

*Bloomington Public
Transportation Corporation*

Title VI Program 2022-2025



Bloomington Public Transportation Corporation
Submitted: October 2022

Table of Contents

Introduction	3
Public Notice of Rights under Title VI	3
Title VI Complaint Procedures	4
Public Outreach and Participation Plan	5
Public Participation Process	5
Summary of Outreach Activities	7
Language Assistance Plan	9
Identification of LEP Individuals in the BPTC Service Area Who Need Language Assistance	11
1. Number of LEP Persons in Service Area	11
2. Frequency of Contact with LEP Persons	12
3. Nature and Importance of BPTC’s Services and Programs	13
4. Available Resources and Costs of Providing Language Assistance Services	14
Translation of Vital Documents	14
Training of Employees	15
Policies and Procedures	15
Over-the-Phone Language Assistive Services	15
Notifying LEP Persons of Language Assistive Services	16
Efforts to Identify Additional Language Assistance Needs	16
LEP Representative Groups	17
Monitoring, Evaluating and Updating the Language Assistance Plan	18
Membership of Non-Elected Boards, Councils, and Committees	19
Subrecipient Compliance with Title VI	19
Facility Planning Equity Analysis	19
Service Standards and Policy Development	20
Types of Services	20
Vehicle Load Standard	21
Vehicle Headway	22
Amenities Policy	22
Vehicle Assignment Policy and Standard	25

On-Time Performance..... 26

Service Availability 26

Appendix A: BPTC Title VI Complaint Form 28

Appendix B: List of Title VI Complaints 29

Appendix C: Public Participation Policy Resolution 30

Appendix D: Language Line Assistive Services..... 32

Appendix E: BPTC Board Resolution Approving 2022-2025 Title VI Program 34

Introduction

Bloomington Public Transportation Corporation (BPTC)—known locally as Bloomington Transit (BT)—is the primary public transportation provider in the City of Bloomington, Indiana. BT operates fourteen primary fixed routes, as well as complementary paratransit service—BT Access—to serve area residents and visitors. Bloomington is home to the flagship campus of Indiana University, whose student body and staff regularly compose 70 percent of ridership on BT fixed routes.

As a public transportation provider and recipient of Federal Transit Administration (FTA) funding (49 USC Section 5307, Urbanized Area Formula Program), BT is obligated to ensure that all of its programs, policies, services, and transportation decision-making processes are accessible to everyone without discrimination of race, color, or national origin, in accordance with Title VI of the Civil Rights Act (1964).

Title VI of the Civil Rights Act of 1964 provides that “no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance.” The Title VI regulatory requirements are included in 49 CFR Section 21.9(b) Title VI Regulations, and in the FTA Circular 4702.1B (“Circular”) Title VI Requirements and Guidelines for Federal Transit Administration Recipients. The Circular provides recipients of FTA financial assistance with guidance and instructions necessary to carry out the U.S. Department of Transportation’s (DOT) Title VI regulations and to integrate into their programs and activities considerations expressed in the Department’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons (70 FR 74087, December 14, 2005).”

The purpose of BPTC’s Title VI Program is to document the practices and operations of the transit agency regarding compliance with Title VI regulations. The Title VI Program is used to ensure that accountability and transparency are upheld throughout all transit operations in line with the agency’s commitment to deliver accessible services for everyone.

Public Notice of Rights under Title VI

BPTC notifies the public of rights afforded by Title VI by prominently posting the message below at all locations owned or operated by BPTC with access to the public, including:

- All revenue vehicles
- Grimes Lane Administration and Maintenance Facility
- Downtown Transit Center

- BPTC website

NOTIFYING THE PUBLIC OF RIGHTS UNDER TITLE VI

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

For more information on Bloomington Transit's civil rights program, and the procedures to file a complaint, contact 812-332-5688, (TTY 812-330-7853); email customer@bloomingtontransit.com; or visit our administrative office at 130 W. Grimes Lane, Bloomington, IN 47403.

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

If information is needed in another language, contact 812-332-5688

Title VI Complaint Procedures

The following instructions are shared with the public for how to submit a Title VI complaint:

Persons may file a signed, written complaint within 180 days of the date of alleged discrimination (example of Complaint Form included as Appendix A). The complaint should include the following information:

- Person's name, address and how to reach the person (telephone number, e-mail address, etc.)
- How, why, when and where the person believes they were discriminated against. Include the location, names and contact information of any witnesses. If the alleged incident occurred on the bus, give date, time of day, route number, location, and bus number.
- The written complaint shall be mailed or delivered to the BPTC General Manager at the address described above.

The BPTC General Manager will track and investigate all complaints received. If the General Manager is not available or if the complaint is filed against the General Manager themselves, the BPTC Board Chair shall investigate the matter. The BPTC General Manager will document all complaints and findings and respond back to the complainant in writing with determinations and findings.

The person may appeal the General Manager's finding by filing a signed, written appeal within 30 days of the date of the General Manager's finding to the Bloomington Public Transportation Corporation Board of Directors. The Board shall investigate the matter and respond back to the complainant in writing with determinations and findings.

A list of all complaints submitted to BPTC related to rights under Title VI is included as Appendix B.

Public Outreach and Participation Plan

The BPTC Public Outreach and Participation Plan has been prepared to ensure that no one is precluded from participating in BPTC's service planning and development process.

Through an open public process, BPTC has developed a public participation plan to encourage and guide public involvement efforts and enhance access to BPTC'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 BPTC uses to reach its riders.

The steps outlined in the Public Participation Process offer early, continuous, and meaningful opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions at BPTC. It is a guide for how BPTC engages its diverse community. BPTC may continue to improve its public participation methods over time based on feedback from all of its riders and community members, including individuals with low incomes, minorities, individuals with disabilities, and people with Limited English Proficiency.

Public Participation Process

BPTC employs several means to communicate to the general public regarding the activities it performs including LEP, disabled, and minority populations. The communication activities may focus in different mediums depending on the program or population affected. These include but are not limited to:

Public Information and Notifications

BPTC will publish brochures and tables regarding BPTC proposals or programs, including how the public can obtain information and make comments, where meetings are to take place, and other

applicable information. The notices for public input are posted 2-30 days in advance so the public has time to consider proposals and make comments. The notice methods include:

- Press releases to local and state media
- Social media postings, including Twitter and Facebook
- Alerts posted on DoubleMap bus tracker app
- Website links and articles
- On-bus advertising with posters on bus fleet
- Email contact list
- Transit Center posters and brochures
- Audio translation services and Spanish, Korean, and Chinese translated materials including fare media signs, system map information, critical notifications and forms such as Title VI notice and application forms

Meeting Locations

BPTC hosts public meetings in locations easily accessible by transit routes, and are otherwise conveniently located for community members to attend. All locations used for the purposes of public meetings are to be accessible to those with disabilities. In cases of fare increases or major service reductions, BPTC staff may determine to hold multiple meetings in different locations and at different times of day to accommodate wider segments of the community. With sufficient notice prior to the meeting, language or hearing interpreters will be made available.

Public Meeting Forums

On critical issues such as major service reductions and fare increases, BPTC offers public meetings that allow for meaningful discussion with riders. For public meetings, BPTC staff prepare proposals in sufficient detail to describe the proposed policy or service changes, and make informational materials available prior to the meeting. If the proposal involves service changes, maps are made available on the BPTC website and in printed form available at the Downtown Transit Center and Grimes Lane Administrative Facility. BPTC staff conduct public meetings and transcribe oral comments if written comments are not possible. Sign-in sheets are made available at public meetings to track participation and for participants to share contact information should they seek to receive updates regarding the subject of the meeting.

Those who cannot attend public meetings may submit written or emailed messages to BPTC staff prior to the advertised deadline for public comment for their feedback to be received and considered. Public comments are summarized and presented to the BPTC Board of Directors and General Manager so that they are part of the decision-making process.

In the course of responding to the Covid-19 pandemic, BPTC began hosting all Board of Directors and public meetings virtually via Zoom. BPTC continues to host in-person meetings alongside Zoom simulcasts to enhance accessibility for anyone seeking to attend.

Website and Social Media

BPTC's website provides round-the-clock information on the transit system, including fare structures, route schedules and service maps. Any changes in service, such as weather emergencies, construction detours, or holiday hours, are made available on the site. All press releases issued by BPTC are published on the site. BPTC's website is fully translatable in eleven languages, including Spanish and Mandarin Chinese—the two languages most frequently encountered by BPTC staff in the course of providing services.

BPTC maintains an active presence on social media platforms, including Facebook and Twitter, as an additional, direct method to engage with riders and the community. All detours and service disruptions are promptly posted on social media, along with notices of upcoming public meetings.

Community Events

BPTC staff members regularly participate in community events that are not specific to public transit. Participating in community events can be an effective method to reach those who do not regularly use public transit services. Examples of events recently attended are the Bloomington Community Farmers' Market, local K-12 career and involvement fairs, IU student body orientation events, and the annual Touch-a-Truck event hosted by Bloomington Parks & Recreation.

Outreach to Community Groups

BPTC meets with community groups, such as social service agencies, to listen to community concerns on the effects of fare changes to low-income and minority populations. BPTC maintains associations with the Latino Outreach Assistant for the City of Bloomington, IU Student Government, as well as the International Student Groups at Indiana University, all of which assist LEP persons.

Summary of Outreach Activities

In BPTC's ongoing efforts to include all those interested in transit services and decision-making processes without regard to race, color, or national origin, agency staff regularly meet with representative organizations and persons throughout the city.

Indiana University draws a large international population to its student body and faculty, many of whom speak English as a second language, and upon arrival are often reliant on public transportation to navigate the city. Every year, BPTC staff attend IU orientation events to help educate students and faculty on how to use the bus system, including reading maps and schedules, where to access information about the bus, using the Double Map GPS bus tracker, and informing

about relevant service changes and updates. BPTC staff conduct similar events at the local high schools to inform students about using the bus.

BPTC completed a *route optimization study* in 2020, in the course of which staff conducted extensive outreach efforts to shape final service change recommendations. To best ensure widespread inclusion in the feedback process, BPTC engaged with riders and the community in a variety of formats, including:

- Public information and input sessions conducted at the Downtown Transit Center, the Monroe County Public Library, IU campus
- Targeted meetings with impacted neighborhood associations and apartment complexes
- Press releases submitted to radio, newspapers, on the BT website, email contacts, social media
- Community meetings with the Bloomington Housing Authority Resident Council
- Pop-up table events conducted at the Downtown Transit Center
- ‘Ride-alongs’ on routes with proposed service changes

In 2019, BPTC updated its Public Participation Policy. A copy of the Board resolution detailing and approving the policy is included as Appendix C.

Language Assistance Plan

Introduction

Section 49 CFR Part 21 states that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance from the Department of Transportation.

Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency was signed on August 11, 2000 by the president of the United States; which was given to clarify Title VI of the Civil Rights Act of 1964. Its purpose was to ensure accessibility to programs and services to eligible persons who are not proficient in the English language. To substantiate the fact that the Title VI of the Civil Rights Act of 1964 applies to LEP individuals, it is noted that the Supreme Court in the case of *Lau vs. Nichols* 414 U.S. 563 (1974) made the interpretation that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination.

On December 14, 2005, the United States Department of Transportation (DOT) published revised guidance for its recipients on the Implementation of Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency". This document states that Title VI and its implementing regulations require that DOT recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP) and that recipients should use the DOT LEP Guidance to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are LEP.

According to 29 CFR 37.35 (a) (b) a recipient of Federal funds should make reasonable efforts to meet the particularized language needs of limited-English-speaking individuals who seek services or information from the recipient. BPTC's Language Assistance Plan has been prepared to address the responsibilities as a recipient of Federal financial assistance to identify and assist individuals who are deficient in the English language. BPTC has and will continue to consider the scope of the program or activity as well as the size and concentration of the population that needs services or information in a language other than English. Based on those considerations, BPTC will take reasonable steps to provide services and information in appropriate languages.

The DOT LEP Guidance recommends that all recipients, especially those that serve large LEP populations, should develop an implementation plan to address the needs of the LEP populations they serve. The DOT LEP Guidance notes that effective implementation plans typically include the following five elements: 1) Identifying LEP individuals who need language assistance; 2) providing

language assistance measures; 3) training staff; 4) providing notice to LEP persons; and 5) monitoring and updating the plan.

Individuals who have a limited ability to read, write, speak or understand English are Limited English Proficient, or “LEP”. Transit agencies that provide language assistance to persons with Limited English Proficiency in a competent and effective manner will help ensure that their services are safe, reliable, convenient, and accessible to those persons. These efforts may attract riders who would otherwise be excluded from participating in the service because of language barriers and, ideally, will encourage riders to continue using the system after they are proficient in English and/or have more transportation options. Catering to LEP persons may also help increase and retain ridership among the agency’s broader immigrant populations in two important ways: 1) agencies that reach out to recent immigrant populations in order to conduct a needs assessment and prepare a language implementation plan (pursuant to the DOT LEP Guidance) will send a positive message to these persons that their business is valued; and 2) community outreach designed to identify appropriate language assistance measure can also assist the agency in identifying the transportation needs of our immigrant and linguistically isolated populations and ensuring that an agency’s transit routes, hours and days of service, and other service parameters are responsive to the needs of these populations. Additionally, transit agencies that conduct outreach to LEP persons can increase their potential for recruiting bilingual employees to better serve the needs of the community. In summary, serving the needs of LEP persons is not only a good business decision; it fulfills the mission of the transit agency to serve the public.

The Bloomington Public Transportation Corporation supports the goals of the DOT LEP Guidance to provide meaningful access to its services by LEP persons. BPTC has devoted resources to provide oral and written language assistance services to LEP persons. This document provides BPTC’s 2022-2025 Language Assistance Plan and includes:

- Identification of LEP Individuals in the BPTC Service Area Who Need Language Assistance (Information based on the Four Factor Analysis required by FTA)
- The Nature and Importance of Transit LEP Individuals
- Available Resources and Costs of Providing Language Assistance Services
- Language assistance measures employed by BPTC
- Strategies for implementing the 2022-2025 LAP
- Language initiatives planned for the next three years

Identification of LEP Individuals in the BPTC Service Area Who Need Language Assistance

“There should be an assessment of the number or proportion of LEP individuals eligible to be served or encountered and the frequency of encounters pursuant to the first two factors in the four-factor analysis” – DOT Guidance

As a recipient of federal funding, BPTC must take reasonable steps to ensure meaningful access to the information and services it provides. To do this BPTC uses the information derived from a Four Factor Analysis to determine the specific language services that are appropriate. The analysis helps BPTC 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 BPTC;
2. The frequency with which LEP persons come into contact with BPTC services and programs;
3. The nature and importance of BPTC’s services and programs in people’s lives; and
4. The resources available to BPTC for LEP outreach, as well as the costs associated with that outreach.

1. Number of LEP Persons in Service Area

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

The American Community Survey 2020 (ACS 2020) 5-Year estimate indicates that 1,218 households in Bloomington are composed of persons with Limited English Proficiency, about 3.8 percent of the population. Further, the ACS 2020 indicates that 1,899 persons (about 3.1 percent of the population) residing in the Bloomington Metropolitan Area reported they speak English less than “very well.” The number of LEP persons in the City of Bloomington who speak English less than “very well” has decreased by about 2.5 percent since the previous demographic analysis in 2019. Of these persons with Limited English Proficiency, the most commonly spoken primary language is of Asian and Pacific Island languages. Data further provided by IU shows that the most common countries of origin of international students are: India (37%), China (22%), South Korea (10%), Taiwan (3%), and Saudi Arabia (2%). The ACS 2020 data depicts the largest populations of LEP

households residing on the IU campus, as well as on the east side of Bloomington. Figure 1 depicts the distribution of LEP persons by Census tract within Bloomington Transit’s service area.

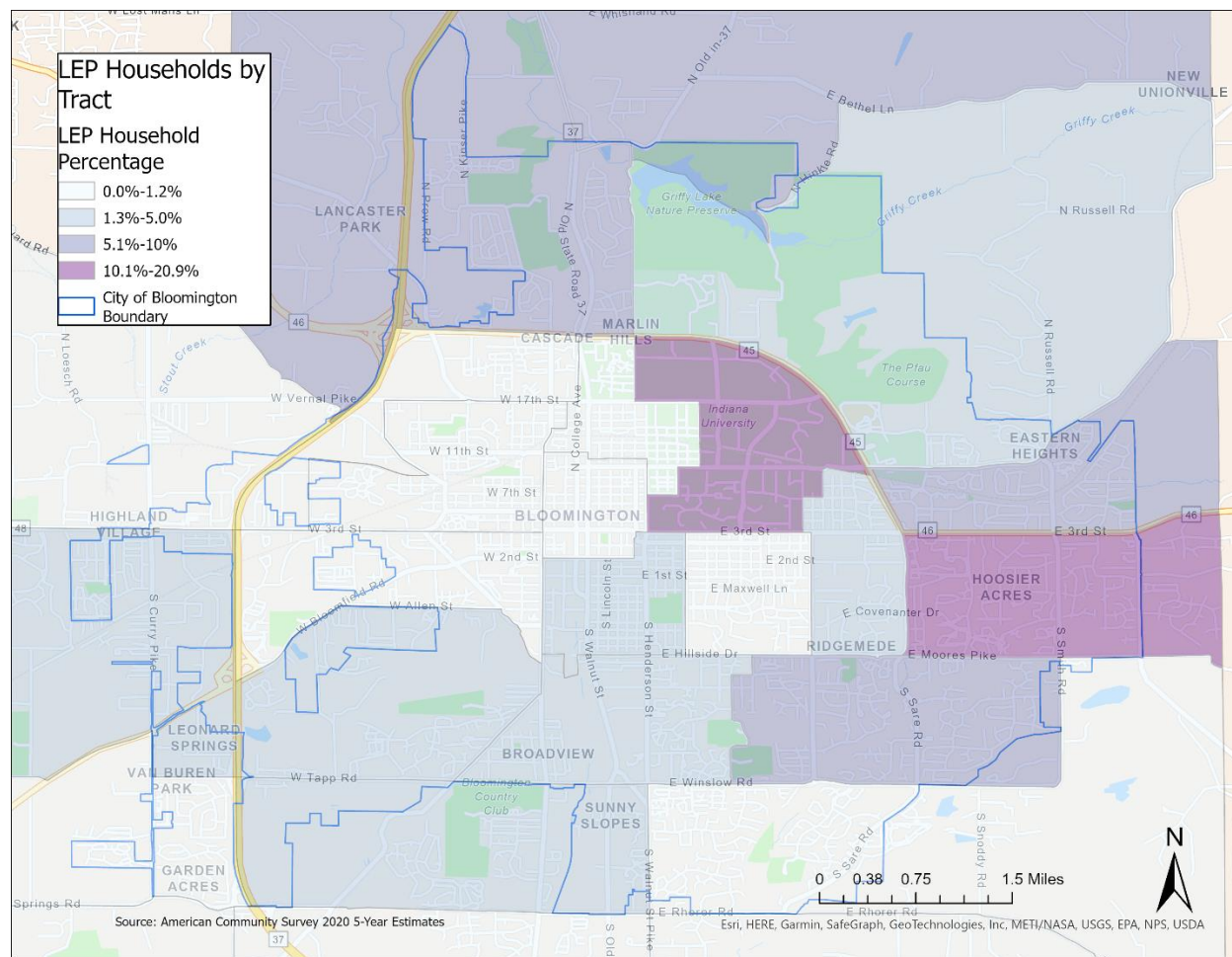


Figure 1: LEP Households by Census Tracts, ACS 2020 5-Year Estimate

2. Frequency of Contact with LEP Persons

“Recipients should assess, as accurately as possible, the frequency with which they have or should have contact with LEP individuals from different language groups seeking assistance, as the more frequent the contact, the more likely enhanced language services will be needed. The steps that are reasonable for a recipient that serves an LEP person on a one-time basis will very different than those expected from a recipient that serves LEP persons daily.” – DOT Guidance

Alongside demographic obtained through the American Community Survey 2020, BPTC conducted a staff survey to determine the frequency with which public-facing staff encounter LEP persons, and to gain insights into how staff may navigate language barriers. The staff survey aligns with ACS 2020 data, indicating that the languages heard most often, besides English, are: Chinese, Indian/Pakistani, and Spanish. 60 percent of respondents indicated that they encounter riders who speak a language beside English as their primary language either ‘often’ or ‘sometimes.’ Survey participants indicated that those routes that primarily serve the IU campus are the routes on which languages other than English are most often heard—routes 6 and 9. The information most commonly sought by riders who do not speak English as their primary language is route and schedule information. The findings from the staff survey demonstrate that transit agency staff do regularly encounter riders who do not speak English as their primary language, and that it remains important to provide adequate translation services, and to prepare bus operators for engaging with LEP persons.

3. Nature and Importance of BPTC’s Services and Programs

BPTC provides connection to those in Bloomington to employment, education, medical appointments, shopping, social activities, and other vital destinations throughout the city. Access to reliable, convenient transportation options is critical in reaching essential services and participating in community life, and many in Bloomington rely on BPTC services as their primary mode of mobility—around 6.5 percent use public transportation for their regular commute, slightly above the national average of 5 percent (ACS 2020). Obstacles to accessing BPTC fixed route or complementary paratransit services, therefore, represent obstacles to accessing essential services and activities.

For LEP persons in Bloomington, obstacles to accessing public transportation may have distinct ramifications. International students attending IU comprise the largest population of LEP persons in Bloomington, with 5,473 international students enrolled in fall 2022. Many of these students reside in Bloomington without a personal vehicle or other means of mobility; furthermore, many live in the city without a familial support network nearby to rely upon. For these individuals, obstacles to accessing transportation may be especially isolating. The number of international students may be expected to rebound over the next three years from declining enrollment figures during the Covid-19 pandemic.

International students attending IU are not the only LEP persons in Bloomington. According to the American Community Survey 2020 5-year estimates for Bloomington, IN, approximately 400 riders whose primary means of transportation to work speak English less than “Very Well,” representing about 12.8 percent of all residents who use public transit for their regular commute. About 10 percent of these riders who speak English less than “Very Well” are Spanish speakers, while the remaining 90 percent speak another language as their primary language.

4. Available Resources and Costs of Providing Language Assistance Services

BPTC is committed to providing equal access to its services for LEP persons by removing obstacles where ever possible. In doing so, BPTC must balance the benefits of providing additional resources with their costs. Fortunately, new technologies and services increasingly allow BPTC to employ new resources for its LEP riders.

Of its vital documents, BPTC has translated and printed its Riders' Guide in Spanish. The pamphlet is available at the front reception desk in our administrative offices located at 130 W. Grimes Lane in Bloomington. Costs to produce the pamphlet were less than \$1,000. BPTC posts emergency exit instruction in Spanish on fixed route buses manufactured after 2002 and, beginning in 2019, BPTC began adding Mandarin Chinese translation of emergency exit information in its fixed route vehicles. Cost to produce the emergency exit information on buses was minimal and was not itemized separately.

In 2019, BPTC began employing the services of an over-the-phone interpretative service through Language Line Solutions. As a government entity, many of the fees associated with using Language Line services are waived, and BPTC pays only fees for use of the service on a per-minute basis. The costs of using different languages varies as follows:

Tiers	Languages	Per Minute Charge
1	Spanish	\$0.74
2	Chinese (Mandarin and Cantonese), French, Japanese, Polish, Russian, and Vietnamese	\$1.08
3	Armenian, Cambodian, German, Haitian Creole, Italian, Korean, and Portuguese	\$1.08
4	Farsi, Tagalog, Thai, Urdu, and all other languages	\$1.08

Figure 2: Translation Services and Costs by Language, Language Line

Translation of Vital Documents

BPTC's website translates all web pages in ten of the most commonly spoken languages, besides English, in Bloomington, including Arabic, Chinese, Dutch, French, German, Italian, Japanese, Korean, Russian, and Spanish. All web-based applications and materials posted on the website are available in each of these languages, including the trip planner, route & schedule information, job opportunities, and staff contact information.

Of its vital documents, BPTC currently translates and prints its Riders' Guide in Spanish. Based upon staff surveys and American Community Survey 2020 data, and according to the Safe Harbor Provision, translation of vital documents will also be available for Mandarin Chinese and Hindi. For further translation needs, those documents most frequently requested by BPTC riders will be evaluated for language translation in the top three languages identified through demographic analysis, surveys, focus groups and community outreach. The documents will include, but not be limited to, the following:

- Route Maps and Timetables
- BT Access Customer Handbook,
- Rules for riding
- Lost and found
- Bike & ride
- Travel training

Translation may not be in printed format given cost considerations. Instead, translation in electronic format for the Web may be the best option for consideration. All vital documents considered for translation will include customer service contact information including information on auditory translation services available through BPTC.

Training of Employees

Beginning in 2017, BPTC drivers and public-facing staff have been trained to understand and speak basic transit-related phrases and questions in Mandarin Chinese, the most commonly spoken language in Bloomington, other than English.

Policies and Procedures

All BPTC Policies and Procedures will be updated to include the use of new LEP tools and professional methods of working with the LEP community. These updates will dovetail with the required training listed above. New hires will experience the training and policies and procedures as a requisite of their orientation process.

Over-the-Phone Language Assistive Services

In 2019, BPTC began to employ the services of Language Line Solutions, an over-the-phone service that connects users with interpreters. Language Line Solutions connects LEP persons with

interpreters, who together speak over 240 languages, allowing BPTC staff the ability to communicate with riders of all languages anticipated to be encountered within the Bloomington service area. The complete list of languages accessible through Language Line is included in Appendix D.

Notifying LEP Persons of Language Assistive Services

Notices have been placed on BPTC buses, our website and at our front reception desk located at 130 W. Grimes Lane in Bloomington, IN that notifies the public to contact us at (812) 332-5688 if any information is needed in a language other than English.

Efforts to Identify Additional Language Assistance Needs

Through community outreach efforts, BPTC builds relationships with groups representative of LEP persons developed for education, religious, advocacy and social purposes. These groups are essential to BPTC dissemination of information and marketing, but also to provide feedback on service.

BPTC expects to see growth in transit use within the LEP communities. It is the hope of BPTC that interaction with the LEP community groups will identify additional resources to assist BPTC in the development of new tools to assist LEP persons. The relationships will also encourage knowledge exchange on cultural attributes BPTC should be aware of while increasing its awareness of LEP persons.

BPTC's Travel Training Department is cognizant of LEP persons seeking assistance to use the service and will seek any additional information that might assist BPTC in reaching out to new communities or develop new assistive tools. Should there be significant changes to BPTC services the identified community organizations will be invited to meetings that may or may not affect them.

Local interpretive and translation services are offered from members of the Indiana University staff and may play a role in future development of tools.

Surveys will be continued periodically to determine changing needs of the LEP communities and BPTC staff. Surveys similar to the past survey will be conducted over the next three years. The information gained from these surveys will be used to help with planning of services and service resources for LEP persons.

BPTC staff will track contact trends and patterns with LEP persons and the outcome of that contact in an effort to identify additional tools needed to assist staff in communications with LEP persons. Contact tracking will come primarily from drivers, customer service staff, travel trainers and

management. The information collected will include date, language spoken, reason for contact, summary of contact, and suggestions for additional tools to be used.

LEP Representative Groups

African Students Association (ASA)
Arab Student Association (ASA)
Asian American Association (AAA)
Asian Cultural Center
Asian Student Union (ASU)
Asian Talent Club (ATC)
Bloomington Center for Global Children
Bloomington Indians
Brazilian Association at IU
Buddhist Study Association at IU
Chinese American Talks (CAT)
Chinese Calligraphy Club (3C)
Chinese Students and Scholars Association (CSSA)
DGTL Buddhist Monastery
Filipino Student Association (FSA)
First Nations Education and Cultural Center
Flames Asian Basketball
Ganden Dheling Buddhist Temple
German Club
Global Village Living-Learning Center (GV)
Hindu Temple of Bloomington Normal
Hong Kong Students' Association (HKSA)
Chinese Students and Scholars Association (CSSA)
DGTL Buddhist Monastery
Filipino Student Association (FSA)
First Nations Education and Cultural Center
Flames Asian Basketball
Ganden Dheling Buddhist Temple
German Club
Global Village Living-Learning Center (GV)
Hindu Temple of Bloomington Normal
Hong Kong Students' Association (HKSA)
Hungarian Cultural Association (HCAIU)
Indonesian Student Association (PERMIAS)
Intensive English Program
International Students, Inc (ISI)
Kazakh Student Association at Indiana

Kelley Without Borders (KWOB)
Korean Association for Career Achievement (KACA)
Korean Conversation Club (KCC)
Korean Students Association (KSA)
La Casa – IU Latino Cultural Center
Latinos Unidos at IU (LUIU)
Lisa’s English Academy
Malaysian Student Association (MSA IUB)
Monroe County Community School Corp.
Navruz Student Association (NSA)
Office of International Services
Russian Cultural at Indiana University Bloomington (RCA IU)
Pakistani Student Association
Sanshin Zen Community
Saudi Students Club in Bloomington (SSCB)
Student Global Communication Society (SGCS)
Taiwanese Student Association (TWSA)
Thai Student Association (TSA)
The Australasian Student Organization (ASO)
The Francophone Club at Indiana University
Tibetan Mongolian Buddhist Cultural Center
Turkish Student Association
Vietnamese Student Association (VSA)

Monitoring, Evaluating and Updating the Language Assistance Plan

To ensure this plan will be implemented successfully and fully, BPTC staff will evaluate all information received from surveys, focus group meetings, outreach efforts, staff contact tracking and staff input. BPTC staff will review the plan annually and update as needed while also developing new concepts for implementation in the next plan. Staff will monitor the following:

- Statistics kept on LEP contacts
- Biennial review of Bloomington Census Data
- Ongoing collaboration with outreach groups
- Effectiveness and usage of written translation material
- Effectiveness and usage of Interpretive Telephone Service
- Assessment of Title VI Program

Membership of Non-Elected Boards, Councils, and Committees

The BPTC Board of Directors is the policymaking body of the transit agency, and is composed of five members—3 appointed by the Bloomington Common Council, and 2 appointed by the Mayor.

BPTC conducts quarterly meetings to review and examine accessibility of transit services through its Bloomington Council on Accessible Transportation (BCOAT). The BPTC customer service manager and planning & special projects manager act as transit representatives for the meetings. Membership is not appointed to BCOAT.

Subrecipient Compliance with Title VI

BPTC does not maintain subrecipient contract status with any organization.

Facility Planning Equity Analysis

BPTC did not undergo planning efforts for, or construct, a new facility in the time since the last Title VI update in 2019.

Service Standards and Policy Development

Types of Services

BPTC provides Bloomington Transit (“BT”) fixed route service along with complementary BT Access paratransit services. As of fall 2022, the BT fixed route network is composed of thirteen routes throughout the city, with 28 vehicles deployed during peak service. BT Access provides service parallel to the fixed route network and serves all locations within City boundaries, with 8 vehicles deployed during peak service.

BPTC categorizes fixed route service to effectively distribute transit resources that meet ridership demand in given areas. The frequency of service (or ‘headway’—the time between bus service at a given location) on a fixed route is a primary indicator of the attractiveness of a transit route to riders; however, the costs of delivering higher frequency services must be justified by demonstrated demand. In its mission to deliver convenient transportation options for all in the community, BPTC has established specific standards according to the goal sought to be achieved with a particular service or route. For example, thousands of IU students and staff rely on BT to commute to the IU campus every day, requiring additional vehicles and shorter headways to meet demand. In areas where there is demonstrably less demand for transit, BT deploys fewer vehicles. BPTC has established the following service standards according to service type to guide decision-making according to the goals for the service and without discrimination for rider demographics.

Service Type	Service characteristics
Frequent	<i>Frequent</i> service may be provided on corridors where demand for transit is demonstrated by existing ridership data, or transit potential is significant—indicated by high densities of residential, commercial, educational or other destinations. Stop-spacing on <i>frequent</i> routes may be more dispersed to maintain speedier service.
Coverage	<i>Coverage</i> service may be provided in areas where demand for mass transit is inconsistent, and may not support frequent service throughout the day. Stop-spacing may be designed to maximize access over travel speed.
Express	<i>Express</i> service may be provided where specific demands for transportation are identified between two or more defined destinations or areas. Bus stops may be limited between primary destinations to ensure speedier service.

Figure 3: Fixed route service types, BPTC

Vehicle Load Standard

Vehicle load refers to the seating and standing capacity of a transit vehicle. Establishing and monitoring vehicle load standards allows the agency to more accurately align services with ridership demand while balancing interests in rider comfort. Should trips regularly exceed the load standards depicted in Figure 4, BT may consider the deployment of *tripper*¹ vehicles to provide extra capacity at peak travel times, or schedule additional vehicles to a route to increase frequency, based upon availability of resources.

Figure 4 depicts the different types of vehicles in operation as well as the seated, standing, total, and maximum load factors for each vehicle type. Load standard refers to a ratio of total passengers with the seating capacity of a vehicle by type (total passengers/vehicle seating capacity). A load standard of 1 represents that all passengers are able to access a seat and all seats are occupied, while values above 1 represent standees. The average of all loads during peak operating periods should not exceed the vehicle's achievable capacity at the vehicle's maximum load point.

Vehicle Type	Seated	Standing	Total	Load Standard	Maximum Load Factor
60' Articulated Bus	62	50	112	1.8	2.0
40' Low Floor Bus	40	18	58	1.4	1.45
35' Low Floor Bus	32	14	46	1.2	1.44
Gillig 30' Low Floor Bus	29	10	39	1.1	1.34
Gillig 30' Standard Bus	30	13	43	1.2	1.43
Ford 25' Standard Bus	20	6	26	1.1	1.30

Figure 4: Vehicle load standards, BPTC

If the maximum load factor is consistently exceeded for a 60-minute period, BPTC staff will evaluate the potential for improving service frequency or adjusting schedule times to focus more service before and after the overload trip. Passenger maximum loads will be evaluated periodically

¹ BPTC defines *tripper* as a vehicle assigned to unscheduled work to be deployed to routes and locations, as needed, to meet capacity demands during peak trips and hours

via random ride check samples, random use of surveillance camera footage, customer feedback, and bus operator feedback.

Vehicle Headway

Projected ridership, passenger loads, and funding availability determine the frequency of service on BT fixed routes. During peak hours, service (6AM – 9AM & 3PM – 6PM) will run every 20 minutes or better while during off peak hours (9AM – 3PM & 6PM – 12AM) service will run every 60 minutes or better. On Saturday and Sunday, service will run every 80 minutes, or better. The frequency of service on BPTC routes will be determined by budgeted resources, ridership, and passenger loads.

Service Type	Peak	Off-Peak	Saturday	Sunday
Frequent	20	60	60	60
Coverage	30	60	60	N/A
Express	40	40	60	N/A

Figure 5: Headway by service type, BPTC

Amenities Policy

BPTC evaluates its amenities for the acquisition, placement, and removal of shelters, trash receptacles, and benches. To determine the placement and maintenance of amenities, BPTC considers funding availability, ridership counts, rider surveys, public safety needs, traffic patterns, and operational needs. The placement of amenities is scrutinized by transit staff to ensure that they are impartially distributed across the network, and without discrimination of race, color, or national origin of the surrounding population.

BPTC considers ridership activity at bus stops and prioritizes the placement and maintenance of amenities at bus stops according to the thresholds in Figure 6. Requests from the public for amenities at specific bus stops are considered alongside these criteria.

Amenity	Threshold for new placement
Trash Receptacle	Recurring reports of litter problems at specific bus stop locations
Bench	Average 20 boardings per day
Shelter	Average 100 boardings per day

Figure 6: Amenity threshold guidelines, BPTC

Trash receptacles may be installed upon the request of the public or BT staff where a repeated litter problem is occurring. Benches may be installed at stops that average 20 boardings per day. Shelters may be considered for installation at bus stops that have weekday boardings of at least 100 passengers daily. BPTC also considers who uses particular bus stops, and may deviate from the above standards to accommodate elderly riders or riders with disabilities. BPTC may also consider entering into cost-sharing arrangements with neighborhood associations, apartment complexes, or other entity should such entity propose installation and partial funding. BPTC typically incurs lifetime maintenance of amenities upon their installation.

Figures 7 and 8 depict locations of amenities according to LEP households, and minority populations by census tracts.

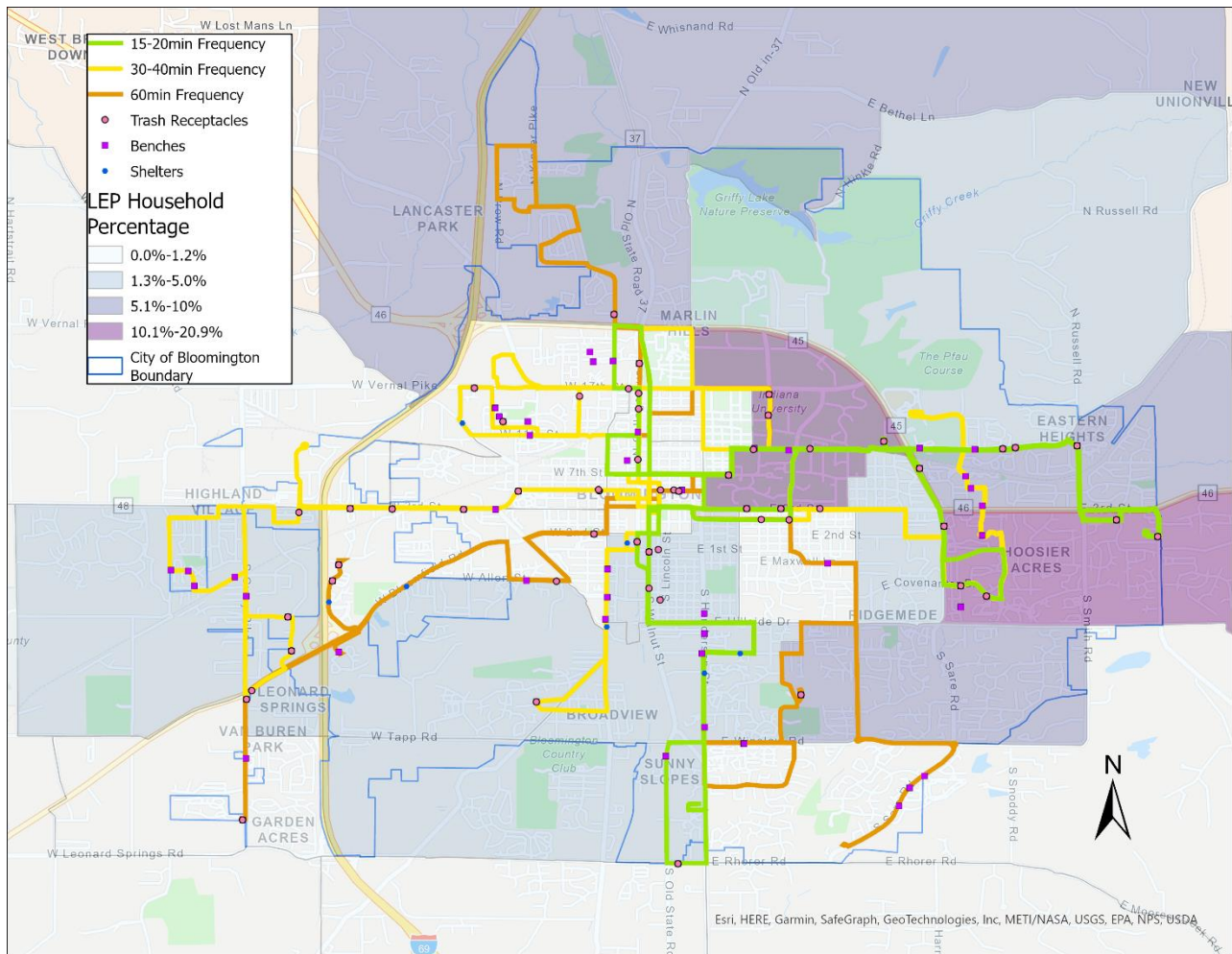


Figure 7: Location of amenities by LEP households, BPTC

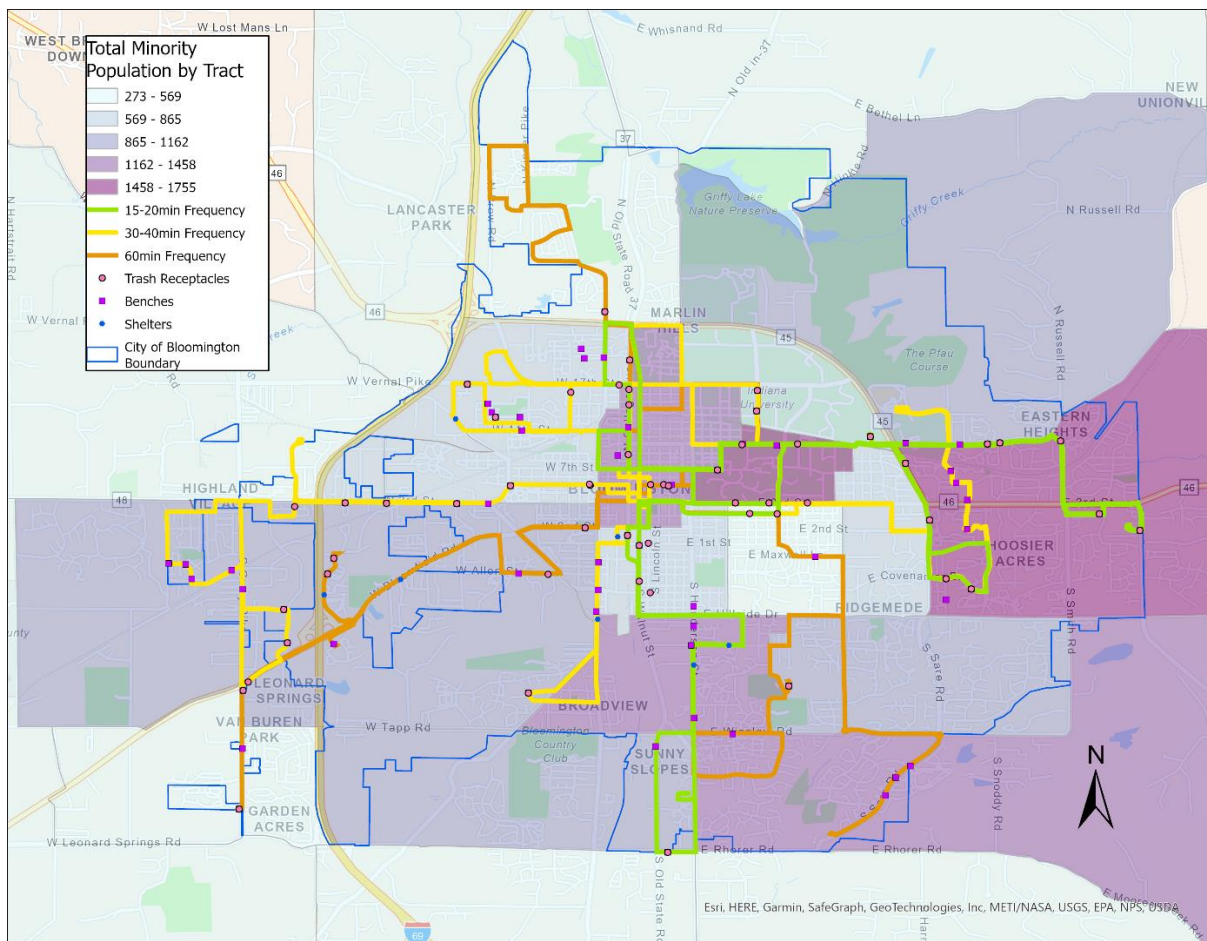


Figure 8: Location of amenities by minority population, BPTC

Vehicle Assignment Policy and Standard

BPTC operates various sizes of buses on fixed routes ranging from 25-feet to 60-feet in length. The size of vehicle assigned to a route is based on daily passenger volume. For example, 40-foot buses are typically assigned to routes with higher passenger loads such as Routes 3, 6 and 9. BPTC's bus fleet consists of vehicles with model years ranging from 2003 to 2021.

Existing infrastructure and route travel patterns sometimes constrain the ability to assign certain vehicle types or vehicles sizes on a given route. For example, hybrid buses and battery-electric buses are taller in height than a standard bus and cannot be assigned to routes that encounter height clearances at overpasses along routes. Specifically, hybrid and battery-electric buses cannot operate on E 10th St due to the low railroad underpass encountered west of the 45/46 bypass. Similarly, larger vehicles may not be able to be assigned to routes that travel through narrow streets or parking lots.

BPTC assigns vehicles without discrimination for populations to be served, and endeavors to assign vehicles to routes to help ensure that the average age of the fleet serving a route does not consistently exceed 25 percent from the average age of the fleet to ensure a fair and equitable distribution of vehicles throughout the BPTC service area.

On-Time Performance

On-time performance standards have been created to ensure BPTC provides reliable service to the Bloomington community. A vehicle is considered on time when it arrives at a time-point no more than 5 minutes after the scheduled time, and departs no earlier than the scheduled time. A vehicle is considered late when it arrives over 5 minutes after the scheduled time at a specified time-point, and it is considered early if it departs at any point before the scheduled time.

Each month, BPTC staff compile a route-by-route summary of on-time performance. The report depicts the amount of on-time, early, and late arrivals/departures as a percentage of total travel points. Any route that is consistently not meeting the on-time performance criteria of $\pm 20\%$ of the overall on-time percentage will be evaluated through AVL on-time performance checks, operator interviews, and/or passenger surveys. After an evaluation is conducted, remedial actions will be recommended, including considering additional vehicles, headway and schedule adjustments, and operator performance reviews.

Service Availability

Service availability is a general measure of the distribution of routes within a transit provider's service area. Measuring service availability helps to ensure that BT fixed routes are accessible to as many people as possible. BPTC strives to provide some level of transit access for all those within its service area, and to serve all major destinations. BPTC strives to provide a bus stop with access to the fixed route network within .25mi of all residences. Destinations with high densities of employment, shopping, recreational and other attractions are considered 'trip generators' and are prioritized for transit service to ensure that transit service is useful to as many people as possible. Examples of high-density destinations include: IU campus and other education destinations, shopping centers, and employment campuses. Other destinations are prioritized based upon the importance of services provided, including: hospitals and medical offices, social service agencies, and government centers. These destinations may generate comparatively fewer trips, but transportation access to their services is considered critical by BPTC. Figure 9 depicts fixed route service availability within BPTC's service area, overlaid upon total population by census tracts.

Appendix B: List of Title VI Complaints

	Date	Summary	Status	Action(s) Taken
Investigations	None	None	None	None
Lawsuits	None	None	None	None
Complaints				
1.	5/7/21	Rider anonymously reported that their driver deviated from the route to park in a secluded area of a shopping center parking lot, and proceeded to urinate in view of the rider. The rider questioned if this behavior was motivated by discrimination for Asian people.	Closed	Staff confirmed the circumstances of the event with on-board video. Discrimination could not be determined to be the motivation. Report was made anonymously, so staff were unable to respond to rider. Driver resigned on 5/20/21.

Appendix C: Public Participation Policy Resolution

RESOLUTION 19-11

A RESOLUTION UPDATING THE PROCESS FOR OBTAINING AND CONSIDERING PUBLIC COMMENT REGARDING PROPOSED INCREASES IN THE BASIC FARE STRUCTURE OR MAJOR SERVICE REDUCTIONS OF BLOOMINGTON TRANSIT OR BT ACCESS

WHEREAS, Bloomington Public Transportation Corporation (BPTC) provides public transit service for the Bloomington community, including Bloomington Transit (BT) fixed route bus service and BT Access demand-response service; and

WHEREAS, BPTC values public participation in its decision-making related to levels of transit service and, in cases of fare increases and major service reductions, is required by the Federal Transit Administration to provide opportunities for public input; and

WHEREAS, BPTC is committed to provide the public with early notification and ample opportunity to comment on any increases to fixed route or BT Access fares or major service reductions; and

WHEREAS, BPTC seeks to revisit its public comment policy established through Resolution 96-02 to incorporate current best practices and evolving methods of communication,

NOW, THEREFORE, BE IT RESOLVED, by the BPTC Board of Directors that the following public comment policy regarding fare increases, and major service reductions be adopted by the BPTC to take effect upon its passage:

DEFINITIONS

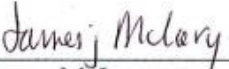
- *'Fare increase'* means any increase to the published basic fare structure of fixed route service and/or BT Access.
- *'Major service reduction'* means a service change that results in the reduction of 10% or greater in scheduled annual revenue service hours for any BT fixed route, or a service change that results in the elimination of 10% or greater in directional route miles for any BT fixed route, or a reduction of 10% or greater to the daily span of hours or service coverage area for BT Access.
- *'Directional route-miles'* means the combined mileage in each direction over which a fixed route operates in revenue service.

PROCESS FOR OBTAINING AND CONSIDERING PUBLIC COMMENT
REGARDING FARE INCREASES OR MAJOR SERVICE REDUCTIONS

- *Announcement and comment period;* BPTC shall announce any proposed fare increases or major service reductions a minimum of 30 days prior to adoption. The announcement shall include a request for public comments. BPTC shall announce proposed major service changes, request public comments, and define the duration of the comment period by general press release, which shall be published on the BT website. BPTC shall allow public comment related to the changes to be submitted for the duration of the comment period prior to adoption.
- *Public meetings;* during the 30 days prior to proposed adoption, BPTC shall hold a minimum of one public meeting to describe proposed major service changes, provide reasoning for proposed changes, and to solicit public comment. Public meetings shall be conducted in a location accessible to persons with disabilities, and accessible by BT fixed route service. Based upon the scope of proposed major service changes, BPTC may determine to conduct multiple public meetings. If BPTC determines to hold multiple public meetings, the locations and/or start-times for those meetings shall be varied to attract more of the Bloomington community.
- *Public notice and advertisement;* BPTC shall submit a public notice of meetings to the *Bloomington Herald-Times*, to be published at least 10 days prior to the first public meeting; additionally, BPTC shall advertise public meetings regarding fare increases or major service reductions on the BT website at least 10 days prior to each meeting.
- *Consideration of public comments;* Any comments received through public meetings or public comment period shall be presented to the BPTC Board of Directors prior to a final decision regarding fare increases or major service reductions. Public comments shall be considered by the BPTC Board of Directors taking into account the potential impact of fare increases or major service reductions upon riders and the community.

ATTEST:

APPROVE:



James McLary
Secretary
Bloomington Public
Transportation Corporation

10-15-19



Nancy Obermeyer
Chair
Bloomington Public
Transportation Corporation

10-15-19



Phone Interpreting Languages

Some languages may not be available at the time of your call. Not all languages are available in all regions. Additional languages and dialects may be available. Rare languages may require additional interpreter connect time or may require an appointment. If you have a question regarding language availability, please contact your Account Executive or Customer Care.

Acholi	Duala	Jamaican Patois	Mbay	Sicilian
Afar	Dutch	Japanese	Mien	Sinhala
Afrikaans	Dzongkha	Jarai	Mirpuri	Slovak
Akan	Edo	Javanese	Mixteco	Slovene
Akateko	Ekegusii	Jingpho	Mizo	Soga
Albanian	Estonian	Jinyu	Mnong	Somali
Amharic	Ewe	Juba Arabic	Mongolian	Soninke
Anuak	Farsi	Jula	Moroccan Arabic	Sorani
Apache	Fijian	Kaba	Mortlockese	Spanish
Arabic	Fijian Hindi	Kamba	Napoletano	Sudanese Arabic
Amenian	Finnish	Kanjobal	Navajo	Sunda
Assyrian	Flemish	Kannada	Nepali	Susu
Azerbaijani	French	Karen	Ngambay	Swahili
Bahasa	French Canadian	Kashmiri	Nigerian Pidgin	Swedish
Bahdini	Fukienese	Kayah	Norwegian	Sylheti
Bahnar	Fulani	Kazakh	Nuer	Tagalog
Bajuni	Fuzhou	Kham	Nupe	Taiwanese
Bambara	Ga	Khana	Nyanja	Tajik
Bantu	Gaddang	Khmer	Nyoro	Tamil
Barese	Gaelic-Irish	K'iché	Ojibway	Telugu
Basque	Gaelic-Scottish	Kikuyu	Oromo	Thai
Bassa	Garre	Kimiuru	Pampangan	Tibetan
Belorussian	Gen	Koho	Papiamento	Tigré
Bemba	Georgian	Korean	Pashoto	Tigrigna
Benaadir	German	Krahn	Plautdietsch	Toishanese
Bengali	German Penn. Dutch	Krio	Pohnpeian	Tongan
Berber	Gheg	Kunama	Polish	Tooro
Bosnian	Gokana	Kurmanji	Portuguese	Trique
Bravanese	Greek	Kyrgyz	Portuguese Brazilian	Turkish
Bulgarian	Gujarati		Portuguese Cape Verdean	Turkmen
Burmese	Gulay	Laotian	Pugliese	Tzotzil
Cantonese	Gurani	Latvian	Pulaar	Ukrainian
Catalan	Haitian Creole	Liberian Pidgin English	Punjabi	Urdu
Cebuano	Hakka China	Lingala	Putian	Uyghur
Chaldean	Hakka Taiwan	Lithuanian	Quechua	Uzbek
Chamorro	Hassaniyya	Luba-Kasai	Quichua	Vietnamese
Chaochow	Hausa	Luganda	Rade	Visayan
Chin Falam	Hawaiian	Luo	Rakhine	Welsh
Chin Hakha	Hebrew	Maay	Rohingya	Wodaabe
Chin Mara	Hiligaynon	Macedonian	Romanian	Wolof
Chin Matu	Hindi	Malay	Rundi	Yemeni Arabic
Chin Senthang	Hindko	Malayalam	Russian	Yiddish
Chin Tedim	Hmong	Maltese	Rwanda	Yoruba
Chipewyan	Hunanese	Mam	Samoan	Yunnanese
Chuukese	Hungarian	Mandarin	Sango	Zapoteco
Cree	Icelandic	Mandinka	Seraiki	Zarma
Croatian	Igbo	Maninka	Serbian	Zo
Czech	Ilocano	Manobo	Shanghainese	Zyphe
Danish	Indonesian	Marathi	Shona	
Dari	Inuktitut	Marka	Sichuan Yi	
Dewoin	Italian	Marshallese		
Dinka	Jakartanese	Masalit		

FOR MORE INFORMATION

www.LanguageLine.com / 1-800-752-6096

© 2019 LanguageLine Solutions® / All rights reserved. 4.29.19/ www.LanguageLine.com

Enabling Communication in Any Situation.™

www.LanguageLine.com



Translation and Localization Top Requested Languages

More than 200 languages and dialects are available.

Afrikaans	Farsi	Khmer	Serbian
Albanian	Finnish	Korean	Sinhalese
Amharic	French (Belgian)	Laotian	Slovak
Arabic	French (Canadian)	Latvian	Somali
Bahasa	French (Euro)	Lithuanian	Spanish (Iberian)
Bengali	German	Macedonian	Spanish (Latin)
Bosnian	Greek	Malay	Sudanese Arabic
Bravanesse	Gujarati	Malayalam	Swedish
Bulgarian	Haitian Creole	Mandinka	Tagalog
Catalan	Hebrew	Marathi	Tamil
Chinese (Simplified)	Hindi	Norwegian	Telegu
Chinese (Trad-HK)	Hmong	Oromo	Thai
Chinese (Traditional)	Hungarian	Polish	Turkish
Croatian	Icelandic	Portuguese	Ukrainian
Czech	Italian	Punjabi	Urdu
Danish	Japanese	Romanian	Vietnamese
Dutch	Javanese	Russian	
Estonian	Kashmiri		
Euro English	Kazakh		

FOR MORE INFORMATION

www.LanguageLine.com / 1-888-763-3364

LanguageLine InSight Video Interpreting® Languages

Video interpreting is offered in the top 36 most requested languages including American Sign Language. Audio-only interpreting is also available in 240 languages.

Albanian	Greek	Korean	Romanian
American Sign Language	Haitian Creole	Laotian	Russian
Arabic	Hebrew	Lithuanian	Somali
Armenian	Hindi	Malay	Spanish
Bengali	Hmong	Mandarin	Tagalog
Burmese	Italian	Nepali	Thai
Cantonese	Japanese	Polish	Turkish
Farsi	Karen	Portuguese	Vietnamese
French	Khmer	Punjabi	
German			

FOR MORE INFORMATION

www.LanguageLine.com / 1-800-752-6096

Appendix E: BPTC Board Resolution Approving 2022-2025 Title VI Program

RESOLUTION 22-20

A resolution approving the Bloomington Public Transportation Corporation's (BPTC) Title VI Program Update.

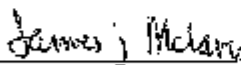
WHEREAS, the Bloomington Public Transportation Corporation is the designated recipient of Federal Transit Administration funds for the Bloomington Urbanized area.

WHEREAS, the BPTC is required to develop and formally approve a Title VI program which includes a Title VI notice to the public; Title VI complaint procedures; Title VI complaint form; list of transit-related Title VI investigations, complaints, and lawsuits since last submission; a public participation plan; a language assistance plan; membership of non-elected committees and boards; copy of Board meeting minutes or resolution showing Board approval of the Title VI Program; and various service standards; and

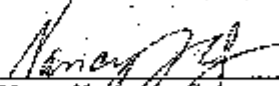
WHEREAS, the BPTC is required to develop and formally approve a Title VI program in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq.; Federal Transit Laws, Title 49, United States Code, Chapter 53; 49 CFR 1.51; 49 CFR part 21; and 28 CFR 42.401 et seq.

NOW THEREFORE, BE IT RESOLVED, by the Board of Directors of the BPTC, that the BPTC Title VI Program dated and approved by the BPTC Board of Directors on September 20, 2022 and prepared in accordance with the aforementioned laws and regulations is hereby approved and affirmed as the BPTC Title VI Program effective immediately.

APPROVE:


James McLary, Chair
Bloomington Public Transportation
Corporation

ATTEST:


Nancy Obermayer, S
Bloomington Public Transportation
Corporation

Approved the 20th day of September 2022.

