# TITLE VI Title VI Program Update

Effective: March 9, 2022



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Greater Bridgeport Transit Title VI Program Update

Effective Date: March 9, 2022 Prepared by: Greater Bridgeport Transit One Cross Street Bridgeport, Connecticut 06610 Tel: (203) 366-7070 URL: gogbt.com page intentionally left blank

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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. PAGE 1 TITLE VI

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

iSolo pregunte!

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

**Il vous suffit de demander!** Pour obtenir des informations dans cette langue, veuillez composer le 203-333-3031.

Wystarczy poprosić! Jeśli potrzebują Państwo informacji w tym języku, prosimy zadzwonić pod numer 203-333-3031.

#### Basta chiedere!

Per informazioni in questa lingua chiamare il numero 203-333-3031.

**Pergunte!** Se precisar de informações neste idioma, ligue 203-333-3031.

**Jis Mande!** Si ou bezwen enfòmasyon nan lang sa a rele nimewo 203-333-3031.

Chỉ Cần Hỏi! Nếu quý vị cần thông tin bằng ngôn ngữ này, xin gọi số 203-333-3031.

**尽管提出要求!** 如果您需要以本文所呈现语言提供的信息,请致电 203-333-3031。

اسأل فقط!

.203-333-3031 مقرر فتاه ىلع لصتا ةغللا مذمب تامولعملل ةچاجب تنك اذإ

"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 process;
- 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. To develop a system to provide services to those with limited English proficiency, GBT engaged a number of community organizations, riders and its own staff members.

GBT's Board of Commissioners was actively involved in the update of this program. The content of the program was approved and adopted by the Board at a public meeting on March 9, 2022.

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 2019 and is effective as of March 9, 2022. 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, in its System Timetable, in meeting rooms and in reception areas, at both its Bus Station and administrative facilities.

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 "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;
- Bi-lingual (English/Spanish) signage on GBT's bus terminal platforms;
- Bi-lingual (English/Spanish) signage at GBT's Customer Service window;
- Bi-lingual (English/Spanish) signage in GBT's meeting rooms; and.
- Bi-lingual (English/Spanish) signage in the reception area of GBT's administrative facility

In addition to English/Spanish signage, all GBT Title VI notices have the following phrase, "if you need information in this language call 203-333-3031", translated into all nine Safe Harbor languages identified in the GBT service area. An example of which is on page five of this document.

### Title VI Notice • 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 203-333-3031.



## **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 Form available at our administrative offices or on our website gogbt.com.



Title VI complaints are not required to be in writing and may also be filed with GBT verbally, in person or over the phone or in writing, via GBT's other feedback portals. GBT Staff regularly examine complaints for evidence of discrimination based on race, color and/or national origin, which may be Title VI complaints.

Section I: Name:				
Address:				
Telephone (Home):		Telephon	e (Work):	
Electronic Mail Address:	I	rerepriori		
Accessible Format Requirements?	Large Print		Audio Tape	9
	TDD		Other	
Section II:				
Are you filing this compl	aint on your own b	ehalf?	Yes*	No
*If you answered "yes"	to this questions, g	o to Sect	ion III	
Please explain why you have filed for a third party: Please confirm that you permission of the aggrie on behalf of a third party	ved party if you an	e filing	Yes	No
Section III:				
I believe the discriminat	ion I experienced v	as based	d on (check all t	hat apply):
[ ] Race	[ ] Color		[ ] Nation	al Origin
Date of Alleged Discrimin	nation (Month, Day	, Year):		
Explain as clearly as pos discriminated against. If and contact information as well as names and co needed, attach an additi	Describe all persons of the person(s) w ntact information of	who we ho discrir f any wit	re involved. In minated against	clude the name you (if known)

ith this agency?  Yes  No    deral, State, or local agency, or wit  []    []  State Agency:
[ ] State Agency:
[ ] State Agency:
[ ] State Court:
[ ] State Court:
[ ] State Court:
on at the agency/court where the
nformation that you think is relevan
Date
s below, or mail this form to:
-

Entry ID	Date	Time	Route	Driver	Early	Pass By	Safety	Rude	Late	Other Cleanliness	Fare Media	Websito	ADA	Title VI	Investigated	Actionable	Mechanical	Reply	Complaint Resolution		Resolution Date	First	Last	Substantiated
4375	Tuesday, December 14, 2021	10.25 a.m.	4	Cole and Champaig	2n					1									I am new to Brdgeport and unaware that the 17 & 4 switch. I was waiting for the #4 and the women pulled up and got off the bus to take a heak. I assumed that when the came back it would be the #4 again but it turned into the #17. At this point it was the same driver. A male driver from another bus looked an end shrugged. My minar compaint it the lack of information — I feel that the buses should have information about the route changes (complaint taken incomplete)	Buses do have signage on the front plus its on th passenger schedules, she said the driver was a female but the two drivers were male.		Annika	Ekbergh	0
		8:40 p.m.	8 47	18 J. Paisley				1											Incompeter Erst of all, the bus driver left the trumbull mail approximately 10 minutes late after already arriving a few minutes late. Then, when it got to my stop he completely ignored the signal and flew past the next two stops, completely ignoring me and the "stop requested signal". And he The stop timere departed from the bus station and proceeder to speed through the route well	The bus operator did not stop and will be consulted.		Diamonic	Van Norder	1
4378	Sunday, December 19, 2021	8.00 p.m.	1 37	02 Pierre			1												pass the speed limit down Housestmic are and Damma are speeding going through too given on one lights pulping me on the doort perspression in drager. Previse go back and too at the an older lady that loaded like shares was in her Glo con the bac at the time. The Buck driver was also had to everyon in the back segarating that here suggest backase he dod not write to be working and writed to harry up and got to the garages on the can go home because H was done to the the segaration of the back segaration of the segaration of the can be done working and writed to harry up and got to the garages on the can go home because H with the segaration of the back segaration of the segaration of the can be done because here the object driving the back to don't list here garations will be and any because the list in darget because the	The bus operator did not talk to anyone about not wanting to work. He was not speeding. He did not run through any red lights or stop sions.		Malik	Moore	0
4379	Tuesday, December 21, 2021	11:45 a.m.	7 47	07 A. Brown						1									Heft my list of the number 7 bus and a passenger took it. I would like to know who did, if possible. It's emergency!!!! My house key is inside and that's the only copy. I won't be able to enter my home without it. I would appreciate it if I can get help	Lost & Found. Directed this woman to check with Martha. Fairfield police were involved. Ed did a screen shot of the video and sent it to the officer. Fairfield police notified Ed first before the complaint came in.		Shaunta	Williams	
	Wednesday, December 22, 2021	12:00 am.				1													He kept driving did not stop for me at bus stop I was literally at bus stop. Bus did not stop. Even had light and me waving with pass in hand.	Sent email to passenger asking for correct time. 12/30/2021 the person was not starning near the pole he was standing away from the pole. His back was also standing with the back towards the road so the operator did not know that the person wanted the bus.		Carmelo		0
	Thursday, December 23, 2021	10:20 a.m.	8 42	07 Patrick															Was at bus stop. Near pole. And bus did not stop. In error sent as bus 1 I think	duplicate				
4383	Friday, December 31, 2021	10.38 a.m.	CL																Incomplete The CL bus never showed up. I been waiting since 10:25em and it's now 11:03. I'm late for work and my manager said my job is on the line. This lart the first time it's happened but this time I found out how to report the bus not showing up.	We don't have a bus scheduled at that location at that time. The closest bus would have been a millord transit bus which would have been in the area at 10:40. Sent email to passenger letting them know.		Karlshon	Fleming	0
4385 4386		3:10 p.m.	1 47	01 Craig		1													I was waiting for the bus at the marshalls plaza and the bus driver rode right past me didn't stop incomplete	There were no passengers at the stop. Two people were walking on the side walk but there was no indication that they wanted the bus.		Malayna	Ауаа	0
4387	Tuesday, January 11, 2021	7:45 a.m.	CL 47	08 Green				1											Bus driver yelfed in my face and was very unprofessional	Bus operator went inside to use the bathroom. The bus doors were closed. The passenger took it upon himself to open the doors and board the bus. The bus operator told him he wasn't supposed to do that but she did not yell in the passenger's face.		Juan	Duarte	0

Sample of GBT complaint tracking database with flag for Title VI complaints.

### The Procedure

Civil rights complaints should be 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, 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 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 also be administratively closed 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, they have 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

#### iSolo pregunte!

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Il vous suffit de demander! Pour obtenir des informations dans cette langue, veuillez composer le 203-333-3031.

#### Wystarczy poprosić!

Jeśli potrzebują Państwo informacji w tym języku, prosimy zadzwonić pod numer 203-333-3031.

#### zudzwonie pod nomer z

**Basta chiedere!** Per informazioni in questa lingua chiamare il numero 203-333-3031.

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Chỉ Cần Hỏi! Nếu quý vị cần thông tin bằng ngôn ngữ này, xin gọi số 203-333-3031.

#### **尽管提出要求!** 如果您需要以本文所呈现语言提供的信息,请致电

اسأل فقط!

.203-333-3031 مقرر فــتاه ىلع لـصـتا ةغللا ەذەب تامولعملل قچاجب تـنك اذإ

### 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.

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

#### Active Lawsuits, Complaints or Inquiries Alleging Discrimination

# **GBT's PUBLIC PARTICIPATION PLAN** Key Principles

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 guide 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 established through public participation 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 with Limited English Proficiency
- Accessibility Every reasonable effort is made to ensure that opportunities to participate are physically, geographically, temporally, linguistically, and culturally accessible.
- **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 be ongoing.
- 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 understand.
- 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 Metropolitan Regional Council of Government's adopted public participation plan dated October 25, 2018. This plan clearly indicates that the MPO's public participation process satisfies GBT's public participation requirements for 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 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.

- A service/fare change proposal is developed internally or as a result of public comment;
- 2. GBT may consult with bus operators from effected routes on service proposals.
- 3. If required, authorization from the GBT Board of Commissioners is sought to proceed to a public comment period;
- 4. 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;
- 5. Bilingual (English and Spanish) public outreach materials and a program are developed;
- Outreach In advance of public information sessions is released (using the tool-box of mediums listed below);
- 7. An Email is transmitted to GBT community partners;
- 8. Local radio station WICC or WCUM interviews may be conducted (if available);
- 9. The public comment period ends;
- 10. A GBT Board of Commissioners summary package is presented detailing the outcome of the public participation process along with staff recommendations;
- 11. The final service/fare change date is set;
- 12. Outreach is conducted in advance of any service or fare change;
- 13. 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.

#### **Passenger Advisory Meetings**

In addition to engaging the public during GBT's decision making process, GBT engages riders at regularly scheduled open public meetings, which serve as listening session regarding various aspects of GBT's service and programs. All riders are encouraged to attend these meetings, which are advertised in a similar fashion to that of other public meetings in GBT's Public Participation Plan. Since the start of the COVID-19 pandemic, in 2020, GBT has not held any Passenger Advisory Meetings. However, consideration is being given to how this might be done remotely while the pandemic persists.

#### **Example: GBT Interior Signage in English**





### **GBT Mediums**

Many of the following mediums are multi-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 utilizing LingoTek automatic translation (January 1, 2019 March 20, 2022);
  - Non-English Total Users: 14,691 (3.71% of all website users)
- Web-Based Feedback (Report It., Your Ideas.)
- Social Media GBT has used Facebook (2,3K+ followers in 2022) and Twitter (1,2K+ followers in 2022) since 2009 to help engage community
- Email GBT has developed an email newsletter which now reaches 2,054 opt-in readers
- Podcasts GBT's family of podcasts includes two on GBT Civil Rights efforts and can be found at <u>soundcloud.com/gogbt/civil-rights</u> and <u>soundcloud.com/ctrides-information/episode-3</u>
- 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

#### **Example: GBT Interior Signage in Spanish**





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TITLE



### **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 stakeholders with whom we regularly communicate through email and direct mail.

### **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.

# 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, most 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 the latest years currently available. Data was reviewed for GBT's four member municipalities as well as Fairfield County in its entirety.

#### Fairfield County Overview

GBT's service area encompasses a 102 square mile area of Fairfield County, Connecticut, and is home to a diverse population of more than forty languages groups. Of the total County population (892,172), 12.5% (111,750) 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 0.1% of the total County Population.

#### Speak English Less Than Very 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 very well."

Speak English "Less than Very Well"	Population Speaking English "Less than Very Well"	Percent of County Population
Spanish or Spanish Creole	69,842	8.2%
Portuguese	11,952	1.3%
Haitian Creole	4,488	0.5%
Chinese	3.096	0.3%

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, 46.5% of the population of 136,777, reports speaking a language other than English. As suggested by the county-wide data, 32.6% of the total population speaks Spanish or Spanish Creole (a total of 44,557 people) and of that number, 50.2% (22,380) report speaking English "less than very well." Following Spanish or Spanish Creole speaking residents, are Bridgeport residents who reported speaking Portuguese or Portuguese Creole (4,688 or 3.4%) and French Creole (4,196 or 3.1%). Of those residents who reported speaking Portuguese or Portuguese or Portuguese Creole and French Creole, 59.4% (2,786) and 35.4% (1,468) reported speaking English "less than very well," respectively.

#### 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 Very 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	5.1%	4.0%	30.1%
Stratford	7.1%	9.3%	32.0%
Trumbull	4.7%	4.5%	26.3%

#### 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 very 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 very well" in Stratford's South End and Center.



Several conclusions can be drawn from this review:

- Approximately 13% of residents of the County report speaking English "less than very well";
- Of those reporting speaking English "less than very well," the largest population speaks Spanish or Spanish Creole at home;
- This pattern largely 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 GBT's services area, which meet the Safe Harbor Provision thresholds, "of 5% or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered". Those language groups are depicted in the table below.



Safe Harbor Language Group	Population	Percent of Service Area Population
Service Area Population	279,049	100%
Spanish or Spanish Creole	53,153	19.0%
French	2,048	0.7%
French Creole	4,812	1.7%
Italian	2,855	1.0%
Portuguese or Portuguese Creole	6,519	2.3%
Polish	1,616	0.6%
Chinese	1,711	0.6%
Vietnamese	1,181	0.4%
Arabic	1,714	0.6%

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, LingoTek, over the phone (OTP) 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 matters are or will be translated into the Safe Harbor languages above. Whereas "Spanish or Spanish Creole" is by far the most common language group that GBT staff come into contact with, many of the below documents are readily available in both English and Spanish. GBT will provide language assistance for all other languages upon request. Hardcopies of the below vital documents are available at GBT's administrative offices, at One Cross St., Bridgeport, CT. Electronic copies, if available, are provided on GBT's website, gogbt.com.

- 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 the below notice, in its rider's guide, 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. GBT has translated the below notice into several additional languages, which have been identified by its community partners and which are becoming more prevalent in the community.

"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, LingoTek, over the phone translation (OTP) services, bilingual signage and documents, and 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 skills);
- 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, maintenance 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 well in English. The first question asked employees if they could communicate in a language other than English, and if so, what language or languages.

Although varying degrees of fluency were indicated, 10 of 29 respondents could speak one or more languages other than English.

- 17 speak Spanish or Spanish Creole
- 1 speaks Italian
- 1 speaks Portuguese
- 1 speaks Creole

Next, the survey asked if in the previous year employees had encountered customers who were unable to communicate well in English and how often they heard or did not hear the language that the customer was comfortable communicating in.

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#### **LEP Customer Encounters**

	Frequency Unspecified	Sometimes	Often	Very Often
Amharic	1			
Arabic		1		
Cantonese			1	
Chinese		1		
Dari	1			
Filipino		1		
French		1		
Haitian		2	1	
Italian		1		
Kitsha	1			
Korean		2		
Oromo	1			
Pashto	1			
Polish		1		
Portuguese		3		
Spanish		4	3	4
Swahili		1		
Tigirina	1			



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

- Fare information
- Schedule and route information

The information obtained through this survey indicates a number of GBT staff members responding to the survey (34%) 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 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 respondents noted that they did encounter clients with limited English proficiency.

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

The respondents noted the following languages; Dari, Swahili, Arabic, Italian, Polish, Creole, French and Spanish, which was the most prevelant language encountered.

#### How do you address language barriers?

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

#### Working Closely with Community Partners

In addition to its own efforts to meet the needs of LEP populations in GBT's service area, GBT works closely with its community partners who work within LEP communities and who have their own toolbox to reach these persons. One such example is GBT's work with the Connecticut Institute for Refugees and Immigrants.

Since 2020 GBT has worked to help support the refugee population in the region through a partnership with The Connecticut Institute of Immigrants and Refugees (CIRI). As mobility plays a critical role in the success of these individuals, a key element of CIRI's orientation is the introduction of GBT services. Included in the sessions are specifics such as bus fares, bus stop locations, navigation resources and more.

In September 2021, staff visited the CIRI office in Bridgeport to observe a bus orientation. The presentation is led by CIRI staff with the assistance of Language Line to accommodate any language barriers. Its purpose is to show new members how to use the system and make them feel more comfortable navigating the transportation system.



In November 2020, GBT provided twenty-seven Welcome Packages, each included a water bottle, notebook, rider's guide and 31-day bus pass.

On June 21, 2021, an additional sixty-three Welcome Packages were provided.

In December 2021, has received more than 100 individuals from Afghanistan since December. Staff is still working to provide Welcome Packages.

Through this initiative, GBT's goal is to make new members of the community feel safe and welcome while riding GBT buses.

#### **Community Partners**

- Action for Bridgeport Community Development
- Beardsley Zoo
- Bridgeport Child Advocacy Coalition
- Bridgeport Downtown Special Services District
- Bridgeport Regional Business Council
- Cardinal Sheehan Center
- Career Resources
- Center for Family Justice
- Connecticut Department of Transportation
- Connecticut Institute for Refugees and Immigrants
- Connecticut Metropolitan Council of Governments
- CTrides
- Greater Valley Chamber of Commerce
- Green Villages Initiative
- Hall Neighborhood House
- Mayor's Initiative for Reentry Affairs
- The Center for Family Justice
- The Kennedy Center (Mobility Services)
- The WorkPlace

#### **Consulting Directly with the LEP Population**

In addition to the census data, internal survey of employees and outreach to community partners, GBT has in previous years applied a survey to its riders, asking the below questions. Due to the spread of COVID-19 in the Bridgeport Region, this survey was not updated with this Title VI program update. GBT has included its most recent rider survey, from its 2019 Title VI update for reference.

- 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 115 riders responded to the survey, applied in-person at the GBT bus station. When asked what language they spoke at home, 23 (20%) reported Spanish or Spanish Creole. The 10 other languages reported in the survey represented 32% of the respondents.

When asked if language was a barrier to accessing GBT buses 87 (76% of respondents) reported that language was not a barrier while 15% responded that language was a barrier or was sometimes a barrier.

When asked if language was a barrier to accessing outreach materials 86 (75% of respondents) reported that language is not a barrier to accessing GBT outreach materials while 13% 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) 92 (80% of respondents) reported that language was not a barrier to accessing customer service representatives while 12% reported that language was or was sometimes a barrier.

### 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 GBT 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.

During the same survey applied in Factor 2 of the LEP analysis, GBT also asked riders: For what purpose do you use the bus. The top three essential trip purposes for GBT riders surveyed were work (43%), General Transportation (43%) and Medical (11%).

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.

### 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:

- "Just Ask!" program
- A multi-lingual website
- A complete bilingual English/Spanish system timetable
- A complete bilingual English/Spanish Rider's Guide for 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.
- Use of Multi-lingual English/Spanish Twitter Feeds and Facebook posts.

To date, the costs associated with these efforts fit within 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

To help improve access to and information regarding public transportation, GBT has implemented a number of tools and strategies, include:

- Replacing Google Translate, on GBT's website with LingoTek, a far more accurate and reliable translation tool for GBT's website, that can translate GBT's entire website into 104 languages, including all nine Safe Harbor languages identified in GBT's most recent Four Factor Analysis.
- 2. Implemented and trained staff in the use of Over the Phone translation services (OTP), which can provide language assistance in a number of languages.
- 3. Implementation of "Just Ask!" program, discussed previously in this program update, to ensure that members of the nine previously identified "Safe Harbor" language groups are able to understand how to obtain vital materials in the language they feel most proficient in. This program includes a notice in GBT's riders guide, is included on vital documents and is advertised with stand-alone posters on buses and at GBT's bus station.

As part of this ongoing work, GBT is considering the following ideas to further improve access to transit information for LEP populations.

- 1. Increase direct outreach efforts to LEP populations, beyond those in the nine Safe Harbor language categories. For example, to Bridgeport's increasing Afghan refugee population.
- 2. Expand "JustAsk!" advertising campaign directly into neighborhoods with high numbers of LEP populations and/or census tracts with persistent poverty, on bus stops and in shelters.
- 3. Increase efforts to recruit more multilingual employees.
- 4. Provide language training to existing employees.

### Oversight

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

GBT's Planning and Service Development Officer is responsible 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;
- Post Event Assessments (PEA)

#### **Post-Event Assessments**

Following service changes, fare increases and planning projects, GBT's Planning and Service Development Officer 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 input?
- 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 training on Spanish for transit employees. All staff are provided with the booklet "Basic Spanish for Transit Employees" prepared by Colorado Mountain College, in association with the Colorado Department of Transportation, and passenger language identification cards. GBT staff is also trained in the use of over the phone translation services, provided by Transperfect.

# 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. They are the only transit related decision-making body at GBT. GBT's Board of Commissioners is composed of ten members (currently one vacancy) 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 to the Board of Commissioners. The member municipalities each have their own process, established by municipal charter and/or ordinance, for selecting and appointing members to the Board of Commissioners. 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.



Municipality		Asian	Black	Hispanic	White	Other
Bridgeport	Community Profile	3%	32%	41%	20%	4%
	Male Commissioners		1		1	
	Female Commissioners				2	
Fairfield	Community Profile	4%	2%	7%	84%	3%
	Male Commissioners				2	
	Female Commissioners					
Stratford	Community Profile	2%	15%	18%	62%	2%
	Male Commissioners				1	
	Female Commissioners				1	
Trumbull	Community Profile	6%	5%	7%	80%	2%
	Male Commissioners				1	
	Female Commissioners					



# **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 participation process. As is required, these updated service standards were reviewed and approved by GBT's Board of Commissioners in that same year.

Any new or amendments to existing service standards and policies requires public input, via GBT's public participation process and review and approval by GBT's Board of Commissioners.

Any new or amendments to existing service standards and policies requires public input, via GBT's public participation process and review and approval by GBT's Board of Commissioners.

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.

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# Vehicle Load

Vehicle load is expressed as the ratio of passengers to the total number of seats on a vehicle, relative to the vehicle's maximum load point. For example, on a bus with thirty-nine seats a vehicle load of 1.46 means that the seats are filled, with approximately eighteen standees.

	Vehicle	Туре	Aver	age Passe	nger Capa	cities
Agency ID	ID Vehicle Manufacturer Length		Seated Capacity	Standing Capacity	Total Capacity	Maximum Load Factor
4300	40	NFA - New Flyer of America	39	18	57	1.46
5300	35	NFA - New Flyer of America	29	14	43	1.48
4200	40	GIL - Gillig Corporation	40	20	60	1.5
329 - 330	40	NFA - New Flyer of America	38	25	63	1.66
4701 - 4711	40	NFA - New Flyer of America	40	25	65	1.63
3701 - 3709	35	NFA - New Flyer of America	31	14	45	1.45
4712 - 4720	40	NFA - New Flyer of America	40	25	65	1.63
3710 - 3715	35	NFA - New Flyer of America	31	14	45	1.45
4001 - 4002	40	PRO - Proterra Inc.	40	17	57	1.43
2221 - 2224	25	GCC - Goshen Coach	20	0	20	1
2701 - 2724	24	SPC - Startrans (Supreme Corporation)	11	0	11	1
2725 - 2726	16	DTD - Dodge Division — Chrysler Corporation	6	0	6	1

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# 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 (20-min.) 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

### **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 five 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. For example, routes with clearance restrictions or turning radius limitations.


## **Transit Amenity Policy**

GBT has over 1,400 stops in the service area – many located and installed more than 30 years ago. The installation of new bus amenities can be requested through the customer service office, through the "Suggest it" form on GBT's website, by email to a GBT staff member or verbally to a staff member or at public meetings. Requests through any of these mediums are forwarded to GBT's Planning and Service Development Department, which anchors GBT's Transit Amenity Program, for consideration.

It is the goal of GBT to place robust transit amenities at bus stops throughout the service area and to that end, GBT considers all requests for transit amenities fully and equally. Amenities are placed in accordance with industry standards and local engineering requirements. Consideration of the requirements outlined by landowners and governing authorities are also necessary. If GBT is unable to obtain landowner permission or local or state permits, an amenity project is unable to move forward. To date, this has been the only reason why GBT has been unable to fulfill an amenity request.

As part of the GBT's Transit Amenity Program, we take an active role in maintaining the federal assets of the program in like new condition. However, when the annual cost of repairs to any amenity (beyond the cost of normal cleaning) is greater than the cost of the amenity, GBT reserves the right to permanently remove the amenity. It is noteworthy, that in consideration of the importance of transit amenities to the community, GBT has not availed itself of this policy.

### **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 2019

Since GBT's 2019 Title VI Plan Submission there have been no changes in GBT's fare structure and two service expansions.

## **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).

"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



## PROGRAM SPECIFIC REQUIREMENTS

### **Title VI Monitoring**

Because GBT operates fewer than 50 buses in peak service, some service standards are not monitored as part of GBT's Title VI Program.

#### 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**

CT-2022-008-00 - Covid Response Operating Assistance No. 2

#### **Open FTA Grants**

CT 90-X526-00 - Multiple Capital Projects CT-95-X013-00 – Regional TOD Pilot Program CT-04-0015-00 – GBT Bus Maintenance Facility Rehabilitation (Design) CT-90-X512-00 – Transit Amenity Improvement Projects CT-90-X455-00 - Facilities, Shelters, Vehicles, Fareboxes CT-2017-001-00 - Multiple Capital Projects CT-2018-003-00 – Multiple Capital Projects, Facility Improvements, Administrative Support, Shop Tools and Equipment CT-2018-004-00 – Connecticut Low-No Pilot Program CT-2019-002-00 – Multiple Capital Projects Midlife Overhauls, Facility Improvements, Administrative Support CT-2020-021-00 - Multiple Capital Projects: Intermodal, Facility Improvement, Administrative Cap. CT-2020-009-01 – Amended GBT Cares Act Grant CT-2021-002 – Multiple Capital Projects – Fare Collection Replacement, 710 Water Street Repairs and Improvements, Cross Street Improvements. CT-2021-011-00 – Facility Improvements, Supplemental Fire Suppressions, Rolling Stock, Public Station Improvements and Support Equipment

### Civil Rights Compliance Reviews in the Past 3 Years

GBT has not been the subject of any such reviews since its 2019 submission.

#### **Recent Annual Certifications and Assurances**

GBT executed its most recent Certifications and Assurances to the FTA February 11, 2022.

#### **Previous Triennial Review Findings**

GBT's August 2019 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**



#### **RESOLUTION 3-9-22-2**

#### Accept and Adopt GBT's Title VI Civil Rights Program 2022 Update

On a motion made by Commissioner Ginnie Preuss, seconded by Commissioner Andrew Ifill, it is hereby resolved to Accept and Adopt GBT's Title VI Civil Rights Program 2022 Update and Authorize the CEO to Submit to FTA for Approval.

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

	Ауе	Nay
BRIDGEPORT		
Mark Anastasi	0 x2.00= 0	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	1 x2.00= 2	0 x2.00≃ 0
FAIRFIELD		
Pierre Ratzki	1 x1.65= 1.65	0 x1.65= 0
Michael Mears	1 x1.65= 1.65	0 x1.65= 0
STRATFORD		
Jennifer Sheldon	0 x1.43= 0	0 x1.43= 0
Joe Kubic	1 x1.43= 1.43	0 x1.43= 0
TRUMBULL		
Vacant	0 x1.00= 0	0 x1.00= 0
Doug Sutherland	1 x1.00= 1	0 x1.00= 0
	<b>TOTAL</b> 11.73	<b>TOTAL</b> 0

The resolution was passed.

#### CERTIFICATION

I, Christine Michaels, Clerk of the 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, March 9, 2022.

Christine Michaels, Clerk of the Board

4/2022

# APPENDIX

**OUTREACH ACTIVITIES** 

SAMPLE OF COMPLAINT DATABASE

TITLE VI COMPLAINT FORM

### **GBT OUTREACH ACTIVITIES 2019-2021**

EVENT TITLE	DATE	LOCATION	PURPOSE
Newsletters 2019	2019	Online	Public outreach via six email newsletters in 2019
Bike Share Outreach	2019	Various locations and dates thoughout Fairfield County	Public outreach events to gather public feedback regarding potential
			regional bike share program
GBT Board of Commissioners Meeting	1/9/2019	GBT Administrative Offices (One Cross St.)	Public meeting of the GBT Board of Commissioners
Passenger Advisory Meeting	1/29/2019	GBT Bus Station - 2nd Floor Community Room	Listening session with riders on various aspects of GBT service.
GBT Board of Commissioners Meeting	2/13/2019	GBT Administrative Offices (One Cross St.)	Public meeting of the GBT Board of Commissioners
GBT 2018 Safety Awards Ceremony	2/28/2019	Public event: GBT Main Bus Terminal	The GBT Safety Awards Ceremony promotes the importance of safety and
			fosters employee engagement.
Transit Press Conference with	3/1/19	Bridgeport Train Station	Public press conference with Governor Lamont regarding transit
Governor Lamont			infrastruture and funding
Passenger Advisory Meeting	3/13/2019	GBT Bus Station - 2nd Floor Community Room	Listening session with riders on various aspects of GBT service.
GBT Board of Commissioners Meeting	3/13/2019	GBT Administrative Offices (One Cross St.)	Public meeting of the GBT Board of Commissioners
GBT Board of Commissioners Meeting	4/10/2019	Water Street Station (710 Water St.)	Public meeting of the GBT Board of Commissioners
Earth Day Party for the Planet	4/13/2019	Beardsley Zoo	Tabling event to promote public transportation's contribution towards
			preserving our Earth.
GBT Earth Day	4/22/2019	Public event: GBT Main Bus Terminal	GBT Earth Day events strengthen community participation, promotes
			ridership, and increases awareness of the benefits of public transportation.
GBT Board of Commissioners Meeting	5/9/2019	Water Street Station (710 Water St.)	Public meeting of the GBT Board of Commissioners
Greater Bridgeport Day at the Capitol	5/14/2019	Judiciary Room at the State Capitol	Provide GBT General Information about the agency, communities we serve,
			and mission statement.
Passenger Advisory Meeting	5/23/2019	GBT Bus Station - 2nd Floor Community Room	Listening session with riders on various aspects of GBT service.
GBT Board of Commissioners Meeting	6/13/2019	Water Street Station (710 Water St.)	Public meeting of the GBT Board of Commissioners
GBT Board of Commissioners Meeting	7/11/2019	Water Street Station (710 Water St.)	Public meeting of the GBT Board of Commissioners

EVENT TITLE	DATE	LOCATION	PURPOSE
Annual Budget Hearing	7/24/2019	Remote - Via Zoom	Public hearing regarding GBT's proposed annual budget, for Fiscal Year 2020
Passenger Advisory Meeting	7/26/2019	GBT Bus Station - 2nd Floor Community Room	Listening session with riders on various aspects of GBT service.
GBT Board of Commissioners Meeting	8/8/2019	Water Street Station (710 Water St.)	Public meeting of the GBT Board of Commissioners
Bus Shelter Ribbon Cuttings	8/23/19	Fairfield and Stratford	Public event with mayors, elected official and the public regarding the GBT amenities programs
GBT Board of Commissioners Meeting	9/12/2019	Water Street Station (710 Water St.)	Public meeting of the GBT Board of Commissioners
Passenger Advisory Meeting	9/18/2019	GBT Bus Station - 2nd Floor Community Room	Listening session with riders on various aspects of GBT service.
GBT Board of Commissioners Meeting	10/9/2019	GBT Administrative Offices (One Cross St.)	Public meeting of the GBT Board of Commissioners
GBT/CT Rides Tabling Event	10/22/2019	St. Vincent's Hospital, 2800 Main St.	Provide GBT information about the public transportation options available to employees of the medical faciity.
GBT Board of Commissioners Meeting	11/6/2019	GBT Administrative Offices (One Cross St.)	Public meeting of the GBT Board of Commissioners
Passenger Advisory Meeting	11/14/2019	GBT Bus Station - 2nd Floor Community Room	Listening session with riders on various aspects of GBT service.
GBT Board of Commissioners Meeting	12/11/2019	GBT Administrative Offices (One Cross St.)	Public meeting of the GBT Board of Commissioners
Newsletters 2020	2020	Online	Public outreach via 20 email newsletters in 2020
Mask Giveaways at Bus Station	2020	Multiple dates throughtout 2020	Mask giveaways to the public during the Covid-19 pandemic
GBT Board of Commissioners Meeting	1/8/2020	GBT Administrative Offices (One Cross St.)	Public meeting of the GBT Board of Commissioners
University of Bridgeport Involvement Fair	1/30/2020	UB, 244 University Ave. Bridgeport	Provide GBT information about the public transportation options available to new students of UB.
HCC Tabling Event with CT Rides	2/5/2020	HCC, 900 Lafayette Boulevard, Bridgeport	Provide GBT information about the public transportation options available to the students of HCC.
GBT Board of Commissioners Meeting	2/12/2020	GBT Administrative Offices (One Cross St.)	Public meeting of the GBT Board of Commissioners
GBT Board of Commissioners Meeting	3/11/2020	GBT Administrative Offices (One Cross St.)	Public meeting of the GBT Board of Commissioners
GBT Board of Commissioners Meeting	6/10/2020	Remote - Via Zoom	Public meeting of the GBT Board of Commissioners

EVENT TITLE	DATE	LOCATION	PURPOSE
GBT Board of Commissioners Meeting	7/8/2020	Remote - Via Zoom	Public meeting of the GBT Board of Commissioners
GBT Board of Commissioners Meeting	9/9/2020	Remote - Via Zoom	Public meeting of the GBT Board of Commissioners
Bridgeport Regional Mobility Gap	9/16/2020	Remote - Via Zoom	Discussion of mobility gaps in the Bridgeport Region with community
Analysis Stakeholder Meeting			stakeholders
ZEB Press Conference	9/28/2020	GBT Maintenance Facility (One Cross St.)	Press conference at GBT with Governor Lamont, elected officials, and the
			public regarding Connecticut's zero emission bus program
GBT Board of Commissioners Meeting	10/14/2020	Remote - Via Zoom	Public meeting of the GBT Board of Commissioners
Public Hearing	11/9/2020	Remote - Via Zoom	Public hearing regarding proposed changes to Routes 19x and 22x.
GBT Board of Commissioners Meeting	11/11/2020	Remote - Via Zoom	Public meeting of the GBT Board of Commissioners
Annual Budget Hearing	11/14/2020	Remote - Via Zoom	Public hearing regarding GBT's proposed annual budget, for Fiscal Year 2021
Bridgeport Fittings Tabling Event with	12/4/2020	705 Lordship Blvd, Stratford	Provide GBT information about the public transportation options available to
CT Rides			employees of the manufacturing plant.
GBT Board of Commissioners Meeting	12/9/2020	Remote - Via Zoom	Public meeting of the GBT Board of Commissioners
Newsletters 2021	2021	Online	Public outreach via 21 email newsletters in 2021
Mask Giveaways at Bus Station	2021	Multiple dates throughtout 2020	Mask giveaways to the public during the Covid-19 pandemic
GBT Board of Commissioners Meeting	1/13/2021	Remote - Via Zoom	Public meeting of the GBT Board of Commissioners
Annual Budget Hearing	1/28/2021	Remote - Via Zoom	Public hearing regarding GBT's proposed annual budget, for Fiscal Year 2022
GBT Board of Commissioners Meeting	3/10/2021	Remote - Via Zoom	Public meeting of the GBT Board of Commissioners
GBT Earth Day	4/22/2021	Public event: Outdoors at the GBT Main Bus Terminal	GBT Earth Day events strengthen community participation, promotes
			ridership, and increases awareness of the benefits of public transportation.
GBT Board of Commissioners Meeting	5/12/2021	Remote - Via Zoom	Public meeting of the GBT Board of Commissioners

EVENT TITLE	DATE	LOCATION	PURPOSE
GBT Board of Commissioners Meeting	6/9/2021	Remote - Via Zoom	Public meeting of the GBT Board of Commissioners
McLevy Green Farmer's Market	7/8/2021	McLevy Green, 102 Bank St., Bridgeport	Tabling event to promote the summer fare free weekends and exended duration of the bus pass from 90 minutes to 120 minutes.
McLevy Green Farmer's Market	7/22/2021	McLevy Green, 102 Bank St., Bridgeport	Tabling event to promote the summer fare free weekends and exended duration of the bus pass from 90 minutes to 120 minutes.
McLevy Green Farmer's Market	8/5/2021	McLevy Green, 102 Bank St., Bridgeport	Tabling event to promote the summer fare free weekends and exended duration of the bus pass from 90 minutes to 120 minutes.
GBT Board of Commissioners Meeting	9/8/2021	Remote - Via Zoom	Public meeting of the GBT Board of Commissioners
Bridgeport Regional Mobility Gap Analysis Stakeholder Meeting	9/21/2021	Remote - Via Zoom	Discussion of mobility gaps in the Bridgeport Region with community stakeholders
COVID Vaccinatin Clinic	9/23/2021	GBT Main Bus Terminal	Support the DPH and provide additional opportunity to members of the GBT community to get the COVID-19 vaccination.
GBT Board of Commissioners Meeting	10/13/2021	Remote - Via Zoom	Public meeting of the GBT Board of Commissioners
COVID Vaccinatin Clinic	10/21/2021	GBT Main Bus Terminal	A continued effort to support the DPH and provide additional opportunity to members of the GBT community to get the COVID-19 vaccination.
Transit Amenity Advisory Group # 1	11/1/2021	Remote - Via Zoom	Discussion on how to streamline and prioritize the placement of transit amenities in represented municiplaities.
GBT Board of Commissioners Meeting	11/10/2021	Remote - Via Zoom	Public meeting of the GBT Board of Commissioners
Transit Amenity Advisory Group # 2	11/15/2021	Remote - Via Zoom	Discussion on how to streamline and prioritize the placement of transit amenities in represented municiplaities.
GBT Board of Commissioners Meeting	12/8/2021	Remote - Via Zoom	Public meeting of the GBT Board of Commissioners
Transit Amenity Advisory Group # 3	12/13/2021	Remote - Via Zoom	Discussion on how to streamline and prioritize the placement of transit amenities in represented municiplaities.
Transit Amenity Advisory Group # 4	1/24/2022	Remote - Via Zoom	Discussion on how to streamline and prioritize the placement of transit amenities in represented municiplaities.
GBT Board of Commissioners Meeting	2/9/2022	Remote - Via Zoom	Public meeting of the GBT Board of Commissioners

EVENT TITLE	DATE	LOCATION	PURPOSE
GBT Board of Commissioners Meeting	3/9/2022	Remote - Via Zoom	Public meeting of the GBT Board of Commissioners
GBT Board of Commissioners Meeting	4/13/2022	Remote - Via Zoom	Public meeting of the GBT Board of Commissioners
GBT Board of Commissioners Meeting	6/12/2022	Remote - Via Zoom	Public meeting of the GBT Board of Commissioners
Virtual DBE Outreach Session	7/27/2021		Outreach event focused on connecting agencies with MBE / DBE firms for potential contracting opportunities

#### Sample: Complaints Database

CI Au Date	Time	Route	Bus	Driver	Early	Pass By	Sarety Rude	Late	Other	Cleaniness Fare Media	Website	ADA	Title VI	Investigated Actionable	Machanical	Reply	Complaint Resolution	Firs	: Last	Substantiated Pass
4375 Tuesday, December 14, 2021	10:25 a.m.	. 4		Cole and Champaign					1								I am new to Bridgeport and unaware that the 17 & 4 switch. I was waiting for the #4 and the woman pulled up and got off the bus to take a break. I assumed that when she came back it would be the #4 again but it turned into the #17. At this point it was the same driver. A male driver from another bus looked a me and shrugged. My main complaint it he lack of information I feel that the buses should have information about the route changes (complaint taken over the phone by cmichaels) Buses do have signage on the front plus its on th passenger schedules. She said the driver was a female but the two drivers were male.	Annika	Ekbergh	0
4377 Saturday, December 18, 2021	8:40 p.m.	8	4718	J. Paisley			1										incomplete         First of all, the bus driver left the trumbull mall approximately 10 minutes late after already arriving a few minutes late. Then, when it got to my stop he completely ignored the signal and flew past the next two stops, completely ignoring me and the "stop requested signal".         The bus operator did not stop and will be consulted.	Diamo	nicVan Norde	n 1
4378 Sunday, December 19, 2021	8:00 p.m.	1	3702	Pierre			1										The Bus Driver departed from the bus station and proceeded to speed through the route well pass the speed limit down Housatonic ave and Barnum ave speeding going through stop signs and red lights putting me and the other passengers in danger. Please go back and look at the cameras or whatever you can do and fire this bus driver I did not feel safe and there was also an older lady that looked like she was in her 60s on the bus at the time. The Bus driver was also rude to everyone on the bus explaining that he was upset because he working and wanted to hurry up and get to the garage so he can go home because it was the holidays. Please investigate this incident and this bus driver because they want to hurry up and get off work.	Malik	Moore	0
4379 Tuesday, December 21, 2021	11:45 a.m.								1								I left my list of the number 7 bus and a passenger took it. I would like to know who did, if possible. It's emergency!!! My house key is inside and that's the only copy. I won't be able to enter my home without it. I would appreciate it if I can get help be onter my home without it. I would appreciate it if I can get help be onter my home without it. I would appreciate it if I can get help be onter my home without it. I would appreciate it if I can get help be onter my home without it. I would appreciate it if I can get help be onter my home without it. I would appreciate it if I can get help be onter my home without it. I would appreciate it if I can get help be onter my home without it. I would appreciate it if I can get help be onter my home without it. I would appreciate it if I can get help be onter my home without it. I would appreciate it if I can get help be onter my home without it. I would appreciate it if I can get help be onter my home without it. I would appreciate it if I can get help be onter my home without it. I would appreciate it if I can get help be onter my home without it. I would appreciate it if I can get help be onter my home without it. I would appreciate it if I can get help be onter my home without it. I would appreciate it if I can get help be onter my home without it. I would appreciate it if I can get help be onter my home without it. I would appreciate it if I can get help be onter my home without it. I would appreciate it if I can get help be onter my home without it. I would appreciate it if I can get help be onter my home without it. I would appreciate it if I can get help be onter my home without it. I would appreciate it if I can get help be onter my home without it. I would appreciate it if I can get help be onter my home without it. I would appreciate it if I can get help be onter my home without it. I would appreciate it if I can get help be onter my home without it. I would appreciate it if I can get help be onter my home without it. I would appreciate it if I can get he		tayWilliams	
4380 Wednesday, December 22, 2021	12:00 a.m.	4				1											He kept driving did not stop for me at bus stop Sent email to passenger asking for correct time. 12/30/2021	Carme	lo Alicea	
4381 Thursday, December 23, 2021 4382 Thursday, December 23, 2021 4383	10:23 a.m. 10:20 a.m.		4207 4207	Patrick Patrick		1											It be person was not staning near the pole he was standing away from the pole. His back was also standing with the back towards the operator standing with the back towards the operator was literally at bus stop. Bus did not stop. Even had light and me waving with pass in hand did not know that the person wanted the bus.           Was at bus stop. Near pole. And bus did not stop. In error sent as bus 1 I think         duplicate           incomplete	Elizab	eth Toney	0
4384 Friday, December 31, 2021	10:38 a.m.	CL															The CL bus never showed up. I been waiting since 10:25am and it's now 11:03. I'm late for time. The closest bus would have been a milford transit bus which would have been a to that 10:40. Sent email to passenger letting them know. There were no passengers at the stop. Two people	Karlsh	on Fleming	0
4385 Friday, December 31, 2021 4386	3:10 p.m.	1	4701	Craig		1											were walking on the side walk but there was no I was waiting for the bus at the marshalls plaza and the bus driver rode right past me didn't sindication that they wanted the bus.	Malay	na Ayaa	0
4387 Tuesday, January 11, 2021	7:45 a.m.	CL	4708	Green			1										Bus operator went inside to use the bathroom. The bus doors were closed. The passenger took it upon himself to open the doors and board the bus. The bus operator told him he wasn't supposed to do that but she did not yell in the passenger's face.	Juan	Duarte	0

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## Greater Bridgeport Transit Civil Rights Complaint Form

Any person who believes they have been aggrieved by any unlawful discriminatory practice, by Greater Bridgeport Transit (GBT), with regard to race, color and/or national origin, in accordance with Title VI of the Civil Rights Act, may use this form to file a complaint with GBT.

Section I:											
Name:											
Address:											
Telephone (Home):	Vork):										
Electronic Mail Address:											
Accessible Format	Large Print										
Requirements?											
	TDD		Other								
Section II:											
Are you filing this compla	int on your own bel	nalf?	Yes*	No							
*If you answered "yes" to	o this questions, go	to Section	III								
If not, please supply the person for whom you are		hip of the									
Please explain why you have filed for a third party:											
Please confirm that you h	ave obtained the		Yes	No							
permission of the aggriev		filing									
on behalf of a third party		5									
Section III:											
I believe the discrimination	on I experienced wa	is based on	(check all the	at apply):							
[ ] Race	[ ] Color	[	] National	Origin							
Date of Alleged Discrimin	ation (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, attach an additional sheet to this form.											

Section IV:										
Have you previously filed a Title VI complaint with this agency? Yes No										
Section IV:										
Have you filed this complaint with any other Federal, State, or local agency, or any Federal or State court?	or with									
[ ] Yes [ ] No										
If yes, check all that apply:										
[ ] Federal Agency: [ ] State Agency:										
[ ] Local Agency:										
[ ] Federal Court: [ ] State Court:										
Please provide information about a contact person at the agency/court where complaint was filed.	the									
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: Chief Executive Officer Greater Bridgeport Transit 1 Cross Street Bridgeport, CT 06610

One Cross Street • Bridgeport, CT, 06610

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203-366-7070 • <u>www.gogbt.com</u>