



Woods Hole, Martha's Vineyard and Nantucket Steamship Authority

Title VI Program

January 2026

TABLE OF CONTENTS

PURPOSE:.....	3
OBJECTIVES:.....	4
DEFINITIONS USED IN THIS DOCUMENT:	4
GENERAL REQUIREMENTS AND GUIDELINES.....	6
PROGRAM REQUIREMENTS.....	6
REQUIREMENT TO NOTIFY BENEFICIARIES OF PROTECTION UNDER TITLE VI	7
REQUIREMENT TO RECORD AND REPORT TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS AND LAWSUITS	8
PROMOTING INCLUSIVE PUBLIC PARTICIPATION	8
REQUIREMENT TO PROVIDE MEANINGFUL ACCESS TO LEP PERSONS.....	9
IDENTIFICATION OF LANGUAGE GROUPS AND LEP PERSONS WITHIN SSA	10
AVAILABILITY OF LANGUAGE ASSISTANCE FOR LEP INDIVIDUALS.....	11
REQUIREMENT TO SET SYSTEM-WIDE SERVICE STANDARDS AND POLICIES	12
APPENDIX A – ENABLING AUTHORITY	13
APPENDIX B - TITLE VI NOTICE TO THE PUBLIC.....	14
APPENDIX C - COMPLAINT PROCEDURES	16
APPENDIX D - COMPLAINT FORM.....	18
APPENDIX E - LIST OF COMPLAINTS SINCE LAST SUBMISSION	23
APPENDIX F - SSA SERVICE DELIVERY POLICY.....	24
APPENDIX G - LIMITED ENGLISH PROFICIENCY PLAN	34

PURPOSE:

The purpose of this document is to set forth the Woods Hole, Martha's Vineyard and Nantucket Steamship Authority's (SSA's) policies and procedures necessary to comply with the U.S. Department of Transportation's (DOT) Title VI regulations (49 CFR part 21), and to integrate these rules into our programs and activities as expressed in FTA Circular 4702.1B "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," dated October 1, 2012. This program incorporates specific guidance for service to geographic areas with a population of 200,000 people or greater under 49 U.S.C. 5307. SSA uses FTA funds for capital projects and preventative maintenance of its vessels, docks and facilities.

It is the policy of the SSA that no person shall, on the grounds of race, color, national origin, disability, class, gender, or sexual orientation be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any of its transportation programs.

Environmental Justice (EJ) is achieved by the SSA by making part of its mission to identify and address the effects of all programs, policies and activities on "minority populations and low- income populations." In order to accomplish this, the SSA must appropriately address the concerns of individuals potentially affected by our activities. Those individuals must appropriately be involved in the development of projects that fit harmoniously within their communities without sacrificing safety or mobility.

Three fundamental principles of environmental justice include but are not limited to the following:

- Ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
- Avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low- income populations.
- Prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

Additionally, Title VI allows an otherwise facially neutral program, policy, or activity that will have a discriminatory impact on minority populations (but does not include low-income populations). That program, policy, or activity may be carried out if (1) the SSA can demonstrate a substantial legitimate justification for the program, policy, or activity; (2) there are no comparably effective alternative practices that would result in less-disparate impacts; and (3) the justification for the program, policy or activity is not a pretext for discrimination. Whereas, Executive Order 12898 and the DOT Order on EJ posit that, if an SSA program, policy, or activity will have a disproportionately high and adverse effect on minority or low-income populations, that program, policy, or activity may only be carried out if further mitigation measures or alternatives that would reduce the disproportionately high and adverse effects are not practicable. In determining whether a mitigation measure or an alternative is “practicable,” the social, economic (including costs) and environmental effects of avoiding or mitigating the adverse effects will be taken into account. Although these two programs, Title VI and EJ, are separate and slightly different programs it is the mission of the SSA to conduct its transportation programs so that both of them are integrated into our policies and procedures to the fullest extent possible.

OBJECTIVES:

1. Ensure that the level and quality of public transportation service are provided in a nondiscriminatory manner;
2. Promote full and fair participation in public transportation decision-making without regard to race, color, or national origin;
3. Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

DEFINITIONS USED IN THIS DOCUMENT:

Disparate impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.

Disproportionate burden refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the SSA to evaluate alternatives and mitigate burdens where practicable.

Disparate treatment refers to actions that result in circumstances where similarly situated persons are intentionally treated differently (i.e., less favorably) than others because of their race, color, or national origin.

Limited English Proficient (LEP) Persons are persons for whom English is not their primary language and who have a limited ability to speak, understand, read, or write English. It includes people who reported to the U.S. Census that they do not speak English well or do not speak English at all. The SSA uses the lower of either 1,000 persons or 5% of the total population of persons eligible to be served or likely to be affected or encountered as the threshold for incorporating foreign languages into its policy for dissemination of transit information.

Low-Income means a person whose median household income is at or below the Department of Health and Human Services' poverty guidelines.

Low-Income Population means any readily identifiable groups of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed SSA program, policy, or activity.

Minority Persons include the following:

- American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
- Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent.
- Black or African American Populations, which refers to peoples having origins in any of the Black racial groups of Africa.
- Hispanic or Latino Populations, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- Native Hawaiian and Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

Minority Population means any readily identifiable group of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient populations (such as migrant workers or Native Americans) who will be similarly affected by a proposed SSA program, policy, or activity.

Minority transit route means a route that has at least 1/3 of its total revenue mileage in a Census block or block group, or traffic analysis zone(s) with a percentage of minority population that exceeds the percentage of minority population in the transit service area. A recipient may supplement this service area data with route-specific ridership data in cases where ridership does not reflect the characteristics of the census block, block group, or traffic analysis zone.

National Origin means the particular nation in which a person was born, or where the person's parents or ancestors were born.

Predominantly Minority Area means a geographic area, such as a neighborhood, Census tract, or traffic analysis zone, where the proportion of minority persons residing in that area exceeds the average proportion of minority persons in the SSA's service area.

Predominantly Low-Income Area means a geographic area, such as a neighborhood, Census tract, or traffic analysis zone, where the proportion of low-income persons residing in that area exceeds the average proportion of low-income persons in the SSA's service area.

Service Area refers to the geographic area in which the SSA is authorized by its enabling legislation to provide ferry service to the public.

Service Standards/Policy means an established policy or service performance measure used by the SSA as a means to plan or distribute services and benefits within its Service Area.

GENERAL REQUIREMENTS AND GUIDELINES

REQUIREMENT TO PROVIDE TITLE VI ASSURANCES

Consistent with 49 CFR Section 21.7(a), the SSA has submitted an assurance to the Cape Cod Regional Transit Authority's (CCRTA) that it will carry out the program in compliance with DOT's Title VI regulations. CCRTA, as a direct recipient of federal financial assistance, then fulfills its requirement with the submission of its annual certifications and assurances to FTA.

PROGRAM REQUIREMENTS

The SSA'S TITLE VI Program includes the following information:

A copy of the SSA's Title VI notice to the public that indicates the SSA complies with Title VI and informs members of the public of the protections against discrimination afforded to them by Title VI.

A copy of the SSA's instructions to the public regarding how to file a Title VI discrimination complaint, including a copy of the complaint form. Complaint procedures are in Appendix C and a copy the SSA's Title VI complaint form is in Appendix D.

A list of any public transportation-related Title VI investigations, complaints, or lawsuits filed with the SSA since the time of the last submission is contained in Appendix E. This list includes only those investigations, complaints, or lawsuits that pertain to allegations of discrimination on the basis of race, color, and/or national origin in transit-related activities and programs and have

been submitted to the SSA.

The SSA, as a subrecipient of federal financial assistance, has adopted CCRTA's public participation plan that includes an outreach plan to engage minority and limited English proficient populations. SSA's and CCRTA's targeted public participation plan for minority populations is part of efforts that extend more broadly to include other constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others.

The SSA, as a subrecipient of federal financial assistance, has adopted a plan for providing language assistance to persons with limited English proficiency, based on the DOT's LEP Guidance.

The SSA's transit-related Board and Port Council are made up of one appointed official of each county or municipality in its Service Area and none of them is selected by the SSA. Therefore, the SSA has not submitted a table depicting the racial breakdown of the membership of its Board or Port Council, nor a description of efforts made to encourage the participation of minorities on the Board or Port Council.

REQUIREMENT TO NOTIFY BENEFICIARIES OF PROTECTION UNDER TITLE VI.

Title 49 CFR Section 21.9(d) requires the SSA to provide information to the public regarding the SSA's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. The SSA fulfills this requirement to disseminate this information to the public by posting a Title VI notice on its website and in public areas of its five (5) ferry terminals in Woods Hole, Hyannis, Oak Bluffs, Vineyard Haven and Nantucket and its Administrative Office's reception area, and on its shuttle buses, vans and ferries. SSA's Title VI notice to the public is provided in Appendix B.

The SSA Title VI notice includes:

- A statement that the SSA operates programs without regard to race, color, or national origin.
- A description of the procedures that members of the public should follow in order to request additional information concerning the SSA's Title VI obligations.
- A description of the procedures that members of the public shall follow in order to file a Title VI discrimination complaint against the SSA.
- The SSA's Practices for Fulfilling the Notification Requirement.

Dissemination. The SSA informs the public of their rights under Title VI through posting the Title VI notice on its website and in public areas of its five (5) ferry terminals in Woods Hole, Hyannis, Oak Bluffs, Vineyard Haven and Nantucket and its Administrative Office's reception

area, and on its shuttle buses, vans and ferries. The posters are in English and Portuguese and are ever present.

Document translation. Notices detailing the SSA's Title VI obligations and complaint procedures may be translated into languages other than English and Portuguese at all times by requesting a written translation from the SSA Administrative offices in Falmouth.

Requirement to develop Title VI Complaint Procedures and Complaint Form. In order to comply with the reporting requirements established in 49 CFR Section 21.9(b), the SSA in conjunction with the CCRTA has developed procedures for investigating and tracking Title VI complaints filed against it and has made its procedures for filing a complaint available to members of the public. The SSA in conjunction with the CCRTA has developed a Title VI complaint form, and the procedure for filing a complaint is available on the SSA's website. The SSA procedure and complaint forms are located in Appendices C and D.

REQUIREMENT TO RECORD AND REPORT TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS AND LAWSUITS

In order to comply with the reporting requirements of 49 CFR Section 21.9(b), the SSA prepares and maintains a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations conducted by entities other than FTA; lawsuits; and complaints naming the SSA. This list shall include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the SSA in response, or final findings related to, the investigation, lawsuit, or complaint. This list is provided to the CCRTA on or before December 31st each year. See Appendix E for the SSA's report of this information.

PROMOTING INCLUSIVE PUBLIC PARTICIPATION

The SSA, as a subrecipient of federal financial assistance, has adopted policies consistent with CCRTA's established public participation. The SSA's plan attempts to reach as many of its constituents as possible by using public meetings, public notices, social media, and its own website to reach and involve minority and LEP populations in public participation activities. The SSA has developed comprehensive measures to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in its decision-making process:

- a. The SSA ensures that it schedules meetings at times and locations that are convenient and accessible for minority and LEP communities. Meetings are scheduled both during the day and at times into the evening to encourage maximum participation.
- b. In addition to different meeting times and locations, the SSA attempts to hold

meetings at those locations and organizations that might encourage minority and the LEP community as members.

- c. The SSA uses newspaper ads and in publications that serve LEP populations. The SSA is especially involved in its outreach to all public transit users through the entire Social Media: Twitter, Facebook, its website to encourage participation in its planning activities.
- d. The SSA's website includes schedule information and route maps for all fixed route services, as well as information about ADA and senior transportation. It also includes the latest SSA news and a form for customer comments, as well as links to other transportation services and member communities.
- e. The SSA issues press releases in the appropriate local newspapers to announce service changes and other news items of interest. The General Manager and/or the Director of Communications is interviewed by local and regional newspapers and other media whenever anything of note occurs within the SSA system.

REQUIREMENT TO PROVIDE MEANINGFUL ACCESS TO LEP PERSONS

Consistent with Title VI of the Civil Rights Act of 1964, DOT's implementing regulations, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121, Aug. 11, 2000), the SSA, as a subrecipient of federal financial assistance, has developed a plan to ensure meaningful access to benefits, services, information, and other important portions of its programs and activities for individuals who are limited-English proficient (LEP). SSA's Language Assistance Plan consists of the Four-factor analysis described in the DOT LEP Guidance from December 14, 2005 (70 FR 74087, Dec. 14, 2005) and updated in May 2011 through the document Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted Programs, in order to determine what steps are necessary to provide meaningful access.

- 1.) The number and proportion of LEP persons served or encountered in the eligible service population:

LEP persons are persons whose primary language is not English and who have a limited ability to speak, read, write, or understand English. The 2020 Census data has the most current official population estimates, but more recent five-year American Community Survey (ACS) provides more detailed data for the SSA's Service Area. The ACS data is based on a smaller number of estimates than the decennial data; therefore, it is considered to be less reliable and has a larger margin of error.

The SSA's Language Assistance Plan uses the 2020 Census estimates for totals of LEP persons by community and census tract. The 2017-2021 ACS data is used to identify languages spoken in the community. Directly impacting analysis for the SSA's Service Area, "Portuguese," the

primary language of most LEP persons in the SSA’s Service Area, was grouped under “Other Indo-European languages.” In future years, language data in this Plan will be updated according to the best and most recent data available with the 5-year ACS estimates.

IDENTIFICATION OF LANGUAGE GROUPS AND LEP PERSONS WITHIN CCRTA SERVICE AREA

According to the 2017-2021 ACS 5-year estimate, the total population of the SSA service area that speaks English less than “very well” is 3.35%.

LEP PERCENTAGES IN SSA SERVICE AREA

Town	Population	Speak English less than “very well”	% LEP
Barnstable County	205,701	6,417	3.12%
Dukes County	16,807	858	5.10%
Nantucket County	10,731	546	5.10%
Total	233,239	7,821	3.35%

Source: 2017-2021 ACS 5-Year Estimates

- 2.) The frequency with which LEP individuals come into contact with the program, activity, or service:

Interviews with SSA transit vehicle drivers revealed a very infrequent need to communicate with LEP individuals. Requests for information from LEP persons are routed to a language telephone tree and the information office at the SSA’s Reservation and Community Relations Office will coordinate these requests for help in foreign languages directly with those requesting help.

SSA is prepared for the occurrence through its notices of the availability of foreign language publications upon request. SSA provides translation of vital documents consistent with the Safe Harbor Provision. This assistance is consistent with the findings in the Four Factor Analysis in that any language can be made available to the public upon request. This notice is posted on the SSA’s website and is known to all employees who come into contact with the public. All documents mailed out of the Administrative offices contain a statement that they are available in other languages upon a telephone call to the office. Staff, including bus drivers, are made aware of the foreign language population consistent with this document and are advised as to how to contact the Administrative Offices for help in interpretation while on duty.

- 3) The nature and importance of the program, activity or service provided by the program: SSA’s transportation services are lifeline services that are considered vital to all users, including LEP persons.

- 4) The resources available to the SSA and costs: SSA's budget for the printing of multi-language schedules and brochures is limited at this time. Low and no-cost measures must be used to create meaningful access for LEP persons.

AVAILABILITY OF LANGUAGE ASSISTANCE FOR LEP INDIVIDUALS

Language assistance measures include SSA's website information translation into hundreds of different languages through a contract with the State contractor "Language Line Services" that provides on-demand, over the telephone interpreter services in over 170 languages as well as written translation services. SSA Staff is instructed in how to use this service. All Administrative and Operations staff that come into contact with the public (including bus drivers) receive training in how to obtain foreign language assistance in person, via telephone, or through the website. Staff are trained in how to contact the "Language Line Services" either through the Administrative Office, or the Reservation and Community Relations Office. The request for information is immediately transmitted to the Language Line Services" who will come on the telephone and speak directly to the person needing assistance or give instructions and assistance to the SSA personnel in how to aid the person. This service is available all hours that the SSA is in operation and information as to its availability is disseminated widely to staff. Staff training includes a section on foreign language assistance to customers. This service will help with unknown languages, provide an interpreter, and provide written translation services. They will assist with contacting a limited English speaker and/or can be conference-called-in to help with a person who has called SSA and by-passed the foreign language assistance telephone tree.

Written translation services and interpretation services at meetings are available through outside organizations and are available upon request at any public meeting. SSA has developed signs for its Administration office, its vessels and its buses that indicate there are translators available and that selected information documents, such as the ADA brochure, and the ADA application can be made available in any language needed. Notice of Title VI protections and translation assistance is posted on the SSA website, in the Reservation and Community Relations Office, and at the Administration office. Ferry and bus routes and schedule information are depicted visually on printed schedules with the major destinations matched to the schedule time. Schedules contain a notice that translation and interpretation assistance are available at the website and at the SSA offices. Notice of Public Hearings and other community outreach efforts may be translated and posted on the SSA website, on social media sites, at the Administration office. This LEP Plan will be monitored annually and updated as required.

In-house training of SSA staff occurs after each annual sample which includes a review of the LEP Plan for updating as required. Title VI - LEP training is provided to SSA staff on an annual basis unless changes in the Plan require a more immediate update.

REQUIREMENT TO SET SYSTEM-WIDE SERVICE STANDARDS AND POLICIES

These requirements apply to all fixed route providers of public transportation service. Title 49 CFR Section 21.5 states the general prohibition of discrimination on the grounds of race, color, or national origin. Section 21.5(b)(2) specifies that a recipient shall not “utilize criteria or methods of administration which have the effect of subjecting persons to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program with respect to individuals of a particular race, color, or national origin.” Section 21.5(b)(7) requires recipients to “take affirmative action to assure that no person is excluded from participation in or denied the benefits of the program or activity on the grounds of race, color, or national origin.” Finally, Appendix C to 49 CFR part 21 provides in Section (3)(iii) that “[n]o person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality of service of transportation service furnished as a part of the project 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.”

- 1) SSA has set service standards and policies for each specific fixed route mode of service it provides. Fixed route modes of service include local ferry and commuter ferry. The SSA sets standards and policies of how service is distributed across the ferry transit system and ensures that the manner of the distribution affords users access to these assets. The SSA’s Service Delivery Policy is attached as Appendix G.

APPENDIX A – ENABLING AUTHORITY

Enabling Legislation:

The Woods Hole, Martha's Vineyard and Nantucket Steamship Authority (SSA) was created pursuant to the provisions of chapter 701 of the Acts of 1960 of the Commonwealth of Massachusetts. The SSA is a body corporate and a public instrumentality of the Commonwealth. The Service Area of the SSA consists of Dukes County (Martha's Vineyard), Nantucket County (Nantucket), and the towns of Falmouth and Barnstable (Barnstable County).

The SSA is to provide adequate transportation of persons and necessities of life for the islands of Nantucket and Martha's Vineyard. It is authorized and empowered to purchase, construct, maintain and operate necessary vessels, docks, wharves, other vessels, equipment, furniture and supplies and to issue its revenue bonds payable solely from revenues, or funds.

The SSA's affairs are managed by a General Manager, who is appointed by and serves at the pleasure of its five-member Board whose members are appointed by its five constituent communities.

THE WOODS HOLE, MARTHA'S VINEYARD AND NANTUCKET STEAMSHIP AUTHORITY OPERATES ITS PROGRAMS AND SERVICES WITHOUT REGARD TO RACE, COLOR, AND NATIONAL ORIGIN IN ACCORDANCE WITH TITLE VI OF THE CIVIL RIGHTS ACT. THIS POLICY COMPLIES WITH CODE OF FEDERAL REGULATIONS UNDER 49 CFR SECTION 21.9 (D).

Reviewed and Approved by:



Alex Kryska,
General Manager
January 28, 2026

APPENDIX B - TITLE VI NOTICE TO THE PUBLIC

WOODS HOLE, MARTHA'S VINEYARD AND NANTUCKET STEAMSHIP AUTHORITY NOTICE OF PUBLICS' RIGHTS UNDER TITLE VI

WOODS HOLE, MARTHA'S VINEYARD AND NANTUCKET STEAMSHIP AUTHORITY OPERATES ITS PROGRAMS AND SERVICES WITHOUT REGARD TO RACE, COLOR, AND NATIONAL ORIGIN IN ACCORDANCE WITH TITLE VI OF THE CIVIL RIGHTS ACT. THIS POLICY COMPLIES WITH CODE OF FEDERAL REGULATIONS UNDER 49 CFR SECTION 21.9 (D).

MEMBERS OF THE PUBLIC WHO FEEL THAT MAY HAVE BEEN DISCRIMINATED AGAINST MAY FILE A COMPLAINT AT THE ADDRESS BELOW AND MUST INCLUDE NAME AND ADDRESS. E-MAIL IS ALSO ACCEPTABLE AT THE ADDRESS: TITLEVI@STEAMSHIPAUTHORITY.COM BUT FILERS MUST INCLUDE THEIR NAME AND ADDRESS FOR CONTACT PURPOSES.

**WOODS HOLE, MARTHA'S VINEYARD AND
NANTUCKET STEAMSHIP AUTHORITY
GENERAL MANAGER
228 PALMER AVENUE
FALMOUTH, MA 02540**

FOR MORE INFORMATION ON THE SSA'S CIVIL RIGHTS PROGRAM AND THE PROCEDURES TO FILE A COMPLAINT, CONTACT 508-548-5011, EXTENSION 301; OR VISIT OUR ADMINISTRATIVE OFFICES AT THE ADDRESS ABOVE, 2ND FLOOR. FOR MORE INFORMATION VISIT: WWW.STEAMSHIPAUTHORITY.COM.

A COMPLAINANT MAY FILE A COMPLAINT DIRECTLY WITH THE FEDERAL TRANSIT ADMINISTRATION BY FILING A COMPLAINT WITH THE OFFICE OF CIVIL RIGHTS, ATTENTION: TITLE VI PROGRAM COORDINATOR, EAST BUILDING, 5TH FLOOR-TCR, 1200 NEW JERSEY AVE, SE, WASHINGTON, DC 20590

If information is needed in another language, please contact LanguageLine Solutions at: (800) 878-8523.

To meet the safe harbor provisions of the regulation this Notice will also be posted in the Portuguese language:

TÍTULO VI COMUNICADO AO PÚBLICO

AVISO DE PÚBLICOS 'DIREITOS TÍTULO VI UNDER

Woods Hole, Martha's Vineyard And Nantucket Steamship Authority opera seus programas e serviços, independentemente de raça, cor e origem nacional nos termos do Título VI da Lei DIREITOS CIVIS. ESTA POLÍTICA EM CONFORMIDADE COM Code of Federal Regulations UNDER 49 CFR SEÇÃO 21,9 (D).

Os membros do público que sentem que PODEM forão discriminados podem apresentar uma morada queixa na morada abaixo e deve incluir nome. E-MAIL TAMBÉM É ACEITÁVEL NO ENDEREÇO SSA mas devem incluir nome e endereço para fins de contato. E-MAIL: TITLEVI@STEAMSHIPAUTHORITY.COM

**WOODS HOLE, MARTHA'S VINEYARD AND
NANTUCKET STEAMSHIP AUTHORITY
GENERAL MANAGER
228 PALMER AVENUE
FALMOUTH, MA 02540**

PARA MAIS INFORMAÇÕES SOBRE DIREITOS CIVIS DO PROGRAMA SSA E OS PROCEDIMENTOS para registrar uma queixa, deve contactar 508-548-5011, Ext. 301; ou visite nossos escritórios administrativos no endereço acima, 2º andar indicado. PARA MAIS INFORMAÇÕES VISITE: WWW.STEAMSHIPAUTHORITY.COM.

O queixoso pode apresentar uma reclamação directamente com a Administração Federal de Trânsito mediante a apresentação de uma queixa junto do ESCRITÓRIO DE DIREITOS CIVIS, ATENÇÃO: TITLE VI Program Coordinator, East Building, 5th Floor TCR, 1200 NEW JERSEY AVE, SE, Washington, DC 20590

Se a informação é necessária em outro idioma por favor contacte LanguageLine Solutions: (800) 878-8523.

APPENDIX C - COMPLAINT PROCEDURES

WOODS HOLE, MARTHA'S VINEYARD AND NANTUCKET STEAMSHIP (SSA) TITLE VI COMPLAINT PROCEDURE – POSTED WWW.STEAMSHIPAUTHORITY.COM

Any person who believes that she or he has been discriminated against on the basis of race, color, or national origin by the SSA may file a Title VI complaint by completing and submitting the SSA's Title VI Complaint Form. The SSA investigates complaints received no more than 180 days after the alleged incident. The SSA will process complaints that are complete.

Once the complaint is received, the SSA will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

The SSA has 30 days to investigate the complaint. If more information is needed to resolve the case, the SSA may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, the SSA can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has 15 days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

If information is needed in another language, please contact LanguageLine Solutions at: (800) 878-8523.

To meet the safe harbor provisions of the regulation the sentence above will also be posted on the web site in the Portuguese language:

TITLE VI COMPLAINT PROCEDURE

Procedimentos de reclamação

WOODS HOLE, MARTHA'S VINEYARD AND NANTUCKET STEAMSHIP (SSA)

TÍTULO VI procedimento de reclamação - PUBLICADO EM WWW.STEAMSHIPAUTHORITY.COM
Qualquer pessoa que acredita ou que tenha sido vítima de discriminação com base em raça, cor ou origem nacional pelo SSA pode apresentar uma queixa Título VI, preenchendo e enviando o Título VI Formulário de Denúncia da agência. O SSA investiga. Quando investiga casos que tenham ocorrido a menos de 180 dias. A Autoridade irá processar reclamações que são completos.

Quando reclamação é recebida, o SSA irá analisá-lo para determinar se o nosso escritório tem jurisdição. O denunciante receberá uma carta de confirmação, informando a ela / ele se a denúncia será investigada por nosso escritório.

O SSA tem 30 dias para investigar a denúncia. Se forem necessárias mais informações para resolver o caso, a Autoridade pode contactar o queixoso. O queixoso tem 10 dias úteis a partir da data da carta para enviar as informações solicitadas para o investigador designado para o caso. Se o investigador não é contactado pelo queixoso ou não receber as informações adicionais no prazo de 10 dias úteis, a SSA pode fechar administrativamente o caso. Um caso pode ser administrativamente fechado também se o queixoso não pretende continuar a perseguir o seu caso.

Depois que o investigador analisá a queixa, ela / ele vai emitir uma das duas cartas ao queixoso: uma carta de encerramento ou uma carta de encontrar (LOF). A carta de encerramento resume as acusações e afirma que não houve uma violação do Título VI e que o caso será encerrado. Um LOF resume as alegações e as entrevistas sobre o suposto incidente, e explica se eventuais medidas disciplinares, treinamento adicional do funcionário, ou outra ação ocorrerá. Se o queixoso pretende recorrer da decisão, que ele / ela tem 15 dias após a data da carta ou a LOF para fazê-lo.

A pessoa também pode registrar uma reclamação diretamente com a Administração Federal de Trânsito, a FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590. Se a informação é necessária em outro idioma por favor contacte LanguageLine Solutions: (800) 878-8523.

PPENDIX D - COMPLAINT FORM

Background

The SSA makes available a Title VI Complaint Form for use by customers who wish to file a Title VI complaint on its website www.steamshipauthority.com. The Title VI Complaint Form specifies the three classes protected by Title VI—race, color, and national origin—and allows the complainant to select one or more of those protected classes as the basis/bases for discrimination. This form may be translated on the web site into many foreign languages, especially Portuguese.

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party: _____				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
Section III:				
I believe the discrimination I experienced was based on (check all that apply):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin				
Date of Alleged Discrimination (Month, Day, Year):				
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.				

Section IV		
Have you previously filed a Title VI complaint with this agency?	Yes	No
Section V		
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?		
<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, check all that apply: <input type="checkbox"/> Federal Agency: _____ <input type="checkbox"/> Federal Court _____ <input type="checkbox"/> State Agency _____ <input type="checkbox"/> State Court _____ <input type="checkbox"/> Local Agency _____		
Please provide information about a contact person at the agency/court where the complaint was filed.		
Name:		
Title:		
Agency:		
Address:		
Telephone:		
Section VI		
Name of agency complaint is against:		
Contact person:		
Title:		
Telephone number:		

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below

Signature

Date

Please submit this form in person at the address below, or mail this form to:

WOODS HOLE, MARTHA'S VINEYARD AND NANTUCKET STEAMSHIP AUTHORITY
 GENERAL MANAGER
 228 PALMER AVENUE
 FALMOUTH, MA 02540

Apêndice D - Formulário de denúncia

Fundo

SSA torna disponível um formulário de reclamação do Título VI para utilização pelos clientes que desejam apresentar uma queixa do título VI no seu site www.capecodrta.org. O Título VI denúncia formulário especifica as três categorias protegidas pelo Título VI-raça, cor e origem nacional e permite que o queixoso para selecionar uma ou mais dessas classes protegidas como base/bases de discriminação.

Secção I:				
Nome:				
Endereço:				
Telefone (Home):			Telefone (Trabalho):	
Endereço de correio electrónico:				
Requisitos de formato acessível?	Impressão Grande		Fitas de áudio	
	TDD		Outros	
Secção II:				
Você arquivamento desta queixa em seu nome?			Sim*	Não
* Se você respondeu "sim" a esta pergunta, vá para a Seção III.				
Se não, favor fornecer o nome e a relação da pessoa para quem você está reclamando:				
Explique porque você ter arquivado para um terceiro: _____				
Confirme que você obteve a permissão da parte lesada se você estiver depósito em nome de um terceiro.			Sim	Não
Secção III:				
Creio que a discriminação I experiente foi baseado no (marque todas as opções que se aplicam):				
<input type="checkbox"/> Corrida <input type="checkbox"/> Cor <input type="checkbox"/> Origem nacional				
Data de alegada discriminação (Mês, Dia, Ano): _____				
Explicar o mais claramente possível o que aconteceu e por que você acredita que foram discriminados. Descrever todas as pessoas que estiveram envolvidas. Incluir o nome e informações de contato da pessoa(s) que discriminados você (se conhecido) bem como nomes e informações de contato de quaisquer testemunhas. Se for necessário mais espaço, por favor use o verso deste formulário.				

APPENDIX E - LIST OF COMPLAINTS SINCE LAST SUBMISSION

The SSA has maintained a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the recipient.

This list includes the date that the transit-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the SSA in response, or final findings related to the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program submitted by CCRTA to FTA every three years. Note: as indicated in the chart below, during the last three years, SSA has not been subject to any Title VI-related investigations by FTA or other entities, nor has it been subject to any Title VI-related lawsuits or received any Title VI complaints.

List of Investigations, Lawsuits and Complaints

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1. MCAD Dias v. SSA	9/11/2020	Allegations of race & color discrimination by former employee	Dismissed - insufficient evidence to support a determination of probable cause	Closed
2. MCAD Middleton v. SSA	02/20/2024	Allegations of race & color discrimination by former employee	Pending	Defending
3. MCAD Frederick v. SSA	5/14/2024	Allegations of race & color discrimination by ferry customer	Dismissed - insufficient evidence to support a determination of probable cause	Closed
4. MCAD Jutras v. SSA	1/9/2025	Allegations of age & disability discrimination by former employee	Pending	Defending

Lawsuits				
1.	None			
2.				
Complaints				
1.	None			
2.				

APPENDIX F- SSA SERVICE DELIVERY POLICY

Introduction

Purpose

The purpose of the *Service Delivery Policy* is to ensure that Woods Hole, Martha's Vineyard and Nantucket Steamship Authority (SSA) provides quality transit services that meet the needs of the riding public and are consistent with the SSA's enabling legislation and other external mandates, such as Title VI of the Civil Rights Act of 1964 and subsequent Environmental Justice (EJ) regulations and policies, by:

- establishing Service Objectives that define the key performance characteristics of quality transit services;
- identifying quantifiable Service Standards that are used to measure whether or not the SSA's transit services achieve the Service Objectives and to evaluate whether SSA services are provided in an equitable manner (as defined by Title VI and EJ);
- outlining a Service Planning Process that applies the Service Standards in an objective, uniform, and accountable manner; and
- involving the public in the Service Planning Process in a consistent, fair and thorough manner.

Background

This document is based on a request by CCRTA that SSA establish and publish performance standards as part of its public information systems. The basis of SSA's service standards and service planning methods was derived by examining those most common to other North American transit systems. The intent is to improve the SSA's performance by adopting best-practice techniques for planning and evaluating services.

In particular, as new technologies that will enhance the SSA's ability to collect and analyze data are adopted, policy modifications are needed to adapt the use of this information for service planning purposes. Future revisions to the service standards or the service planning process are reviewed by the public as part of the system's public policy relative to transparency and approved by the SSA Board of Directors.

Services

This policy addresses the SSA's fixed route services, including:

Ferry Routes

Year-round and daily (traditional and fast ferry) service on published schedules between:

1. Woods Hole, Massachusetts and Vineyard Haven, Massachusetts and Oak Bluffs, Massachusetts (seasonal); and
2. Hyannis, Massachusetts to Nantucket Massachusetts

Service Objectives

The SSA's mission is to operate a safe, effective, and reliable transportation system for the islands of Martha's Vineyard and Nantucket with a commitment to sustainability, accessibility, our port communities, and public engagement.

To evaluate progress toward achieving its mission, the SSA has identified the following Service Objectives, which the Authority believes represent the most important characteristics of an outstanding transit system:

Accessibility

Services should be geographically available throughout the community and should operate at convenient times and frequencies

Reliability

Services should be operated as scheduled

Safety

Services should be provided in a safe manner

Comfort

Services should offer a clean, pleasant and comfortable riding environment

Cost Effectiveness

Services should be tailored to target markets in a financially sound and cost-effective manner.

Service Standards

For each of the Service Objectives, the SSA has established quantifiable Service Standards, which allow the SSA to evaluate the performance of SSA services relative to each of the Service Objectives. These Service Standards are summarized in the following table:

Table 1: Summary of Service Standards

<u>Service Objective</u>	<u>Service Standard</u>
Accessibility	Frequency of Service
Reliability	Schedule Adherence
Safety & Comfort	Ferry Vessel Loading
Cost Effectiveness	Cost of Service Analysis

Frequency of Service Standard

To maintain accessibility to the transportation network within a reasonable waiting period, the SSA has established set operating schedules levels for each ferry route. These minimum levels dictate the frequency of service regardless of customer demand.

Weekday and weekend schedules for all routes for both the Frequency of Service and Vehicle Load Standards can be viewed at [Ferry Schedules for Nantucket & Martha's Vineyard | The Steamship Authority](#). Note, travel patterns on the weekend are different than on weekdays

When passenger and vehicle demands indicate that additional service is warranted, the frequency of service will be reviewed with the possibility of increasing service to provide a sufficient number of vessels to accommodate passenger and vehicle demands.

Reliability Service Standards

The performance of service is affected by many variables, including vehicle traffic congestion, accidents, weather, sea and road conditions, vehicle and vessel failures, etc. The Schedule Adherence Standards provide ways of measuring how reliably services adhere to the published schedules. If a service does not pass the Schedule Adherence Standards, the SSA will determine the reason why it does not perform reliably and will take action to correct the problems. In terms of service planning, this may mean adjusting departure and arrival times, changing assigned vessels, etc.

Schedule Adherence

Schedule Adherence Standards provide the tools for evaluating the service performance of individual SSA routes. The Schedule Adherence Standards are based on frequency of service; passengers are generally interested in adherence to published schedules and expect arrivals/departures to occur as published.

Schedule Adherence Standards: The Schedule Adherence Standards for ferry routes are designed to ensure that routes operate as reliably as possible without early departures, chronic delays, or unpredictable wait and/or travel times.

1. **Ferry Timepoint Tests:** To determine whether a ferry is on-time at an individual timepoint, such as the beginning of a route, end of a route, or a scheduled point in between, the SSA uses the following test based on service frequency:
 - a. **Scheduled Departure Service:** For scheduled departure services, customers are advised to be at the dock and ready for boarding at least thirty (30) minutes prior to scheduled departure. During the summer months, passengers should arrive forty-five (45) minutes to one (1) hour prior to a scheduled departure time, as passenger and vehicle capacities may be reached on popular sailings prior to departure.
 - b. **On Time Test for Scheduled Departure Timepoints:** A route is considered to provide scheduled departure service for any part of the day in which it departs within fifteen (15) minutes of its scheduled departure time.

2. **Ferry Route Test:** The second part of the Ferry Schedule Adherence Standard determines whether or not a route is on time, based on the proportion of timepoints on the route that are on time over an entire service day.

Safety & Comfort Service Standard

The public's perception of comfort and the reality of public safety are influenced by the number of passengers on a bus and whether or not a seat is available to each rider for all or most of the trip. The perception remains for the number of passengers and/or vehicle on a ferry and whether or not sufficient space or a seat is available to each vehicle and rider for the trip. The Vehicle Load Standards, which vary by time of day and route, establish the average maximum number of passengers or vehicles allowed to provide a safe and comfortable trip for customers.

Cost-Effectiveness Service Standard

The operation of SSA service must be conducted within the resource levels budgeted for each mode. It is therefore important to have a measure that can compare the economic productivity of any given route in relation to other routes or to the system average for that mode. As a part of the Service Delivery Policy, SSA has developed its Cost-of-Service Analysis to measure the cost-effectiveness of its ferry routes.

Net Cost per Trip Standard

Net cost per trip is calculated by summing the total cost of operating each route and dividing by the number of trips in a given year. This ratio reflects the benefits of a given service (measured in both passenger and freight trips) against the public cost of operating the service.

During the regular service planning processes, all routes and their respective net cost per trip are analyzed. Routes that have a net cost per trip higher than the revenue per trip are considered deficient and are subject to review for modifications that could improve the performance.

Service Planning Process

SSA regularly evaluates the performance of its services through its service planning process. The primary objective of the service planning process is to ensure that SSA uses available resources in the most effective manner by developing strategies to improve performance and/or to reallocate service within the system.

Service Planning Process

The service planning process is an on-going evaluation and implementation of incremental service changes that occur on a continual basis, at least annually, and on an over-arching basis that involves major changes and requires public participation. The ferry schedules are developed and printed on an annual basis.

The data used for all service evaluations are collected on a regular basis through various means to track and evaluate the performance of services against each of the Service Standards.

Minor changes to ferry services are made through the on-going service planning process and can be implemented with existing equipment, within the adopted budget, and without significantly affecting route structure or service delivery.

Major changes are ones that will have a significant effect on customers, resource requirements, route structure, or service delivery. These are evaluated and implemented through the SSA’s public participation plan (with the exception of services associated with major capital investment).

Table 2: Minor & Major Service Changes

Minor	
Running time adjustments <ul style="list-style-type: none"> • Departure time adjustments Changes to match ridership and service levels (provided the frequency and loading standards are still met) • Route variation modifications 	Changes that can be implemented with existing equipment and within the adopted budget
Major	
Major Service restructuring <ul style="list-style-type: none"> • Implementation of new routes or services • Elimination of a route or service • Elimination of part of a route 	Changes that will have a significant effect on resources, and may potentially have a significant effect on customers

The On-going Service Planning Process pertains to service changes that are evaluated in the on-going service planning process and can be initiated in a variety of ways. These include, but are not limited to:

- service requests and/or complaints from the public;
- feedback from operations staff; and
- proposals made by the administrative staff or board or port council members.

Staff screen all potential service changes to determine whether they are minor or major in nature (as defined above). In addition, each potential change is considered using the criteria listed below (not all criteria are necessarily used in every evaluation).

- Performance measured against the Service Standards
- The rationale for the change
- Net cost per new trip
- Net savings per lost trip
- Changes in ridership or freight
- Changes in travel time
- Changes in operating costs
- Changes in fare revenue

- Key characteristics and demographics of the area served
- Contribution to the achievement of external mandates, such as Title VI and EJ
- Other factors, as appropriate

Minor changes that are approved by the General Manager, and that can be made within the adopted budget, are implemented as soon as possible.

Annually, SSA develops a report that describes the performance of its fixed route services:

- a description of the performance of existing services;
- recommendations for major service changes;
- a discussion of service changes that were considered and/or evaluated, but are not recommended at the time; and
- a general review of the effectiveness of previous major service changes.

A key component of the annual service planning process is an evaluation of the performance of existing services. Based on this analysis, the Service Planning function proposes major service changes that will improve the performance of services that fail any of the Service Standards. To complete the evaluation, staff reviews all proposed service increases and reductions. Proposed service increases, if any, are reviewed using the cost-of-service analysis: those that result in the lowest incremental cost are given priority for implementation.

After the results are reviewed and completed, any savings from the service reductions are compared to the cost of major service enhancements to help select the proposed service changes. The goal is to maximize ridership and service performance in a cost-effective manner. The recommendations that result from this process are reviewed by the General Manager to assess the feasibility of implementation. Major changes are made available to the public for review and comment. A list of the final recommendations, an indication of the routes that still violate one or more of the service standards, and the Title VI/EJ analysis are then submitted to the SSA Board for final approval before any changes are implemented.

Table 3: Summary of Service Planning Processes

Magnitude of changes	Minor	Major
Initiation of changes:	<ul style="list-style-type: none"> • Requests/complaints from public • Operations feedback • Administrative Staff or Board or Port Council Members 	<ul style="list-style-type: none"> • Requests/complaints from public • Operations feedback • Administrative Staff or Board or Port Council Members • Public Meetings

Evaluation of changes:	Review by General Manager	<ul style="list-style-type: none"> • Comparative evaluation of proposed service changes, and possible new services\ • Review by General Manager • Public review and comment • Title VI/EJ analysis
Implementation of changes:	Approval of the General Manager	Approval of the SSA Board

Public Participation

Public participation in the service planning process occurs as both an on-going process and as a Service Plan specific process. The purpose of public involvement in the service planning process is to promote a regular dialogue with existing and potential customers, elected officials, and communities regarding their ever-changing service needs.

On-Going Public Outreach

The SSA provides avenues for on-going communication through the SSA’s website, as well as the customer complaints email address and comments sent to SSA through its various communication forms of Twitter and Facebook. Service-related comments/requests are directed to the appropriate department for consideration and response. Upon request, staff also attend monthly public meetings to address specific service issues. In addition, from time to time, the SSA may conduct specific market or route-based surveys to gather direct input on a major service change or potential new service. These outreach efforts are intended to provide members of the public with the opportunity to submit service comments and requests to the SSA for consideration. To this end, the SSA solicits ideas for service changes through written comments (submitted on-line or via the mail), as well as through public meetings throughout the service area. The SSA schedules open public meetings in appropriate locations and presents the analysis and issues behind the proposed service changes and solicits public comments on them. Staff then assesses and analyze the suggestions made through the public comments and, as appropriate, incorporate them into the final recommendations that go to the SSA Board for approval before implementation.

All Service Plan public notifications, meetings, and hearings will conform to the requirements of the Americans with Disabilities Act, Title VI of the Civil Rights Act of 1964, Environmental Justice regulations, Open-Meeting rules, and SSA policies associated with these laws.

Glossary of Terms & Acronyms

Coverage: The geographic coverage of the SSA system (specifically for the service area in which ferries operate). Coverage is a service guideline that is used to measure progress toward achieving the Accessibility Service Objective.

Fixed Route Service: SSA services that operate on designated routes with published schedules.

Frequency of Service: The number of trips/hour provided on a route. Frequency of Service is one of the Service Standards that are used to measure progress toward achieving the Accessibility Service Objective.

Net Cost/Trip: Reflects the benefits of a given service (measured in trips) against the public cost of operating the service. Net Cost/Trip is the Service Standard that is used to measure progress toward achieving the Cost-Effectiveness Service Objective.

Schedule Adherence: An indication of performance, or how reliably services adhere to the published schedules. Schedule Adherence is the Service Standard that is used to measure progress toward achieving the Reliability Service Objective.

Service Evaluation Process: Through the Service Evaluation Process, data collected on SSA services are compared against the Service Standards to determine whether or not individual existing services perform at acceptable levels and to evaluate the potential of possible service changes. The Service Evaluation Process also uses the Service Standards to compare the performance of existing services, with those of proposed service changes and/or possible new services, to prioritize the allocation of resources within the system.

Service Objectives: To evaluate progress toward achieving its mission, the SSA has identified five Service Objectives that the Authority believes represent the most important characteristics of high quality service: 1) Accessibility—services should be geographically available throughout the service area and should operate at convenient times and frequencies; 2) Reliability—services should be operated as scheduled; 3) Safety—services should be provided a safe manner; 4) Comfort—services should offer a pleasant and comfortable travel environment; and 5) Cost Effectiveness—services should be tailored to target markets in a financially sound and cost-effective manner.

Service Plan: Through preparation of a Service Plan, the SSA ensures that the CCRTA uses available funds in the most effective manner by evaluating the performance of existing services against the Service Standards. Based on this analysis, the Service Planning may propose new service and/or major changes to existing services to improve their performance on the Service Standards.

Service Planning Process: The SSA regularly evaluates the performance of its services through the service planning process. The primary objective of the service planning process is to ensure that the SSA uses available resources in the most effective manner by developing strategies to improve performance and/or to reallocate service within the system.

Service Standards/Guidelines: The Service Standards/Guidelines perform two important functions: 1) they establish the minimum or maximum acceptable levels of service that the SSA must provide to achieve the Service Objectives; and 2) they provide a framework for measuring the performance of SSA services in the Service Evaluation Process.

Title VI: Title VI of the Civil Rights Act of 1964 requires that transit agencies that receive federal funding demonstrate that they do not discriminate in the provision of services on the basis of race, color, or national origin.

Vehicle Load: Defines the level of passenger and vehicle loading that is acceptable for a safe and comfortable trip. Vehicle Load is expressed as a ratio of the number of passengers or vehicles on a particular conveyance (ferry or bus) to the number of seats or space available. Vehicle Load is the Service Standard that is used to measure progress toward achieving the Safety and Comfort Service Objectives.

APPENDIX G - LIMITED ENGLISH PROFICIENCY PLAN

WOODS HOLE, MARTHA'S VINEYARD AND
NANTUCKET STEAMSHIP AUTHORITY
TITLE VI COORDINATOR
228 PALMER AVENUE
FALMOUTH, MA 02540
(508) 548-5011

INTRODUCTION

This *Limited English Proficiency Plan* has been prepared to address the Woods Hole, Martha's Vineyard and Nantucket Steamship Authority's (SSA's) responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English proficiency 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 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, which includes the SSA.

Plan Summary

The SSA 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. As defined 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.

In order to prepare this plan, the SSA used the 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 by the SSA.
2. The frequency with which LEP persons come in contact with SSA services.
3. The nature and importance of services provided by the SSA to the LEP population.
4. The interpretation services available to the SSA and overall cost to provide LEP assistance.

A summary of the results of the four-factor analysis is in the following section.

MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS

1. The number or proportion of LEP persons in the service area who may be served or are likely to require SSA services.

The SSA discussed with the CCRTA's staff the SSA's review of the 2020 U.S. Census Report and determined that 7,821 persons out of 233,239 in SSA's area of service have limited English proficiency; that is, they speak English "not well" or "not at all", this is only a 3.35% of the overall population in the service area.

2. The frequency with which LEP persons come in contact with SSA services.

The SSA staff has reviewed the frequency with which its board, office staff and operating staff have, or could have, contact with LEP persons. This includes telephone inquiries or office visits. To date, the SSA has had very few requests for interpreters and no requests for translated program documents. The board, office staff and operating staff have had very little contact with LEP persons. Similarly, the SSA's staff has reviewed the frequency with which its board, office staff, vessel crews, terminal employees and bus/van drivers have, or could have, contact with LEP persons. They similarly have had very limited contact with LEP persons and very few, if any, requests for translation services.

3. The nature and importance of services provided by the SSA to the LEP population.

There is no large geographic concentration of any type of LEP individuals in the service area for the SSA. The overwhelming majority of the population speak only English. As a result, there are few social, service, professional and leadership organizations within the SSA service area that focus on outreach to LEP individuals. The SSA board, office staff and employees are most likely to encounter LEP individuals through ferry/bus/van rides, office visits, telephone conversations, and attendance at Board/Port Council meetings.

4. The resources available to the SSA, and overall costs to provide LEP assistance.

The SSA reviewed its available resources that could be used for providing LEP assistance, which of its documents would be most valuable to be translated if the need should arise, and considered potential translation services if needed within a reasonable time period. Language translation if needed would be provided through a telephone interpreter line for which the SSA would pay a fee. The SSA has explored the use of Google Translate on its website (www.steamshipauthority.com). This allows people to choose one of over fifty (50) languages to view information. Anything posted on the website (ferry schedules, applications, service information, policies) can be translated utilizing the Google Translate. It also allows staff that interacts with the public to view and print information in any of those languages. Google Translate was made available at the SSA's Administrative Office in Falmouth.

LANGUAGE ASSISTANCE

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to SSA services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

How the SSA staff may identify an LEP person who needs language assistance:

- Post notice of LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand.
- All SSA staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.
- When the SSA sponsors an informational meeting or event, an advanced public notice of the event should be published including special needs related to offering a translator (LEP) or interpreter (sign language for hearing impaired individuals). Additionally, a staff person may 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. Although translation may not be able to be provided at the event it will help identify the need for future events.

LANGUAGE ASSISTANCE MEASURES

Although there is a very low percentage in the SSA service areas of LEP individuals, that is, persons who speak English “not well” or “not at all,” the SSA will strive to offer the following measures:

1. SSA staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English.
2. The following resources will be available to accommodate LEP persons:
 - The use of Google Translate which allows people to choose one of over fifty (50) languages to view information

STAFF TRAINING

The following training will be provided to all staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Documentation of language assistance requests.
- How to handle a potential Title VI/LEP complaint via Google Translate

TRANSLATION OF DOCUMENTS

The SSA weighed the cost and benefits of translating documents for potential LEP groups. Considering the expense of translating the documents, the likelihood of frequent changes in documents and other relevant factors, at this time it is an unnecessary burden to have any documents translated.

Due to the very small local LEP population, the SSA does not have a formal outreach procedure in place. Translation resources have been identified and are limited in this region. However, when and if the need arises for LEP outreach, the SSA will 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 language based on the known LEP population.

MONITORING

Monitoring and Updating the LEP Plan - The SSA will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated when data from the 2020 U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in the SSA service areas. 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.
- Determination 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 the SSA's financial resources are sufficient to fund language assistance resources needed.
- Determine whether the SSA fully complies with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the SSA's failure to meet the needs of LEP individuals.
- Maintain a Title VI complaint log, including LEP to determine issues and basis of complaints.

DISSEMINATION OF THE SSA LEP PLAN

- Post signs at conspicuous and accessible locations notifying LEP persons of the LEP Plan and how to access language services.
- State on agendas and public notices in the language that LEP persons would understand that documents are available in that language upon request at the SSA's administrative offices located in Falmouth.