

# Greyhound Lines, Inc. Title VI Program

P. O. Box 660362  
Dallas, TX 75266-  
0362  
214-849-8000

[www.greyhound.com](http://www.greyhound.com)

This document was prepared in accordance with the FTA Circular 4702.1B, dated October 1, 2012, prohibiting discrimination against protected classes of people identified by the Federal Government and under Federal Law, Regulations, and Guidance as identified in the Table of Authorities below.



Table of Contents		Page
U. S. Government Requirements for Protected Classes Against Discrimination and Retaliation – Table of Legal Authorities		3
Title VI Plan Executive Summary		4
Title Plan Program – Plan Statement		4
Policy		4
Governing Board		4
General Reporting Requirements		4
Annual Submittal Of Certifications and Assurances to FTA		4
Requirement to Provide Title VI Assurances (Annual Certifications and Assurances to FTA)		5
Requirement to Prepare and Submit a Title VI Program		6
Requirement to Notify Beneficiaries of Protection Under Title VI		6
Requirement to Have Title VI Complaint Procedures and A Complaint Form		6
Requirement to Track and Report Transit-Related Title VI Investigations, Lawsuits and Complaints		6
Requirement to Promote Inclusive Public Participation Policy		7
Requirement to Provide Meaningful Access to LEP Persons		7
Minority Representation on Planning and Advisory Bodies		7
Requirement to Provide Assistance to Subrecipients		8
Requirement to Monitor Subrecipients		8
Determination of Site or Location of Facilities		9
Requirement to Provide Additional Information upon Request		10
<b>Title VI Requirements for Intercity Bus Service Providers</b>		10
Additional Information About Nondiscrimination and Title VI		10
Appendix 1	Board of Directors Resolution Approval	11
Appendix 2	Title VI Notice to Beneficiaries	12
Appendix 2	Aviso a los beneficiarios del Título VI	13
Appendix 3	Title VI Complaint Procedures	14
Appendix 3	Procedimientos para la presentación de quejas conforme al Título VI	15
Appendix 4	Title VI Complaint Form	17
Appendix 4	Formulario para la presentación de quejas conforme al Título VI	19
Appendix 5	List of Title VI Investigations, Complaints, and Lawsuits	21
Appendix 6	Public Participation Plan	22
Appendix 7	Minority Representation on Company Committees and Councils	23
Appendix 8	System-Wide Service Standards	24
Appendix 9	System-Wide Service Policies	25
Appendix 10	Employee Education Form	26
Appendix 11	Acknowledgement of Receipt of Title VI Plan	27
Appendix 12	Letter Acknowledging Receipt of Title VI Complaint	28
Appendix 13	Letter of Finding (Notify Complainant that the Complaint is Substantiated)	29
Appendix 14	Closure Letter (Notify Complainant that the Complaint is Not Substantiated)	30
Appendix 15	State and Local Agency Contact Information for Filing Complaints	31
Appendix 16	Greyhound's Title VI Limited English Proficiency – Language Access Plan	32

## Table of United States Government Requirements (Legal Authorities) for Protected Classes Against Discrimination and Retaliation

Greyhound Lines, Inc., Title VI Program Plan is based on the following U. S. Government Requirements for protected classes, against discrimination and retaliation, that include race, color, national origin (including limited English proficiency), disability, sex, age, and religion, from these sources:

- *Title VI of the Civil Rights Act of 1964* (42 U.S.C. § 2000d), prohibiting discrimination based on race, color, or national origin (including limited English proficiency).
- *Federal Transit Laws, as amended* (49 U.S.C. Chapter 53 et seq.), especially 49 U.S. Code § 5332, prohibiting discrimination against participating in a project, program, or activity receiving financial assistance under this chapter because of race, color, religion, national origin, sex, disability, or age.
- The *Americans with Disability Act of 1990* (42 U.S.C. § 12101) prohibiting discrimination based on disability, requiring covered employers and service providers to make reasonable accommodations for employees and the disabled in programs and services it provides, and imposes accessibility requirements on public accommodations.
- The *Age Discrimination Act of 1975* (29 U.S.C. § 6101) prohibiting discrimination based on age in programs and activities receiving federal financial assistance.
- The *Age Discrimination in Employment Act [ADEA] of 1967* (29 U.S.C § 621) protects certain applicants and employees forty (40) years of age and older from discrimination on the basis of age in hiring, promotion, discharge, compensation, or terms, conditions or privileges of employment, and prohibits retaliation against a protected person for complaints about discrimination, filing a charge of discrimination, or participating in an employment discrimination investigation or lawsuit.
- *Section 504 of the Rehabilitation Act of 1973* (29 U.S.C. § 794) prohibits discrimination based on disability.
- *Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970*, as amended (42 U.S.C. § 4601 et seq.), prohibits against exclusion from participation in, denial of benefits, and discrimination under federally assisted programs on ground of race, color, or national origin.
- *Title IX of the Education Amendments Act of 1972* (20 U.S.C. § 1681) prohibits discrimination based on sex in education programs or activities receiving Federal funding.
- *“Coordination of Enforcement of Nondiscrimination in Federally Assisted Programs” Department of Justice regulation, 28 CFR Part 42, Subpart F*, (December 1, 1976, unless otherwise noted).
- *U.S. Department of Homeland Security regulation 6 C.F.R. Part 19*, which prohibits discrimination based on religion in social service programs.
- *U.S. Department of Transportation (DOT) regulation, 49 CFR Part 21, “Nondiscrimination in Federally Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964”*
- FTA Circular 4702.1B, “Title VI Requirements and Guidelines for Federal Transit Administration Recipients” (March 1, 2016)
- FTA Circular 4703.1, “Environmental Justice Policy Guidance for Federal Transit Administration Recipients” (August 15, 2012)
- DOT Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Persons (December 14, 2005)
- Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” (August 11, 2000)
- Section 12 of FTA’s Master Agreement Civil Rights 30 (November 2, 2023)

## **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 FlixBus North 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 or retaliation in the level and quality of services or related benefits provided by Greyhound, its employees, affiliates, and contractors (see Table of Authorities covered on page 3 above).

Greyhound Title VI Coordinator:

James Bristow

General Counsel

945-251-7107

[james.bristow@fliix.com](mailto:james.bristow@fliix.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](http://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](http://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/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:

James Bristow  
General Counsel  
P. O. Box 660362  
Dallas, TX 75266-  
0362  
[james.bristow@fliix.com](mailto:james.bristow@fliix.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 10, 2024**

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;

WHEREAS, Greyhound, by resolution, formally appointed the Title VI Program on September 24, 2022;

WHEREAS, Greyhound has now updated its Title VI Program to reflect current contact information and to maintain compliance with regulation, including Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq. Federal Transit Laws, Title 49, United States Code, Chapter 53; 49 CFR § 1.51; 49 CFR part 21; 28 CFR § 42.401 et seq.; FTA Circular 4702.1B; E.O. 13166; E.O. 12898; and the list of other Federal authorities in the Greyhound Title VI Program Plan, approved by the U.S. Department of Justice, Civil Rights Division.

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 adopts the updated Title VI Program as set forth in the program plan documentation dated September 2024 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 10, 2024.

Kadir Boysan, CEO

Scott MacDonald, Director

Being all of the Directors of Greyhound Lines, Inc.

September 2024



## **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 customer service at 214-849-8000, go online to [www.greyhound.com](http://www.greyhound.com) or write our corporate headquarters at P. O. Box 660362, Dallas, Texas, 75266-0362.

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 214-849-8000.

Si se necesita información en otro idioma, llame al 214-849-8000.



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 214-849-8000, visitar [www.greyhound.com](http://www.greyhound.com) visitar nuestras oficinas centrales en P. O. Box 660362, Dallas, Texas, 75266-0362.

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 214-849-8000. Si se necesita información en otro idioma, llame al 214-849-8000.



### **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  
P. O. Box 660362  
Dallas, TX 75266-0362

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, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Avenue SE, Washington, DC 20590.

If information is needed in another language, contact 214-849-8000.

Si se necesita información en otro idioma, llame al 214-849-8000.



### **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  
P. O. Box 660362  
Dallas, TX 75266-0362

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 214-849-8000. Si se necesita información en otro idioma, llame al 214-849-8000.



## **Appendix 4: Title VI Complaint Form**

Section 601 of Title VI of the Civil Rights Act of 1964 states that “[n]o 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 214-849-8000. Si se necesita información en otro idioma, llame al 214-849-8000.

### **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  
P. O. Box 660362  
Dallas, TX 75266-0362



## 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 214-849-8000. Si se necesita información en otro idioma, llame al 214-849-8000.

### 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

P. O. Box 660362

Dallas, TX 75266-0362



## **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**

<b>INCIDENT DATE</b>	<b>INCIDENT CITY/ST</b>	<b>BASIS OF CLAIM</b>	<b>STATUS</b>	<b>TYPE</b>	<b>NOTES</b>



## **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](http://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**

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



## **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.  
Dallas, TX 75201

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 945 251 7107 or write to us at:

Greyhound Lines, Inc.  
Attn: Title VI Coordinator  
P. O. Box 660362  
Dallas, TX 75266-0362

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.  
Dallas, TX 75201

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  
P. O. Box 660362  
Dallas, TX 75266-0362

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

Today's Date

Ms. Jane Doe  
1234 Main St.  
Dallas, TX 75201

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  
P. O. Box 660362  
Dallas, TX 75266-0362



## **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. 11<sup>th</sup> 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.  
P. O. Box 660362  
Dallas, Texas 75266-0362

Table of Contents		
Limited English Proficiency Plan		Page
Four Factor Analysis		34
1.	The number or proportion of LEP persons in the service area	34
2.	The frequency with which LEP individuals come into contact with service	35
3.	The nature and importance of service provided by Greyhound	35
4.	The resources available to the recipient of the federal funds to assure meaningful access to the service by LEP persons	35
Implementation Plan		36
Safe Harbor		37
Language Access Plan		38
Introduction and Purpose		38
LEP Populations to be Served or Encountered and the Frequency of Encounters		39
Language Assistance Measures		39
Competent Bilingual Staff		40
Informal Interpreters		41
Written Translation Services		42
Accuracy of Translation		42
Staff Training Regarding LEP Policies and Procedures		42
Providing Notice of Free Language Services to Persons with LEP		43
Continuous Oversight of the LAP – Monitoring and Updates		43



## 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. Additional guidance came from the U.S. Department of Justice Civil Rights Division and their recommended Table of Authorities cited above and changes have been made to Greyhound’s Title VI and accompanying Limited English Proficiency (LEP) and Language Access Plan (LAP).

### 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) 2020 Census Data; (2) Census Bureau’s American Community Survey and Fact Finder Surveys; and Department of Labor LEP Special Tabulation website. Languages spoken by individuals with whom Greyhound staff have frequent contact with will determine which documents will be translated and the types of interpreters provided in accordance with U.S.D.O.T. LEP Guidance, that requires DOT/FTA recipients to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. Greyhound uses internal traffic control feedback on customer interactions, relying on local employees’ feedback about customer interactions as well as contacts with its Customer Information Center (CIC) as regular metrics of those LEP persons needing assistance.

Data collected by Greyhound from its Customer Information Center (CIC) Language Survey during recent calls indicates the number of calls per preferred language group as follows: English (2,880,275), Spanish (379,064) and French (19,017). A review of this 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 French speakers. While there may be other languages identified by the CIC, the numbers are small and infrequent, and therefore were not monitored during this timeframe. Likewise, these calls are from the entirety of the Greyhound service area, but do not include any additional caller characteristics. Greyhound continues to evaluate all its callers to the CIC, as well as the more frequent internal traffic control interactions by staff to determine if there is a need to expand its customer LEP practices beyond what it currently performs.

2) The frequency with which LEP individuals come into contact with the service. The extent to which Greyhound serves LEP persons daily via our fixed route intercity bus service, is unknown, especially in light of electronic devices that readily translate information for users. With more than 95% of Greyhound tickets already purchased online, via electronic devices, the need for direct customer sales is less than previously experienced. Greyhound is currently evaluating the frequency by which Greyhound personnel identify and serve LEP persons, and in the geographic regions of the area Greyhound serves. Of those LEP persons who ride Greyhound buses, Greyhound will seek to determine the needs of the top six LEP languages identified and if requested by passengers or State DOTs, to provide vital documents in that language.

The degree to which Greyhound terminal staff encounter LEP persons varies and terminal staff do not make assumptions of an individual's primary language based on race, color, or national origin. However, if there appears to be some type of language difficulty in the terminal staff's presence, as recommended by the FTA, they will seek to determine whether a person needs language assistance in one of many other ways, and if that assistance is available, including:

- a) Voluntary self-identification by the individual with LEP or their companion;
- b) Affirmative inquiry regarding the primary language of the individual if they have self-identified as needing language assistance services;
- c) Engagement by a qualified multilingual staff or qualified interpreter, if available, to verify an individual's primary language;
- d) Use of an "I Speak" language identification card or poster, if there are other native languages experienced in a certain community; or
- e) Asking the individual about their region, municipality, village or specific community to ensure the correct identification of the language.

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 a large number of connection points over multiple states. Greyhound also receives operating and capital assistance from various State DOTs under the 49 U.S.C. §5311(f) Intercity Bus Grant Program and will periodically examine whether those subsidized routes carry increased numbers of LEP persons. Periodically, State DOTs will contact Greyhound asking for more detailed LEP information on the state subsidized services the company runs in their state, and

Greyhound staff will provide the research and data requested.

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, however, there are bilingual staff that can assist with translations, as needed. For other languages, translators are available as well, although not immediately. In many locations, Greyhound shares space with third party carriers and public transit agencies and does periodically rely on those agency resources for assistance in helping LEP persons. Greyhound will also pay for translation and interpreter services when needed. Additional resources the company consults include those listed above plus these websites: U.S.D.O.J. Civil Rights Division; LEP.gov; U.S.D.O.L.; the U.S.D.O.T.; and FTA websites. The CIC is a procured service, that handles customer inquiries before, during and after the passenger's trip. A third party may also contact the CIC for questions related to their client's travel needs and ticket purchases as well. Greyhound's internal traffic control activities also monitor and provide assistance where needed.

Documents that are determined to be vital are always translated into Spanish based on the areas of the National Intercity Bus Network system served, and where required by customer demand. 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. The Greyhound.com website information is automatically translated into the language of the mobile end user purchasing tickets and browsing the company website, which increases the reach of those seeking information, in their own language. This feature applies to mobile and non-mobile computer devices, placing even more control in the hands of our passengers. Greyhound continues to focus on technology enhancements during a time of declining resources and cost constraints to ensure that reasonable efforts are made to address its obligations for LEP persons and their needs. This includes sharing language assistance materials and services among and between recipients, advocacy groups, affected populations and Federal agencies.

### **Implementation Plan**

Based on the four-factor analysis, Greyhound has made reasonable efforts to identify the language needs and services required to provide meaningful access to information for the LEP customers of Greyhound. The type of service the company provides also plays a role in deciding how those the LEP needs are met, as Greyhound's bus is in a geographic area for only a short time before departing to its next location. Because Greyhound only carries paid ticketed passengers on its service, many times local staff interactions with the traveling public may not indicate a need for LEP service, even though a LEP person is traveling on 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, or changes in its service that include larger targets of LEP persons, when identified. Since July 2012, Greyhound has included as part of its LEP Plan program, 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. Greyhound continues to offer paid translators, as needed, for larger group travels, identified in advance by local staff.

### **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, 1,800 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, its CIC information, and local staff internal traffic control assessments 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 has complied and will continue to 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 the frequently encountered Limited English Proficiency group who is currently using our services. Greyhound terminal and operations staff will also utilize competent and accurate translators for individuals identified as needing 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 that qualifies for specialized translation needs, as determined by Greyhound. In addition to this determination, Greyhound fully understands that the vast majority of its passengers, more than 95%, purchase their tickets online, using mobile devices which provide access to the Greyhound website in the language of the user. Therefore, until another LEP language group is identified, by future data, that meets the threshold identified in the Safe Harbor Provision, or Greyhound is operating more schedules in an area that can be reasonably identified as needing expanded LEP vital document translations, only Spanish Language group translation of vital documents will be provided.

Data collected by Greyhound from its recent 2023 survey of Customer Information Center Language Survey indicate the number of calls per preferred language group as follows: English (2,880,275); Spanish (379,064); and French (19,017). There were other preferred language groups encountered but the numbers were not collected by staff due to the infrequency of contact. Greyhound continues to monitor its CIC 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. The aforementioned observations do not prevent Greyhound from conducting regional surveys requested by State DOTs who provide 49 U.S.C. § 5311(f) Intercity Bus Capital or Operating Grants 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 staff;
- 3) The nature and importance of the service provided by Greyhound and its staff; 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. Greyhound also relies on services provided by our third party ticket agents, other intercity bus carriers and local public transit agencies that Greyhound interlines with.

### **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, 1,800 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 Greyhound 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. If requested ahead of time, 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, as required by the DOT/FTA guidance. Greyhound vital documents include but are not limited to: complaint, consent, release, or waiver forms, and DOT-specific application forms for services, programs, or activities covered by the program. The document must be targeted to the public and include but are not limited to: all Title VI related items, notices, announcements, Greyhound website, public awareness, written notices of rights, and any information that would provide the public notice and permit participate in the benefits provided under the Federal assistance Greyhound receives. In addition, Greyhound will conduct its own 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, Greyhound, its staff and vendors will 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. At some locations, Greyhound may also provide public translations made by its other transportation business partners to access local amenities and services in various other languages, for which Greyhound will neither guarantee accuracy nor responsibility for the translated information.

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 214-849-8000. Si se necesita información en otro idioma, llame al 214-849-8000.

## **Staff Training Regarding LEP Policies and Procedures**

All current Greyhound staff have been trained on their obligation to provide meaningful access to information and services for LEP persons. Likewise, ongoing training on this topic will be part of our company's orientation for new employees, and existing employees as needed. 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**

By implementing our Limited English Proficiency (LEP) and Language Access Plans (LAPs) Greyhound can help remove barriers to meaningful access to those Greyhound passengers who are LEP persons seeking to use or participate in all the company's transportation services, and related activities. Greyhound will monitor and update this LEP and LAP on an ongoing basis, as determined by the ongoing assessment of our customers by Greyhound staff and management. Technology enhancements and the continued increase in online ticketing sales will continue to have an impact on those identifiable LEP persons that need further Greyhound translation or interpreter assistance, although the need for such services will be monitored going forward. As Federal agencies continue to review and change the Federal mandates under Title VI – LEP – LAP and expand expectations of those who receive Federal financial assistance, Greyhound will continue to make the necessary adjustments in its Title VI – LEP – LAP documents to fulfill those requirements.