

PVTA



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**PVTA Title VI Program Update**

*Submitted October 2024*

Pioneer Valley Transit Authority



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# Translation/Tradução/Traducción/翻译/ Перевод/ Dịch

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## INTRODUCTION

This 2024 Title VI Program Update of the Pioneer Valley Transit Authority (PVTA) is presented to verify compliance with Civil Rights Act of 1964 and its amendments (42 U.S.C. § 200d), collectively known as Title VI, which prohibit discrimination on the basis of race, color, or national origin in programs and activities that receive federal funds.

This document has been produced consistent with the guidelines in Federal Transit Administration (FTA) Circular 4702.1B effective October 1, 2012, as well as the requirements of 49 C.F.R. § 21.23(f). Updates to this Title VI Program are submitted to the Federal Transit Administration Region One Civil Rights Officer every three years, as required by 49 CFR Section 21.9(b).

PVTA is the largest FTA Tier 1 public transit agency in Massachusetts with a service area that covers 24 member communities, over 600 sq. mi. and a population of 623,629. In FY 2023, with 44 fixed-routes and a fleet of 189 buses and 147 ADA vans, PVTA provided nearly 7 million fixed-route rides and over 176,000 paratransit trips. PVTA is committed to providing the highest quality of convenient and accessible public transportation service that meets the needs of passengers in an efficient, cost-effective manner. Its vision is to assist the Pioneer Valley in making our communities more livable through transportation services. PVTA takes the role as an economic engine to increase access to the number of jobs, affordable housing, health care, retail centers, social services, and public spaces that can be accessed within a given travel radius on transit, especially for a large majority of minority and EJ populations within and around Springfield, Massachusetts.

The mobility that PVTA provides through its fixed route and paratransit services is critical for the many people in the region who do not, or cannot, drive. Data from PVTA bus rider surveys confirm that the majority of customers depend on PVTA for access to work, education, medical care, shopping, and other essential services. For the region's businesses and institutions, PVTA provides essential links to economic, academic, and cultural activity centers.

This 2024 Title VI Program Update has been prepared to verify that:

1. PVTA benefits and services supported by FTA funds are available to, and fairly distributed among, transit customers without regard to race, color, or national origin.
2. The opportunity and ability of persons to participate in transit planning, programming and implementation is not limited on the basis of race, color, or national origin; and
3. Any necessary corrective, remedial and affirmative actions have been taken to eliminate and prevent discrimination against people on the basis of race, color, or national origin.

## FTA CHECKLIST

FTA Circular 4702.1B Attachment A provides a checklist for the items required in Title VI Programs. Below are listed the relevant items for the transit providers serving an urbanized area with greater than 200,000 in population and operating 50 or more fixed route vehicles in peak service, under which PVTA qualifies. This Title VI Program is organized around the requirements as laid out in the checklist.

### i. General Requirements

1. Title VI Notice to the Public, including a list of locations where the notice is posted
2. Title VI Complaint Procedures
3. Title VI Complaint Form
4. List of transit-related Title VI investigations, complaints, and lawsuits
5. Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission
6. Language Assistance Plan
7. A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees
8. Description of how the agency monitors its subrecipients for compliance with Title VI, and a schedule of subrecipient Title VI Program submissions
9. A Title VI equity analysis if the recipient has constructed a facility
10. A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors reviewed and approved the Title VI Program

### ii. Requirements of Transit Providers

11. Service standards
  - 11.1. Vehicle load for each mode
  - 11.2. Vehicle headway for each mode
  - 11.3. On time performance for each mode
  - 11.4. Service availability for each mode
12. Service policies
  - 12.1. Transit amenities for each mode
  - 12.2. Vehicle assignment for each mode
13. Demographic and service profile maps and charts
14. Demographic ridership and travel patterns, collected by surveys
15. Results of monitoring program and report, including evidence that the board considered, was aware of the results, and approved the analysis
16. A description of the public engagement process for setting the “major service change policy,” disparate impact policy, and disproportionate burden policy
17. Results of service and/or fare equity analyses conducted since the last Title VI Program submission, including evidence that the board or other governing entity or officials considered, was aware of, and approved the results of the analysis

## 1.0 TITLE VI NOTICE TO THE PUBLIC AND LOCATIONS POSTED

Included in [Appendix A](#) is a copy of the Title VI Notice to the public used by PVTA. The locations where it is posted:

1. All public-facing spaces at PVTA Administrative Offices.
2. In the Customer Service area at Union Station.
3. In PVTA transit stations, including Holyoke Transportation Center and Westfield Transit Pavilion.
4. In all PVTA fixed-route vehicles.

## 2.0 TITLE VI COMPLAINT PROCEDURES

Consistent with 49 CFR Section 21.9(b), PVTA has established and implemented a Title VI complaint procedure. These complaint procedures are posted on the PVTA website at <http://pvta.com/titleVI.php>. As explained on the PVTA website:

### Complaint Filing

To file a complaint alleging a violation of Title VI or related federal nondiscrimination law, contact the Title VI Specialist (above) within 180 days of the alleged discriminatory conduct.

To file a complaint alleging a violation of the state's Public Accommodation Law, contact the Massachusetts Commission Against Discrimination within 300 days of the alleged discriminatory conduct at:

Massachusetts Commission Against Discrimination (MCAD)  
One Ashburton Place, 6th Floor  
Boston, MA 02109  
617-994-6000  
TTY: 617-994-6196

## 3.0 TITLE VI COMPLAINT FORM

A copy of the Title VI Complaint form in English is included as [Appendix B](#). A copy of the Title VI Complaint Form in Spanish is included as [Appendix C](#).

## 4.0 TRANSIT-RELATED INVESTIGATIONS, COMPLAINTS, LAWSUITS

Since the 2021 submission, PVTA has had two (2) complaints on the basis of race, color, or national origin.

- Received November 4, 2022. Complainant alleged discrimination based on race, PVTA determined that the passenger violated the no food and beverage policy on the bus.
- Received May 28, 2024. Complainant alleged discrimination based on disability status with insufficient incident details. PVTA identified the incident as an ADA complaint and requested more information from the applicant.

## 5.0 PUBLIC PARTICIPATION PLAN

The PVTA Advisory Board adopted a revised Public Participation Plan on November 20, 2024. This included a public process to update the Disparate Impact and Disproportionate Burdens Policies. The Public Participation Plan can be found as [Appendix D](#).

A list of public outreach and community partner engagement in the past three years (October 1, 2021 to October 1, 2024) includes the following:

- 9 Public hearings for route and service changes
- 16 PVTA Advisory Board meeting
- 3 Paratransit Rider’s Council Meetings
- 2 Paratransit Rider Outreach
- 32 Senior Outreach Events
- 5 Meetings with community stakeholders related to service and vulnerable populations (Includes with dialysis providers, human service agencies and senior centers)
- 3 General rider outreach, includes outreach meetings, in person on board outreaches and route specific surveys
- 2024 Southern System passenger survey
- 2024 Paratransit Survey
- 26 Regional Transportation Advisory Committee (JTC) Public Meetings
- 25 Pioneer Valley Metropolitan Planning Organization (MPO) Public Meetings
- Re-engaged the Mystery Rider program for Fixed Route by conducting approximately 50 rides each quarter.
- PVTA has held numerous ongoing meetings with localities and MassDOT regarding bus routes, bus stop locations and construction meetings to provide feedback on roadway construction projects.
- Title VI Program Update meetings were held at four (4) in-person locations and two (2) virtual public meetings were held to offer additional opportunities for in-person feedback.

## 6.0 LANGUAGE ASSISTANCE PLAN

The Language Assistance Plan can be found in [Appendix E](#).

## 7.0 MEMBERSHIP OF NON-ELECTED, COMMITTEES AND COUNCILS

PVTA is committed to meeting the needs of all passengers and ensuring that no person is excluded from participation in or denied the benefits of its services. PVTA encourages participation of people of color on transit committees. PVTA conducted a survey of the race and ethnicity of Advisory Board members and Paratransit subcommittee on September 2024. The results showed that of the 15 respondents (out of 26 members), 87% of the Advisory Board identified race as White, 13% as Black. For ethnicity, 93% of those responding are “not Hispanic or Latino or Spanish Origin,” and 7% are Hispanic, Latino, Spanish Origin, and Puerto Rican.

As described in the enabling state legislation Chapter 161B, Section 5 of the Massachusetts General Laws, the Advisory Board is composed of the chief elected officials from member communities or their representatives. As such, PVTA has no authority in the appointment of community-affiliated Board members. As described in the law, there are two non-community-affiliated positions, the Rider Representative, and the ADA Representative. They are selected on a rotating basis by Board members. The ADA Representative must have a mobility impairment or have a family member with a mobility impairment. The Rider Representative is chosen from five candidates nominated by the Massachusetts AFL/CIO. PVTA actively seeks input from a broad range of riders on operational and service issues that affect bus riders and organizations with an expressed interest in public transit.

**Table 7.0-1. PVTA Boards, Committees and Councils**

<b>Committee</b>	<b>Composition</b>
PVTA Advisory Board	<ul style="list-style-type: none"> <li>a) The Mayor or City or Town Manager of each city.</li> <li>b) The Chair of the Board of Selectmen of each town having such board, or the Town Manager or Town Administrator of each town.</li> <li>c) Advisory Board members may appoint designees to act on their behalf.</li> </ul>
Paratransit Sub-Committee	PVTA Advisory Board members
Paratransit Rider Council	PVTA Advisory Board members
Finance and Audit Committee	PVTA Advisory Board members
Compensation Committee	PVTA Advisory Board members
Route Sub-committee	PVTA Advisory Board members
Paratransit Appeals Committee	<ul style="list-style-type: none"> <li>a) PVPC</li> <li>b) PVTA</li> <li>c) Agawam Council of Aging / PVTA Advisory Board</li> <li>d) Belchertown Select Board / PVTA Advisory Board</li> </ul>
Bus Rider Appeals Committee	<ul style="list-style-type: none"> <li>a) PVPC</li> <li>b) Agawam Council of Aging / PVTA Advisory Board</li> <li>c) Belchertown Select Board / PVTA Advisory Board</li> </ul>
PVTA Safety Committee	<ul style="list-style-type: none"> <li>a) PVTA Chief Safety Officer.</li> <li>b) Frontline workers</li> <li>c) PVTA management</li> </ul>

## 8.0 SUBRECIPIENT MONITORING PROCEDURES

The Pioneer Valley Transit Authority has one (1) subrecipient of federal funding, the Pioneer Valley Planning Commission (PVPC). To ensure compliance with Title VI requirements, the PVTA implements the following methods:

1. PVTA Title VI Program Officer works closely with subrecipient staff to determine the appropriate level of assistance to be provided.
2. PVTA Title VI Program Officer provides subrecipient staff with guidance and references to Title VI resources as needed. These include FTA publications, webinars, website resources, and information received at FTA trainings.
3. Title VI complaints against PVPC are to be immediately reported to PVTA to ensure consistency with its complaint procedures.
4. PVTA Title VI Program Officer assesses the effectiveness of assistance to the subrecipient through the review of monthly invoices, regular service review meetings, informal ongoing meetings and phone calls, quarterly staff coordination meetings, and review of FTA Triennial and Title VI Program Reviews.
5. PVTA annually reviews and renews the interagency agreements with PVPC for 5303 and 5307 funding to assure that the terms pertaining to Title VI program compliance are up-to-date and are achieving compliance with the PVTA Title VI Program.
6. PVTA reviews subrecipient invoices and activity reports monthly.
7. PVTA subrecipient oversight is also performed as a part of quarterly coordination meetings among senior PVTA and PVPC staff; monthly service review meetings involving PVPC and operating contractors; and through meetings between PVTA and PVPC staff as needed.

Samples of PVPC Title VI forms and resources can be found in the following appendices:

- Sample notices to the public informing beneficiaries of their rights under DOT's Title VI regulations can be found in [Appendix F](#).
- Sample PVPC Title VI complaint procedure form can be found in [Appendix G](#).
- Sample PVPC Title VI complaint form can be found in [Appendix H](#).
- Sample demographic information for PVPC can be found in the PVPC Title VI Program found in [Appendix I](#).

The PVPC is an FHWA direct recipient, and an FTA subrecipient, the commission does not provide any transportation services. A copy of their Title VI Program can be found in [Appendix I](#).

## 9.0 TITLE VI EQUITY ANALYSIS OF CONSTRUCTED FACILITIES

There have been no Capital Construction Equity Analyses required since the submission of the last PVTA Title VI Program Plan.

## 10.0 TITLE VI PROGRAM APPROVAL

The federal circular requires, “A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program.” (page A-1) Further, the circular requires transit providers to, “Submit the results of the monitoring program as well as documentation (e.g., a resolution, copy of meeting minutes, or similar documentation) to verify the board’s or governing entity or official(s)’s consideration, awareness, and approval of the monitoring results to FTA . . .” (page VI-10) Finally, the circular requires, “A copy of the board meeting minutes or a resolution demonstrating the board’s or governing entity or official(s)’s consideration, awareness, and approval of the major service change policy and disparate impact policy.” (page IV-4).

The Advisory Board meeting minutes from November 20, 2024, showing the consideration, awareness, and approval of the above items can be found in [Appendix J](#).

## 11.0 SERVICE STANDARDS

On Page IV-3 of Circular 4702.1B, FTA requires service providers to submit “System-wide service standards and system-wide service policies, whether existing or new (i.e. adopted by the transit provider since the last submission) as described in this chapter.” The standards required by the circular are:

- Vehicle load for each mode
- Vehicle headway for each mode
- On-time performance for each mode
- Service availability for each mode

Below are the specific standards developed by PVTA as outlined in the circular.

### 11.1 Vehicle Load

The PVTA has developed service standards for vehicle loads. This standard is calculated by taking the percentage of monthly trips for each route that, for some portion of the trip, exceeded 35 passengers onboard. The number of trips with more than 35 passengers is divided by the total trips operated for each route. This percentage of “crowded” trips for each route is compared against the allowable threshold for the route’s tier of service, with higher crowding tolerance at higher tiers of service frequency.

*Table 11.1: Vehicle Crowding Tolerance*

	Tier 1: 4/hr	Tier 2: 3/hr	Tier 3: 2/hr	Tier 4: 1/hr	Tier 5: <1/hr
Crowded Trips Threshold	20%	15%	10%	5%	0%



## 11.2 Vehicle Headway

PVTA’s routes are classified into tiers based on their typical weekday vehicle headway. This standard is calculated by taking the percentage of weekday trip intervals (during the academic year) equal to or less than the target headway. Suggested guidelines for weekend frequencies are also provided but are not used to measure headway attainment.

**Table 11.2: Service Frequency Guidelines**

	Tier 1: 4/hr	Tier 2: 3/hr	Tier 3: 2/hr	Tier 4: 1/hr	Tier 5: <1/hr
Weekday Headway	15	20	30	60	120
Saturday Headway	30	30	60	60	--
Sunday Headway	60	60	120	120	--

## 11.3 On-Time Performance

The PVTA has set a goal of 90% on-time performance for fixed route service. The agency tracks performance by operator on a monthly basis. Performance is measured against scheduled time points. A trip is considered “Early” if it departs prior to the scheduled time and is considered “Late” if it departs more than five minutes after the scheduled departure time.

## 11.4 Service Availability

The PVTA applies a uniform target for stop spacing across its system.

**Table 2. Current Stop Spacing**

	Tier 1: 4/hr	Tier 2: 3/hr	Tier 3: 2/hr	Tier 4: 1/hr	Tier 5: <1/hr
Minimum Stop Spacing (feet)	1000	1000	1000	1000	1000
Maximum Stops per Mile	5	5	5	5	5

## 12.0 SERVICE POLICIES

As required in circular 4702.1B pages IV-6 – IV-7, PVRTA has developed policies related to distribution of transit amenities and vehicle assignment to the four garages.

### 12.1 Transit Amenities

Bus shelters are an attractive and often a very important amenity for bus riders. At stops with lower bus frequency, shelters provide much needed protection from the elements; at stops with higher frequency, shelters can help to grow ridership. Shelters are important to the user experience for any bus stop, however due to resource limitations, a prioritization process is necessary to determine which stops would be best suited for a shelter. PVRTA monitors amenities through quadrennial in person bus stop surveys (last conducted in 2023).

PVRTA requires bus shelter placement at stops with ridership of at least 60 boardings per day in urban locations, ridership of at least 40 boardings per day in suburban locations, and ridership of at least 15 boardings per day in rural locations. Shelter placement at stops with lower ridership may be considered if the location experiences a particularly large number of transfers, development proposed for the area will likely increase ridership, or elderly or mobility challenged passengers in the area would benefit from the addition of a shelter. Bus shelter policy requires input from appropriate stakeholders (i.e., community planners, abutters, residents, and business owners), which should be solicited before final placement decisions are made. PVRTA has 292 stops (14.7 percent of stops) with shelters.

PVRTA has assessed available benches at bus stops and currently, 348 stops have benches (17.6 percent of stops) While PVRTA does not have a standard for shelter placement, a review of other system policies shows that in general the guideline for installing a bench is half of the standard used for shelter placement.

PVRTA has assessed available lighting at bus stops and currently, 158 stops have lighting within 20 feet (8 percent of stops) Lighting at stops is an important factor as it improves the safety and security of the bus stops, as well as allows bus drivers to see waiting passengers and drivers of other vehicles to see passengers boarding and deboarding the bus.

Most of the bus stops are marked with PVRTA bus stop signs; however, unmarked stops or flag stops are used in some areas. Passengers need to arrive at the stop 5 minutes or more before the expected arrival of the bus, be ready to board (with fare and any ID cards), and signal the driver as the bus approaches. PVRTA provides different types of transit services, including local and express services. Generally, services that provide more accessibility have more frequent stops that are closely spaced, and services that provide more mobility such as express or commuter services have fewer stops. PVRTA follows guidelines for a minimum stop spacing (or maximum stops per mile) based on the type of service offered. Where multiple routes operate in the same corridor, the standard for the higher service type applies.

## 12.2 Vehicle Assignment

Buses are replaced based on fiscal constraints including annual state allocations, the Regional Transportation Plan, and State Transportation Improvement Plan, grant specifications and awards, and grant availability. Bus replacement is detailed in the Transit Asset Management Plan. Buses are specified to the regional garage rather than specific routes. Massachusetts General Law MGL Chapter 161B precludes regional transit authorities like PVTA from providing direct service. While buses are the property of PVTA, they are operated and maintained by each bus operating company (DGR, MV Transportation, Hulmes Transportation Ltd, University of Massachusetts Transit Services, and Quaboag Connector).

Route vehicle assignments are based on the size of the vehicle and passenger loads on each particular route. There are also garage limitations to consider, as some garages are better equipped to deal with articulated 60-foot buses and others have equipment specific to battery-electric buses.

All models provide similar passenger accommodations: all are air conditioned, equipped with wheelchair tie-downs and ramps, and have automatic announcements that comply with the Americans with Disabilities Act.

Vehicles are deployed from PVTA's three main fixed route garages to provide equitable service among routes. PVTA maintains operational requirements while ensuring that a higher proportion of route miles services census blocks with larger than average populations of low-income residents and people of color.

## 13.0 DEMOGRAPHIC AND SERVICE PROFILES

The PVTA service area is defined by a diverse population, both in terms of race/ethnicity and income levels. The average proportion of people of color for block groups in the 24 PVTA member communities is 36.12%, and the average low-income population is 16.2%. "Minority" is defined as anyone who does not identify as white and/or is Hispanic, and low-income is defined using the federal poverty definition. PVTA uses the term "People of Color" in place of the term minority as some PVTA communities are majority non-white, however minority will continue to be used when consistency with FTA Circular 4701.1B is most important.

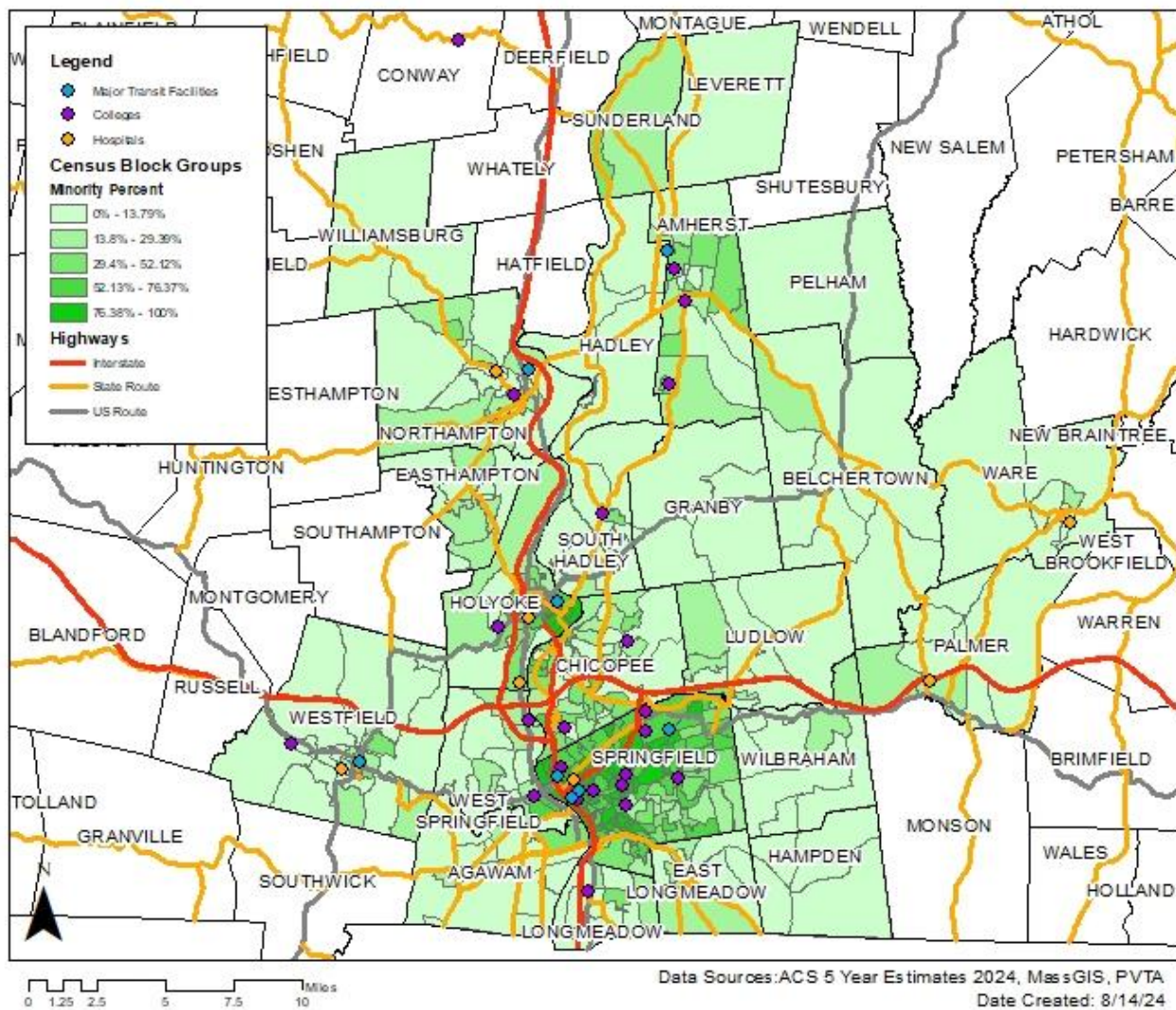
The following demographic maps show the information required in FTA Circular 4701.1B page IV-8:

### 13.1 Demographic Map 1

The circular requires, “A base map of the transit provider’s service area that overlays . . . geographic data with transit facilities . . . as well as major activity centers or transit trip generators and major streets and highways. . . This map shall overlay census tract, block or block group data depicting minority populations with fixed transit facilities” (page IV-8). The first map shows the following:

- Transit stops
- Transit facilities
- Major activity centers (Hospitals and post-secondary institutions)
- Highways
- Block group data depicting minority populations

*Map 13.1: Block Group Minority/Non-Minority Population*



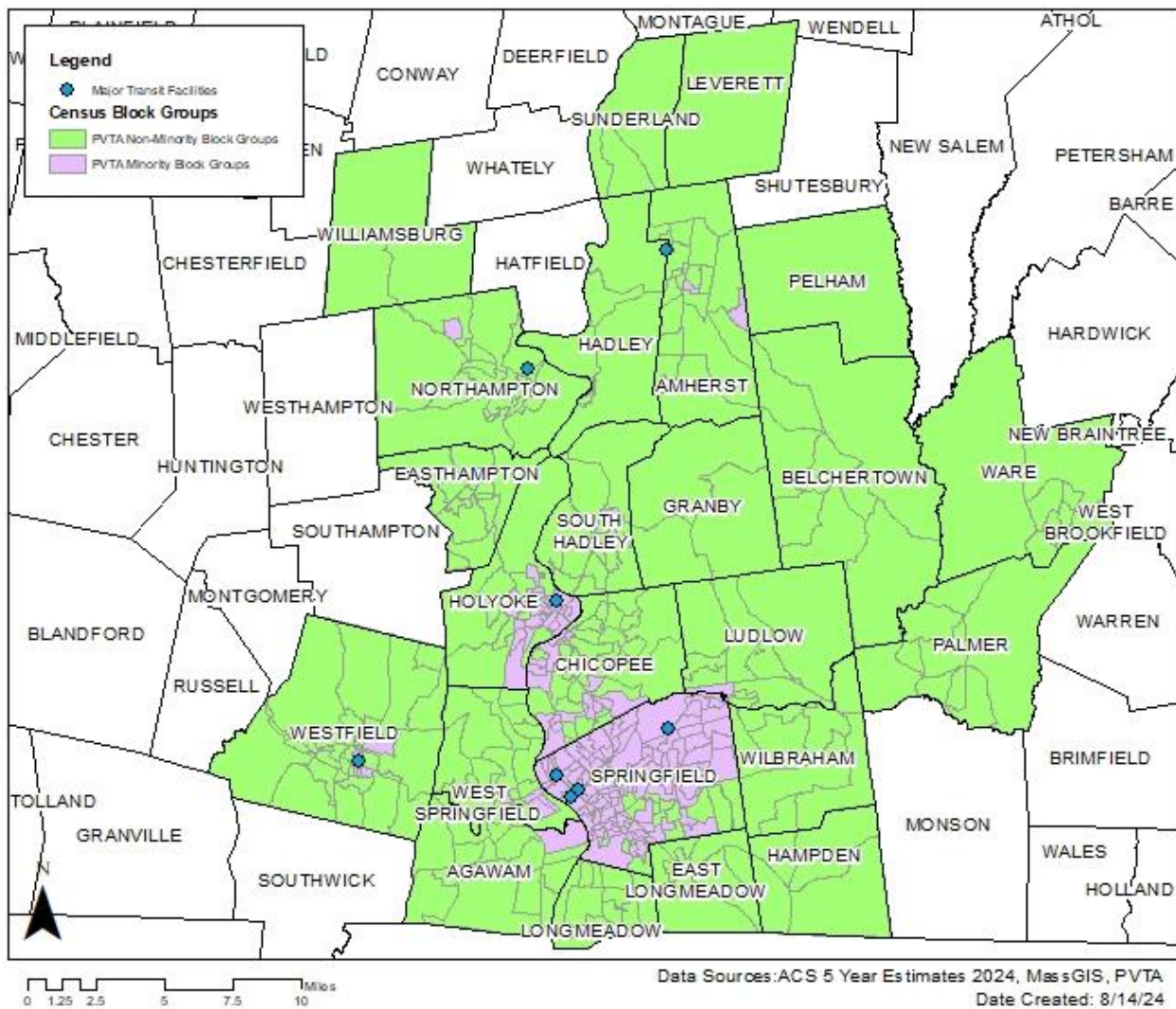


### 13.2 Demographic Map 2

The circular requires, “Another map shall highlight those transit facilities that were recently replaced, improved or are scheduled (projects identified in planning documents) for an update in the next five years.” (Page IV-8) The second demographic map depicts the following:

- Transit facilities
- Transit facilities that were recently upgraded
- Transit facilities that are being constructed
- Block groups with a larger-than-average minority population

*Map 1: Transit Facilities Status*

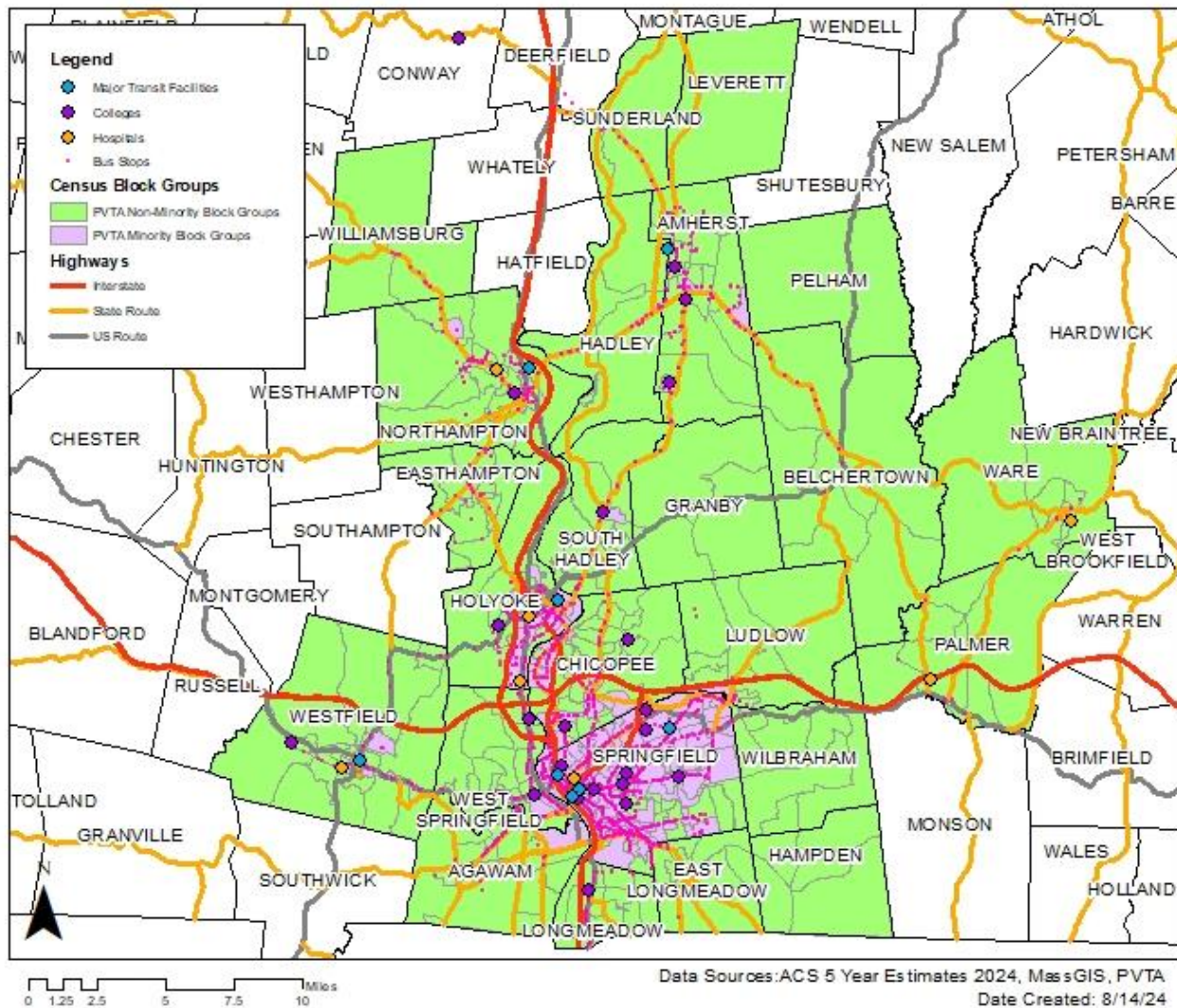


### 13.3 Demographic Map 3

The circular requires, “A demographic map that plots the information listed . . . above and also shades those Census tracts, blocks, block groups, TAZs, or other geographic zones where the percentage of the total minority population residing in these areas exceeds the average percentage of minority populations for the service area as a whole.” (page IV-8) The third demographic map shows the following:

- Transit stops
- Major Transit facilities
- Major activity centers (Hospitals and post-secondary institutions)
- Highways
- Block groups with a larger-than-average minority population

*Map 12.3: Minority and Non-Minority Block Groups*



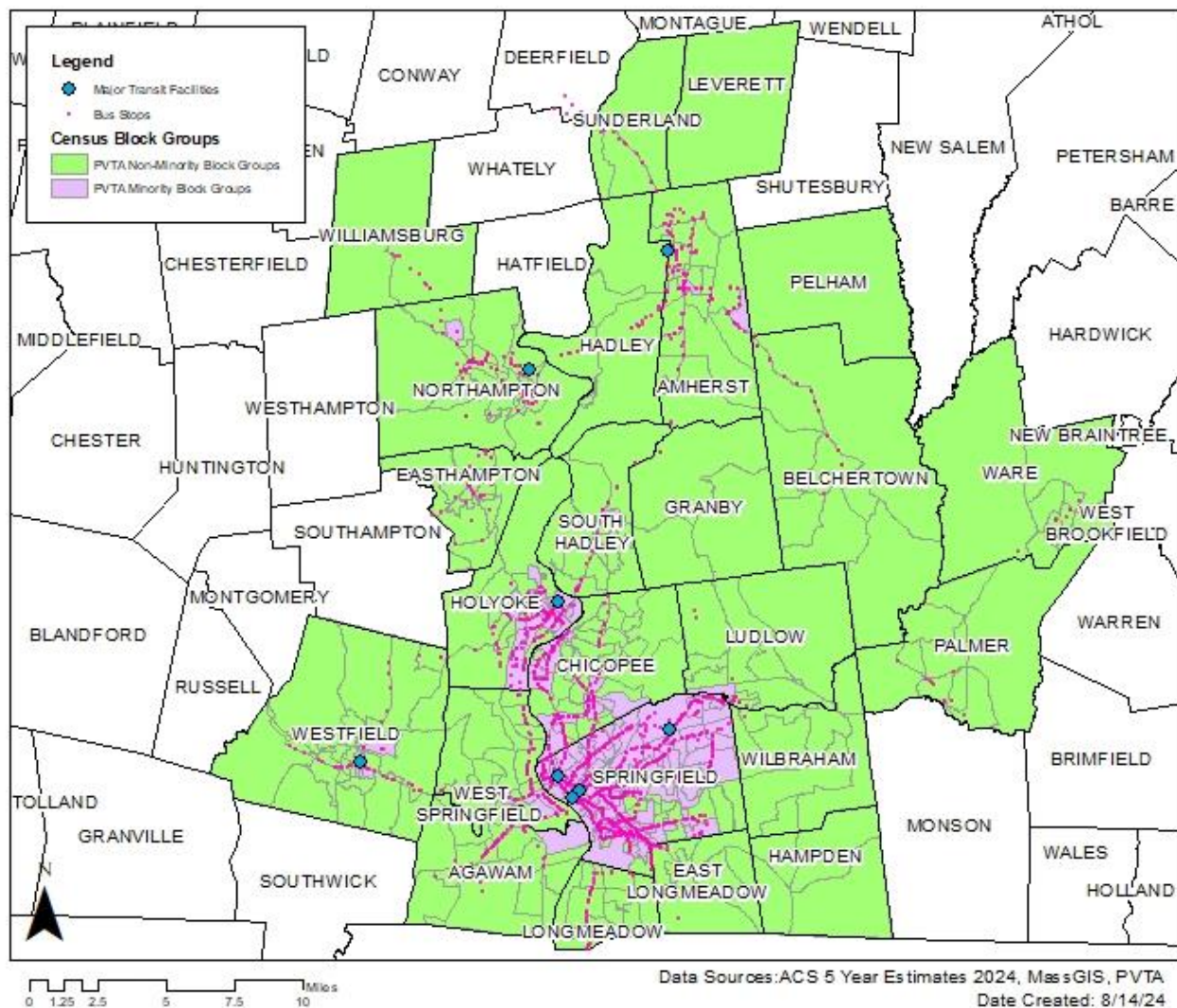


### 13.4 Demographic Map 4

The circular requires, “Transit providers shall also prepare a GIS or alternative map overlaying minority populations with fixed transit facilities, such as bus shelters, transit stations, and fixed guideways.” (page IV-8) The fourth demographic map shows the following:

- Major transit facilities
- Transit stops
- Block groups with a larger-than-average minority population

*Map 13.4: Minority Block Groups and Transit Facilities*



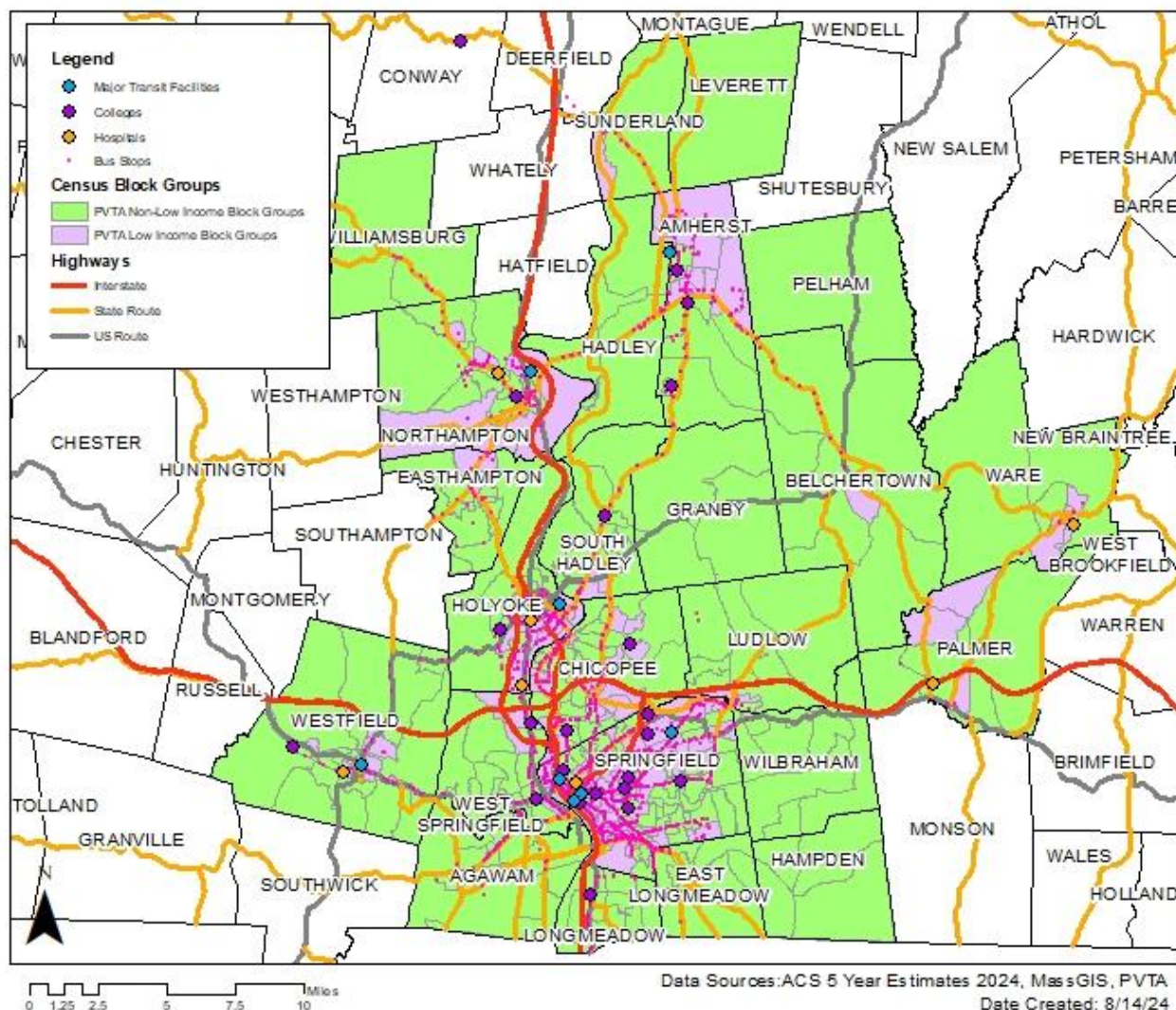


### 13.5 Demographic Map 5

The circular requires that, “. . . demographic maps shall also depict those Census tracts, blocks, block groups, TAZs, or other geographic zones where the percentage of the total low-income population residing in these areas exceeds the average percentage of low-income populations for the service area as a whole.” (page IV-8) The fifth demographic map shows the following:

- Transit stops
- Major transit facilities
- Major activity centers (hospitals and post-secondary institutions)
- Highways
- Block groups with a larger-than-average minority population

*Map 13.3: Low Income Block Groups*



## 14.0 DEMOGRAPHIC RIDERSHIP AND TRAVEL PATTERNS

The PVRTA conducted on-board customer surveys in 2022 (Northern System) and 2024 (Southern System) collecting ridership and customer information. As outlined in circular 4701.1B pages IV-8 to IV-9, the PVRTA below provides information from those surveys in tabular format on the following:

1. “Information on the race, color, national origin, English proficiency, language spoken at home, household income, and travel patterns” (IV-8); and
2. Information on “fare usage by fare type amongst minority users and low-income users.” (IV-8)

*Table 14.1 Race/Ethnicity of Customers*

Race/Ethnicity	Percentile
American Indian or Alaskan Native	0.49%
Asian/Pacific Islander	11.60%
Black or African American	12.32%
Hispanic/Latino	25.55%
Other	0.84%
Two or More Races	4.62%
White Alone	44.57%

This table was developed using the 2022 Northern System Customer Survey and 2024 Southern System Customer Survey. The data was distributed by region using FY2023 ridership totals by Operator. Those answering “Yes” to “Hispanic/Latino” on both customer surveys are considered Hispanic/Latino whether a race option was chosen. Only those choosing more than one option on the 2022 survey question on race are listed as Two or More Races. Consistent with FTA Circular 4702.1B minority is defined as those who are not white alone.

*Table 14.2 Language Spoken at Home by Customers*

Language	Percentile
English Only	69.21%
English and Spanish	16.75%
English and Other	7.98%
Spanish Only	3.94%
Other Only	2.12%

\*English and other are defined as English and any language other than Spanish

This table was developed using the 2022 Northern System Customer Survey and 2024 Southern System Customer Survey. The data was distributed by region using March 2024 ridership by region. Customers could choose multiple languages on both surveys. Those who chose “English Only” or chose “Spanish Only” are listed appropriately. Respondents who chose English, Spanish and any other language are listed as English and Spanish.

**Table 14.3 Reported Income of Customers**

Income Level	Percent
<b>Under 100% FPL</b>	<b>40.19%</b>
<b>100% - 133% FPL</b>	<b>9.73%</b>
<b>133%-200% FPL</b>	<b>17.00%</b>
<b>200%-400% FPL</b>	<b>20.34%</b>
<b>400% + FPL</b>	<b>12.73%</b>

**Table 14.4. Fare Type Usage by Race/Ethnicity**

Fare Type	American Indian/ Native American	Asian/ Pacific Islander	Black/ African American	Hispanic/ Latino	Other	Two or More Races	White
<b>Free (Prepaid)</b>	0.17%	10.65%	3.42%	6.06%	0.28%	1.67%	23.40%
<b>Full Fare (Cash Onboard)</b>	0.11%	0.88%	5.06%	12.77%	0.38%	1.70%	12.34%
<b>Senior or Discount (Cash on Board)</b>	0.00%	0.00%	0.97%	1.39%	0.16%	0.16%	2.93%
<b>Weekly or Monthly Pass</b>	0.14%	0.16%	1.56%	3.68%	0.00%	0.57%	3.61%
<b>Senior or Discount Pass</b>	0.05%	0.00%	1.59%	1.27%	0.00%	0.32%	2.54%

Answers are not distributed by system (Northern/Southern) to provide a more complete picture of race by fare type throughout the service area.

**Table 14.5 Fare Type Usage by Income Category**

Income Level	Free (Prepaid)	Full Fare (Cash On Board)	Senior or Discount (Cash on Board)	Weekly or Monthly Pass	Senior or Discount Pass
<b>100% or Less FPL</b>	13.79%	15.12%	3.29%	4.87%	2.86%
<b>100% - 133% FPL</b>	3.23%	4.42%	0.90%	0.97%	0.24%
<b>133% - 200% FPL</b>	7.44%	6.33%	1.09%	1.28%	0.91%
<b>200% - 400% FPL</b>	11.28%	6.11%	0.55%	1.83%	0.73%
<b>Above 400% FPL</b>	10.81%	1.22%	0.18%	0.31%	0.24%

The four income categories listed are the narrowest congruent categories between the 2022 and 2024 Customer Surveys. The Federal Poverty Level (FPL) for each response was determined in the year the survey was conducted.

**Table 14.6: Travel Patterns by Race**

Trip Purpose	American Indian/Native American	Asian/Pacific Islander	Black/African American	Hispanic/Latino	Other	Two or More Races	White
College	0.03%	6.40%	1.83%	3.19%	0.15%	0.93%	11.79%
Work	0.04%	1.60%	3.58%	7.20%	0.30%	1.31%	9.93%
Shopping	0.03%	1.81%	3.16%	6.04%	0.22%	0.73%	6.94%
Social/Recreation	0.06%	1.90%	1.91%	4.03%	0.12%	0.69%	7.80%
Medical	0.14%	0.22%	0.96%	2.27%	0.08%	0.37%	3.17%
School (K-12)	0.00%	0.09%	0.39%	1.38%	0.03%	0.15%	0.62%
Other	0.08%	0.20%	0.77%	2.57%	0.04%	0.64%	2.12%

On the 2022 and 2024 Customer Survey, respondents could answer this question by choosing multiple trip purposes while in 2016 respondents were limited to a single answer. All recorded answers are included in this chart. Percentages from this table are derived from the number of responses (not the number of surveys) as PVTA recognizes customers may have more than one purpose for making a trip.

## 15.0 MONITORING PROGRAM RESULTS

FTA Circular 4702.1B on page IV-10 requires that transit providers, “Submit the results of the monitoring program as well as documentation (e.g., a resolution, copy of meeting minutes, or similar documentation) to verify the Board’s or governing entity or official(s)’s consideration, awareness, and approval of the monitoring results to FTA every three years as part of the Title VI Program.” The results of the monitoring program are presented below. Minority Routes are those routes where the proportion of people of color riding the route is greater than the system average of 56.45% (using customer survey data).

### 15.1 Route Performance

The circular requires that, “Transit providers shall assess the performance of each minority and nonminority route in the sample for each of the transit provider’s service standards and service policies.” (page IV-10). The four service standards outlined in the section Service Standards, as required by circular 4702.1B pages IV-5 to IV-6, are Headway, On-Time Performance, Vehicle Loading, and Service Availability (stop spacing). Table 15.1 shows the results of that analysis.

**Table 13: Route Performance**

Route	Tier	Minority Route	% Headway Standard	OTP	% Crowded Trips	% Spacing Standard
G1	2	Yes	108%	68%	2.0%	92%
G2	3	Yes	103%	76%	0.8%	101%
G3	3	Yes	104%	74%	0.6%	78%
B4	3	Yes	81%	82%	0.0%	71%
G5	4	No	138%	72%	0.4%	112%
B6	3	Yes	94%	56%	1.3%	116%
B7	1	Yes	80%	65%	2.6%	98%
R10	4	No	139%	67%	1.0%	187%
P11	4	Yes	129%	72%	0.0%	375%
B12	5	Yes	150%	71%	0.0%	2282%
R14	5	Yes	243%	66%	0.4%	178%
B17	4	Yes	131%	65%	1.3%	91%
G19	4	No	108%	67%	0.2%	286%
P20	2	Yes	86%	71%	1.3%	124%
P21	3	Yes	100%	75%	2.7%	93%
P21E	3	Yes	100%	87%	0.0%	465%
R22	4	Yes	108%	72%	0.2%	124%
B23	4	No	107%	61%	0.5%	228%
R24	4	No	100%	70%	0.2%	138%
R29	5	Yes	100%	74%	0.5%	301%
X90	4	Yes	113%	77%	0.2%	102%
X92	4	Yes	150%	70%	0.6%	106%
G73E	3	Yes	97%	78%	0.9%	2073%
WSU	1	No	98%	74%	0.0%	199%
R41	4	No	100%	72%	1.9%	439%
39E	4	No	92%	87%	0.0%	456%
R41	4	No	100%	72%	1.9%	439%
R42	4	No	100%	63%	1.7%	439%
B43	2	No	144%	67%	0.8%	199%
R44	5	No	183%	75%	0.7%	219%
B48	3	No	77%	59%	0.0%	884%
NE	5	No	200%	*	*	428%
B79	5	No	100%	28%	0.1%	2376%
R29	5	Yes	100%	74%	0.5%	301%
30	1	No	77%	82%	5.6%	154%
31	2	No	94%	75%	8.9%	229%
33	3	No	82%	74%	2.0%	144%
34	2	No	59%	84%	3.9%	131%
35	2	No	86%	71%	9.3%	127%
36	4	Yes	108%	87%	0.1%	213%
38	3	No	100%	87%	1.0%	264%
45	5	Yes	117%	78%	0.0%	229%
46	5	No	40%	69%	0.4%	311%
PS	4	No	140%	*	*	1628%
WS	5	No	120%	*	*	1365%

**Table 15.2: Routes Standards Attainment**

Route	Tier	Minority Route	Headway Std. Met	OTP Std. Met	Load Std. Met	Spacing Std Met
G1	2	Yes	Yes	No	Yes	Yes
G2	3	Yes	Yes	No	Yes	Yes
G3	3	Yes	Yes	No	Yes	Yes
B4	3	Yes	Yes	No	Yes	Yes
G5	4	No	Yes	No	Yes	Yes
B6	3	Yes	Yes	No	Yes	Yes
B7	1	Yes	Yes	No	Yes	Yes
R10	4	No	Yes	No	Yes	Yes
P11	4	Yes	Yes	No	Yes	Yes
B12	5	Yes	Yes	No	Yes	Yes
R14	5	Yes	Yes	No	No	No
B17	4	Yes	Yes	No	Yes	Yes
G19	4	No	Yes	No	Yes	Yes
P20	2	Yes	Yes	No	Yes	Yes
P21	3	Yes	Yes	No	Yes	Yes
P21E	3	Yes	Yes	No	Yes	Yes
R22	4	Yes	Yes	No	Yes	Yes
B23	4	No	Yes	No	Yes	Yes
R24	4	No	Yes	No	Yes	Yes
R29	5	Yes	Yes	No	No	No
X90	4	Yes	Yes	No	Yes	Yes
X92	4	Yes	Yes	No	Yes	Yes
G73E	3	Yes	Yes	No	Yes	Yes
WSU	1	No	Yes	No	Yes	Yes
R41	4	No	Yes	No	Yes	Yes
39E	4	No	Yes	No	Yes	Yes
R41	4	No	Yes	No	Yes	Yes
R42	4	No	Yes	No	Yes	Yes
B43	2	No	Yes	No	Yes	Yes
R44	5	No	Yes	No	No	No
B48	3	No	No	No	Yes	Yes
NE	5	No	Yes			
B79	5	No	Yes	No	No	No
R29	5	Yes	Yes	No	No	No
30	1	No	No	No	Yes	Yes
31	2	No	Yes	No	Yes	Yes
33	3	No	Yes	No	Yes	Yes
34	2	No	No	No	Yes	Yes
35	2	No	Yes	No	Yes	Yes
36	4	Yes	Yes	No	Yes	Yes
38	3	No	Yes	No	Yes	Yes
45	5	Yes	Yes	No	No	No
46	5	No	No	No	No	No
PS	4	No	Yes			
WS	5	No	Yes			



## 15.2 Routes and Standards

As required in the FTA circular 4702.1B, “Transit providers shall compare the transit service observed in the assessment to the transit provider’s established service policies and standards.” (page IV-10) Table 15.2 shows the results of that analysis.

## 15.3 Route Performance Discrepancies and Corrective Actions

The circular requires that, “For cases in which the observed service for any route exceeds or fails to meet the standard or policy . . . the transit provider shall analyze why the discrepancies exist and take steps to reduce the potential effects.” (page IV-10) The PVTA is aware of the areas where performance for Minority Routes is not meeting standards. In each case, the agency is pursuing corrective action.

- **Stop Spacing Standard** – The majority of our routes do meet the minimum spacing requirements for bus stops. For those routes which have excessively close stops, the PVTA is engaging in a process of bus stop relocation to improve on-time performance and travel reliability. PVTA is currently working with the City of Springfield to consolidate many bus stops for this purpose and plans to next engage with neighboring communities in a similar effort.
- **Headway Standard** – Under the direction of MassDOT, AECOM performed a [Comprehensive Service Analysis](#) of the Pioneer Valley Transit Authority in 2020. This included fixed-route service. Route classifications were built using route headways. Headway recommendations were provided route by route based on many factors. Many survey responses or riders throughout PVTA's service area included requests for decreased headways and increased frequency. Many routes have recommendations for increased headways listed in the AECOM CRTP Table 55: Fixed Route Recommendations and Appendix E: PVTA Recommendations. Many survey responses or riders throughout PVTA's service area included requests for decreased headways and increased frequency.
- **On-Time Performance** – There are two factors which result in low OTP for Minority Routes in the PVTA service area. The first is technological; due to routing and schedule structure, some trips are being counted as “early” when they are in fact on time. PVTA is working with its IT vendor to resolve that issue. The other has to do with the rural/urban nature of the region. Areas which have smaller percentages of people of color tend to be more rural, and thus traffic congestion is less common. This results in our areas with higher proportions of people of color dealing with slower travel and worse OTP, while rural areas can maintain a higher OTP. PVTA is working with MassDOT and the communities to install Transit Signal Priority on key corridors, as well as other rapid bus elements (e.g., queue jumps) on especially congested corridors.



## 15.4 Transit Amenities Policy

The circular also requires that transit agencies must examine the application of its transit amenities policy. The PVTA has a policy for installing shelters, benches, ADA landing pads, and other amenities for high-ridership, high-frequency (Tier I) bus routes. Once those routes have been completed, PVTA will move on to Tier II bus routes, and so on until all bus stops are ADA compliant and, where appropriate, have shelters, benches, trash receptacles, and other amenities.

PVTA is committed to using a Title VI lens for installing bus stop amenities, with a special emphasis on ADA improvements. For example, PVTA recently completed a full stop inventory for the system, determining the location and condition of existing shelters. This stop inventory has allowed PVTA to systematically prioritize installation of bus shelters in Environmental Justice block groups whenever funding is available. PVTA received grant funding in FY2021 for implementation of 9 new bus shelters at bus stops through the MassDOT Shared Winter Streets and Spaces Program.

## 15.5 Transit Amenities Monitoring

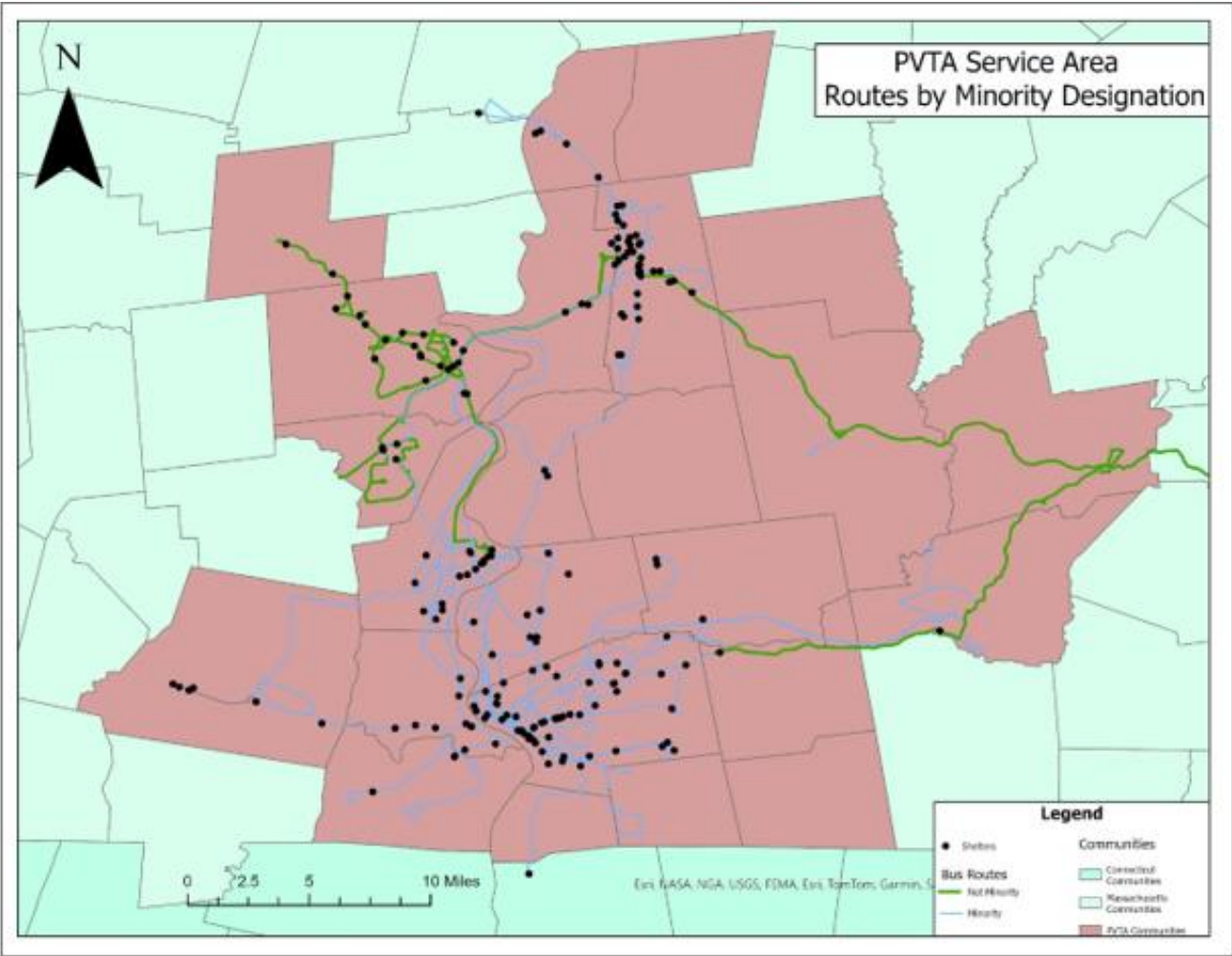
PVTA monitors amenities through quadrennial in person bus stop surveys (last conducted in (2023)). First, minority and non-minority routes are identified in compliance with procedures in the FTA Circular 4702.B, census block data as obtained through REMIX software methodology is used as baseline data. This data is supplemented with PVTA survey data, on routes for which reliable data is available. This would allow for the determination of minority and non-minority routes in the system. Using amenities data from the Bus and Bus Stop Amenities Report, bus stop amenities at all systemwide bus stops re overlaid on the routes using REMIX to demonstrate placement along minority and non-minority routes.

PVTA followed this procedure for the analysis conducted to determine the distribution of amenities. Applying the minority route definition in accordance with FTA's Circular 4702.B minority and non-minority routes were identified using previously completed system demographic surveys and census block data through REMIX software methodology.

Bus stop shelter data from the recently completed Bus and Bus Stop Amenities Report (September 2023) was overlaid on all the routes to determine the number of shelters available on each route, as seen on [Map 15.5: PVTA Service Area by Minority Designation](#).

The numerical result of this data is listed in [Table 15.6](#) PVTA Transit Amenities by Minority/Non-Minority Routes. The analysis shows that minority routes have the highest percentage of shelter amenities installed along those routes than the percentage of shelter amenities installed along non-minority routes in the PVTA system. PVTA has set a goal for the distribution of transit shelter amenities on minority routes to 85% of all routes.

**Map 15.5: PVTA Service Area by Minority Designation with Bus Stop Shelters**



**15.6 Transit Amenity Distribution Monitoring**

PVTA will commence monitoring the distribution of transit amenities, specifically bus shelters, at route level between identified minority and non-minority routes. As with other PVTA Service Standards, performance evaluation of the distribution of transit amenities will be conducted annually. A quarterly report will be generated that indicates the status of bus shelter transit amenities that are installed, removed, and damaged as reported by service contractors. PVTA will collaborate with our stakeholders and partners to track shelters, benches, trash cans and lighting locations for which PVTA is not responsible for (installed and maintained by third parties such as: businesses, MassDOT, cities and towns, developers). During PVTA’s quadrennial inventory of bus stops amenities which includes a condition assessment of shelters, benches, trashcans, lighting, and infrastructure, all amenities regardless of ownership will be included.

**Table 15.6 PVTA Transit Amenities by Minority/Non-Minority Routes**

Routes	Minority	Status	Shelters	Sum of Shelters	
30	No	Non-Minority	18	<b>Non-Minority Route Shelters</b>	191
31	No	Non-Minority	23		
33	No	Non-Minority	13	<b>Minority Route Shelters</b>	209
34	No	Non-Minority	9		
35	No	Non-Minority	11		
36	Yes	Minority	15		
38	No	Non-Minority	15		
39E	No	Non-Minority	7		
45	Yes	Minority	16		
46	No	Non-Minority	10		
B12	Yes	Minority	2		
B23	No	Non-Minority	5		
B4	Yes	Minority	4		
B43	No	Non-Minority	18		
B48	No	Non-Minority	3		
B6	Yes	Minority	14		
B7	Yes	Minority	16		
B17	Yes	Minority	12		
B79	No	Non-Minority	3		
G1	Yes	Minority	19		
G19	No	Non-Minority	2		
G2	Yes	Minority	15		
G3	Yes	Minority	12		
G5	No	Non-Minority	6		
G73E	Yes	Minority	2		
NE	No	Non-Minority	3		
P11	Yes	Minority	4		
P20	Yes	Minority	17		
P21	Yes	Minority	10		
P21E	Yes	Minority	5		
PS	No	Non-Minority	0		
R10	No	Non-Minority	12		
R14	Yes	Minority	7		
R22	Yes	Minority	6		
R24	No	Non-Minority	7		
R29	Yes	Non-Minority	15		
R41	No	Non-Minority	7		
R42	No	Non-Minority	9		
R44	No	Non-Minority	9		
WS	No	Non-Minority	1		
X90	Yes	Minority	9		
X92	Yes	Minority	9		

## 15.7 Observed Disparate Impacts

The circular requires that, “Transit providers shall develop a policy or procedure to determine whether disparate impacts exist on the basis of race, color, or national origin, and apply that policy or procedure to the results of the monitoring program.” (page IV-10) PVTA has examined key performance measures and applied the Disparate Impact threshold (20%) to those measures which are, on average, not meeting standards.

*Table 4. Average Performance for Minority and Non-Minority Routes*

Route Category	% Headway Goal Achieved	On-Time Performance	% Vehicle Loading Goal Achieved	% Stop Spacing Goal Achieved
<b>Goal</b>	100%	>85%	<10%	>100%
<b>Minority Routes</b>	114%	73%	1%	363%
<b>Non-Minority Routes</b>	108%	70%	2%	474%

Headways and on-time performance for both minority and non-minority routes are, on average, not meeting performance standards. Minority routes perform better on headways, and non-minority routes perform better for on-time performance. Corrective actions are described in the section *Route Performance Discrepancies and Corrective Actions*. Since the on-time performance disparity between minority and non-minority routes does not exceed the Disparate Impact threshold of 20%, there is no disparate impact determined for this difference.

## 15.3 Advisory Board Awareness, and Approval of Monitoring Program

The PVTA Advisory Board reviewed and approved the Title VI program, the Disparate Impact and Disproportional Burden Policy, and the results of the Monitoring Program on **TBD**. The meeting notice, agenda and minutes for this action are included as an attachment.

## 16.0 MAJOR SERVICE CHANGE, DI/DB PUBLIC PROCESSES

The public was consulted on the proposed Major Service Change, Disparate Impact, and Disproportionate Burden policies through five (5) public meetings in 2024. Comments on the policies were received in-person, by telephone and online through the use of a public comment form.

The Major Service Change, Disparate Impact, and Disproportionate Burden policies as adopted by the board can be found in [Appendix K](#).

## **17.0 TITLE VI SERVICE EQUITY ANALYSES**

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. PVRTA is required to evaluate any fare change and any major service change to determine whether those changes have a discriminatory impact.

The Pioneer Valley Transit Authority performed three Title VI analyses during the three-year reporting period for this Title VI Program. You can find copies of the analyses in [Appendix M](#). The Advisory Board agendas and meeting minutes demonstrating that the board considered, was aware of, and approved the analyses can be found in [Appendix J](#).

### **17.1 PVRTA-SATCo Service Adjustment FY22**

PVRTA pursued decreasing the number of hours necessary to perform service with its transportation contractor SATCo within their network area. The reason for decreasing hours performed in service is to meet the constraints of the labor market due to a shortage in CDL driver applicants and Massachusetts Paid Family and Medical Leave recipients. These adjustments meet the goal of decreasing driving hours to mitigate the labor shortage challenge.

These adjustments had a disproportionate impact on low-income riders and disparate burden on people of color.

Within the process of choosing these routes, PVRTA reviewed all other SATCo routes by their revenue hours, then by existing headway and finally by average Passengers per Revenue Hour. These routes fit the business priorities of the PVRTA with the fewest riders impacted without impacting the geographic service area.

PVRTA will increase service to match previous service headway levels when CDL Drivers become available and trained.

### **17.2 Senior Service Van Expansion FY23**

PVRTA began a pilot program for new expanded senior van services to better meet the needs of the riders and meet the motivations set for this service. PVRTA expanded this service without detriment to low-income populations or populations of color. The motivations for expanding service include increasing travel opportunities by offering additional alternative times to peak service hours, increasing service hour span to evenings and into weekends as requested by the riders, and increasing ridership in-line with PVRTA's mission and business practices.

The expansion had a disproportionate impact on low-income riders of 39.04% and a disparate burden on people of color of 23.08%. Disproportionate impact and disparate burden analysis does not consider the positivity of the change, but rather is the absolute difference. The increase in service positively impacted people of color and low-income riders.

### **17.3 Service Enhancements 2023-2024**

On November 20<sup>th</sup>, 2023, the PVTA Board approved the use of the funding to implement a series of free fare service pilots as well as the following service enhancement to bus routes B17, G1, G73E, P21E, R10, R14, and the Ware-Palmer Shuttle. Only the following routes rose to the level of needing a Title VI Service Equity Analysis: G73E, P21E, Ware-Palmer Shuttle.

PVTA performed seven (7) public hearings between December 4 through December 12. These events were conducted both in-person and virtually in compliance with the Open Meeting Law, that recently extended the option for virtual attendance to public meetings. The enhancements generally received favorable responses from the public.

None of the enhancements will have a disproportionate burden on low-income individuals only one enhancement will have a disparate impact on people of color. The enhancements are positive, less discriminatory than any available transit service and could increase ridership from protected classes.

### **17.4 Enhance Northampton Demand Response**

On March 20, 2024, the PVTA Advisory Board approved the use of funding to implement the NOHO Shuttle as a pilot program to operate for six (6) months from May 1<sup>st</sup> through November 2024 pending an analysis and evaluation of the service and completion of the Title VI analysis.

PVTA performed three (3) public hearings on April 18<sup>th</sup> and April 23<sup>rd</sup>, 2024. These events were conducted both in-person and virtually in compliance with the Open Meeting Law, that recently extended the option for virtual attendance to public meetings. Comments received at the public meetings were mostly service questions that were easily answered by staff.

A public survey was also conducted of NOHO Shuttle riders from May 20 to June 3<sup>rd</sup> following the implementation of the pilot program. The survey revealed that eighty (80%) of respondents supported the service change.

The replacement of the NOHO Senior Shuttle and Northampton Survival Center Shuttle with the NOHO Shuttle shows no disparate impact findings based on race or disproportionate burden on low-income populations. The addition of the Northampton “NOHO” Shuttle provides sufficient mitigation to any disparate impacts or disproportionate burdens to riders if the shuttles were discontinued alone.

## **ADDITIONAL DATA SOURCES USED FOR TITLE VI PROGRAM UPDATE**

PVTA will use survey data when available otherwise relevant ACS data from the past year will be used

**Additional Data Sources for Non-ADA Paratransit Demand Response Service DI/DB Analyses**  
Prior to the reduction of any Non-ADA Paratransit Demand Response service by community, PVTA will record ridership and survey the typical ridership on the route to establish a demographic baseline for the service.

Prior to the addition of any new Non-ADA Paratransit Demand Response service by community, PVTA will record ridership and survey the typical ridership on the route during the proposed temporary or pilot duration of the service to establish a demographic baseline for the new service.

The difference between the demographic baseline and the fixed-route system average determines the delta impact on riders of color and low-income riders. This delta is assessed against the Disparate Impact and Disproportionate Burden thresholds. This assessment is based on methodology seen in FTA Circular 4702.1B Appendix K-7.





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