Title VI Plan

Agency Name: Arenac Public Transit Authority (APTA)

1. **Program Statement:**

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that “no person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or subjected to discrimination under any program or activity receiving Federal financial assistance” (42 U.S.C. Section 2000d).

Arenac Public Transit Authority is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1B.

This plan was developed to guide Arenac Public Transit Authority in its administration and management of Title VI-related activities.

**Title VI Coordinator Contact Information**

Operations Manager

Arenac Public Transit Authority

Title VI Coordinator

4358 Airpark Drive P.O. Box 431

Standish, MI 48658

1. **Information Dissemination**

Title VI posters shall be prominently and publicly displayed in the Arenac Public Transit Authority facility and in their revenue vehicles. Additional information relating to nondiscrimination obligation can be obtained from the Arenac Public Transit Authority Title VI Coordinator.

Title VI information shall be disseminated to Arenac Public Transit Authority employees annually via the Employee Education form (see Appendix A) in payroll envelopes. This form reminds employees of the Arenac Public Transit Authority policy state, and of their Title VI responsibilities in their daily work and duties.

During New Employee Orientation, new employees shall be informed of the provisions of Title VI, and the Arenac Public Transit Authority expectations to perform their duties accordingly.

All employees shall be provided a copy of the Title VI Plan and required to sign the Acknowledgement of Receipt (see Appendix B).

1. **Subcontracts and Vendors**

All subcontractors and vendors who receive payment from Arenac Public Transit Authority where funding originates from any Federal assistance are subject to the provisions of Title VI of the Civil Rights Act of 1964 as amended.

Written contracts shall contain non-discrimination language, either directly or through the bid specification package which becomes an associated component of the contract.

1. **Record Keeping**

The Title VI Coordinator will maintain permanent records, which include, but are not limited to, signed acknowledgements of receipt from the employees indicating the receipt of the Arenac Public Transit Authority Title VI Plan, copies of Title VI complaints or lawsuits and related documentation, and records of correspondence to and from complainants, and Title VI investigations.

1. **Title VI Complaint Procedures**

How to file a Title VI Complaint?

The complainant may file a signed, written complaint up to one hundred and eighty (180) days from the date of the alleged discrimination. The complaint should include the following information:

* Your name, mailing address, and how to contact you (i.e., telephone number, email address, etc.).
* How, when, where and why you believe you were discriminated against. Include the location, names, and contact information of any witnesses.
* Other information that you deem significant.

The Title VI Complaint Form (see Appendix C) may be used to submit the complaint information. The complaint may be filed in writing to Arenac Public Transit Authority at the following address:

Operations Manager

Arenac Public Transit Authority

4358 Airpark Drive P.O. Box 431

Standish, MI 48658

NOTE: Arenac Public Transit Authority encourages all complainants to certify all mail that is sent through the U.S. Postal Service and/or ensure that all written correspondence can be tracked easily. For complaints originally submitted by facsimile, an original, signed copy of the complaint must be mailed to the Title VI Coordinator as soon as possible, but no later than 180 days from the alleged date of discrimination.

What happens to the complaint after it is submitted?

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by Arenac Public Transit Authority will be directly addressed by Arenac Public Transit Authority.

Arenac Public Transit Authority shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, Arenac Public Transit Authority shall make every effort to address all complaints in an expeditious and thorough manner.

A letter of acknowledging receipt will be mailed within thirty (30) days. Please note that in responding to any requests for additional information, a complainant’s failure to provide the requested information may result in the in the administrative closure of the complaint.

How will the complainant be notified of the outcome of the complaint?

Arenac Public Transit Authority will send a final written response letter to the complainant. In the letter notifying complainant that the complaint is not substantiated, the complainant is also advised of his or her right to 1) appeal within 7 calendar days or receipt of the final written decision from Arenac Public Transit Authority and or 2) file a complaint externally with the U.S Department of Transportation and/or the FTA. Every effort will be made to respond to Title VI complaints within 60 working days of receipt of such complaints, if not sooner.

In addition to the complaint process described above, a complainant may file a Title VI complaint with the following offices:

Federal Transit Administration Office of Civil Rights

Attention: Title VI Program Coordinator

East Building, 5th Floor – TCR

1200 New Jersey Ave., SE

Washington, DC 20590

1. **Limited English Proficiency (LEP) Plan**

Provide a summary of your LEP Plan approved by MDOT.

1. **Community Outreach**

As an agency receiving federal financial assistance, we have made the following community outreach efforts:

Customer Complaint Process. Citizens may call the Arenac Public Transit Authority’s Operations Manager at 989-846-7500 to lodge a complaint or comment. All complaints/comments are input into database and then distributed to the relevant manager who reaches the complaint and responds back to the citizen. Arenac Public Transit Authority complaint process was updated 2020/2021.

General Awareness and Satisfaction Surveys. We conduct rider and general awareness surveys frequently. Surveys are developed to assist Arenac Public Transit Authority in gathering information to develop new routes and address any concerns.

We submit to the Michigan Department of Transportation in conjunction with Arenac County Commissioners annually as application for funding. The application requests funding for both capital and operating assistance. Part of the annual application is a public notice, which includes a 30-day public comment period.

**VIII. List of transit-related Title VI investigations, complaints, and lawsuits**

As of the adoption date of this Title VI Plan, there have been no investigations, complaints, or lawsuits against Arenac Public Transit Authority.

IX. **Title VI Equity Analysis**

The procedures outlined in Title VI Program and referenced in FTA C 4702.1B will be adhered to for facility construction projects.

If Arenac Public Transit Authority constructs a facility such as a storage facility, maintenance facility or operations facility, the following will be adhered to:

* 1. The recipient shall complete a Title VI equity analysis during the planning stage about where a project is located or sited to ensure the location is selected without regard to race, color, or national origin.
  2. When evaluating locations of facilities, recipients should give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result.
  3. If the recipient determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, the recipient may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin.

**X. Demographics of Elected Boards and Committees**

Arenac Public Transit Authority service area has no concentration of minority individuals in the County. Arenac Public Transit Authority is committed to ensuring that no person is excluded from participation in membership in the Local Advisory Council based on race, color, or national origin, as protected by Title VI Federal Transit Administration (FTA) Circular C 4702.1B.

Members are selected by the affiliated organizations based on their clients who are major users of Arenac Public Transit Authority’s transportation services. All affiliate organizations of the Local Advisory Council are Title VI compliant. Arenac Public Transit Authority encourages minority participation from them. With such a small minority percentage of both population and ridership, the makeup of the council is in line with the census data. All announcements for meetings and funding requests are public notice and published county wide.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Body | Caucasian | Latino | African Am. | Asian Am. | Native Am. |
| Population | 96.2% | 1.7% | 0.5% | 0.3% | 1.2% |
| AOI Board | 100% | 0% | 0% | 0% | 0% |
| AOI Local Advisory Council | 100% | 0% | 0% | 0% | 0% |

Appendix A Employee Annual Education Form

Title VI Policy

No person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

All employees of the Arenac Public Transit Authority are expected to consider, respect, and observe this policy in their daily work and duties. If a citizen approaches you with a question or complaint, direct him or her to the Operations Manager for referral to the Title VI Coordinator.

In all dealing with citizens, use courtesy titles (i.e. Mr., Mrs., Ms., Or Miss) to address them without regard to race, color, or national origin.

Appendix B Acknowledgement of Receipt of Title VI Plan

I hereby acknowledge the receipt of the Arenac Public Transit Authority Title VI Plan. I have read the plan and am committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1B.

Your Signature \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Print your name \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Appendix C TITLE VI COMPLAINT FORM

Title VI of the 1964 Civil Rights Act requires that “No person in the United States shall, on the ground 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.” If you feel you have been discriminated against in transit services, please provide the following information to assist us in processing your complaint and send it to:

Arenac Public Transit Authority

4358 Airpark Drive P.O. Box 431

Standish, MI 48658

Please print clearly:

Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Address: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

City, State, Zip Code: \_\_\_\_\_\_\_\_\_\_\_\_

Telephone Number: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Person discriminated against: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Address of person discriminated against: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

City, State, Zip Code: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Please indicate why you believe the discrimination occurred:

\_\_\_\_\_ race or color

\_\_\_\_\_ national origin

\_\_\_\_\_ income

\_\_\_\_\_ other

What was the date of the alleged discrimination? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Where did the alleged discrimination take place? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Please describe the circumstances as you saw it: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Appendix D Letter Acknowledging Receipt of Complaint

Today’s Date

Ms. Jo Doe

1234 Main St.

Clarksville, Tennessee 37040

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against Arenac Public Transit Authority\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by telephoning 989-846-7500 or write to me at this address.

Sincerely,

Name

Title VI Coordinator

Arenac Public Transit Authority

4358 Airpark Drive P.O. Box 431

Standish, MI 48658

APPENDIX E Letter Notifying Complainant that the Complaint is Substantiated

Today’s Date

Ms. Jo Doe

1234 Main St.

Clarksville, Tennessee 37040

Dear Ms. Doe

The matter referenced in your letter of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_(date) against Arenac Public Transit Authority alleging Title VI violation has been investigated.

(An/Several) apparent violation(s) of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

Thank you for calling this important matter to our attention. You were extremely helpful during our review of the program. ***If a hearing is requested, the following sentence may be appropriate.)*** You may be hearing from this office, or from federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

Name

Title VI Coordinator

Arenac Public Transit Authority

4358 Airpark Drive P.O. Box 431

Standish, MI 48658

APPENDIX F Letter Notifying Complainant that the Complaint Is Not Substantiated

Today’s Date

Ms. Jo Doe

1234 Main St.

Clarksville, Tennessee 37040

Dear Ms. Doe

The matter referenced in your complaint of \_\_\_\_\_\_\_\_(date)against APTA \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ has been investigated.

The results of the investigation did not indicate that the provisions of Title VI of the Civil Rights Act of 1964, had in fact been violated. As you know, Title VI prohibits discrimination based on race, color, or national origin in any program receiving federal financial assistance.

The Arenac Public Transit Authority has analyzed the material and facts pertaining to your case for the evidence of the Transits failure to comply with any of the civil rights laws. There is no evidence found that any of these laws have been violated.

I therefore advise you that your complaint has not been substantiated, and that I am closing this matter in our files.

You have the right to 1) appeal within seven calendar days of receipt of this final written decision from Arenac Public Transit Authority and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the Federal Transit Administration at:

Federal Transit Administration Office of Civil Rights

Attention: Title VI Program Coordinator

East Building, 5th Floor - TCR

1200 New Jersey Ave., SE

Washington, DC 20590

Thank you for taking the time to contact us. If I can be of assistance to you in the future, do not hesitate to call me.

Sincerely,

Name

Title VI Coordinator

Arenac Public Transit Authority

4358 Airpark Drive P.O. Box 431

Standish, MI 48658

APPENDIX G Samples of Narrative to be included in Posters to be Displayed

In Revenue Vehicles and Facilities

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that “no person in the United States shall, on the ground 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” (42 U.S.C Section 2000d).

Arenac Public Transit Authority is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by the Title VI in Federal Transit Administration (FTA) Circular 4702.1B. **If you feel you are being denied participation in or being denied benefits of the transit services provided by Arenac Public Transit Authority or otherwise being discriminated against because of your race, color, national origin, gender, age, disability, you may contact our office at:**

**Title VI Coordinator**

**Arenac Public Transit Authority**

**4358 Airpark Drive P.O. Box 431**

**Standish, MI 48658**

**Limited English Proficiency (LEP) Plan**

Arenac Public Transit Authority

Arenac County

Introduction

This Limited English Proficiency Plan has been prepared to address the Arenac Public Transit Authority responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled *Improving Access to Services for Persons with Limited English Proficiency,* indicates that differing treatment based upon a person’s inability to speak, read, write, or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including Arenac Public Transit Authority which receives federal assistance through Arenac County which receives federal assistance through the U.S. Department of Transportation (U.S DOT).

Plan Summary

Arenac Public Transit Authority has developed this *Limited* English *Proficiency Plan* to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided by the transit. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write, or understand English.

This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

To prepare this plan, Arenac Public Transit Authority undertook the U.S. DOT four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter an Arenac Public Transit Authority program, activity, or service.
2. The frequency with which LEP persons come in contact with Arenac Public Transit Authority programs, activities or services.
3. The nature and importance of programs, activities or services provided by Arenac Public Transit Authority to LEP population.
4. The resources available to Arenac Public Transit Authority and overall costs to provide LEP assistance. A summary of the results of the Arenac Public Transit Authority four-factors analysis is in the following section.

Four-Factor Analysis

1. *The number or proportion of LEP persons in the service area who may be served or are likely to encounter an Arenac Public Transit Authority program, activity, or service.*

Arenac Public Transit Authority staff reviewed the 2019 U.S Census Report and determined that out of a population of 15165, 253 persons in Arenac County (3.8% of the population) speak a language other than English. In Arenac County, 72 persons (0.4%) have limited English proficiency; that is, they speak English “not well” or “not at all.”

In Arenac County, of those persons with limited English proficiency, 25 speak Spanish, 18 speak Asian and Pacific Island language, 24 speak other Indo-European languages, primarily Polish and German, and 5 speak other languages.

1. *The frequency with which LEP persons encounter Arenac Public Transit Authority programs, activities, or services.*

Arenac Public Transit Authority assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries and surveying vehicle operators. To date, Arenac Public Transit Authority has had no requests for interpreters and no requests for translated Arenac Public Transit Authority documents in Arenac County. Staff and vehicle operators have had little or no contact with LEP persons.

1. *The nature and importance of programs, activities or services provided by Arenac Public Transit Authority to the LEP population.*

There is no large geographic concentration of any type of LEP individuals in the Arenac Public Transit Authority service area of Arenac counties. The overwhelming majority of the population, 96.9% in Arenac County speak only English. Services provided by Arenac Public Transit Authority that are most likely to encounter LEP individuals are the contract routes for Bay-Arenac Behavioral Health, NEMSCA Head start and Mercy Plus and the demand response (Transit) system which serves primarily senior and disabled persons.

1. *The resources available to Arenac County and overall costs to provide LEP assistance.*

Bay-Arenac Behavioral Health, NEMSCA Head start are 2 organizations that Arena Public Transit Authority are currently partnered with, and would assist at no additional cost (as long as it is in the individual’s person-centered plan), in providing resources in relation to accessing a professional interpreter/translation services or augmentative communication specialist. Staff and vehicle operating training would also be included in these resources.

Based on the four-factor analysis, Arenac Public Transit Authority developed its LEP Plan as outlined in the following section.

Limited English Proficiency (LEP) Plan Outline

How the Arenac Public Transit Authority, Inc staff may identify an LEP person who needs language assistance:

* Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events.
* When Arenac County or Arenac Public Transit Authority sponsors an event, have staff person greet participants as they arrive. By informally engaging participants in conversation it is possible to gauge each attendee’s ability to speak and understand English.
* Have Census Bureau *Language Identification Flashcards* available at Arenac Public Transit Authority events near the registration table. Individuals self-identifying as persons not proficient in English may not be able to be accommodated with translation assistance at the event, but it will assist the sponsoring agency in identifying language assistance needs for future events.
* Have *Language Identification Flashcards* on all transit vehicles to assist vehicle operators in identifying specific language assistance needs of passengers. If such individuals are encountered, vehicle operator’s will be instructed to try to obtain contact information to give to the transit operations manager or follow-up. Dispatchers will also be instructed to obtain contact information from LEP individuals they encounter, either in person or over the phone.
* *Language Identification Flashcards* will be available at the Dispatcher office. It will be especially important for the dispatch agent to have these cards available since our organization serves both the public and contract routes.
* Vehicle operators and other front-line staff, like dispatchers, will be surveyed annually on their experience concerning any contacts with LEP persons during the previous year. The survey will be conducted in October each year.

Language Assistance Measures

Although there is a very low percentage in Arenac County of LEP individuals, that is, persons who speak English “not well” or “not at all”, the Arenac Public Transit Authority will ensure that the following measures are in place:

* *Language Identification Flashcards* will always be available in Arenac Public Transit Authority vehicles, or dispatch office.
* When an Arenac Public Transit Authority website is designed, a feature will be added to allow an LEP person to contact staff via email indicating his/her native language and the type of assistance needed.
* When an interpreter is needed, in person or on the telephone, staff will attempt to determine what language is required and then access assistance through the Bay-Arenac Behavioral, NEMSCA Head start and Mercy Plus.

Staff Training

The following training will be provided to Arenac Public Transit Authority staff:

* Information on the Arenac Public Transit Authority Title VI Policy and LEP responsibilities.
* Description of language assistance services offered to the public, Bay-Arenac Behavioral Health, NEMSCA Head start and Mercy Plus service recipients.
* Use of the *Language identification Flashcards.*
* Documentation of language assistance requests.
* How to handle a potential Title VI/LEP complaint.

Outreach Techniques

Arenac Public Transit Authority does not have a formal outreach procedure in place due to the low numbers of individuals needing LEP services: however, Arenac Public Transit Authority will contact Bay-Arenac Behavioral Health for individuals receiving their services to initiate the formal procedures they carry out to provide necessary LEP services when necessary. When and if the need arises for LEP outreach, the Arenac Public Transit Authority will also consider the following options:

* When staff prepares a document, or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative based on the known LEP population.
* Bus schedules, maps, and other transit publications will be made available in an alternative language when and if a specific and concentrated LEP population is identified.

Monitoring and Updated the LEP Plan

Arenac Public Transit Authority will update the LEP as required by U.S DOT. At a minimum, the plan will be reviewed and updated when data from the 2020 U.S Census is available, or when higher concentrations of LEP individuals are present in the Arenac Public Transit Authority, service area. Updates will include the following:

* The number of documented LEP person contacts encountered annually.
* How the needs of LEP persons have been addressed.
* Determination of the current LEP population in the service area.
* Determined as to whether the need for translation services has changed.
* Determine whether local language assistance programs have been effective and sufficient to meet the need.
* Determine whether transit system financial resources are sufficient to fund language assistance resources needed.
* Determine whether Arenac Public Transit Authority have fully complied with the goals of this LEP Plan.
* Determine whether complaints have been received concerning the agency’s failure to meet the needs of LEP individuals.