

Title VI Program Update

Effective: February 10, 2016 Revised: March 2017



Greater Bridgeport Transit
Title VI Program Update

Effective Date: February 10, 2016

Revised: March 2017

Prepared by: Greater Bridgeport Transit One Cross Street

Bridgeport, Connecticut 06610

Tel: (203) 366-7070

URL: gogbt.com

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INTRODUCTION

GBT's Commitment to Civil Rights

This update of Greater Bridgeport Transit's (GBT) Title VI Program has been prepared to ensure that the level and quality of GBT's fixed route and demand response services are provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to GBT's riders and other community members. Additionally, through this program, GBT has examined the need for services and materials for persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English.

While it is a matter of principle that GBT is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or subjected to discrimination in the receipt of any of GBT's services on the basis of race, color or national origin, the contents of this program have been prepared in accordance with Section 601 of Title VI of the Civil Rights Act of 1964 and Executive Order 13116 (Improving Access to Services for Persons with Limited English Proficiency).





"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 assistance."

—Civil Rights Act of 1964

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Si necesita información en este idioma, llame al 203-333-3031.

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Pour obtenir des informations dans cette langue, veuillez composer le 203-333-3031.

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"Federal agencies are to examine the services they provide, identify any need for services to those with limited English proficiency, and develop and implement a system to provide those services so LEP persons can have meaningful access to them."

-Executive Order 13166

Under the Civil Rights Act of 1964, and as a recipient of federal funding under the programs of the Federal Transit Administration (FTA) of the U.S. Department of Transportation (US DOT), GBT has an obligation to ensure that:

- The benefits of its bus services are shared equitably throughout the service area;
- The level and quality of bus services are sufficient to provide equal access to all riders in its service area:
- No one is precluded from participating in GBT's service planning and development pro-
- Decisions regarding service changes or facility locations are made without regard to race, color or national origin and that development and urban renewal benefitting a community as a whole not be unjustifiably purchased through the disproportionate allocation of its adverse environmental and health burdens on the community's minority population: and
- A program is in place for correcting any discrimination, whether intentional or unintentional.

GBT has engaged the public in the development of this program. The service standards detailed in this program, along with the public engagement process and the events triggering public outreached were all presented and discussed at a public information meeting in December of 2012. To develop a system to provide services to those with limited English proficiency, GBT engaged a number of community organizations and over 176 riders.

GBT's Board of Commissioners was actively involved in the update of this program. In November 2012, the Board authorized the public review of the public participation process and updated service standards. The content of the program was approved and adopted by the Board at a special meeting on February 7, 2013.

This program contains all of the elements required of a transit provider operating in an urbanized area of 200,000 or more in population and operating less than fifty vehicles in peak service. It supersedes GBT's Title VI Program of 2013 and is effective as of February 10, 2016. It has been prepared using data from the most recent U.S. Census.

GENERAL REQUIREMENTS

Notice to the Public

To make GBT's riders aware of its commitment to Title VI compliance, and of their right to file a civil rights complaint, GBT has presented the following language, in both English and Spanish, on its website goGBT.com, on posters at its Bus Station and in its System Timetable.

GBT alerts its riders and other community members of its Civil Rights policy and complaint process under Title VI using the following:

- Bi-lingual (English/Spanish) Web-based information available on the "Know your Civil Rights" section of gogbt.com
- Bi-lingual (English/Spanish) signage on GBT Access paratransit buses;
- Bi-lingual (English/Spanish) signage on GBT fixed route buses; and
- Bi-lingual (English/Spanish) signage on GBT's bus terminal platforms.

Your Civil Rights

Greater Bridgeport Transit (GBT) 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 they have been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with GBT. For more information on GBT's civil rights program and the procedures to file a complaint, please contact 203-366-7070; email info@gogbt.com or visit our administrative office at One Cross Street, Bridgeport, CT 06610 from 8:30 am to 4:30 pm Monday through Friday. 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 For more information about GBT programs and services, visit www.gogbt.com. If information is needed in another language, please contact 203-366-7070.





Discrimination Complaint Procedures

GBT has established a process for riders to file a complaint under Title VI. Any person who believes that she or he has been discriminated against on the basis of race, color, or national origin by GBT may file a Title VI complaint by completing and submitting the agency's Title VI Complaint available at our administrative offices or on our website goGBT.com.





Complaint forms are translated in all Safe Harbor languages and are available on the website.

The Procedure

Civil rights complaints should filed immediately. However, GBT will investigate complaints up to 180 days after the alleged incident. GBT will process complaints that are complete. Once the complaint is received, GBT will review it and the complainant will receive an acknowledgement letter informing them whether the complaint will be investigated by GBT.

GBT has up to thirty days to investigate the complaint. If more information is needed to resolve the case, the GBT may contact the complainant. The complainant has thirty days from the date of the letter to send requested information to the investigator assigned to the case.

If GBT's investigator (from the Department of Human Resources) is not contacted by the complainant or does not receive the additional Information within thirty days, GBT 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, one of two letters will be issued 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.

A 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 ten 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:

Federal Transit Administration Office of Civil Rights 1200 New Jersey Avenue SE Washington, DC 20590. Title VI Complaint Form

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Active Lawsuits, Complaints or Inquiries Alleging Discrimination

GBT maintains a list of active investigations conducted by FTA and entities other than FTA, including lawsuits and complaints naming GBT that allege discrimination on the basis of race, color or national origin. This list includes the date that the transit-related Title VI investigation, lawsuit or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit or complaint; and actions taken by GBT in response, or final findings related to the investigation, lawsuit, or complaint.

As of the writing of this program, there are no service complaints pending which allege discrimination on the grounds of race color, national origin or any other form of discrimination.

Active Lawsuits, Complaints or Inquiries Alleging Discrimination

Type (Investigation, Lawsuit, Complaint)	Date	Summary of Complaint	Status	Action(s) Taken
There are no current or pending lawsuits, complaints or inquiries.				



GBT's PUBLIC PARTICIPATION PLAN



GBT's Public Participation Plan (PPP) has been prepared to ensure that no one is precluded from participating in GBT's service planning and development process. It ensures that:

- Potentially affected community members will have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health:
- The public's contribution can and will influence GBT's decision making;
- The concerns of all participants involved will be considered in the decision-making process; and
- GBT will seek out and facilitate the involvement of those potentially affected.

Through an open public process, GBT has developed a public participation plan to encourage and quide public involvement efforts and enhance access to GBT's transportation decision-making process by minority and Limited English Proficient (LEP) populations. The public participation plan describes the overall goals, guiding principles and outreach methods that GBT uses to reach its riders.

Limited English Proficient (LEP)

LEP refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

Early, Continuous and Meaningful

The steps outlined in the public participation plan offer early (in the planning process), continuous and meaningful opportunities for the public to be involved in the identification of social, economic and environmental impacts of proposed transportation decisions at GBT. It is a guide for how GBT engages its diverse community. GBT may continue to improve its public participation methods over time based on feedback from all of its riders and community members including low-income, minority and LEP populations as well as customer and community-based organizations.



Goals of the Public Participation Plan

The overarching goals of GBT's PPP, which were presented for public review in December 2012 include:

- Clarity in Potential for Influence The process clearly identifies and communicates where and how participants can have influence and direct impact on decision making.
- Consistent Commitment GBT communicates regularly, develops trust with riders and our community and builds community capacity to provide public input.
- **Diversity** Participants represent a range of socioeconomic, ethnic and cultural perspectives, with representative participants including residents from low income neighborhoods, ethnic communities and residents from Limited English Proficiency
- Accessibility Every reasonable effort is made to ensure that opportunities to participate are physically, geographically, temporally, linguistically, and culturally
- **Relevance** Issues are framed in such a way that the significance and potential effect is understood by participants.
- Participant Satisfaction People who take the time to participate feel it is worth the effort to join the discussion and provide feedback.
- Partnerships GBT develops and maintains partnerships with communities through the methods described in its public participation plan.
- Quality Input and Participation That comments received by GBT are useful, relevant and constructive, contributing to better plans, projects, strategies and decisions.

Objectives of the Public Participation Plan

GBT's Public Participation Plan is based on the following principles:

- Flexibility The engagement process will accommodate participation in a variety of ways and be adjusted as needed.
- Inclusiveness GBT will proactively reach out to and engage low income, minority and LEP populations from the GBT service area.
- **Respect** All feedback will be given careful and respectful consideration.
- Proactive and Timeliness Participation methods will allow for early involvement and
- Clear, Focused and Understandable Participation methods will have a clear purpose and use for the input, and will be described in language that is easy to
- Honest and Transparent Information provided will be accurate, trustworthy and complete.
- Responsiveness GBT will respond and incorporate appropriate public comments into transportation decisions.
- Accessibility Meetings will be held in locations which are fully accessible and





welcoming to all area residents, including, but not limited to, low-income and minority members of the public and in locations relevant to the topics being presented and discussed.

GBT will use its public participation plan when considering fare changes, modifications to routes and schedules and other transit planning projects when:

- A fare increase or significant change in the method of fare payment is being considered:
- A new route is established;
- An existing route is proposed for elimination;
- Considering the total discontinuance of service on any line or group of lines on any given day when service is currently offered;
- Any system-wide change in service hours that exceeds (plus or minus) 10% of current total service hours:
- Routing on any given route or group of routes that affects more than 25% of the riders using the affected route(s); or
- Schedules are changed on any given route or group of routes that reduces the total number of one-way bus trips by more than 25% of the current number of bus trips.
- For minor schedule and service changes not rising to the level of those above, GBT will post service change notices on appropriate buses and stops sixty days in advance of the change date.

Regional Partnership/Capital Programming

For its capital programming, including major facility and bus procurements, GBT uses the Greater Bridgeport Regional Council's adopted public participation plan dated February 2008. This plan clearly indicates that the MPO's public participation process satisfies the GBT's public participation requirements for the its Program of Projects. The notices for the regional Transportation Improvement Program (TIP) also state that the notice of public involvement activities and time established for public review of and comments on the TIP will satisfy FTA's program of projects requirement.

GBT's Public Participation Process

Outreach Efforts – Alerting Riders and Encouraging Engagement

GBT's PPP includes many new mediums extending beyond the traditional approach which relied on legal notices and intermittent media coverage. While GBT maintains these elements to its outreach program along with traditional seat-drop flyers, GBT has availed itself of the communication methods more widely used by members of our community and riders.

While there may be minor variation in the outreach process from time-to-time, the outline below provides the general steps for engaging riders in the decision making process using a fare or service change as an example.

- 1. A service/fare change proposal is developed internally or as a result of public comment;
- 2. An internal review by the appropriate committees is conducted (for example, GBT's Service Review Committee, detailed later in this program, will review all service change proposals);
- 3. Proposals are reviewed by GBT's Passenger Advisory Committee (PAC);
- 4. A Title VI review of the proposal is conducted;
- 5. If required, authorization from the GBT Board of Commissioners is sought to proceed to a public comment period;
- 6. Public outreach venues, dates and times are determined with consideration of the proposed changes and their impact on specific locations/populations within the GBT service area:
- 7. Bilingual (English and Spanish) public outreach materials and a program are developed;
- 8. Outreach In advance of public information sessions is released (using tool-box of mediums listed below):
- 9. An Email is transmitted to GBT community partners;
- 10. Local radio station WICC or WCUM interviews may be conducted (if available);
- 11. The public comment period ends:
- 12. A GBT Board of Commissioners summary package is presented detailing the outcome of the public participation process along with staff recommendations;
- 13. The final service/fare change date is set;
- 14. Outreach is conducted in advance of any service or fare change;
- 15. Bilingual system timetable and website updated in advance of the proposed change.

Selection of Meeting Locations

When determining locations and schedules for public meetings, GBT will:

- Schedule meetings at times and locations that are convenient and accessible for minority and LEP communities;
- Employ different meeting sizes and formats including town hall type meeting formats;
- Coordinate with community organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities;
- Consider radio, television, or newspaper ads as well as podcasts that serve LEP populations.
- Provide opportunities for public participation through means other than written communication, such as one-on-one interviews or use of audio or video recording devices to capture oral comments.



GBT Mediums (Bi-lingual)

- Print Newspapers and other periodicals
- Outdoor Advertising on-board buses (interior and exterior) and in bus shelters
- Website GBT has assembled a comprehensive website with automatic alerts
- Web-Based Feedback (Report It, Shout It, Suggest It, and How Are We Doing).
- Social Media GBT has used Facebook (1347+ followers in 2015) and Twitter (834+ followers in 2015) since 2009 to help engage community
- Email GBT has developed an email newsletter which now reaches 740+ opt-in
- Video/YouTube GBT has developed a How to Use the Fare Box video that is available at gogbt.com and on GBT's YouTube channel
- Radio (if available and appropriate)
- Seat Drops, On-board Flyers GBT regularly uses seat drops and flyers to provide riders with details of service changes and schedules of public meetings and hearings.
- On- board Scrolling messages
- On-Board Audio Messaging
- In Terminal Public Address System and scrolling messages
- Direct Mail to Community Partners
- **Public Information Sessions**
- **Public Hearings**
- **Legal Notices**

Facebook



Seat Drops

Twitter

♠ Home Moments Notifications Messages

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Tweets & replies Photos & videos

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Greater Bpt Transit @goGBT - Jan 29

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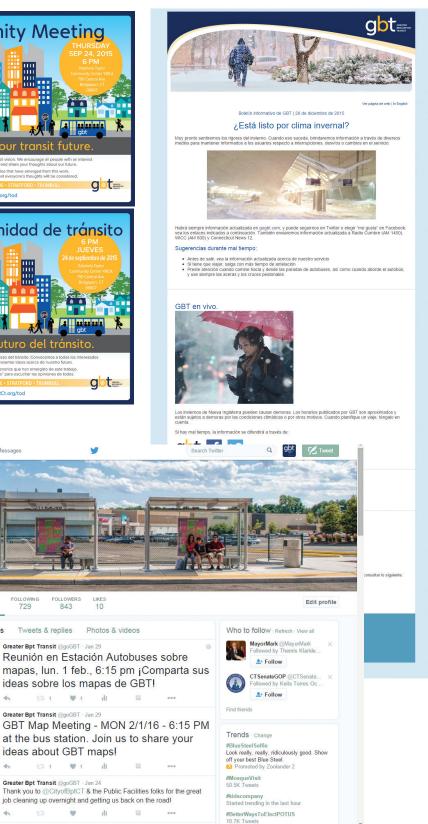
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iii Joined March 2010

Greater Bridgeport Transit - We provide public bus service for people in the Greater Bridgeport, Connecticut, area.



Email





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Addressing Comments

The Incorporation of Public Comments into Decisions

All comments received through the public participation plan are given careful, thoughtful consideration. Because there are a number of different ways riders or members of the community can comment on proposed service or fare changes (mail, email, social media, public meetings and others), all comments are assembled into a single document for presentation the GBT Board of Commissioner for consideration.

Identification of Stakeholders

Our Community Partners

Stakeholders are those who are either directly or indirectly affected by a plan, or the recommendations of that plan. Those who may be adversely affected, or who may be denied benefit of a plan's recommendation(s), are of particular interest in the identification of specific stakeholders. Stakeholders can come from a number of groups including general citizens/residents, minority and low-income persons, public agencies, and private organizations and businesses. While stakeholders may vary based on the plan or program being considered, GBT has assembled a listing of stakeholders with whom we regularly communicate through email and direct mail. A complete list of GBT's community stakeholders can be obtained by contacting GBT.

Stakeholder List

Any community organization or person can be added to GBT's mailing list and receive regular communications regarding service changes by contacting the GBT administrative office at (203) 366-7070 Extension 100. Local organizations and businesses can also request that a speaker from GBT attend their regular meeting at the same number or through the GBT website gogbt.com

LANGUAGE ASSISTANCE PLAN

Improving Access for People with Limited English Proficiency

In order to ensure meaningful access to programs and activities, GBT uses the information obtained in a Four Factor Analysis to determine the specific language services that are appropriate. This analysis helps GBT to determine if it communicates effectively with LEP persons and informs language access planning.

The **Four Factor Analysis** is a local assessment that considers:

- 1. The number or proportion of LEP persons eligible to be served or likely to be encountered by GBT;
- 2. The frequency with which LEP persons come into contact with GBT services and programs;
- 3. The nature and importance of GBT's services and programs in people's lives; and
- 4. The resources available to GBT for LEP outreach, as well as the costs associated with that outreach.

Factor 1 - Number of LEP Persons in Service Region

The first step in determining the appropriate components of a Language Assistance Plan is understanding the proportion of LEP persons who may encounter GBT's services, their literacy skills in English and their native language, the location of their communities and neighborhoods and, more importantly, if any are underserved as a result of a language barrier.

To do this, GBT evaluated the level of English literacy and to what degree people in its service area speak a language other than English and what those languages are. Data for this review is derived from the United States Census Bureau "American Fact Finder" web portal data from 2014. Data was reviewed for GBT's four member municipalities as well as Fairfield County in its entirety.

Fairfield County Overview

GBT's service system encompasses an eighty-two square mile area of Fairfield County, Connecticut and is home to a diverse population of more than thirty-eight languages groups. Of the total County population (891,911), 12.03% (107,296) residents report speaking English less than very well. The most populous groups in the category are shown below. Of the remaining populations, those reporting speaking English "less than very well" range from 0% to 0.3% of the total County Population.



Speak English Less than Well (County)

This data reveals that at the county level, while there are numerous languages spoken at home, there is a significant Spanish speaking population which reports speaking English less than well.

Speak English "Less than Very Well"	Population Speaking English "Less than Very Well"	Percent of County Population
Spanish or Spanish Creole	62,555	7.0%
Portuguese or Portuguese Creole	9,350	1.0%
Chinese	3,640	0.4%
French Creole	3,145	0.4%

Because GBT's service area does not include all of Fairfield County and is centered on four member municipalities, additional census data was reviewed at the municipal level.

Bridgeport

Within the City of Bridgeport, 46% of the population of 135,898, reports speaking a language other than English. As suggested by the county-wide data, 32% percent of the total population speaks Spanish or Spanish Creole (a total of 43,487 people) and of that number, 53% (23,048) report speaking English "less than well". Second to Spanish or Spanish Creole speaking residents are residents speaking other European languages (13,454) or 9.9%, with more than half (7,131) reporting speaking English "less than very well".

Fairfield, Stratford, Trumbull

While the core of the service area and more than 80% of all GBT services are within the City of Bridgeport, some GBT routes travel to suburban communities with less dense populations. While the populations are lower, the same general characteristics e.g., after English, the next most popular language spoken at home being Spanish or Spanish Creole exist in GBT's other member municipalities. The table below summarizes language spoken at home and "less than very well" in GBT's suburban communities.

Speak English Less than Well (Suburban Portion of GBT's Service Area)

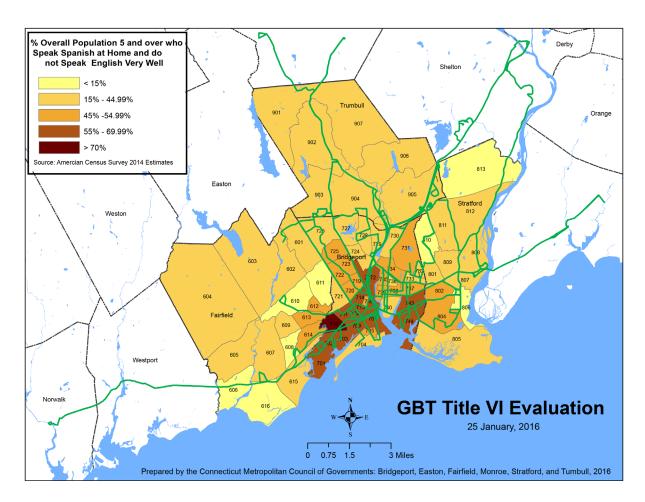
As indicated by the current County wide data and supported by data at the municipal level, there is a high percentage of Spanish or Spanish Creole speaking residents in the GBT service area and while the overall number is lower in suburban portions of the service area, the largest population reporting speaking a language at home other than English and reporting speaking English "less than very well" remains the Spanish or Spanish Creole speaking residents.

Municipality	Percent Overall Speaking English "Less than Very Well"	Percent Speaking Spanish or Spanish Creole	Percent Speaking Spanish or Spanish Creole speaking English "Less than Very Well"
Fairfield	5.0%	4.0%	32%
Stratford	7.3%	9.2%	33.9%
Trumbull	5.2%	4.4%	32.5%

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The Locations of the LEP Community

While the need to provide language services to the Spanish speaking population in the GBT service area is clearly demonstrated in the tables above; it is helpful to understand where in the service area populations of limited English proficiency reside. The map below provides a spatial display of residents who speak Spanish at home and report speaking English "less than well."





GBT has long been aware of the significant Spanish speaking population in its service area. The map indicates locations where this population is concentrated in the service area; most notably in the Bridgeport downtown area and neighborhoods in the East End/East Side, North End, Mill Hill and the west end, including Black Rock. It is also noteworthy that there are "pockets" of residents reporting speaking English "Less than Well" in Stratford's South End and Center.

Several conclusions can be drawn from this review:

- Approximately twelve percent of residents of the County report speaking English "less
- Of those reporting speaking English "less than well", the largest population speaks Spanish or Spanish Creole at home;
- This pattern largely also holds true when data is reviewed at the municipal level; and
- The largest LEP language group (Spanish or Spanish Creole speaking) is concentrated in the core of GBT's service area.

Safe Harbor Provision

Beyond those reporting speaking Spanish or Spanish Creole at home and speaking English "less than very well", there are nine Safe Harbor languages groups, which are likely to be encountered in its services area, which meet the Safe Harbor Provision thresholds, "of five percent or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered". Those language groups are depicted in the table below.

Safe Harbor Language Group	Population	Percent of Service Area Population
Service Area Population	277,061	100%
Spanish or Spanish Creole	51,707	18.7%
French	2,066	0.7%
French Creole	4,333	1.6%
Italian	3,006	1.1%
Portuguese or Portuguese Creole	6,229	2.2%
Polish	1,663	0.6%

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Safe Harbor Language Group	Population	Percent of Service Area Population
Chinese	1,694	0.6%
Vietnamese	1,714	0.6%
Arabic	1,413	0.5%

To ensure members of these language groups are not excluded from participating in or denied the benefits of GBT services, due to a limited ability to read, write, speak or understand English, GBT provides free language services, to ensure inclusion of persons, whose primary Language is not English. These services include, Google Translation, On Phone Translation (OPT) services, bilingual signage and documents, in person interpreters, employee language training and guides. These services are discussed in more detail at points throughout this document.

As the data in the table above indicates, Spanish or Spanish Creole is by far the largest language group to likely be encountered by GBT. Further surveys of GBT's riders and employees support this conclusion. As a matter of practice, many of GBT's written and verbal communications and documents are provided in both English and Spanish.

Documents pertaining to vital subject matter are translated into the Safe Harbor languages noted above. GBT will provide language assistance for all other languages upon request. Those vital documents include:

- Complaint forms
- Intake and application forms
- Notices of denials, losses or decreases in benefits or services
- ADA complementary paratransit eligibility applications
- Guidance on how to apply for ADA complementary paratransit service
- Title VI complaint forms
- Notices of a person's rights under Title VI
- Fare and half fare information
- Guidance on how to obtain schedule and route information
- Guidance on how to receive notice of and participate in public events and outreach
- Guidance on how to contact GBT or file a complaint

GBT has provided a brochure, which contains the below notice, translated into the nine Safe Harbor language groups, informing members of those groups, of the language services provided to them, by GBT, free of charge.

"Greater Bridgeport Transit (GBT) is committed to ensuring that no person(s) is excluded from participating in or denied the benefits of GBT services, due to a limited ability to read, write, speak



or understand English. These services include, Google Translation, On Phone Translation (OPT) services, bilingual signage and documents, in person interpreters.

As a matter of practice, many of GBT's written and verbal communications and documents are provided in both English and Spanish. However, documents pertaining to vital subject matter are also translated into this language upon request. Those vital documents include:

Complaint forms

Intake and application forms

Notices of denials, losses or decreases in benefits or services

ADA complementary paratransit eligibility applications

Guidance on how to apply for ADA complementary paratransit service

Title VI complaint forms

Notices of a person's rights under Title VI

Fare and half fare information

Guidance on how to obtain schedule and route information

Guidance on how to receive notice of and participate in public events and outreach Guidance on how to contact GBT or file a complaint"

Factor 2 - Frequency of LEP Use

There are a large number of places where GBT riders and members of the LEP population can come into contact with GBT services including the use of fixed route and demand response buses, calls to customer service representatives, reservation agents and GBT's outreach materials. An important part of the development of GBT's Language Access Plan is the assessment of major points of contact, including:

- The use of the bus service (on-board signage, announcements and driver language
- Communication with GBT's customer service staff;
- Bus pass sales;
- Printed outreach materials;
- Web-based outreach materials;
- Public meetings:
- Demand response reservation agents;
- Local news media (print and radio);
- Automatic, service related audio announcements on-board GBT buses; and
- Service related posters at GBT's bus terminal.

To better understand the frequency with which LEP riders come into contact with GBT services, GBT conducted internal surveys of customer service staff, paratransit reservation agents, administrative staff and both fixed route and demand response drivers. The survey tool was aimed at determining what language skills already exist among GBT employees and the number and nature of encounters with riders or other community members where language has been a barrier.

GBT distributed a language surveys to its employees. The objective of the survey was to evaluate

the needs of GBT customers who are not able to communicate in English. The first question asked employees was if they could communicate in a language other than English, and if so, what language or languages.

Although varying degrees of fluency were indicated, 33 of 69 respondents could speak one or more languages other than English.

- 32 speak Spanish or Spanish Creole
- 3 speak French or French Creole
- 1 speak Italian
- 2 speaking Brazilian Portuguese
- 1 speaking Laotian
- 1 speaking Haitian
- 1 speaking Indu
- 1 speaking Japanese
- 2 speaking Vietnamese
- 2 Sign language
- 1 African languages

Next, the survey asked if in the previous year employees had encountered customers who were unable to communicate in English and how often they heard or did not hear one of fourteen languages.



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LEP Customer Encounters

	Rarely	Sometimes	Often	Not Applicable
Spanish or Spanish Creole	2	25	31	0
French or French Creole	9	14	7	24
Italian	17	11	3	22
Portuguese or Portuguese Creole	11	19	3	19
German	13	4	0	36
Greek	13	7	0	33
Persian	13	2	0	36
Hindi	13	5	6	28
Chinese	15	11	3	23
Japanese	15	8	1	28
Russian	16	4	0	31

The three other languages were identified as Toko, an African dialect, Arabian, and lip reading.

The next survey question asked what type of needs or requests for assistance had employees received from LEP customers. Those responses included:

- Help with fastening a seat (demand response)
- Help with shopping bags
- Help with a cane, walker or mobility device
- Street or venue location (directions)
- Making a reservation (demand response)
- To discuss the fare
- Schedule and route information

The information obtained through this survey indicates a high number of GBT staff members responding to the survey (50%) speak one or more languages other than English, many speaking Spanish. Additionally, riders speaking Spanish are among the most frequently encountered LEP populations.

Community Partners

As part of this assessment, GBT also canvassed eight of its community partners to assess the extent to which they come into contact with LEP populations. GBT asked the partner agencies to estimate the percent of clients they interact with who would have limited English proficiency using the following questionnaire:

Do you encounter non-English speaking/reading people who need your services? All eight respondents noted that they did encounter clients with limited English proficiency.

If so, what are the top three languages that you encounter?

The eight respondents noted the following languages; Spanish, Spanish Creole, Portuguese, French, Haitian Creole, Asian, and African Languages.

How do you address language barriers?

Respondents use a variety of processes to address language barriers including bi-lingual staff, Language Line, translation services and family members.

Do you find language to be a barrier in preventing you from providing service?

While some expressed some difficulty in dealing with limited English skills, none of the respondents were prevented from providing their services as a result of a language barrier.

Community Partners

- Action for Bridgeport Community Development
- The Center for Family Justice
- Connecticut Commission on Human Rights & Opportunities
- Hall Neighborhood House
- Bridgeport Child Advocacy Coalition
- Career Resources
- Cardinal Sheehan Center
- The Kennedy Center (Mobility Services)



Consulting Directly with the LEP Population

In addition to the census data, internal survey of employees and outreach to community partners, GBT applied a survey to its riders asking the following questions:

- Languages spoken at home?
- Is language a barrier to accessing GBT services?
- Is language a barrier to accessing GBT outreach materials?
- Is language a barrier to access GBT customer service?

More than 176 riders responded to the survey, applied in-person on-board and at the GBT bus station. When asked what language they spoke at home, 24 (14%) reported Spanish or Spanish Creole. The 10 other languages reported in the survey represented 15% of the respondents.

When asked if language was a barrier to accessing GBT buses 154 (88% of respondents) reported that language was not a barrier while 6% responded that language was a barrier or was sometimes a barrier.

When asked if language was a barrier to accessing outreach materials 156 (89% of respondents) reported that language is not a barrier to accessing GBT outreach materials while 6% reported that language is a barrier or sometimes a barrier.

When asked if language is a barrier to accessing GBT customer service representatives (telephone and in-person) 158 (90% of respondents) reported that language was not a barrier to accessing customer service representatives while 5% reported that language was or was sometimes a barrier.

Riders surveys were applied at the GBT bus station in Downtown Bridgeport and on-board GBT services.

Factor 3: The Importance of GBT Service to People's Lives

Access to the services provided by GBT, both fixed route and demand response are critical to the lives of many in the region. Many depend on GBT's fixed route services for access to jobs and for access to essential community services like schools, shopping and medical appointments. Riders eligible for service under the American's with Disabilities Act (ADA) require service for the same reasons. Because of the essential nature of the services and the importance of these programs in the lives of many of the region's residents, there is a need to ensure that language is not a barrier to access.

In a Fall 2012 survey of 854 GBT riders, 588 (68%) reported depending on the service for work related transportation. During the same survey applied in Factor 2 of the LEP analysis, GBT also asked riders: For what purpose do you use the bus. Ninety three percent of the riders responding reported that they use the bus more than several times a week with purposes ranging from work (47%), shopping (38%), school (15%) – all essential trip purposes.

If limited English is a barrier to using these services, then the consequences for the individual could limit their access to obtain health care, education or employment. Critical information from GBT which can affect access includes:

- Route and schedule information
- Fare and payment information
- Information regarding making the best use of the system (How To)
- Service announcements
- Safety and security announcements
- Complaint and comment forms
- Outreach related to opportunity for public comments
- Information about demand response services under the ADA and other special programs
- What to do in an emergency (where to look for service change announcements)

Example: GBT Interior Signage



We want your ride with us to be safe, clean, on-time and friendly.

If we are not meeting your expectations you can tell us by visiting goGBT.com, calling (203) 333-3031 or visiting our information booth in the bus terminal.

Queremos que viaje con nosotros en un ambiente seguro, limpio y agradable, y llegue puntual a su destino.

Si no estamos cumpliendo con sus expectativas, puede informárnoslo visitando goGBT.com, llamando al (203) 333-3031 o visitando nuestro módulo de información ubicado en la terminal de autobuses



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Factor 4 - Resources and Costs for LEP Outreach

GBT has committed resources to improving access to its services and programs for LEP persons. Today, bilingual information (English/Spanish) is distributed in an extensive number of mediums including:

- A bi-lingual English/Spanish website
- A complete bilingual English/Spanish system timetable
- A complete bilingual English/Spanish Rider's Guide to demand response services (ADA paratransit)
- Bilingual English/Spanish outreach materials (seat drops and service change alerts)
- Bilingual English/Spanish representation at public meetings
- Bilingual English/Spanish customer service representatives
- Bilingual English/Spanish Demand Response reservation agents/customer service representatives
- Bilingual English/Spanish on-board signage
- Bilingual English/Spanish guides and training for GBT drivers.
- Increased use of Bilingual English/Spanish Twitter Feeds and Facebook posts (not yet 100%)
- A bilingual English/Spanish video on how to use GBT's new farebox.

To date, the costs associated with these efforts fit within the GBT's marketing and outreach budget. Costs are predominantly associated with translation services and material production.

OUTCOMES

New tools and alerting riders of language assistance

Following the "Four Factor Analysis" conducted with GBT's 2013 Title VI Program update, it was concluded that, while there are currently extensive outreach and materials for LEP populations of the service area, additional services would be beneficial, particularly to less prevalent LEP populations in the region. These additional services included:

- 1. The addition of Google Translate to GBT's website, which was completed in 2014. The available languages for this service were further updated to include all nine "Safe Harbor" language groups identified in this Title VI program update.
- 2. The addition of translation services for telephone communications is anticipated to be in service by the time this program update is submitted (February 2016).
- 3. In 2015, GBT assigned new staff, charged with improving GBT's community engagement process.
- 4. GBT is creating a new page, with multiple languages for print system timetables and web-based postings, indicating how GBT provides language assistance. Additionally,

a brochure, discussed previously in this program update, will be created to ensure that members of the nine previously identified "Safe Harbor" language groups are able to understand how to and obtain vital materials in the language they feel most proficient in. These projects are expected to complete in April 2016.

Additional recommendations gleaned from the internal staff survey include:

- 1. Use a smart phone with a translation application;
- 2. Offering employees conversational or transit specific language training;
- 3. Recruiting more multilingual employees;
- 4. A multi-language touch screen monitor where passengers can access bus route information at the terminal
- 5. On-board announcements in different languages

GBT is considering all of these items.

Oversight

Monitoring, Evaluating and Updating the Language Assistance Plan and Public **Participation Process**

In February 2013, GBT created a new staff position charged with improving community engagement. It is the responsibility of this staff member to ensure compliance with GBT's Title VI Plan, Public Participation Program, Language Assistance Plan and other community outreach efforts. The monitoring of the Language Assistance Plan will include:

- Periodic reviews of regional census data for changing patterns of LEP populations;
- Ongoing collaboration with regional partners;
- Ongoing review of Google Translate requests at GBT's website; and
- Post Event Assessments (PEA)

Post-Event Assessments

Following service changes, fare increases and planning projects, GBT Manager of Planning and Service Development assesses the effectiveness of public involvement against the goals established in this plan. This assessment will ask the questions:

- 1. Did the public know there was an opportunity to participate?
- 2. Was the purpose of the participation clearly articulated to the public?
- 3. Did the public have access to appropriate resources and information to allow for meaningful participation?
- 4. Did the decision making process allow for consideration and incorporation of public
- 5. Were there complaints about the public engagement process?
- 6. Were the public engagement efforts cost effective?
- 7. What additional methods could have been employed to improve the process?
- 8. Should the Public Participation Process or Language Assistance Plan be amended?





Training Employees

As part of their regular training, GBT operators are provided an one hour module on Spanish for transit employees. All staff are provided with the booklet "Basic Spanish for Transit Employees" prepared Colorado Mountain College in association with the Colorado Department of Transportation.

Translation of Vital Documents

GBT has translated many vital documents into Spanish and is in the process of translating others.

- Civil Rights Complaint Form Translated into Spanish in March 2013
- ADA Eligibility Applications Translated in 2006
- ADA Service Overview Booklet Translated into Spanish in 2006
- Service change announcements Translated into Spanish since 2001
- On-board notices Translated into Spanish since 2001
- Notification of free language services New print and web-based content will be complete in 2016
- Maps and schedules, rider information, ADA service information, news and event announcements are all translated into Spanish on GBT's website www.gogbt.com
- Service Complaint Forms Translated in March 2013

DECISION MAKING BODIES

Non-Elected Committees and Councils

GBT Board of Commissioners

At GBT, decisions regarding policy, service changes, fares, capital programming and facility locations are made by a municipally appointed Board of Commissioners. GBT's Board of Commissioners is composed of ten members representing four cities and towns who are members of GBT. These members are appointed by the chief elected officials of these member municipalities. Currently GBT has no mechanism to influence who is appointed. Meetings of the GBT Board of Commissioners are always open to the public, held at GBT's bus station or administrative offices and noticed on our calendar of events at gogbt.com.

Body	Caucasian	Latino	African American	Asian American	Native American
Board of Commissioners	8	0	1	0	0

Non-Decision Making Working Groups

GBT also works with two informal working groups, composed of meetings of Bus Operators and Riders. The Service Review Committee and the Passenger Advisory Committee meet to discuss routes, schedules, and other topics important to the community and our riders and contribute valuable ideas to GBT's planning and operations.

Service Review Committee

The Service Review Committee is an informal technical meeting of GBT Bus Operators, who are selected to discuss specific aspects of GBT's service. Attendees are selected based on their experience with a specific service or services. For example, a committee meeting to discuss modifications to GBT's Route 1 service would consist of current Route 1 Bus Operators. Attendance at these meetings is voluntary. However, GBT's employees are often eager to share their ideas and while this is not a decision making body, the services that the Agency puts out are greatly benefited by their input.

Passenger Advisory Committee (PAC)

Passenger Advisory Committee (PAC) is an open public meeting of riders, which meets quarterly, to discuss all aspects of GBT's Services, from the perspective of the public. All riders are encouraged to attend and these meetings are noticed publically. Interested attendees can sign up to be notified by mail or email of upcoming meetings and all meeting dates are posted on GBT's website. Attendance at these meetings is fluid and while some attendees do attend regularly. While this is not a decision making body, the services that the Agency puts out are greatly benefited by their input.

SERVICE STANDARDS and POLICIES

GBT has developed a set of quantifiable service standards and policies. These service standards were updated in 2012 through a public participations process, approved by GBT's Board of Commissioner's and with the input of GBT's Passenger Advisory Committee (PAC).

These service standards and policies include:

- Vehicle Load
- Headways (Frequencies)
- On-time Performance (Schedule Adherence)
- Service Availability
- Vehicle Assignment Policy
- Transit Amenity Policy

Following the internal updating of these policies and standards, GBT advertised and held a public information session to receive comments on the proposed standards. During the session, GBT staff presented an overview of the components of GBT's public participation process as well as the various policies and standards. A copy of the presentation is available by contacting GBT.



Example: Public Meeting Announcements on Facebook and Email



The outcome of the public session was agreement on the service standards and policies as detailed below.

RESCHEDULED from 12/5/12:

Service Standards Public Meeting

December 19, 2012 5 pm - 7 pm

at the GBT Bus Station in the Community Room, 2nd floor

GBT is updating its service standards and would like your input. We have a series of service standards that are used to guide our planning and improve the service we provide. They are goals we work toward and service conditions that arise that alert us that service changes are needed. They cover things like on time performance, the locations of bus shelters, bus frequency, accessibility and the number of passengers on each bus.

Join us to find out more. We hope to see you there.

Vehicle Load

Vehicle load is expressed as the ratio of passengers to the total number of seats on a vehicle.

Vehicle Type	Seated Capacity	Standing Capacity	Total Capacity	Preferred	Average Load	Maximum Load
35' NewFlyer	29	20	49	1	1.5	2
40' NewFlyer	39	20	59	1	1.5	2
40' NewFlyer Hybrid	38	20	58	1	1.5	2
40' Gillig	40	25	65	1	1.5	2
Mini Bus Ford F-450	20	0	20	1	NA	NA
Mini Bus Chevy 3500	10	0	10	1	NA	NA



Vehicle Headway (Frequency)

Vehicle headway is the amount of time between two buses traveling in the same direction on a given route. GBT buses are scheduled with a variety of frequencies based generally on demand. Routes are schedule in 30 and 60 minute frequencies. GBT will also consider more frequent (20min.) service where ridership levels warrant and funding levels permit and less frequent services where demand dictates.

Policy Headways and Periods of Operation

Service	Weekday Peak	Weekday Off Peak	Saturday	Saturday Off Peak	Sunday Peak	Sunday Off Peak
GBT Local and Express Services	30	60	30	60	30	60

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On-Time Performance

Among the most important service standard for riders is on-time performance or adherence to published schedules.

- A vehicle is considered on time if it departs a scheduled time point no more than two minutes early and no more than 5 minutes late.
- GBT's on-time performance objective is 90% or greater.

Service Availability – Access to the Bus

GBT currently provides transit service so that 90% of all residents of the City of Bridgeport are within a 1,300 feet (1/4 mile) walk of bus service. Consideration is given to new markets as demand warrants and as resources become available.

Vehicle Assignment Policy

With several practical considerations, GBT assigns buses to service so that average age of the buses serving each route does not exceed the average age of the fleet. Bus assignments take into account the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route. Hybrid buses are not permitted on routes with clearance restrictions and service to Routes 13 and 17 is provided only with 35' buses due to turning radius limitations on those routes.

Transit Amenity Policy

GBT has over 1,400 stops in the service area – many located and installed more than 30 years ago. Stops, shelters and benches will be placed according to industry standards (TCRP Report 19) with consideration of permitting and for local and special needs.

The installation of new bus amenities can be requested through the customer service office, through the "Suggest it" form on GBT's website or at public meetings.

When the annual cost of repairs to any amenity (beyond the cost of normal cleaning) is greater than the cost of the structure, GBT reserves the right to permanently remove the amenity.

Monitoring Service Standards

For the on-going monitoring and measurement of service standards and policies, GBT uses the following schedule and methods.

Service Standard/Policy	Sample Schedule	Methodology	
Vehicle Load	All Routes Bi-Annually	Automatic Passenger Counters on Fixed Route Buses	
Vehicle Headways	Assessed Annually as Part of Service Planning	Automatic Vehicle Location System	
On-Time Performance	Assessed Monthly	Automatic Vehicle Location system	
Service Accessibility	Assessed Annually as Part of Service Planning	Planning Desk/Geographic Information System Review	
Vehicle Assignment Policy	Assessed Quarterly	Automatic Vehicle Location System	



Summary of Changes

Service Change Evaluations/Taking Action/Summary of Significant **Service Changes Since 2013**

Since GBT's 2013 Title VI Plan Submission there have been no changes in GBT's fare structure or service reductions.

> "The development and urban renewal befitting a community as a whole will not be unjustifiable purchased through the disproportionate allocation of its adverse environmental and health burdens on the community's minorities".

> -Executive order 12898: Federal Actions to Address Environmental Justice in Minority and Low Income Populations

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Construction Equity Analysis

When GBT plans to construct or expand a facility, such as a vehicle storage facility, maintenance facility, transit hub or operation center, the agency will include a copy of the Title VI Equity Analysis conducted during the planning stage with regard to the location of the facility. The following principles will be applied in the analysis:

- 1. To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations;
- 2. To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process; and
- 3. To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

GBT will follow federal guidance provided in FTA Circular 4703.1 (August 2012).

PROGRAM SPECIFIC **REQUIREMENTS**

Title VI Monitoring (from 2010 Title VI Plan)

The results of the ongoing monitoring of service standards as defined in the GBT's 2009 program can be obtained by contacting GBT.

Subrecipient Compliance

During this report period, GBT did not engage with any subrecipients.

Equity Analysis for Facility

During the past three years, GBT has not constructed a vehicle storage, operations center or maintenance facility.

Demographic Service Profile

Because GBT operates fewer than 50 buses in peak service, a demographic service profile was not prepared for this plan update.

GRANTS, REVIEWS and CERTIFICATIONS

Pending Applications for Financial Assistance

GBT has no pending applications for financial assistance from any federal agency other than the FTA.

Pending FTA Grants

GBT has no pending grants

Open FTA Grants

CT-04-0015-00 Bus Maintenance Facility Rehabilitation

CT-04-0026-00 Bus Maintenance Facility Roof Replacement (State of Good Repair)

CT-39-0003-00 Bridgeport T.O.D. - Alternative Modes Analysis Task

CT-90-X455-00 Facilities, Shelters, Vehicles, Farebox Replacement

CT-90-X512-00 Transit Amenity Improvement Projects

CT-90-X526-00 2015 - Multiple Capital Projects

CT-90-X900-00 Multiple Project Capital Improvements

CT-95-X013-00 Regional T.O.D. Pilot Program

CT-95-X018-00 Purchase of Replacement Hybrid Buses

Civil Rights Compliance Reviews in the Past 3 Years

GBT has not been the subject of any such reviews since its 2013 submission.

Recent Annual Certifications and Assurances

GBT executed its most recent Certifications and Assurances to the FTA in January 2015 and is in the process of executing 2016 Certifications and Assurances.

Previous Triennial Review Findings

GBT's 2013 Triennial Review resulted in no findings with respect to its Title VI Plan/activities.



CONTACT



For addition information on the Greater Bridgeport Transit Authority's Title VI Plan, or its efforts to comply with the Civil Rights Act of 1964 or Executive Order 13166 Improving Access to Services for Persons with Limited English Proficiency, please contact:

> Douglas C. Holcomb, General Manager/Chief Executive Officer Greater Bridgeport Transit Authority One Cross Street Bridgeport, Connecticut 06610 Tel: (203) 366-7070 Extension 124

E-Mail: Dholcomb@gogbt.com

BOARD ADOPTION of POLICY

Minutes of Regular Public Meeting - February 10, 2016

APPENDIX D

RESOLUTION 2-10-16-04

(Re: Title VI Program)

On a motion made by Commissioner Kovacs and seconded by Commissioner Ifill, it is hereby resolved to accept and adopt GBT's Title VI Civil Rights Program 2016 Update and authorize the CEO to appoint an agency Title VI Officer and to submit to FTA for approval.

The members cast the following voting units on the foregoing resolution:

	Aye	Nay
BRIDGEPORT		
Mark Anastasi	1 x2.00= 2	0 x2.00= 0
Andrew Ifill	1 x2.00= 2	0 x2.00= 0
Andrea Kovacs	1 x2.00= 2	0 x2.00= 0
Ginnie Preuss	0 x2.00= 0	0 x2.00= 0
FAIRFIELD		
Mitchell Fuchs	0 x1.65= 0	0 x1.65= 0
	0 x1.65= 0	0 x1.65= 0
STRATFORD		-
Laurie Goodsell	0 x1.43= 0	0 x1.43= 0
Tom Malloy	1 x1.43= 1.43	0 x1.43= 0
TRUMBULL		
Neil Lieberthal	1 x1.00= 1	0 x1.00= 0
Sharon McNeal	1 x1.00= 1	0 x1.00= 0
	TOTAL 9.43	TOTAL 0

The resolution was passed unanimously.

CERTIFICATION

I, Gerri M. Condon, Clerk of Board of Commissioners of the Greater Bridgeport Transit Authority, do hereby certify that the foregoing resolution was adopted by the ballots depicted above at a meeting of that body, duly called and held on Wednesday, February 10, 2016



Gerri M. Condon, Clerk of the Board

2/11/16 Date