Western-Washtenaw Area Value Express  
Title VI Program  

Date Adopted: November 23, 2021

I. Program Statement

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of 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 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” (42 U.S.C. Section 2000d).

Western-Washtenaw Area Value Express (WAVE) 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 and in accordance with Title VI in Federal Transit Administration (FTA) C 4702.1B.

All employees of the Western-Washtenaw Area Value Express are expected to consider, respect, and observe this policy in their daily work and duties.

II. Title VI Coordinator Contact Information

Julia Roberts, Executive Director  
Western-Washtenaw Area Value Express  
PO Box 272  
Chelsea, MI 48118-0272  
(734) 433-1338  
ride@wavebus.org

III. WAVE Title VI Public Notices

WAVE – Title VI Compliance:

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of 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 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 (42 U.S.C. Section 2000d).

Western-Washtenaw Area Value Express is committed to ensuring that no person is excluded from participation in, or denied benefits of, its transit services on the basis of race, color, or national origin, as protected by Title VI in FTA C 4702.1B. If you feel you are being denied participation in or being denied benefits of the transit services provided by Western-Washtenaw Area Value Express, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, you may contact our office at Western-Washtenaw Area Value Express, PO Box 272, Chelsea, MI 48118 or www.RideTheWaveBus.org.

Title VI Notice Locations:

a) All WAVE Vehicles
b) WAVE Dispatch
c) WAVE Website: www.RideTheWaveBus.org
d) WAVE Employee Handbook

IV. Title VI Complaint Procedures

Complainant Instructions:

A complainant may file a signed, written complaint up to one hundred and eighty (180) days from the date of the alleged discrimination. Include:

a) Name, mailing address and how to contact you (i.e., telephone, through the mail or via email
b) The basis of the complaint (how, when, where and what). Include the location, names and contact information of any witnesses.
c) Other information that you deem significant.

The Title VI Complaint Form (Appendix A) may be used to submit complaint information. The complaint may be filed in writing with Western-Washtenaw Area Value Express at the following mailing address:

Western-Washtenaw Area Value Express
PO Box 272
Chelsea, MI 48118
NOTE: WAVE 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.

WAVE Complaint Procedures:

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by Western-Washtenaw Area Value Express (WAVE) will be directly addressed by the agency. WAVE shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English.

Once the complaint is received, staff has 30 business days to review it. WAVE will send the complainant an acknowledgement letter upon notice of alleged discrimination. If more information is needed to resolve the case, Western-Washtenaw Area Value Express may contact the complainant. The complainant has 30 business days from the date of the letter to send requested information to WAVE. If WAVE does not receive the additional information within 30 business days, it can administratively close the case. A case can be administratively closed if the complainant no longer wishes to pursue their case.

After WAVE reviews the complaint, they will issue one of two letters to the complaint: a Closure Letter or a Letter of Finding. A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A Letter of Finding 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, they have 15 days after the date of a Letter or Closure or Finding.

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.

V. Title VI Investigations, Complaints and Lawsuits

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 Western-Washtenaw Area Value Express Title VI Program, copies of Title VI complaints or lawsuits and related documentation, and records of correspondence to and from complainants, and Title VI investigations. Western-
Washtenaw Area Value Express will also prepare and maintain a list of any Investigations, Lawsuits and Complaint (WAVE Appendix B).

WAVE has not had any public transportation related Title VI investigations, complaints, or lawsuits filed since the time of the last submission of the Title VI Program.

VI. Public Participation, Outreach & Limited English Proficiency Plan

Western-Washtenaw Area Value Express (WAVE) believes public outreach is an important part of a Title VI Program. WAVE reaches out and seeks the public viewpoint by:

a) Publishing WAVE’s notice of the approved Title VI Program, which includes a request for comment
b) Participation in the Coordinated Public Transit-Human Services Transportation Planning Team when called. Bi-monthly participation in the Transportation Coordinating Committee (TCC) in Washtenaw County
c) Transit Improvement Plan (TIP) Notices, which includes public comment periods
d) Posting Title VI Notices on WAVE vehicles and in WAVE offices
e) Periodic WAVE surveys asking for public comments on a variety of topics
f) Bilingual Outreach – WAVE’s Limited English Proficiency Plan is based on a four-point study, and it also identifies an individual’s language and provides translation services while using WAVE services (See Appendix C, D, and E)
g) Travel Training, upon request

VII. Table of Board Membership – Racial Makeup

<table>
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<th>Title VI Response Summary of Ethnicity of the 12 Member WAVE Board of Directors</th>
<th>Poll Results</th>
</tr>
</thead>
<tbody>
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<td>See Other</td>
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<tr>
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<td>Native Hawaiian or Other Pacific Islander</td>
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<tr>
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<tr>
<td>Other</td>
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</tbody>
</table>
Western-Washtenaw Area Value Express offers positions on WAVE Boards, Councils, Committees, etc. regardless of race or ethnicity. The majority of WAVE’s Board of Directors’ membership is comprised of individuals that were recommended by local municipalities. Local municipalities are required to follow Title VI guidelines and monitor the same.

As of this writing, WAVE has not subcontracted programmatic services except for mobility management services. Mobility management services are subcontracted through a MDOT approved Third Party Contract with the Ann Arbor Area Transportation Authority (AAATA), who also has an approved Title VI Program. Contract stipulations spell out that all State and Federal laws will be followed or, upon notification, the contract may be cancelled if a situation of noncompliance to the policy arises and is not corrected. WAVE will monitor subcontractors and vendors for compliance through observation and active management of complaints.

VIII. Title VI Equity Analysis (Facilities, Storage, Operation Centers, Etc.)

Western-Washtenaw Area Value Express is not planning construction at this writing. However, WAVE will comply with guidance in accordance with 49 CF 21.9(b) to ensure sub-recipients are complying with DOT Title VI regulations and guidance set forth in Chapter III-I0, 1.2. Monitoring Sub-recipients if projects are undertaken. In future projects, WAVE would comply, as follows:

a. WAVE would complete a Title VI equity analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. WAVE would engage in outreach to persons potentially impacted by the siting of facilities and compare the equity impacts of various siting alternatives before the selection of a preferred site.

b. When evaluating locations of facilities, WAVE would give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. An analysis would be done at the Census tract or block group where appropriate to ensure that proper perspective is given to localized impacts.

c. If WAVE determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, it 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. WAVE
understands it must show how both tests are met. WAVE would consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

IX. **Certified Board of Director Resolution**

Attached is a Certified Board of Director Resolution that states: Whereas, the Western-Washtenaw Area Value Express (WAVE) has the authority to contract with the Michigan Department of Transportation to provide state and federal funds for passenger transportation related services and capital assistance; be it resolved that Western-Washtenaw Area Value Express approve and adopt the attached WAVE Title VI of the Civil Rights Act of 1964 policy.

X. **Service Policy Standard for the Community Connector Route**

The Community Connector route has double services with both east and west route variations. The west route variation operates six, two-hour loops, seven days-per-week between Chelsea, the City of Dexter and Ann Arbor, where WAVE passengers transfer to Ann Arbor Area Transportation Authority vehicles. The east route variation operates alternating hours starting in rural Washtenaw County, travels through the Jackson Road corridor and terminating in Ann Arbor, where WAVE passengers transfer to Ann Arbor Area Transportation Authority vehicles. In addition, the east route variation offers six periods of route deviations per day. Amenities include air conditioning and heating, wheelchair lifts to provide accessibility and bike racks that stow two bicycles on each vehicle.

WAVE bus signage is provided at designated bus stops. Although WAVE does not provide benches or shelters at interurban express bus stop signs, the City of Chelsea provides a bench for riders on Park Street in Chelsea at bus stop signage. The City of Dexter maintains a bus shelter for riders in downtown Dexter. Finally, the Jackson Rd. Meijer offers a bus shelter for riders at the west end of their building.

Passengers that cannot walk to bus stops may call Dispatch for accommodations within ¾ mile off the route. Additional route deviations ¾ mile off the route may be routinely reserved from travelers' homes to an interurban express bus stop along the Jackson Road corridor.

WAVE’s website: [RideTheWaveBus.org](http://RideTheWaveBus.org) is available to travelers to obtain specific information regarding bus stops and fares. Schedules may be printed from website links.
XI. Service Standards for the Community Connector Route

Service standards for the Community Connector Route include:

a) Vehicle load Standards

The average of all loads during the Community Connector operating period does not exceed the vehicles’ achievable capacity. The vehicle used for this route is an 18+2, 29-foot bus. Without a wheelchair onboard, seated capacity is 23 passengers due to continuous back row seating. Overhead mounted and seat grip bars allow for eight (8) standees. WAVE averaged capacities:

Peak hour: 15 passengers  
Non-Peak hour: 2 passengers

b) Vehicle Headway Standards

Bus one operates seven days per week with two-hour loops starting at 6:00am and ending at 7:30pm. Bus two operates weekends on alternating hours. Saturday hours are between 7:30am – 8:40 pm. On Sunday, bus two operates from 8:30am to 8:25pm. The vehicle headway is one bus per hour except traveling on the same line.

Bus stops were planned and assigned with consideration to several factors including, but not limited to: parking lot locations and the density of transit dependent populations.

c) On-Time Performance Standards

WAVE considers on-time performance being at the bus stop at the posted times. However, the agency acknowledges that weather or road or vehicle accidents may exist along the route that can alter our performance. In those instances, WAVE notifies customers that our pick-up window may be within fifteen minutes of the scheduled pick-up times. Travelers may call Dispatch for an estimate of an altered pick-up time.

WAVE’s on-time performance standard during non-peak hours is estimated to be 99.99%. Peak hour on-time rate is estimated at 98%.
d) **Service Availability Standards**

Community Connector bus stops are placed near: entries to highly populated areas (housing developments), parking lots, schools and central locations (downtown) Chelsea and the Village of Dexter.