

Table of Contents

I.	General Requirements and Guidelines	1
1.	Introduction.....	1
2.	Requirement to Provide Title VI Assurances	3
3.	Requirement to Notify Beneficiaries of Protection Under Title VI	4
4.	Requirement to Develop Title VI Complaint Procedures and Complaint Forms	4
5.	Requirement to Record and Report Transit-Related Title VI Investigations, Complaints, and Lawsuits.....	4
6.	Promoting Inclusive Public Participation.....	5
7.	Requirement to Provide Meaningful Access to LEP Persons	5
8.	Minority Representation on Planning and Advisory Boards	6
9.	Documentation of Old Colony Title VI Program Approval.....	6
10.	Requirement to Provide Additional Information Upon Request	6
II.	Requirements and Guidelines for Fixed Route Transit Providers	8
1.	Requirement to Set System-Wide Service Standards.....	8
A.	Vehicle Load for Each Mode	8
B.	Vehicle Headway for Each Mode.....	8
C.	On-Time Performance for Each Mode.....	8
D.	Service Availability for Each Mode	8
2.	Requirement to Set System-Wide Service Policies	8
A.	Distribution of Transit Amenities for Each Mode	8
B.	Vehicle Assignment for Each Mode	9
3.	Conclusion.....	9
	Appendix.....	10
	Appendix A: Transit Vehicles List.....	11
	Appendix B: Signed Title VI Certifications and Assurances Document.....	14
	Appendix C: BAT Notice to Public about Title VI Rights.....	18
	Appendix D: BAT Title VI Complaint Procedures – Long Notice.....	19
	Appendix E: BAT Title VI Complaint Procedures – Short Notice	20
	Appendix F: BAT Title VI Complaint Forms	21
	Appendix G: BAT Title VI No Complaint or Lawsuit Letter	30
	Appendix H: Old Colony MPO 2021 Public Participation Plan	32
	Appendix I: 2022 Old Colony Measures of Effectiveness Report.....	105
	Appendix J: Vehicle Load Policy	128

Appendix K: Headway Policy	130
Appendix L: On-Time Performance.....	132
Appendix M: Service Availability Policy	134
Appendix N: US Census American Community Survey Map Series	136
Appendix O: Population Characteristics	142
Appendix P: Bus Shelter and Benches Inventory	143
Appendix Q: Title VI Complaint Procedure on BAT Bus	145
Appendix R: Public Hearing Policy	146
Appendix S: Transit Amenities Policy	148
Appendix T: Vehicle Assignment Policy	150
Appendix U: 21-Day Public Comment Period Notices	153
Appendix V: Public Comments Received	157
Appendix W: Advisory Board Meeting Agenda in Multiple Languages.....	158
Appendix X: Review and Approval	161
Appendix Y: BAT Limited English Proficiency/Language Assistance Plan	162

I. General Requirements and Guidelines

1. Introduction

The Brockton Area Transit Authority (BAT) hereby states its policy to uphold and assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related federal and state statutes and regulations. Title VI prohibits discrimination in Federally assisted programs and requires that no person in the United States of America 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 assistance. Massachusetts law also prohibits discrimination based on race, color, religious creed, national origin, sex, gender identity, sexual orientation, genetic information, pregnancy, or a condition related to said pregnancy including, ancestry or status as a veteran, and BAT assures compliance with these laws and related federal and state civil rights laws prohibiting discrimination based on aforementioned categories.

The BAT 2023 Title VI Report has been prepared by the Old Colony Planning Council (OCPC) in response to BAT request for a Title VI compliance analysis. Title VI analyses and reporting is required by of the Federal Transit Administration (FTA) for civil rights performance monitoring at a minimum of every three (3) years. Transportation providers who are recipients of Federal financial assistance from FTA are required to monitor and evaluate their transit services to ensure compliance with Title VI of the Civil Rights Act of 1964.

The Title VI of the Civil Rights Act of 1964 states the following:

“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 subjected to discrimination under any program or activity receiving Federal financial assistance.”

The objective of this report is to provide data, analysis, and other information as outlined in the Circular 4702.1B “Title VI Requirements and Guidelines for Federal Transit Administration Recipients” and incorporates Executive Order 13166 Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons. The objectives of FTA’s Title VI Program, as set forth in FTA Circular 4702.1B are to ensure that the following are provided without regard to race, color, or nation origin:

- To ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner.
- To promote full and fair participation in public transportation decision-making without regard to race, color, or nation origin.
- To ensure meaningful access to transit related programs and activities by persons with limited English proficiency.

This report focuses on whether the transit service and related benefits are made available and are equitably distributed without regard to race, color, and national origin. Data analyzed for this report concerning high and low minority populations, low-income populations, and those with limited English proficiency comes from U.S. Census data. Fleet inventories and various transit amenities information is provided by BAT.

Brockton Area Transit Authority 2023 Title VI Report

The report also includes information on the transportation network. Most bus routes begin at BAT's Intermodal Transportation Centre, the hub of regularly scheduled bus service for Brockton and surrounding communities.

Brockton Area Transit Authority (BAT)

The Brockton Area Transit Authority (BAT) was established in 1974 and its mission statement is: "To proudly serve and be recognized as an innovative regional transit authority by providing safe, reliable and efficient service to our customers, clients and communities while achieving maximum effectiveness in complementing other forms of transportation in order to promote the general, economic, and social well-being of the area and the Commonwealth" (MGL ch.161b)."

In fulfilling this mission, the Brockton Area Transit Authority's objectives will be to its:

- ***Customers and Clients:*** responsive, respectful, friendly, safe, accessible, affordable, and dependable.
- ***Community:*** a concerned and responsible entity that supports community activities through both organizational and personal involvement.
- ***Employees:*** an employer that provides a working environment that recognizes and rewards employee contributions and initiatives; opportunities for personal growth and career advancement; and encouragement for effective and open communication and employee involvement.
- ***Operators:*** a provider of resources to support levels and quality of service determined by the authority to be reasonable, necessary, and consistent with contractual and regulatory obligations.
- ***Regulators and Funding Sources:*** a well-run, fiscally responsible authority that operates with prudent business policies and practices.

Importantly, BAT's fixed route service connects neighboring communities and the Central Business District in Boston, as well as industrial parks, colleges, medical facilities, shopping centers, and area commuter rail service. Service is offered seven days a week. Weekday service to the MBTA's Ashmont Station begins at 5:45 a.m. and ends at 12:20 a.m. Weekday service in the City of Brockton and neighboring communities begins at 6:00 a.m. and ends at 8:55 p.m. Weekend service operates at a reduced capacity with Saturdays starting at 7:40 a.m. and ending at 8:55 p.m. and Sundays running from 11:30 a.m. until 5:55 p.m.

The Brockton Area Transit Authority's service operates out of the Intermodal Transportation Centre (Intermodal Centre) that opened in 1999. The Intermodal Centre, adjacent to the MBTA Brockton Commuter Rail Station, serves as the transit hub for the South Shore and Greater Brockton area and offers ease of access to all passengers, while bringing together many modes of transportation around a modern and convenient facility. The Centre includes a waiting area, dispatch & information center, vending machines, and bicycle & automobile commuter parking. BAT has a distinctive coalition with the local business community, and BAT's innovative transportation solutions continue to contribute positively to the service area's economy.

The BAT Intermodal Centre was closed for most of 2020 and 2021 due to the COVID-19 pandemic. However, BAT brought in a new tenant that opened for service in fall 2020. Lady C&J Café opened for business at the BAT Centre in November 2020 and offers food options for both breakfast and lunch/dinner.

Brockton Area Transit Authority 2023 Title VI Report

Customer Service Office

BAT participates in the MBTA's stored value card fare collection system, the Charlie Card, and all BAT's fixed route buses have fare boxes capable of utilizing the card. Charlie Card users pay a reduced fare. Stored value on a Charlie Card may be used to pay fares and to store one-day, seven-day, and 31-day passes. Charlie Card Ticket Vending Machines (TVM) are available at the BAT Centre. These TVMs may be used to purchase, add value to, and even store a seven-day or 31-day passes to a Charlie Card. Portuguese and (Haitian) French-Creole languages were added to the TVMs as a result of a recommendation made in a past Title VI report assessments due to the large Haitian and Cape Verdean populations in BAT's service area. BAT also has a student pass in their fare structure, which is available to middle school, high school, and college students in the BAT Service Area. BAT's students pass makes these students eligible for half prices bus fares and monthly passes.

The two-story parking garage at the Intermodal Centre provides parking for 267 vehicles. The parking garage provides pay stations for customer convenience. The parking pass vending machines provide language transaction options in English, Spanish, (Haitian) French Creole and Portuguese, a recommendation outcome from BAT's 2013 Title VI and LEP documents. In addition to the parking garage, a modest office building adjacent to the Intermodal Transportation Centre houses BAT's administration offices.

Brockton Area Transit Authority strives to maintain a state of good repair through its ongoing system preservation efforts. Ninety-four (94) percent of the current BAT fixed route fleet is 2005 model year or newer Gillig low floor buses, the remaining six percent are 2020 Freightliner buses, and the overall fleet average age is 2015. These low-floor buses make traveling for the disabled and elderly easier with no steps to climb or wheelchair lifts to access. Appendix A is a list of all the fixed route vehicles in the system.

BAT buses are approximately in the same physical condition and generally reflect the years of use. They are all operated on a rotating schedule, which precludes route discrimination based on bus condition. This also ensures that the rolling stock is circulated efficiently and wears evenly according to vehicle age. Additionally, BAT fixed route buses are used for different routes for each run via a pulse system. For example, a bus used to service Route 3 (outbound then inbound) may go out as Route 4 when it returns to the Terminal. After it returns to the Intermodal Centre, it is used to serve Route 4A, and so on. This pulse system avoids the use of new equipment for only certain geographic areas, and older equipment being used for others.

BAT is staffed with an office "navigator" who actively seeks and encourages members of BAT's service area to participate in the BAT Advisory Board as the "Riding or Disabled Member" for a one-year term.

Based on the 2023 Title VI findings, it is the determination of Old Colony Planning Council that Brockton Area Transit Authority demonstrates that transit service is made available and is equitably distributed for all individuals without regard to race, color, or national origin throughout the transit system.

2. Requirement to Provide Title VI Assurances

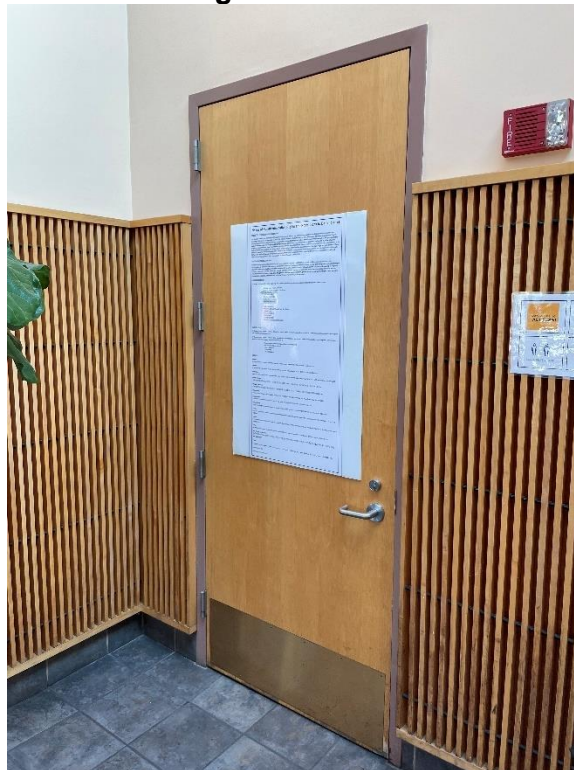
The most recently signed copy of Brockton Area Transit Authority's Title VI Certification and Assurances can be found in Appendix B.

3. Requirement to Notify Beneficiaries of Protection Under Title VI

BAT has posted information for the public on its website (<https://www.ridebat.com/title-vi/>) regarding the Title VI obligations and protections against discrimination afforded to the public by Title VI.

Appendix C is a copy of the BAT notification in English, Portuguese, Haitian French Creole, and Spanish, informing customers of their rights under Title VI. This notice is displayed on board buses and at the BAT Centre.

Figure 1: Notice of Nondiscrimination Rights and Protections to Beneficiaries in BAT Centre



4. Requirement to Develop Title VI Complaint Procedures and Complaint Forms

Brockton Area Transit Authority's Title VI complaint procedures are similar to the processes as outlined by the Old Colony Metropolitan Planning Organization. A copy of BAT's Complaint Procedures are located in Appendices D and E.

Appendix F presents BAT's Title VI complaint form in English and the three other most represented LEP groups in BAT's service area.

5. Requirement to Record and Report Transit-Related Title VI Investigations, Complaints, and Lawsuits

Appendix G is a correspondence from Brockton Area Transit Authority's legal counsel stating that currently there are no investigations, complaints, or lawsuits against the authority.

6. Promoting Inclusive Public Participation

Appendix H displays the Old Colony MPO's Public Participation Plan, which BAT will use in lieu of creating its own. The current Old Colony MPO's Public Participation was adopted on August 17, 2021.

As part of the 21-Day Public Review and Comment Period for the Title VI Report and LEP Plan, two table events were hosted at the BAT Centre on May 17th and 25th, 2023. In addition, articles were posted in the Enterprise and El Mundo Boston legal notices as well as in the OCPC Weekly Newsletter.

Figure 2: Shawn Bailey and Cidalia Rodrigues at the BAT Centre



7. Requirement to Provide Meaningful Access to LEP Persons

Brockton Area Transit Authority uses a multi-pronged approach to provide access for LEP Persons. BAT's bus operators speak over nine different languages and can provide translations for customers when needed. In addition, BAT utilizes the planning process of the Old Colony Metropolitan Planning Organization and Joint Transportation Committee meetings to provide another avenue of access for LEP persons. BAT also has a Consumer Advisory Council that provides feedback about the transit service to the authority. BAT utilizes the Old Colony Planning Council and the methods laid out in the organization's Public Participation Plan to also help engage the LEP population. BAT has a navigator position, located in the customer service office at the BAT Intermodal Centre, to assist passengers in trip planning, service announcements, and Portuguese translation. As noted below, BAT operators speak over nine (9) different languages and can provide translations when needed.

Engaging the diverse population within BAT's service area is important. BAT is committed to providing quality services to all citizens, including those with limited English proficiency. Portuguese, Haitian French Creole, and Spanish are the most spoken languages by LEP individuals in BAT's service area.

Brockton Area Transit has included efforts to address persons with limited English proficiency in many ways. BAT's operators collectively speak over nine languages or language-dialects and are

Brockton Area Transit Authority 2023 Title VI Report

available to communicate information or assist customers in languages other than English, making them a valuable human resource.

Brockton Area Transit Authority publishes all public hearing notices in the local community newspaper, which is English only; on its website and websites of partner organization, and physically in the Town and City Halls of those communities in the BAT service area. All Gillig buses have signs in Spanish, English, Haitian French Creole, and Portuguese and bus schedules printed in these languages too. BAT continuously updates its bus interior information boards with materials in Portuguese, Haitian French Creole, and Spanish. The park and pay stations located in BAT's commuter parking garage provides for transactions in English, Spanish, Portuguese, and Haitian French Creole.

Brockton Area Transit Authority utilizes the LEP program that has been developed by Old Colony Planning Council. Additional methods are discussed in the Old Colony Title VI report.

BAT is available for any additional questions or requests for information.

8. Minority Representation on Planning and Advisory Boards

Per MGL Chapter 161(b) Section 5, the BAT Advisory Board is to be comprised of the chiefly elected officials in the BAT service area (City Mayors/Managers and Select Board Chairs), plus one disabled commuter and one rider commuter. Below is the composition of BAT's Advisory Board members.

Table 1: Brockton Area Transit Authority Advisory Board

NAME	COMMUNITY	GENDER	RACE
Robert Sullivan	Brockton	M	White
Alex Bezanson	Abington	M	White
Frank Hagerty	Avon	M	White
Michael Dutton	Bridgewater	M	White
Cathie Klabish	Brockton	F	White
Peter Spagone	East Bridgewater	M	White
Dottie Fulginiti	Easton	F	White
Laura FitzGerald-Kemmett	Hanson	F	White
Michael O'Loughlin	Rockland	M	White
Debra Roberts	Stoughton	F	Black
Anthony Kinahan	West Bridgewater	M	White
Frank Lynam	Whitman	M	White

9. Documentation of Old Colony Title VI Program Approval

BAT's requirement to provide documentation of Title VI program review will be demonstrated through the meeting minutes of the May 25, 2023 meeting of the BAT Advisory Board. The review and approval documentation can be viewed in Appendix Y.

10. Requirement to Provide Additional Information Upon Request

Additional information concerning Chapter IV of the Title VI Circular is not required due to BAT not servicing a UZA of 200,000 people or operating 50 or more transit vehicles in peak revenue

Brockton Area Transit Authority 2023 Title VI Report

service. Additional information concerning Chapter V of the Title VI Circular is not required, since this section of the Title VI Circular pertains to State Title VI reporting. Additional information concerning Chapter VI reporting is not required of BAT, since this reporting section is a requirement of Metropolitan Transportation Planning Organizations.

II. Requirements and Guidelines for Fixed Route Transit Providers

1. Requirement to Set System-Wide Service Standards

A. Vehicle Load for Each Mode

Vehicle load is the ratio of the number of seats on vehicles to the number of passengers on board a given bus. BAT's load policy differs depending on the number of available seats on a given bus and vehicle type. BAT has three types of buses in revenue fixed route service: 40' high floor buses containing 38 seats, 40' low floor bus containing 31 seats, 35' low floor buses containing 31 or 32 seats, and 30' low floor buses containing 27 seats. BAT's load policy concerning low and high floor buses is that of 1.40, meaning all seats are filled and the number of people standing equals a maximum of 40% of the number of seats on that bus. The written policy can be found in Appendix J.

B. Vehicle Headway for Each Mode

The measurement of the time interval between buses traveling in the same direction on a particular route is known in the transit industry as vehicle headway. BAT's headway policy differs depending on the particular route, time of day, and day of the week service operates. Bus headways range from 30 to 60 minutes during morning peak hours, 15-to-60-minute headways in the afternoon peak hours, and 30-60 minutes during off-peak hours. Saturday and Sunday service headways average about a bus every 30 to 60 minutes. A more detailed description of BAT's vehicle headways can be viewed in Appendix K.

C. On-Time Performance for Each Mode

Brockton Area Transit averaged a 99.75% on-time performance rate for the last fiscal year. This is consistent with the BAT policy which is to maintain a 95% on time performance or higher. On-time Performance for the past four years can be viewed in Appendix L.

D. Service Availability for Each Mode

BAT strives to have 90% of all individuals in its service area within a quarter mile walk of a bus stop. BAT's service availability policy also states that bus stops should not be spaced more than three (3) city blocks apart for local bus service and allows for passengers to flag down buses when they are not in proximity to a bus stop to board an approaching transit vehicle. BAT's demand response service, DIAL-A-BAT, provides transit service for those seniors and individuals with a disability that cannot use regular fixed route service. DIAL-A-BAT provides transit service to those living in the city of Brockton, with limited service in the towns of: Abington, Avon, East Bridgewater, Easton, Stoughton, West Bridgewater, and Whitman that reside within $\frac{3}{4}$ of a mile to fixed route bus line. DIAL-A-BAT also provides Community Transit Grant funded paratransit service to parts of Avon, Easton, Hanson, Rockland, and Stoughton. BAT's Service Availability Policy can be viewed in Appendix M.

2. Requirement to Set System-Wide Service Policies

A. Distribution of Transit Amenities for Each Mode

Brockton Area Transit Authority's Transit Amenities Policy states that amenities shall be distributed based on passenger boarding at a particular stop. All bus stops within the City of Brockton will have a bus stop placard to alert passengers that they are at a bus stop. Those bus

Brockton Area Transit Authority 2023 Title VI Report

stops displaying high number of boardings will have bus shelters, benches, and/or trash cans. The Transit Amenities Policy can be viewed in Appendix S. BAT's system is in place for riders to report claims of discrimination. The process to file a Title VI complaint with BAT can be found in Appendices D and E. The cycling of BAT vehicles from pulse to pulse assures equal access to all in reach of BAT's service area.

B. Vehicle Assignment for Each Mode

Brockton Area Transit Authority's written Vehicle Assignment policy, as can be seen in Appendix W, states that buses are assigned their given route the night before service begins. 40' coaches are assigned to the most heavily ridden lines traveling streets that can accommodate the size of these vehicles, and 35' and 30' coaches assigned to lines with lower ridership or routes requiring buses to make tighter turns. In addition to buses being assigned based on ridership and operating conditions, BAT's practice of scheduling buses on a "pulse" schedule ensures no particular bus is assigned to any single geographic area and that transit vehicles are equitably distributed throughout the system. BAT buses, with the exception of the new Gillig buses are approximately in the same physical condition and operate on a rotating schedule, which precludes route discrimination based on bus condition. Appendix A presents the Transit Vehicle Inventory and Appendix T presents the Vehicle Assignment Policy. The pulse system avoids the use of new equipment utilized in certain geographic areas, and older equipment being used exclusively in others. BAT has a vehicle replacement schedule that is incorporated in the Old Colony MPO's Transportation Improvement Program (TIP). Objective transportation criteria are used to evaluate projects included in the TIP.

3. Conclusion

The 2023 Title VI Report provides data and analysis consistent with FTA Circular 4702.1B for public transit providers. Topic areas specifically addressed in the 2023 Title VI Report are: 1.) Limited English Proficiency Plan; 2.) Composition of Advisory Board and Committees members, 3.) System wide service standards and policies. The report is presented sequentially with the outline of FTA Circular 4702.1B and includes supplemental data within the Appendices.

Based on the 2023 Title VI findings, it is the determination of Old Colony Planning Council that Brockton Area Transit Authority demonstrates that transit service is made available and is equitably distributed for all individuals without regard to race, color, or national origin throughout the BAT fixed route system.

Appendix

Appendix A: Transit Vehicles List

Appendix B: Signed Title VI Certifications and Assurances Document

Appendix C: BAT Notice to Public about Title VI Rights

Will be placed here when completed

Appendix D: BAT Title VI Complaint Procedures – Long Notice

Will be placed here when completed

Appendix E: BAT Title VI Complaint Procedures – Short Notice

Will be placed here when completed

Appendix F: BAT Title VI Complaint Forms

Appendix G: BAT Title VI No Complaint or Lawsuit Letter

Appendix H: Old Colony MPO 2021 Public Participation Plan

Appendix I: 2022 Old Colony Measures of Effectiveness Report

Appendix J: Vehicle Load Policy

Appendix K: Headway Policy

Appendix L: On-Time Performance

Appendix M: Service Availability Policy

Appendix N: US Census American Community Survey Map Series

Appendix O: Population Characteristics

BAT Population Characteristics by Community

City/Town	Total Population	Minority Population	% Minority Population	Below Poverty	% Below Poverty
Abington	16,974	2,486	14.65%	1,011	5.96%
Avon	4,740	1,185	25.00%	198	4.18%
Bridgewater*	27,397	4,317	15.76%	2,103	7.68%
Brockton	105,455	72,307	68.57%	12,774	12.11%
Easton	24,962	3,834	15.36%	1,159	4.64%
East Bridgewater	14,393	1,441	10.01%	983	6.83%
Hanson	10,601	991	9.35%	244	2.30%
Stoughton	29,028	9,653	33.25%	1,810	6.24%
Rockland	17,774	1,770	9.96%	1,395	7.85%
West Bridgewater	7,622	445	5.84%	317	4.16%
Whitman	15,116	1,223	8.09%	737	4.88%
Total/Average	274,062	99,652	19.62%	22,731	6.07%

Source: U.S. Census Bureau 2021 ACS 5-Year Estimates

*Bridgewater's most recent ACS data is 2018

Appendix P: Bus Shelter and Benches Inventory

Appendix Q: Title VI Complaint Procedure on BAT Bus



If you have compliments or complaints please call or text BAT at 508.690.0016 or email us at info@ridebat.com.

Appendix R: Public Hearing Policy

Appendix S: Transit Amenities Policy

Appendix T: Vehicle Assignment Policy

Appendix U: 21-Day Public Comment Period Notices

Appendix V: Public Comments Received

Will be placed here when completed

Appendix W: Advisory Board Meeting Agenda in Multiple Languages

Appendix X: Review and Approval

Will be placed here when completed

Appendix Y: BAT Limited English Proficiency/Language Assistance Plan

Will be placed here when completed