Assistance Measures

The type of language assistance necessary to provide meaningful access will vary depending on the type of communication staff is having with the LEP person (e.g., phone, in person or written communication) and in some circumstances more than one method will work. Regardless of how the language assistance is provided, we recognize the importance of providing such services in a timely manner and in an appropriate place. Failure to do so may effectively delay or deny LEP customers access to our services. We understand that the extent of our obligation to provide both oral and written translation is dependent on the four-factor analysis.

As such, we have made every effort to translate all vital written documents into Spanish. Our four-factor analysis has determined that while there are other languages using our service, none rise to the level of the Safe Harbor Requirements and as such there is no need for translation services beyond Spanish. However, we do provide a translated written notice of the person's right to an oral interpretation when they request one.

Our marketing efforts need to be fully accessible to LEP persons. This includes, but isn't limited to, brochures, advertisements, choice of newspapers and radio stations.

The degree to which we will provide oral language assistance will depend on the nature and importance of the activity. We will provide free language assistance to LEP individuals for important, critical junctures, such as assistance with ticket purchasing and navigating our services. When we hold public meetings, we will automatically provide an interpreter for any required LEP population. We will also announce in major languages in any public notice of the meeting that anyone in need of an interpreter may call a certain number before the meeting to request an interpreter. We will provide these individuals free language assistance at the meeting.

Competent Bilingual Staff

Greyhound makes every effort to hire staff that can communicate with customers. A significant consideration when hiring staff for a location (managerial as well as drivers) is whether the applicant can competently provide language assistance to LEP customers at the location. A large percentage of our staff is bilingual, and every effort has been made to match their language skills with the needs of LEP customers. Our preference is to meet the needs of our LEP customers through direct language assistance. When this isn't possible, we are committed to meeting our LEP customers' needs through other methods.

We understand that it isn't enough for staff to be "bilingual" when communicating with our LEP customers. Some bilingual persons may be able to effectively communicate in two languages but aren't competent to interpret between English and that language. We also recognize that the skills of interpreting and the skills used for translating aren't the same. A person may be capable of one and not the other. We will make every effort to offer bilingual staff interpreter training and professional development opportunities to ensure that communication is effective and accurate.

Greyhound's goal is to provide meaningful access to our services for individuals with limited English proficiency in a timely manner. As stated above, we often use competent bilingual staff to act as interpreters for customers.

Interpreters, when necessary to be used, aren't required to provide a formal certification as an interpreter. However, they must still do the following:

- Be proficient in and able to communicate information accurately in both English and the other applicable language;
- Understand transportation-related terms;
- Maintain impartiality and act solely in the role as an interpreter; and
- Be aware of regionalisms and be able to provide the most appropriate interpretation in a consistent manner.

Where individual rights depend on precise, complete, and accurate interpretation, we will try to use certified interpreters or those otherwise deemed qualified by a state or federal court. Regardless of who is used as an interpreter, location staff will adhere to the following guidelines when using an interpreter:

- Explain to the interpreter the purpose of the communication and provide a description of the information to be conveyed;
- Provide brief explanations of technical terms of art that may come up during the communication;
- Avoid using acronyms;
- Speak in short sentences;
- Express one idea at a time and allow the information to be interpreted prior to continuing;

- Check in with the interpreter to make sure he/she is understanding what you're saying because if he/she doesn't then how he/she translates the information may be confusing to the LEP customer;
- Avoid using double negatives;
- Enunciate words;
- Don't use contractions;
- Talk to the customer and not to the interpreter. In other words, face the customer and look at him/her and not the interpreter;
- Be patient;
- Thank the interpreter.

Informal Interpreters

Customers who have limited English proficiency often choose to bring an informal interpreter with them to assist in communication, including but not limited to the LEP customer's family members, friends, or personal advocates. In such instances, location staff must remember the following:

- Informal interpreters may not be appropriate, depending on the circumstances and subject matter. Simply put, not all informal interpreters are competent to provide quality and accurate interpretations. As a result, such language assistance may not result in an LEP person obtaining meaningful access to our services.
- In emergency situations that are not reasonably foreseeable, Greyhound may need to temporarily rely on informal interpreters. Reliance on children is especially discouraged unless there is an extreme emergency, and no competent interpreters are available.

Written Translation Services

Greyhound will provide written translation of vital documents into the language of each frequently encountered LEP group who is currently using our services. In addition, we will conduct our marketing (including using translated materials) in a manner that reaches each LEP group "eligible" to be served based on the census data for the geographic area.

Accuracy of Translation

Greyhound will make every effort to use competent and accurate translators. We recognize that this is particularly important for documents with legal or other information where accuracy has important consequences. Many of the considerations discussed regarding interpreters apply to translators. As stated earlier, the skill of translating is very different from the skill of interpreting, and competency in one doesn't mean competency in the other. When possible, we will rely on our location staff to translate

documents, and either have two people work in tandem or have one person translate the document and a second, independent translator, translate it back into English to make sure it's accurate.

When translating documents, we make every effort to do so at the appropriate reading level of our target audience. We also recognize that there isn't always an appropriate direct translation of an English term. We will work with our translators to provide an appropriate alternative and try to develop and maintain a glossary of commonly used terms that can be used again, when appropriate. We may also provide our translators with examples of previous translations of similar material to assist in translation.

Greyhound has translated a number of documents that we will utilize. Staff has also been instructed that LEP persons may not be able to read their native language, and to be ready to provide oral interpretation of written documents. If information is needed in another language, contact 214-849-7420. Si se necesita información en otro idioma, llame al 214-849-7420.

Staff Training Regarding LEP Policies and Procedures

All current Greyhound staff will be trained on their obligation to provide meaningful access to information and services for LEP persons. Likewise, training on this topic will be part of our company's orientation for new employees. The training will seek to make all employees aware of the following:

- A) Background of the LEP program;
- B) Our company's obligation to provide meaningful access to individuals with LEP;
- C) LEP policies and procedures; and
- D) Protocol in responding to LEP callers, written communications from LEP persons and in-person contact with LEP persons.

Providing Notice of Free Language Services to Persons with LEP

We recognize that it is important to put customers on notice that we provide free language assistance. We will develop a notice in different languages that states this and how to obtain language assistance. We may notify persons through the following methods:

- A) Post signs in common areas and offices;
- B) Place this statement in marketing materials, if space is limited, we will put it in the most common language(s).
- C) Use a telephone voice mail menu in the most common languages encountered;
- D) Provide notices on non-English-language radio and television;
- E) Presentations and/or notices at community organizations.

Continuous Oversight of the LAP – Monitoring and Updates

Greyhound will monitor and update this LAP on an ongoing basis.