



Title VI Program

2021-2024

Adopted June 8, 2021

**130 Hollywood Drive
Suite 101
Butler, PA 16001**

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BUTLER TRANSIT AUTHORITY
2021- 2024 TITLE VI PROGRAM
May 2021

NOTICE TO PUBLIC REGARDING COMPLIANCE WITH TITLE VI

Butler Transit Authority (BTA) is in compliance with Title VI of the Civil Rights Act of 1964. As such:

Any person who is riding, or seeks to ride any public vehicle which is operated as a part of service provided by Butler Transit Authority shall be given the same access, seating, and other treatment with regard to the use of such vehicle as other persons without regard to their race, color, or national origin.

No person who is, or seeks to be, an employee of Butler Transit Authority or its lessees, concessionaires, contractors, licensees, or any organization furnishing public transportation service shall be treated less favorably than any other employee or applicant with regard to hiring, dismissal, advancement, wages, or any other conditions and benefits of employment, on the basis of race, color, or national origin.

No person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality of transportation service furnished by Butler Transit Authority on the basis of race, color, or national origin. Frequency of service, age and quality of vehicles assigned to routes, quality of stations serving different routes, and location of routes may not be determined on the basis of race, color, or national origin.

The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin.

Additional information regarding Butler Transit Authority's nondiscrimination obligations may be obtained by contacting Butler Transit Authority at 130 Hollywood Drive – Suite 101, Butler, PA 16001; by calling 724-283-0445; or by submitting a request through the comment / suggestion section of Butler Transit Authority's website: <http://www.butlertransitauthority.com/>.

Individuals or organizations who believe they have been denied the benefits of, excluded from participation in, or subject to discrimination on the grounds of race, color, or national origin by Butler Transit Authority can file a written complaint with Butler Transit Authority at 130 Hollywood Drive – Suite 101, Butler, PA 16001; or with the Federal Transit Administration's Office of Civil Rights under Title VI of the Civil Rights Act of 1964. The complaint must include the complainant's name, address, and telephone number; date of the alleged act of discrimination; name of alleged discriminating official; basis of the complaint; and a statement of the facts and circumstances of the alleged discrimination.

LOCATIONS WHERE TITLE VI NOTICE IS POSTED

This notice is posted on BTA's website <http://www.butlertransitauthority.com/> and at BTA's Terminal (113 E. Cunningham, Butler, PA) and BTA's Administrative Office (130 Hollywood Dr., Butler PA).

TITLE VI COMPLAINT PROCEDURES

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 for alleged discrimination in any program or activity administered by Butler Transit Authority (BTA).

These procedures do not deny the right of the complainant to file complaints with other State or Federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to obtain early resolution of complaints at the lowest level possible. Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited by Title VI and related statutes by BTA may file a complaint.

The following measures will be taken to resolve Title VI complaints:

1.) A formal complaint must be filed within 180 days of the alleged occurrence. Complaints shall be in writing and signed by the individual or his/her representative, and will include the complainant's name, address and telephone number; name of alleged discriminating official, basis of complaint (race, color, national origin, sex, disability, age, limited English), and the date of alleged act(s). A statement detailing the facts and circumstances of the alleged discrimination must accompany all complaints.

BTA strongly encourages the use of BTA's Title VI Complaint Form when filing official complaints.

Written complaints should be sent to:

Butler Transit Authority
130 Hollywood Dr – Suite 101
Butler, PA 16001

2.) When a complaint is received, BTA will record the complaint in the Title VI complaint data base and provide written acknowledgment to the Complainant, within ten (10) days by registered mail.

3.) If a complaint is deemed incomplete, additional information will be requested, and the Complainant will be provided 60 business days to submit the required information. Failure to do so may be considered good cause for a determination of no investigative merit.

4.) Within 15 business days from receipt of a complete complaint, BTA will determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant investigation. Within five (5) days of this decision, the Executive Director or his/her authorized designee will notify the Complainant by registered mail, informing him/her of the disposition of the complaint.

a. If the decision is not to investigate the complaint, the notification shall specifically state the reason for the decision.

b. If the complaint is to be investigated, the notification shall state the grounds of BTA's jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting the investigator.

5.) When BTA does not have sufficient jurisdiction, the Executive Director or his/her authorized designee will refer the complaint to the appropriate State or Federal agency holding such jurisdiction.

6.) If the complaint has investigative merit, the Executive Director or his/her authorized designee will fully investigate the complaint. A complete investigation will be conducted, and an investigative report will be prepared within 60 days from receipt of the complaint. The report will include a narrative description of the incident, summaries of all persons interviewed, and a finding with recommendations

and conciliatory measures where appropriate. If the investigation is delayed for any reason, the appropriate authorities will be notified, and an extension will be requested.

7.) The Executive Director or his/her authorized designee will issue letters of finding to the Complainant within 90 days from receipt of the complaint.

8.) If the Complainant is dissatisfied with BTA's resolution of the complaint, the complainant has the right to file a complaint with the Federal Transit Administration:

File a complaint by completing the [FTA complaint form \(PDF\)](#). The complaint form must be signed and mailed to:

*Federal Transit Administration
Office of Civil Rights
Attention: Complaint Team
East Building, 5th Floor – TCR
1200 New Jersey Avenue, SE
Washington, DC 20590*

With your form, please attach on separate sheet(s):

- A summary of your allegations and any supporting documentation.
- Sufficient details for an investigator to understand why you believe a public transit provider has violated your rights, with specifics such as dates and times of incidents.
- Any related correspondence from the transit provider.

**Butler Transit Authority
Title VI - Civil Rights - Complaint Form**

This form may be used to file any discrimination complaint, but be aware that the only classes protected under Title VI are Race, Color, and National Origin.

Instructions: To submit a Title VI complaint to Butler Transit Authority, please complete the form below and submit to Butler Transit Authority, 130 Hollywood Drive – Suite 101, Butler, PA 16001. For questions or a full copy of BTA’s Title VI policy and complaint procedure call 724-283-0445.

1. Name (Complainant)															
2. Home Address (number and street, city, state, zip code):															
3. Telephone Number(s) (with area code): Home: _____ Work: _____															
4. Date of Incident:															
5. If applicable, name of person(s) who allegedly discriminated against you, as well as their location and position (if known):															
6. Discrimination because of: <table style="width: 100%; border: none;"> <tr> <td><input type="checkbox"/> Race (Title VI)</td> <td><input type="checkbox"/> Color (Title VI)</td> <td><input type="checkbox"/> National Origin (Title VI)</td> </tr> <tr> <td><input type="checkbox"/> Creed / Religion</td> <td><input type="checkbox"/> Sex (includes sexual harassment)</td> <td><input type="checkbox"/> Viet Nam Era Veteran</td> </tr> <tr> <td><input type="checkbox"/> Disability</td> <td><input type="checkbox"/> Sexual Orientation</td> <td><input type="checkbox"/> Disabled Veteran</td> </tr> <tr> <td><input type="checkbox"/> Age</td> <td><input type="checkbox"/> Marital Status</td> <td><input type="checkbox"/> Retaliation</td> </tr> <tr> <td><input type="checkbox"/> Limited English</td> <td></td> <td></td> </tr> </table>	<input type="checkbox"/> Race (Title VI)	<input type="checkbox"/> Color (Title VI)	<input type="checkbox"/> National Origin (Title VI)	<input type="checkbox"/> Creed / Religion	<input type="checkbox"/> Sex (includes sexual harassment)	<input type="checkbox"/> Viet Nam Era Veteran	<input type="checkbox"/> Disability	<input type="checkbox"/> Sexual Orientation	<input type="checkbox"/> Disabled Veteran	<input type="checkbox"/> Age	<input type="checkbox"/> Marital Status	<input type="checkbox"/> Retaliation	<input type="checkbox"/> Limited English		
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<input type="checkbox"/> Age	<input type="checkbox"/> Marital Status	<input type="checkbox"/> Retaliation													
<input type="checkbox"/> Limited English															
7. Explain as briefly and clearly as possible what happened and how you believe you were discriminated against. Indicate who was involved. Be sure to include how you feel other persons were treated differently than you. Also, attach any written material pertaining to your complaint.															

8. Why do you believe these events occurred?

9. What other information do you think is relevant to the investigation?

10. How can this/these issue(s) be resolved to your satisfaction?

11. Please list below any person(s) we may contact for additional information to support or clarify your complaint (e.g. witnesses):

<u>Name</u>	<u>Address</u>	<u>Phone Number</u>

12. Have you filed this complaint with any other federal, state, or local agency; or with any federal or state court?

Yes No

If yes, check all that apply:

Federal Agency: _____

Federal Court: _____ State Agency: _____

State Court: _____ Local Agency: _____

If filed with an agency and/or court, please provide the following information regarding the contact person at the agency/court where the complaint was filed:

<u>Name</u>	<u>Title</u>	<u>Agency/Court</u>	<u>Address</u>	<u>Phone Number</u>

Title VI complaints may also be filed directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Complaint Team; East Building, 5th Floor - TCR; 1200 New Jersey Ave. S.E.; Washington, DC 20590.

Signature (Complainant):

Date Signed:

LIST OF TITLE VI INVESTIGATIONS, COMPLAINTS OR LAWSUITS

There have been no Title VI investigations, complaints, or lawsuits filed with BTA since the time of the last Title VI submission in 2018.

PUBLIC PARTICIPATION PLAN

Butler Transit Authority (BTA)'s Public Participation Plan provides an opportunity for meaningful input into BTA's service planning and development process. It ensures that affected community members have an opportunity to participate in decisions about proposed activities that will affect their environment or their use of BTA services. BTA seeks to encourage public involvement efforts, including increasing access to BTA's transportation decision-making process by minority, low-income, and limited English-speaking populations.

BTA's ongoing public participation plan 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 and ability to participate in life activities;
- Contribution from the public can influence BTA's decision-making;
- Concerns of all persons and groups involved will be considered in the decision-making process; and
- BTA will seek out and facilitate the involvement of those potentially affected.

BTA will use a variety of communication mechanisms to ensure that all populations, including those residing in minority census tracts, persons with low-income, persons with disabilities, and persons with limited English proficiency have an opportunity to participate in service development and changes to service delivery.

BTA will proactively reach out to and engage low-income, minority and LEP populations within the BTA service area. BTA will incorporate appropriate public comments into transportation decisions. Meetings will be held in locations which are fully accessible to all area residents.

All comments received through the public participation plan on fare changes or major service reductions will be given full consideration. Comments can be submitted by mail, email, in-person at public meetings, etc.

Opportunities for Public Participation

Service and Fare Changes

BTA will use its public participation plan when considering fare increases, major service reductions (greater than 25%), and new transit facilities.

Transit Enhancements

The opportunity for public participation presents itself when transit enhancements are considered that would support the delivery of services. Examples of such improvements include the

installation of bus stop signs and shelters, ITS deployment, and establishing new policies for use of services.

BTA had no major service adjustments nor fare changes during the report period; the last fare increase was in 2012 and it has been many years since there were any major service changes in the local Butler area fixed route service area

In mid-2018 BTA initiated commuter service from Butler to downtown Pittsburgh. The Southwestern Pennsylvania Commission led two major studies which led to the development and implementation of this service; the Cranberry Area Transit Study in 2004 and the Butler Transit Development Plan in 2016-2017. The public was invited to participate in two public meetings in October and December 2016. Invitations were emailed and mailed to constituencies throughout Butler County and included low income, minority and disabled populations In addition for the December meeting, invitations were placed on the buses and posted on social media sites.

Capital Planning/Program of Projects

BTA works in concert with the Southwestern Pennsylvania Commission (SPC) the Metropolitan Planning Organization (MPO) which is responsible for regional transportation planning activities. SPC works with interested parties to ensure effective and innovative transportation planning that is representative of and responsive to the needs of the entire region. To achieve this goal, SPC offers the public an active role in the development of transportation plans, programs, and projects beginning in the early stages of planning processes. This includes the development of the program of projects.

Among the goals of this plan are to inform and educate the public by making timely and accurate information accessible to the public; to develop methods and opportunities for traditionally underserved portions of the population to participate in the transportation planning process, including minority, non-English speaking and low-income groups; engage the public and encourage continued participation; use public input to shape policies, plans, and programs; and to continually monitor and evaluate the public engagement process.

SPC involves a wide range of interested parties including citizens (including minority, non-English speaking and low-income individuals), affected public agencies, representatives of public transportation employees, private providers of transportation, users of public transportation, and other interested parties. Public participation panels have been established in each county, including Butler County, and are designed to be representative of the diverse population and interests in each county.

A copy of SPC's most recently adopted 2015 Public Participation Plan can be found through the following link:

https://www.spcregion.org/wp-content/uploads/2019/091spc_ppp_015-1.pdf

Other Public Participation Opportunities

BTA will annually advertise in a newspaper of general circulation the monthly board meetings that meet at BTA's Central Office located at 130 Hollywood Drive, Butler, PA 16001 to allow access to the general public. Meeting dates are also posted on BTA's web site.

BTA will solicit public input prior to adoption of the annual plan.

SUMMARY OF OUTREACH EFFORTS SINCE LAST TITLE VI SUBMISSION

Butler Transit Authority (BTA) annually conducted meetings with local service agencies in central Butler County to review current services and to request suggestions and improvements to services. BTA coordinates service with a number of agencies to deliver accessibility to their clientele. Agencies that currently supply bus passes, discounts or tokens to their clients include the Catholic Charities, Butler County Community College (BC3), Butler County Drug and Alcohol, Center for Community Resources, Victims Outreach (VOICE), Veterans Affairs, and Butler County Adult Probation.

BTA conducted public outreach meetings at various sites periodically through the year to promote ridership. An outreach coordinator is employed to personally assist individuals to learn how to access the bus system for their use by contacting the Authority's offices. Following are details of these outreach activities:

* Transportation 101 - BTA holds an annual event called Transportation 101. This is geared towards social service agencies that work with the clients that need transportation. The focus of this program is to "train the trainer." The Authority trains professionals in the community on how to ride the bus, how to read a bus schedule, different fare options, etc. Many of the participating professionals work with low income individuals in need of transportation. This has been a very successful program in educating professionals in the community on the bus.

* BC3 Open House - BTA annually attends the community college's open house. This is a great opportunity to speak with low income and minority students on how the bus works and their options for riding to and from school, work, etc.

* Senior Centers - The Authority has visited several of the County's senior centers to educate the seniors about their transportation options. Many of the senior citizens are on fixed income budgets and the Authority takes the opportunity to explain how the bus works, how to read a schedule, etc. The Authority also takes senior applications to encourage seniors to sign up and take advantage of the free transportation offered to them courtesy of the PA lottery. BTA has visited all of the senior centers in the County as well as senior living facilities such as Lowrie House, Under Our Wing, etc.

* Health and Wellness Expos - BTA has participated in several health and wellness events hosted by the Area Agency on Aging and the Butler County Chamber. As with all events these are a great opportunity to encourage ridership and inform the community of the options available and economic value of using public transportation.

* Here to Help Event – The Authority has participated in several events hosted by Careerlink. These events are directed primarily to the unemployed/low income individuals in the community. The Authority’s presence at these events is critical to inform people looking for employment that transportation options are available to them. The Authority has the ability to connect not only with the individuals themselves, but also with staffing agencies and other businesses. It is a great opportunity to spread the word about public transportation.

* High Rise Facility Visits/Material Distribution - The Authority has a great relationship with the Housing Authority of Butler County. The Housing Authority operates the majority of the high-rise apartment facilities in Butler. The residents of the facilities are typically seniors or low-income individuals. By visiting the facilities and speaking with the building managers, BTA has the ability to reach a large number of individuals through meetings and material distribution.

* Stand Down for Homeless Vets - The Stand Down event has become an annual event in Butler where BTA is able to discuss transportation options for veterans who are homeless and networks with other social service agencies in the community.

* Agency with Choice Program – The Agency with Choice Program is a home care service model created by the Office of Developmental Programs (ODP) to provide choices in consumer directed care to individuals with developmental disabilities. BTA provides information about transportation options for participants in this program.

* Transportation Options – Transportation Options is an annual meeting that takes place to inform the public and community agencies of the transportation options in the county. BTA participates annually to educate and create an awareness of the services BTA provides.

* Newsletters to Social Service Agencies– BTA issues newsletters twice a year to social service agencies to keep them apprised of BTA happenings.

* Other Activities– During the past three years, BTA also participated with an AmeriCorps Adult Literacy event at BC3; Community Care Connections, Kids Count/Family Psychological Services.

Outreach Activities since 2018 Submittal:

6/3/2019 – Multi-Agency Needs Assessment – discussed the details of a community health assessment. Networked and discussed the challenges facing the community including transportation barriers and breaking down those obstacles.

Week of 8/1/2019 – Butler Farm Show – discussed transportation options, fares, schedules, route service areas and general bus information with people from all over the area throughout the week.

1/6/2021 – Center for Community Resources (homeless program) – discussed tokens, schedules, and transportation options for those in the homeless and transitional programs.

PROVIDING LANGUAGE ASSISTANCE FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY

Four Factor Analysis

1) The number or proportion of Limited English Proficiency (LEP) persons eligible to be served in the BTA service area who may be served or likely to encounter a BTA program, activity, or service

Data from the U.S. Census Bureau’s 2010 Census shows that there is not a significant LEP population in Butler County. In BTA’s core service area, which is comprised of the City of Butler, Butler Township, and Center Township, there are only a total of 280 individuals age 5 and older who “*speak English less than very well*” which is 0.7% of the total population. The expanded service area, which includes 100 additional communities through which the commuter service travels has 418 individuals age 5 and older who “*speak English less than very well*” which is 0.9% of the service area population. The proportion of persons in BTA’s service area, as well as all of Butler County who reported to the 2010 Census that they “*speak English less than very well*” is considerably lower than the statewide proportion of such persons as shown below:

	<u>Total Population</u>	<u>LEP Population</u>	<u>% LEP of Total Population</u>
BTA Core Service Area	35,642	280	0.7%
BTA Expanded (incl. Commuter)	65,539	418	0.9%
Butler County	177,369	1,566	0.9%
Pennsylvania	2,081,931	515,501	4.3%

Data from the 2015-2019 American Community Survey 5-year estimates provide details of the various languages spoken by individuals within BTA’s full service area and the number of people who speak English less than very well. Of the 418 individuals who speak English less than very well, 214 or 51% speak Spanish, though this is only 0.3% of the total service area population.

BUTLER TRANSIT AUTHORITY	TOTAL	%
Population 5 years and older	65,539	100%
English Only	63,799	97.3%
Language other than English	1,740	2.7%
Speak English Less than "very well"	418	0.6%
Arabic	3	0.0%
Speak English Less than "very well"	0	0.0%
Chinese (incl. Mandarin, Cantonese)	165	0.3%
Speak English Less than "very well"	60	0.1%

French, Haitian, or Cajun	184	0.3%
Speak English Less than "very well"	47	0.1%
German or other West Germanic lang.	278	0.4%
Speak English Less than "very well"	0	0.4%
Korean	0	0.0%
Speak English Less than "very well"	0	0.0%
Russian, Polish, or other Slavic lang.	158	0.2%
Speak English Less than "very well"	21	0.0%
Spanish	597	0.9%
Speak English Less than "very well"	214	0.3%
Tagalog	80	0.1%
Speak English Less than "very well"	0	0.0%
Vietnamese	30	0.0%
Speak English Less than "very well"	0	0.0%
Other Asian & Pacific Island languages	10	0.1%
Speak English Less than "very well"	0	0.0%
Other Indo-European languages	223	0.3%
Speak English Less than "very well"	76	0.1%
Other and unspecified languages	12	0.0%
Speak English Less than "very well"	0	0.0%

2) The frequency with which Limited English Proficiency (LEP) come in contact with a BTA program, activity, or service

There has been no known contact with BTA services by individuals with limited English proficiency. There have been no requests for language translation services nor have bus operators or persons who provide information to the public regarding BTA's services had contact with individuals with limited proficiency who would benefit from information or materials provided in a language other than English.

3) The nature and importance of the program, activity, or service provided by BTA to people's lives

BTA provides public transportation services to persons who need to travel within and between the City of Butler, Butler Township and Center Township. Major destinations include Butler Memorial Hospital and other medical facilities, Butler County Community College, and Clearview Mall and other shopping locations. Persons rely on public transit services to get to work, medical services, shopping and other activities.

4) The resources available to BTA and costs

Various tools such as provision of the Census Bureau's "I Speak" cards could be used to help in the identification of specific languages for individuals with limited English proficiency. The use of AltaVista Babel Fish or similar software for translation of BTA materials by staff and the

public and/or translation services such as Language Line at <http://www.language.com> could be accessed to provide translation services as needed. Due to the limited LEP population, costs are expected to be minimal.

BTA has, in conjunction with the Butler County Blind Association, made route schedules and information available in Braille.

LIMITED ENGLISH PROFICIENCY PLAN

BTA has assessed the data regarding the persons with limited English proficiency within its service area and has determined that there is not a need at this time to develop a formal LEP implementation plan. The number of LEP individuals within the service (371) is fewer than 1,000 LEP which is less than 5% of the service area population (1%). BTA will periodically evaluate the situation to determine if there are changes in the population of persons with limited English proficiency that would warrant the development of an LEP plan for provision of materials in languages other than English.

Although a formal LEP plan is not required, BTA will implement the following LEP needs identification and outreach actions:

How to Identify a Person with LEP who needs Language Assistance

The following tools will help identify persons who may need language assistance:

- At BTA sponsored workshops, conferences or meetings, establish a welcome table for people to sign-in and to have a staff member greet and briefly speak to each attendee. To informally gauge the attendee's ability to speak and understand English, ask a question that requires a full sentence reply. Provide Census Bureau "I Speak" cards at the table to identify potential language needs at future events;
- Provide Census Bureau "I Speak" cards at the BTA Transit waiting area; and
- Survey drivers and other first line staff annually regarding their experiences with direct or indirect contact with individuals with LEP.

Language Assistance Measures

BTA will implement the following LEP procedures. The creation of these steps are based on the very low percentage of persons speaking other languages or not speaking English at least "well" and the lack of resources available in the BTA service area:

- Census Bureau's "I Speak" Cards are to be located in the Transit Center waiting area at all times

- BTA’s website offers site translation services through Google Translate and is available to the LEP population with computer access.
- When an interpreter is needed, in person or on the telephone, staff will utilize Language Line services. Language Line Services are available to the general public, though there is a cost to the entity initiating contact.

BTA Staff Training

All BTA staff will be provided with the “LEP Needs Identification and Outreach” section of the Title VI Plan and will be educated on procedures to follow. This information will also be part of the BTA staff orientation process for new hires. Training topics are listed below:

- Understanding the Title VI policy and LEP responsibilities;
- What language assistance services BTA offers;
- Use of LEP “I Speak” Cards;
- How to use the Language Line interpretation and translation services;
- Documentation of language assistance requests; and
- How to handle a Title VI and/or LEP complaint.

Outreach Techniques

BTA does not have a formal practice of outreach techniques due to the very limited LEP population and resources available in the service area. However, the following are a few options that BTA will incorporate when the need arises for LEP outreach:

- When staff is making a presentation on a topic that might be of importance to persons who have LEP or if staff is hosting a meeting or workshop in a geographic location with a known concentration of persons with LEP, meeting notices, advertisements, and agendas will include an alternative language based on the known LEP population;
- When publishing a general public meeting notice, based on the LEP population and when relevant, a clause that translates into “A *(insert language(s))* translator will be provided.”
- Key printed materials will be translated and made available at the BTA Transit Center, on board vehicles and in communities when a specific and concentrated LEP population is identified.
- BTA utilizes Google translate on its web site.

Monitoring and Updating the LEP Plan

This plan is designed to be flexible and can be easily updated. At a minimum, BTA will follow the Title VI Program update schedule for updating the LEP Plan. Major updates most likely will not occur until the next Census unless BTA finds it necessary and crucial for an update before that time.

Each update should examine all plan components such as:

- How many LEP persons were encountered;
- Were their needs met;
- What is the current LEP population in BTA service area;
- Has there been a change in the types of languages where translation services are needed;
- Is there still a need for continued language assistance for previously identified BTA programs? Are there other programs that should be included;
- Have BTA's available resources, such as technology, staff and financial costs changed;
- Has BTA fulfilled the goals of the LEP Plan; and
- Were any complaints received?

Dissemination of the BTA Limited Proficiency Plan

BTA includes the LEP plan within the Title VI Program on the BTA website <http://www.butlertransitauthority.com/> together with its Title VI Policy and Complaint Procedures. BTA's Notice of Rights under Title VI to the public is posted in BTA's transit center, on all BTA vehicles, and in selected printed materials also refers to the LEP Plan's availability.

Any person, including social service, non-profit, and law enforcement agencies and other community partners with internet access will be able to access the plan.

Copies of the LEP Plan will be provided, on request, to any person requesting the document via telephone, in person, by mail or email. LEP persons may obtain copies/translations of the plan upon request.

VITAL DOCUMENTS TRANSLATION / SAFE HARBOR PROVISION

The most common Limited English Proficiency population are those who speak Spanish less than very well which is 214 individuals which represent 0.3% of the total service area population. No individual LEP group falls outside the Safe Harbor Provision of 5% or 1,000 persons, whichever is less.

Currently under the Safe Harbor Provision, the LEP populations in BTA's service area do not meet the minimum standards for mandatory translation of documents. Upon request, BTA staff will provide appropriate translation assistance of vital documents. *These vital documents include but are not limited to: complaint forms; application forms; written notices of rights; and notices of denials, losses, or decreases in benefits or services.*

MEMBERSHIP OF NON-ELECTED COMMITTEES

BTA does not have any non-elected committees or councils.

MONITORING SUB-RECIPIENTS FOR TITLE VI COMPLIANCE

BTA does not have sub-recipients.

TITLE VI EQUITY ANALYSIS FOR CONSTRUCTION PROJECTS

There have been no facilities constructed since the May 2015 Title VI Program report.

DOCUMENTATION OF REVIEW AND APPROVAL OF TITLE VI PROGRAM

The Title VI Program has been reviewed and approved by Butler Transit Authority's Board of Directors at its September 18, 2018 meeting. A copy of the resolution is provided at the end of this document.

SERVICE STANDARDS

Service Standard for Vehicle Load

The load factor is generally defined as how crowded a public transit vehicle must be before additional service is added.

BTA's load factor is 1.2 on all local fixed routes. A factor of 1.2 means that every seat on the bus is filled and the number of standees equals 20% of the number of seats on the bus. A load factor of 1.3 will be established for commuter service to Pittsburgh when that service begins.

Load factors are monitored to determine whether additional service or vehicles are needed on routes that meet or exceed the vehicle load factor

Service Standard for Vehicle Headway

Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given line or combination of lines. Headways and frequency of service are general indications of the level of service provided along a route. Vehicle headway is one component of the amount of travel time expended by a passenger to reach his/her destination.

BTA's headways on all routes are similar and are 1 hour and 4 minutes until 11 AM and 1 hour and 8 minutes between 11 AM and 5 PM.

Service Standard for On-Time Performance

Dependability is examined in terms of schedule adherence, which measures the difference between scheduled time and the time the bus actually passes a particular location.

The schedule adherence standard consists of two parts: (1) the definition of "on-time"; and (2) the proportion of trips that operate within the "on-time" range. For purposes of assessing dependability, "on-time" is established at zero minutes early to ten minutes late for fixed route services.

The standard for schedule adherence is that eighty-five percent (85%) of the trips throughout the service day arrive on-time.

Service Standard for Service Availability

BTA provides service that is within ¾-mile of 85% of all residents in BTA's service area. BTA has less than 1% of any given minority population in the BTA service area.

Service Policies for Transit Amenities

There is at least one public or private transit wait shelter on each of BTA's fixed routes.

Service Policies for Vehicle Assignment

BTA's twelve vehicle fleet consists of two 2003 35-foot buses and two 2007 30-foot buses, three 2017 30' CNG Buses including one trolley-style bus. Also, five 2017 45' CNG Coach buses. The vehicles are rotated between the four routes so that all buses are used on all routes.

**RESOLUTION FOR THE APPROVAL OF
BUTLER TRANSIT AUTHORITY'S
TITLE VI PROGRAM**

The Butler Transit Authority Board hereby approves the attached Title VI Program by resolution at the regularly scheduled Board Meeting of the Butler Transit Authority held on June 8, 2021.

I, Joseph J. Hasychak, Board Chairperson of the Butler Transit Authority do hereby certify that the foregoing is a true and correct copy of the Resolution adopted at a regular meeting of the Butler Transit Authority held the 8th day of June, 2021.

DATE: June 8, 2021



Board Chairperson

Attest:
Butler Transit Authority
By: James Diamond



Board Secretary – June 8, 2021