

Blue Water Area Transportation Commission

Title VI Program



Updated 1/1/21

Title VI program Requirements:

Sections

1. Title VI Notice to the Public, including a list of locations where the notice is posted
2. Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)
3. Title VI Complaint Form
4. List of transit-related Title VI investigations, complaints, and lawsuits
5. Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission
6. Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance
7. A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees
8. Primary recipients shall include a description of how the agency monitors its subrecipients for compliance with Title VI, and a schedule of subrecipient Title VI Program submissions
9. A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.
10. A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program. For State DOT's, the appropriate governing entity is the State's Secretary of Transportation or equivalent
11. Service Standards and Policies

Section 1. Title VI Notice to the Public, including a list of locations where the notice is posted

Public Notice

**NOTIFYING THE PUBLIC OF RIGHTS UNDER
TITLE VI
BLUE WATER AREA TRANSPORTATION**

Blue Water Area Transportation operates its program 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 Blue Water Area Transportation.

For more information on Blue Water Area Transportation's civil rights program, and the procedures to file a complaint, contact (810) 987-7373 extension #129, email bwatc@bwbus.com, or visit our administrative office at 2021 Lapeer, Port Huron, Michigan.

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

If more information is needed in another language, contact (810) 987-7373 extension #129.

To ensure that our drivers understand our obligations and our passengers understand their rights, BWATC has posted our *Title VI Notice to the Public* in easily accessible locations. The notice has been posted:

1. On BWATC's website located at <http://www.bwbus.com>.
2. In newspapers distributed county wide as part of our annual State of Michigan operating assistance application.
3. On all Revenue Service Vehicles.
4. In BWATC's Admin/Maintenance Facility
5. In BWATC's Transfer Center

Section 2. Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)

Blue Water Area Transportation Commission 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 the Blue Water Area Transportation Commission (hereinafter referred to as “the Commission”) may file a Title VI complaint by completing and submitting the Commission’s Title VI Complaint Form. The Blue Water Area Transportation Commission investigates complaints received no more than 180 days after the alleged incident. The Commission will process complaints that are complete.

Once the complaint is received, the Commission 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 our office. If our office has jurisdiction and will investigate the complaint, the case will be assigned to the designated Title VI officer of the Commission and he/she will document all aspects of the investigation in a Title VI complaint log. The Commission has 30 days to investigate the complaint. If more information is needed to resolve the case, the Commission may contact the complainant. The complainant has 30 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 does not receive the additional information within 30 business days, the Commission 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 letter or the LOF to do so.

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

Section 3. Title VI Complaint Form

See Attachment A

Section 4. List of transit-related Title VI investigations, complaints, and lawsuits

None since last submission

Section 5. Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission

Since BWATC's last submission, the Commission has performed community outreach in a number of ways and ensured that minority and low-income people had access to our activities. BWATC has:

- a. Hosted various Local Advisory Committee (LAC) meetings on our ADA accessible premises 4 to 5 times per year. All LAC meetings are open to all people in the community and BWATC does not select members of the Committee. These meetings have a variety of people who represent many different demographic profiles of the community.
- b. Performed a Four Factor LEP Analysis that included a great deal of outreach – see Attachment B.
- c. BWATC has worked directly with nine not-for-profit agencies in the past three years that deal mainly with low-income and minority issues. We incorporated them into our county-wide coordinated and consolidated transportation program. Working with these agencies, low-income and minorities had their transportation needs evaluated to see if existing public transportation would meet their needs or if they needed transportation help from our Mobility Manager. By working with these agencies on a day-to-day basis, a great deal of transportation information was disseminated throughout the community.
- d. BWATC posted our *Title VI Notice to the Public* in readily accessible locations on all of our revenue vehicles in order to ensure that our drivers understand our obligations and passengers understand their rights.
- e. BWATC has posted our *Title VI Notice to the Public* in readily accessible locations throughout our Admin/Maintenance Facility located at 2021 Lapeer Ave., Port Huron, MI. This facility is currently the only Admin/Maintenance facility that BWATC operates.
- f. BWATC has posted our *Title VI Notice to the Public* in our Blue Water Transit Bus Center located at 720 McMorran Blvd., Port Huron, MI.
- g. BWATC published our *Title VI Notice to the Public* in newspapers with county wide circulation as part of our annual application for operating assistance from the State of Michigan.
- h. BWATC has included our *Title VI Notice to the Public* on our website as well as this program.
- i. BWATC has performed an analysis of Public Participation since our last submission and public participation has been strong. We found that LAC meetings are open to the public and held at BWATC's Admin/Maintenance Facility at 10:30 am on the fifth Tuesday of the month for each calendar quarter and one meeting in January. BWATC's facility is ADA accessible and accessible

via public transportation. BWATC performs outreach for participation in LAC meetings through the St. Clair County Community Services Coordinating Body which is a coalition of over 60 health and human service organizations in the county as well as posting LAC meeting times and dates at the City of Port Huron Offices and the County Library. A review of meeting attendees shows that past meetings have been attended by users of public transportation, disabled persons, low-income persons, persons representing the elderly, and staff from agencies that service all of the above. Participation in LAC meetings has been strong and there have been no requests to change venue or the date and time of the meeting.

In addition to the public outreach performed by BWATC, BWATC also has an established policy to consider public comment before raising a fare or carrying out additions or reductions in transportation service. See Attachment F.

Section 6. Language Assistance Plan for providing language assistance to persons with Limited English Proficiency (LEP), based on the DOT LEP Guidance

See Attachment C

Section 7. A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees

BWATC has no such committees or councils.

Section 8. Primary recipients shall include a description of how the agency monitors its subrecipients for compliance with Title VI, and a schedule of subrecipient Title VI Program submissions

BWATC has no such subrecipients.

Section 9. A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.

BWATC has not constructed any type of facility since our last submission.

Section 10. A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program. For State DOT's, the appropriate governing entity is the State's Secretary of Transportation or equivalent

See Attachment D

Section 11. Service Standards and Policies

See Attachment E

Attachment A

Blue Water Area Transportation Commission Title VI Complaint Form

Section I:

Name:

Address:

Telephone (Home): Telephone (Work):

Electronic Mail Address:

Section II:

Are you filing this complaint on your own behalf?

Yes *

No

*If you answered "yes" to this question, go to Section III.

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

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 a third party.

Yes

No

Section III:

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

() Race () Color () National Origin

Date of Alleged Discrimination (Month, Day, Year): _____

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.

Section IV

Have you previously filed a Title VI complaint with this agency?

Yes

No

Section V

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

☐ Yes ☐ No

If yes, check and list 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:

Section VI

Name of agency complaint is against:

Contact person:

Title:

Telephone number:

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

Signature and date required below

Signature Date

Please submit this form in person at the address below, or mail this form to:
Blue Water Area Transportation Commission
2012 Lapeer Ave.
Port Huron, MI 48060

Attachment B

Blue Water Area Transportation Commission Limited English Proficiency (LEP)

Four Factor Analysis

Blue Water Area Transportation Commission (BWATC) has conducted this analysis to meet requirements under Title VI of the Civil Rights Act of 1964, which seeks to improve access to services for persons with Limited English Proficiency (LEP). The purpose is to ensure that no person 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 from the FTA.

Analysis Using Four Factor Framework

BWATC has conducted the following analysis using the four factors identified in the DOT LEP guidance:

Factor 1: The number and proportion of LEP persons served or encountered in the eligible service population

Task 1. Step 1: Examine prior experiences with LEP individuals.

BWATC assessed prior experiences with LEP individuals by surveying current dispatchers, operators, and other frontline staff. The survey showed that with the estimated 976,448 customer interactions BWATC had in the previous year, at most only 3 interactions took place between BWATC staff and transit customers where language was a barrier to communication. Of those 3 interactions, Arabic was documented as the predominant language spoken. BWATC also determined that there were no complaints received over the preceding three years concerning the agency's failure to meet the needs of LEP individuals.

Task 1. Step 2: Become familiar with the data from the U.S. Census.

The latest available information for St. Clair County is the 2019 American Community 5-Year Estimated data. This data describes the languages spoken in St. Clair County and the number of individuals speaking each language. The data is as follows:

St. Clair County
2019 U.S. Census Estimate

<u>LANGUAGE SPOKEN AT HOME</u>	<u>Number</u>	<u>Percent</u>
Population 5 years and over	151,253	100
English only	146,754	97.0
Language other than English	4,499	3.0
Spanish	1,774	1.2
Other Indo-European languages	1,710	1.1
Asian and Pacific Island languages	432	0.3
Other	583	0.4

The two most significant non-English language populations speak Spanish and Indo-European languages.

Task 1. Step 2A: Identify the geographic boundaries of the area that your agency serves.

BWATC's service area includes all of St. Clair County, Michigan. Appendix A shows a U.S. Census Tract Map of St. Clair County, Michigan. This Census Tract Map is also available here:

https://www2.census.gov/geo/maps/dc10map/tract/st26_mi/c26147_st_clair/DC10CT_C26147_000.pdf.

Task 1. Step 2B: Obtain Census data on the LEP population in your service area.

Appendix B contains the Census data on English proficiency in St. Clair County, listing population by language and the numbers of the population that speaks English less than "very well."

Task 1. Step 2C: Analyze the data you have collected.

St. Clair County has 4,499 people who speak *Language other than English* at home. This accounts for 3.0% of the population over 5 years old. Non-proficiency of this population is determined by those who speak English less than "very well." A total of 1,185 people in St. Clair County are identified as LEP. This equates to 0.8% of the total County population.

The Spanish language speaking population is the largest in the county with 1,774 people. Of these, 510 people, or 0.3% of the county population over 5 years old, are defined as LEP.

The next largest group is the Indo-European speaking population with 1,710 people. Of the Indo-European speaking county population, 352 people, or 0.2% of the county population over 5 years old, are defined as LEP.

Asian and Pacific Islander language speaking population is the third largest group in the county with 432 people and of these 112, or 0.1% of the county population over 5 years old, are defined as LEP.

Task 1. Step 2D: Identify any concentrations of LEP persons within your service area.

BWATC assessed our service area and could not identify any concentrations of LEP persons.

Task 1. Step 3: Consult state and local sources of data.

The Blue Water Area Transportation Commission contacted the Port Huron Area School District, the largest District in our service area, and consulted with the District's Director for State and Federal Programs. The data supplied by the School District on its LEP population is attached as Appendix C. Currently; there are 47 LEP students out of a student population of over 7,125.

Task 1. Step 4: Community organizations that serve LEP persons.

BWATC has current associations with:

Port Huron Area School District, St. Clair County Community Mental Health, Blue Water Community Action, YMCA of the Blue Water Area, ARC of St. Clair County, Community Enterprises of St. Clair County, St. Clair County Council on Aging, Visiting Nurses Association, Sacred Heart Rehabilitation, and other local units of government. All of these organizations serve LEP persons.

Task 1. Step 4A: Identify community organizations.

Because of the small number of LEP individuals in our service area, there were no community organizations identified that represent communities with LEP populations.

Task 1. Step 4B: Contact relevant community organizations.

BWATC corresponded with:

Port Huron Area School District, St. Clair County Community Mental Health, Blue Water Community Action Agency, YMCA of the Blue Water Area, Community

Enterprises of St. Clair County, St. Clair County Council on Aging, and BWATC's Local Advisory Committee.

Task 1. Step 4C: Obtain information.

BWATC received feedback from the Port Huron Area School District, St. Clair County Community Mental Health, Blue Water Community Action Agency, YMCA of the Blue Water Area, Community Enterprises of St. Clair County, St. Clair County Council on Aging, and BWATC's Local Advisory Committee.

II. Factor 2: The frequency with which LEP individuals come into contact with or programs, activities and services

Task 2. Step 1: Review the relevant programs, activities, and services you provide.

BWATC provides Fixed Route service in the Cities of Port Huron and Fort Gratiot Township as well as demand response service throughout St. Clair County. BWATC surveyed dispatchers, operators, and frontline staff on their interactions with LEP individuals. A summary of the results of the Survey is attached as Appendix D.

Task 2. Step 2: Review information obtained from community organizations.

BWATC surveyed community organizations that service LEP populations and received information about the LEP populations that they serve. None of the organizations contacted knew of any issues or barriers LEP populations had with BWATC transit's service. The community organizations did not identify any concentration of LEP individuals in our service area.

Task 2. Step 3: Consult directly with LEP persons.

In order to reach LEP persons, BWATC has agreed to be on the agenda of any future Port Huron Area School District LEP specific parent meetings.

III. Factor 3: The Importance to LEP persons of your program, activities, and services

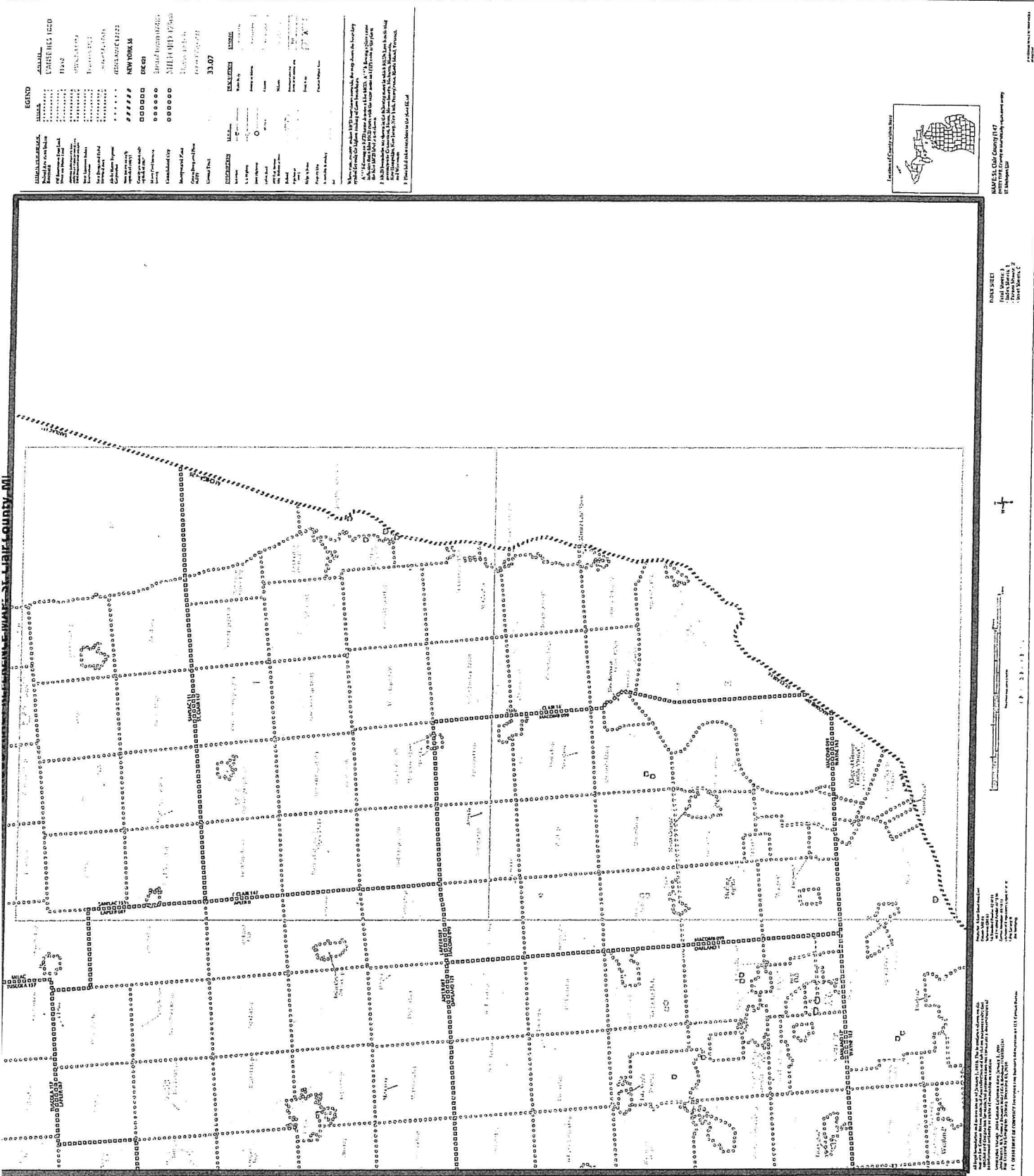
There is no large concentration of any type of LEP individuals in the BWATC service area. Surveys of BWATC dispatchers, operators and frontline staff show that contact with LEP population has been very minimal. The services provided by BWATC that are most likely to encounter LEP individuals are our fixed routes as well as our general demand response service that primarily serves senior and disabled persons.

IV. Factor 4: The resources available to the recipient and costs

BWATC assessed the available resources that could be used for providing LEP assistance, including which BWATC documents would be the most valuable to the LEP community if translated. BWATC also took inventory of available organizations that could be approached for partnering opportunities for outreach and translation efforts and learned that there are multiple professional translation services that BWATC could utilize on an as-needed-basis. In addition, the amount of staff and vehicle operating training that might be needed was also considered during the assessment.

Based on the four factor analysis, BWATC developed its LEP plan as outlined in Attachment C of this report.

Appendix A



Appendix B

TABLE ID: DP02
 SURVEY/PROGRAM: American Community Survey
 PRODUCT: ACS 5-Year Estimates Data Profiles

Note: The table shown may have been modified by user selections. Some information may be missing.

St. Clair County, Michigan				
Label	Estimate	Margin of Error	Percent	Percent Margin of Error
LANGUAGE SPOKEN AT HOME				
Population 5 years and over	151,253	±41	151,253	(X)
English only	146,754	±443	97.0%	±0.3
Language other than English	4,499	±442	3.0%	±0.3
Speak English less than "very well"	1,185	±251	0.8%	±0.2
Spanish	1,774	±305	1.2%	±0.2
Speak English less than "very well"	510	±158	0.3%	±0.1
Other Indo-European languages	1,710	±338	1.1%	±0.2
Speak English less than "very well"	352	±124	0.2%	±0.1
Asian and Pacific Islander languages	432	±136	0.3%	±0.1
Speak English less than "very well"	112	±74	0.1%	±0.1
Other languages	583	±303	0.4%	±0.2
Speak English less than "very well"	211	±137	0.1%	±0.1
ANCESTRY				
Total population	159,247	*****	159,247	(X)
American	10,931	±922	6.9%	±0.6
Arab	1,000	±316	0.6%	±0.2
Czech	419	±116	0.3%	±0.1
Danish	359	±122	0.2%	±0.1
Dutch	2,793	±420	1.8%	±0.3
English	15,580	±918	9.8%	±0.6
French (except Basque)	10,226	±796	6.4%	±0.5
French Canadian	5,134	±706	3.2%	±0.4
German	45,333	±1,613	28.5%	±1.0
Greek	659	±196	0.4%	±0.1
Hungarian	1,554	±246	1.0%	±0.2
Irish	20,654	±1,102	13.0%	±0.7
Italian	9,278	±963	5.8%	±0.6
Lithuanian	358	±114	0.2%	±0.1
Norwegian	940	±185	0.6%	±0.1
Polish	18,852	±1,131	11.8%	±0.7
Portuguese	65	±36	0.0%	±0.1
Russian	992	±203	0.6%	±0.1
Scotch-Irish	1,625	±267	1.0%	±0.2
Scottish	5,501	±601	3.5%	±0.4
Slovak	352	±106	0.2%	±0.1
Subsaharan African	338	±179	0.2%	±0.1
Swedish	1,422	±231	0.9%	±0.1
Swiss	169	±62	0.1%	±0.1
Ukrainian	509	±141	0.3%	±0.1
Welsh	771	±164	0.5%	±0.1
West Indian (excluding Hispanic origin groups)	99	±73	0.1%	±0.1
COMPUTERS AND INTERNET USE				
Total households	64,850	±525	64,850	(X)
With a computer	57,884	±557	89.3%	±0.6
With a broadband Internet subscription	53,533	±538	82.5%	±0.6

DATA NOTES

TABLE ID: DP02
 SURVEY/PROGRAM: American Community Survey
 VINTAGE: 2019
 DATASET: ACSDP5Y2019

PRODUCT: ACS 5-Year Estimates Data Profiles
FTP URL: None
API URL: Download the entire table at <https://api.census.gov/data/2019/acs/acs5/profile>

USER SELECTIONS
GEOS St. Clair County, Michigan

EXCLUDED COLUMNS
None

APPLIED FILTERS
None

APPLIED SORTING
None

WEB ADDRESS
<https://data.census.gov/cedsci/table?q=DP02&g=0500000US26147&tid=ACSDP5Y2019.DP02&hidePreview=true>

TABLE NOTES:
Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities, and towns and estimates of housing units for states and counties.

Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Technical Documentation section. Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.

Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see ACS Technical Documentation). The effect of nonsampling

Ancestry listed in this table refers to the total number of people who responded with a particular ancestry; for example, the estimate given for Russian represents the number of people who listed Russian as either their first or second ancestry. This table lists only the largest ancestry groups; see the Detailed Tables for more categories. Race and Hispanic origin groups are not included in this table because official data for those groups come from the Race and Hispanic origin questions rather than the ancestry question (see Demographic Table).

Data for year of entry of the native population reflect the year of entry into the U.S. by people who were born in Puerto Rico or U.S. Island Areas or born outside the U.S. to a U.S. citizen parent and who subsequently moved to the U.S.

Methodological changes to citizenship edits may have affected citizenship data for those born in American Samoa. Users should be aware of these changes when using 2018 data or multi-year data containing data from 2018. For more information, see: American Samoa Citizenship

The Census Bureau introduced a new set of disability questions in the 2008 ACS questionnaire. Accordingly, comparisons of disability data from 2008 or later with data from prior years are not recommended. For more information on these questions and their evaluation in the 2006 ACS Content Test, see the Evaluation Report Covering Disability.

Data about computer and Internet use were collected by asking respondents to select "Yes" or "No" to each type of computer and each type of Internet subscription. Therefore, respondents were able to select more than one type of computer and more than one type of Internet subscription.

The category "with a broadband Internet subscription" refers to those who said "Yes" to at least one of the following types of Internet subscriptions: Broadband such as cable, fiber optic, or DSL; a cellular data plan; satellite; a fixed wireless subscription; or other non-dial up subscription types.

An Internet "subscription" refers to a type of service that someone pays for to access the Internet such as a cellular data plan, broadband such as cable, fiber optic or DSL, or other type of service. This will normally refer to a service that someone is billed for directly for Internet alone or sometimes as part of a bundle.

"With a computer" includes those who said "Yes" to at least one of the following types of computers: Desktop or laptop; smartphone; tablet or other portable wireless computer; or some other type of computer.

was used to map pre-2016 data to the post-2016 categories, enabling creation of 5-year data. For more detailed information about the 2016 changes, see the 2016 American Community Survey Content Test Report for Computer and Internet Use located at https://www.census.gov/library/working-papers/2017/acs/2017_Lewis_01.html or the user note regarding changes in the 2016 questions located at <https://www.census.gov/programs-surveys/acs/technical-documentation/user-notes/2017-03.html>. For more detailed information about the crosswalk, see the user note regarding the crosswalk located at <https://www.census.gov/programs-surveys/acs/technical-documentation/user-notes.html>.

The 2015-2019 American Community Survey (ACS) data generally reflect the September 2018 Office of Management and Budget (OMB) delineations of metropolitan and micropolitan statistical areas. In certain instances, the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB delineation lists due to differences in the effective dates of the geographic entities.

Estimates of urban and rural populations, housing units, and characteristics reflect boundaries of urban areas defined based on Census 2010 data. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.

Explanation of Symbols: An "***" entry in the margin of error column indicates that either no sample observations or too few sample observations were available to compute a standard error and thus the margin of error. A statistical test is not appropriate. An "-" entry in the estimate column indicates that either no sample observations or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest interval or upper interval of an open-ended distribution, or the margin of error associated with a median was larger than the median itself. An "-" following a median estimate means the median falls in the lowest interval of an open-ended distribution. An "+" following a median estimate means the median falls in the upper interval of an open-ended distribution. An "****" entry in the margin of error column indicates that the median falls in the lowest interval or upper interval of an open-ended distribution. A statistical test is not appropriate. An "*****" entry in the margin of error column indicates that the estimate is controlled. A statistical test for sampling variability is not appropriate. An "N" entry in the estimate and margin of error columns indicates that data for this geographic area cannot be displayed because the number of sample cases is too small. An "(X)" means that the estimate is not applicable or not available.

COLUMN NOTES

None

Appendix C

Port Huron Area School District LEP Census by language 12/7/2020

Arabic	24
Spanish	8
Mandarin Chinese	5
Albanian	2
Chaldean	1
Gujarati	1
Tagalog	1
Ukrainian	1
Turkish	1
Bosnian	1
Japanese	1
	1

Total LEP Students	47
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Total District Student Census	7,125
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% LEP Students	0.66%
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Summary of LEP Survey
Conducted November 2020

Appendix D

Number of Surveys 53

	Yes	No	Total
Have you experienced an LEP Customer(s) during the past year	<u>18</u>	<u>35</u>	<u>53</u>

	Yes	No	Total
If yes, have they requested help regarding transportation and you have not been able to help them because of a language barrier	<u>3</u>	<u>15</u>	<u>18</u>

	1-5	5-10	more than 10
If yes, how many times in the past year has this occurred?	<u>3</u>	<u>0</u>	<u>0</u>

Number of times individuals could not be helped because of a language barrier compared to Transit system as a whole:

Total unlinked passenger trips
in past year 716,448 very low this year due to covid

Estimated total annual calls received by
dispatch in past year 260,000 PY 78,000

Total Customer interactions 976,448

Total times language was a barrier 15
(Assume all at high end of range
e.g. 1-5 times = 5 times)

% of customer interactions
when language was a barrier
to service 0.00154%

Languages Encounter (if known) 3 response

1. Arabic 3

Attachment C

Blue Water Area Transportation Commission Limited English Proficiency (LEP) Plan

The Blue Water Area Transportation Commission (BWATC) has adopted the following implementation plan to meet requirements under Title VI of the Civil Rights Act of 1964 which seeks to improve access to services for persons with Limited English Proficiency (LEP). The purpose is to ensure that no person 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 from the FTA.

How BWATC Staff May Identify an LEP Person Who Needs Language Assistance

- Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events.
- When BWATC sponsors an event, have a staff person greet participants as they arrive. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English.
- Have Census Bureau *Language Identification Flashcards* available at BWATC events near the registration table. Individuals self-identifying as persons not proficient in English may not be able to be accommodated with translation assistance at the event, but it will assist the sponsoring agency in identifying language assistance needs for future events.
- Have *Language Identification Flashcards* on all transit vehicles to assist vehicle operators in identifying specific language assistance needs of passengers. If such individuals are encountered, vehicle operators will be instructed to try to obtain contact information to give to the transit system manager for follow-up. Dispatchers and schedulers will also be instructed to obtain contact information from LEP individuals they encounter, either in person or over the phone.
- *Language Identification Flashcards* will be available at BWATC's main office reception desk.
- Vehicle operators and other front-line staff, like dispatchers, dial-a-ride schedulers, and senior operations staff will be surveyed annually on their experience concerning any contacts with LEP persons during the previous year. Surveys will take place in November of each year.

Language Assistance Measures

Although there is a very low percentage in St. Clair County of LEP individuals, that is, persons who speak English less than “very well”, BWATC will ensure that the following measures are in place:

- *Language Identification Flashcards* will be available at all times in BWATC vehicles and at BWATC’s main office and transfer center where tickets are sold or information is distributed.
- When the BWATC website is redesigned, a feature will be added to allow an LEP person to contact staff via email indicating his/her native language and the type of assistance needed.
- The BWATC Title VI Policy and Limited English Proficiency Plan will be posted on the agency website, www.bwbus.com.
- Whenever the BWATC website is redesigned or updated, BWATC staff will work with the website host to ensure that BWATC’s website can be translated into most languages by choosing the desired language via a drop box located on the main page.
- When an interpreter is needed, in person or on the telephone, staff will attempt to determine what language is required and then access language assistance services at www.languageine.com or a similar on-demand language assistance service.

Staff Training

The following training will be provided to BWATC staff:

- Information on the BWATC Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of the Language Identification Flashcards.
- Documentation of language assistance requests.
- Use of www.languageine.com or similar service.
- How to handle a potential Title VI/LEP complaint.

Outreach Techniques

In order to reach LEP persons, BWATC has agreed to be on the agenda of any future Port Huron Area School District LEP specific parent meetings. BWATC will also continue to survey a vast array of community organizations about LEP populations.

If it is ascertained that more outreach is needed, BWATC will consider the following options:

- When staff prepares a document, or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.
- Bus schedules, maps, and other transit publications will be made available in an alternative language when, and if, a specific and concentrated LEP population is identified.

Monitoring and Updating the LEP Plan

BWATC will update the LEP as required by U.S. DOT. At a minimum, the plan will be reviewed and updated when it is clear that higher concentrations of LEP individuals are present in the BWATC service area. Updates will include the following:

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

Dissemination of the BWATC LEP Plan

A link to the BWATC LEP Plan and the Title VI Policy will be included on BWATC's website at www.bwbuses.com. Any person or agency with internet access will be able to access and download the plan from the BWATC website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person, and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the plan in translation which BWATC will provide, if feasible. Questions or comments regarding the LEP Plan may be submitted to the BWATC General Manager as follows:

General Manager's Office
Blue Water Area Transportation Commission
2021 Lapeer Ave.
Port Huron, MI 48060
810-987-7373

Attachment D

Resolution of the BWATC Approving Title VI Program

We, the Commission of the Blue Water Area Transportation Commission, do hereby approve the Commission's Title VI Program dated January 1, 2021.

Linda Bruckner 1/27/2021
Linda Bruckner Date
Commissioner

Anita Ashford 1/27/2021
Anita Ashford Date
Commissioner

Blue Water Area Transportation Commission Service Standards and Policies

The following information provides the Blue Water Area Transportation Commission's standards and policies related to the four quantitative indicators and two procedures required by the Federal Transit Administration (FTA) for inclusion in each fixed-route transit operator's Title VI Program. The four indicators for which quantitative standards are required include: 1) vehicle load, 2) vehicle headway, 3) on-time performance, and 4) service availability. In addition, operators must adopt qualitative policies addressing the following procedures: 1) vehicle assignment, and 2) distribution of transit amenities.

Blue Water Area Transportation Commission Fixed Route Service Standards

1 . Vehicle Load Standards

Vehicle loads shall not exceed 1.5. (Note: The vehicle load standard is expressed as a ratio of passengers to the number of seats available on a particular vehicle.) For example, if a vehicle has 28 seats then no more than 14 people will stand if all seats are occupied for a total of 42 passengers. $42/28 = 1.5$.

2. Vehicle Headway Standards

Headways and Periods of Operation - Line Haul - City of Port Huron and Fort Gratiot Township

Weekday	Day	Evening
Route 1	45	90
Route 2	45	90
Route 3	45	90
Route 4	45	90
Route 5	45	45
Route 6	45	90
Route 9	45	90
Shopper Shuttle	45	45

Weekday Day service runs from 6:15am until 7:00 pm for Routes 1-9 and 9:35am until 7:00 pm for the Shopper Shuttle

Weekday Evening service runs from 7:00 pm until 11:30 pm for Routes 1-9 and 7:00 pm until 9:15 pm for the Shopper Shuttle

Headways and Periods of Operation - Line Haul - City of Port Huron and Fort Gratiot Township

Saturday	Day	Evening
Route 1	90	90
Route 2	90	90
Route 3	90	90
Route 4	90	90
Route 5	90	45
Route 6	90	90
Route 9	90	90
Shopper Shuttle	45	45

Saturday service runs from 7:45am until 7:00 pm for Routes 1-9 and 9:35am until 7:00 pm for the Shopper Shuttle

Evening service runs from 7:00 pm until 11:30 pm for Routes 1-9 and 7:00 pm until 9:15 pm for the Shopper Shuttle

Periods of Operation - Line Haul - Commuter Route between City of Port Huron and Macomb Township

Weekday	Depart Port Huron	Arrive Macomb County	Depart Macomb County	Arrive Port Huron
94 Express South - 1st Trip	6:20am	7:15am		
94 Express South - 2nd Trip	7:00am	8:00am		
94 Express South - 3rd Trip	4:45pm	5:53pm		
94 Express North - 1st Trip			7:20am	8:05am
94 Express North - 2nd Trip			9:10am	9:55am
94 Express North - 3rd Trip			6:15pm	7:00pm
M-29 South	7:10am	9:05am		
M-29 South	4:10am	6:05pm		
M-29 North			8:10am	9:55am
M-29 North			5:56pm	7:35pm

3. On-time Performance Standards

The Blue Water Area Transportation Commission's on-time performance objective is 80% or greater. A vehicle is considered on time if it departs from a scheduled time point no more than 1 minute early and no more than 5 minutes late.

4. Service Availability Standards

BWATC fixed line buses shall stop on demand along all fixed route bus routes within the City of Port Huron and Fort Gratiot Township when possible to do in a safe manner. BWATC will stop at published locations for Commuter routes and will also stop on demand when possible to do so in a safe manner.

Blue Water Area Transportation Commission Fixed Route Service Policies

1. Vehicle Assignment Policy

Vehicles are assigned to routes based on ridership demands with newer vehicles being rotated across all routes. Specific vehicles are assigned to routes only when required by operating conditions (e.g., in cases where a smaller bus is required to provide service on narrower streets).

2. Transit Amenities Policy

Any location that has at least 50 daily boardings would qualify for the installation of a bus shelter. Any location that has at least 25 daily boardings would qualify for the installation of a bench. The Commission will review all general public requests for the installation of either a bus shelter or bench. Trash containers should be installed at all bus shelter locations and may be installed at other locations upon request.

The placement of any passenger amenity is contingent on BWATC receiving all required Local/State/County permits and permission to place an amenity.



Blue Water Area Transit

2021 Lapeer Avenue
Port Huron, Michigan 48060
website www.bwbus.com

(810) 987-7373
Fax (810) 987-2431
e-mail bwatc@bwbus.com

Blue Water Area Transportation Commission Policy on Fare and Service Changes

It is the Policy of the Blue Water Area Transportation Commission to solicit the general public so that they may have the opportunity to provide written comment and/or request a public hearing whenever:

- A. A change is proposed to a fixed route that will affect 10% of the system-wide fixed route vehicle hours.
- B. A change in fares is proposed

Public Notices to solicit written comments and/or request a public hearing will be published in a local newspaper. The public will be allowed 30 days to respond with written comments and/or to request a public hearing.

If a public hearing is requested within 30 days of the Public Notice, BWATC will publish a Public Hearing Notice within 30 days. The Public Hearing Notice will be published in a local newspaper at least 30 days prior to the date of the public hearing.

All comments received will be reviewed by BWATC's Board of Commissioners before a final decision is made.