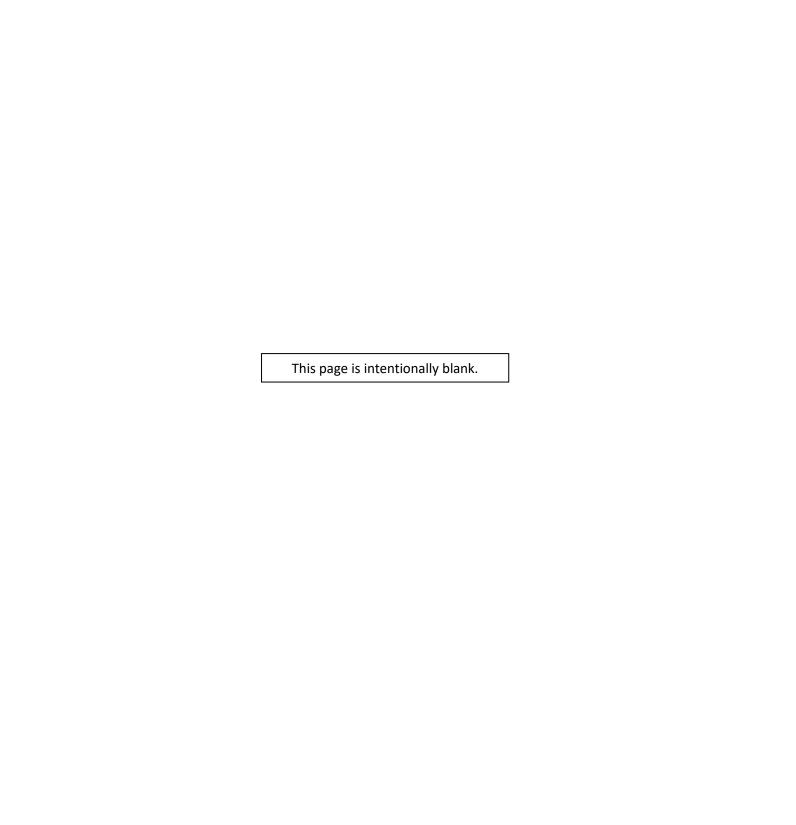


Service Equity Analysis of Senior Service Van Transportation Expansion FY23



Expanded
Weekday and
Saturday
Service



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Select Glossary

PVTA – Pioneer Valley Transit Authority is the "Operator" or "Agency" as defined by FTA and is a Tier 1 Buses Only Transit Agency operating throughout 24 communities in Western Massachusetts.

ADA Paratransit – For the purposes of this document, ADA and Paratransit are interchangeable, defined in FTA Circular 4710.1 as Complimentary Paratransit Service. While not defined as demand responsive in 4710.1, PVTA considers ADA Paratransit Services to be within PVTA's Demand Response transportation mix.

Demand Response – PVTA defines Demand Response as any service that involves a rider-scheduled ride with vehicle dispatched based on demand. This excludes scheduled stops on fixed-route service. PVTA fixed-route service also include stops on-demand built into existing schedules, also excluded from Demand Response. Services included in PVTA's definition includes: Councils on Aging Van transportation supported by PVTA, PVTA's ADA Paratransit rides, and Senior Service Van Transportation.

Senior Service Van Transportation – PVTA provides complimentary demand response services to the over 60 population on a first come first served basis. PVTA contracts this service in conjunction with the ADA Paratransit contract. Services are performed by MV Transit. This service is not supported or authorized by FTA.

MV Transit – This external service provider (or Contractor) administers the paratransit and senior service van transportation contracted services.

SATCo – Springfield Area Transit Company, the organization that operates fixed-route bus service out of the SATCo Cottage Street Garage, also performs maintenance on most of the fixed-route and demand response fleet.

Summary

The Pioneer Valley Transit Authority (PVTA) will begin an expansion of senior service van transportation (known as "Dial-a-Ride") in all 24 service communities currently offered by PVTA to its member communities for residents aged 60 and older. These 24 cities and towns are active voting members on the PVTA Advisory Board.

Expanded service will include additional evening hours on weekdays and Saturday service to match weekday levels for most communities. A detailed breakdown of the expansion can be found on Table 3: New PVTA Senior Dial-a-Ride Service Span.

Three main motivations have guided PVTA's decision to expand service hours for Senior Service Van Transportation.

- Riders have expressed interest in expanded evening and weekend service for all service modes for some time.
- MV Transit believes added service hours will allow more flexibility to adjust schedules to accommodate the existing demand.
- PVTA is motivated to increase ridership in a time when ridership continues to see slow growth industry-wide.

Senior Dial-a-Ride service is a discretionary program at the direction of the PVTA Advisory Board. The service is operated according to standards, fare, and budget established by the PVTA Advisory Board. The Paratransit contracted service provider (Operator) performs scheduling and allocates vehicle and driver resources to this service if resources are available after Federally mandated ADA Paratransit service needs are met. Residents have long hoped to expand the program later into the evenings and into the weekends. And MV Transit has turned away seniors due to a lack of available resources in the afternoons without flexibility to offer alternative schedules. These extended hours will ease the burden on existing resources during peak hours while offering new trips to new riders.

Since April 2022, PVTA has been operating a pilot program with similar parameters and has seen less crowding at peak hours, fewer desired trips left unscheduled and generally increased ridership.

There will be no change to PVTA's ADA van service for the service area's residents or any other persons who are eligible for and use the ADA vans. It is also important to note that while both the Diala-ride and ADA services use the same systems and operator within most communities, ADA trips are prioritized absolutely over Diala-Ride. The expanded service will only affect Senior Service customers within PVTA's service area. Expanded service impacts all 24 communities (Table 1).

Other components of the service (driver blocking and dispatching processes at MV Transit, customer interfacing with the schedulers and cost of fare) are not impacted by these changes.

Agawam	Amherst	Belchertown	Chicopee
Easthampton	East Longmeadow	Granby	Hadley
Hampden	Holyoke	Leverett	Longmeadow
Ludlow	Northampton	Palmer	Pelham
South Hadley	Springfield	Sunderland	Ware

Westfield West Springfield Wilbraham Williamsburg	Westfield	West Springfield	Wilbraham	Williamsburg
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1. Conformance with Regulatory Requirements

This analysis has been prepared to comply with the requirements of Title VI of the Civil Rights Act of 1964 in 49 CFR Section 21.5(b)(2), 49 CFR Section 21.5(b)(7), and Appendix C Section 3 to 49 CFR part 21, and in accordance with the guidance in Federal Transit Administration (FTA) Circular 4702.1B of March 1, 2016, and related guidance to FTA recipients with service areas containing 200,000 or more residents and Tier 1 Buses Only agencies. Under these regulations and guidelines, the Pioneer Valley Transit Authority (PVTA) is required to conduct a Title VI equity analysis while planning a major service change to determine whether service changes will have a discriminatory impact with regard to race, color, income, or national origin. Equity analyses are required regardless of whether proposed changes would be beneficial or detrimental to riders.

This analysis has been prepared because the expansion of services increases Dial-a-Ride service span by 53.7%, impacting more than the 7.5% threshold to qualify as a Major Service Change. This threshold was established with the adoption of the Title VI Update FY2021 with Appendix K: Major Service Change Policy, Disparate Impact Policy, and Disproportionate Burden Policy on October 1, 2021.

The purpose of an equity analysis is to determine whether or not the new extended span of service would have an adverse impact on PVTA customers of color and/or low-income riders. A demographic analysis of the customers using PVTA's current Senior Service van transportation is required by FTA to determine whether the changes represent a disparate impact on populations of people of color (Minority) or a disproportionate burden on low-income populations and whether mitigation is warranted.

In accordance with FTA guidance, this report uses the term "minorities" where necessary to conform to federal regulations that refer collectively to people who are not white. However, in PVTA's view the term "minorities" is not consistent with the intent and purpose of an equity analysis. Therefore, PVTA uses more inclusive language with respect to race and ethnicity wherever possible in this document.

2. PVTA Background Information

The Pioneer Valley Transit Authority (PVTA) is the regional transit authority for 24 municipalities in Western Massachusetts serving a total population of 580,956 with 133,888 over the age of 60. PVTA is the only Tier 1 buses only service in Massachusetts, with 193 heavy duty buses operating on 42 fixed routes, as well as 133 cutaways that provide ADA, community circulator, and senior "dial-a-ride" services. PVTA's 627-square mile service region contains urban areas in the Cities of Springfield (third largest in Massachusetts), Chicopee, and Holyoke; more than 45,000 students and employees of UMass Amherst and surrounding colleges and communities; and outlying suburban and rural communities. In FY19, PVTA provided over 10 Million fixed-route rides and over 250,000 paratransit trips.

Created in 1974 under Massachusetts General Law 161B, PVTA and the Commonwealth's 13 other regional transit authorities may not directly operate fixed route bus routes and paratransit van services. Employee management, maintenance, and vehicle operators are contracted through DGR Management (Springfield Area Transit Company, Valley Area Transit Company), UMass Transit Services, Hulmes Transportation Inc. Ltd., Quaboag Connector and MV Transit. SATCo provides demand response vehicle

maintenance services including all vehicles operated by MV Transit. MV Transit manages demand response operations.

PVTA's \$54 million budget receives 18% of funding from assessments and contributions from local member communities. PVTA member communities' annual assessments are calculated in proportion to the level of fixed-route service provided. This calculation must conform with M.G.L. 161B Section 9.

PVTA serves a large rural population who live outside of the urbanized area. Residents in these communities, including Hadley, Pelham, Williamsburg, Deerfield, Sunderland, Granby, Belchertown, Palmer, and Ware, depend on PVTA for lifeline connections to work, school, medical, shopping, and other trip purposes. In addition to being rural, some areas in Palmer also have a high poverty rate, as high as 26%. The economic sustainability of these rural communities depends on PVTA's continued provision of vital, safe and affordable transit connections to increase rural access to economic opportunities and other communities.

PVTA also serves a large urban municipal population throughout most of the Springfield, MA—CT Urbanized Area in Chicopee, Holyoke and Springfield. The area is majority-minority (39.9%¹ White non-Hispanic/Latino vs. 70.1% in Massachusetts). The area also has a higher rate of disability for individuals under 65 (15.1% vs. 7.9%), non-high school graduates (~20% vs. 8.8%), low-income (23.7% vs. 10.4%), and younger than Massachusetts as a whole (14.5% over age 65 vs. 17.4%); these are potential indicators of a population struggling with poor health outcomes. Transportation access is one variable known to impact health outcomes. Senior Service Van Transportation is that vital connection for many over the age of 60.

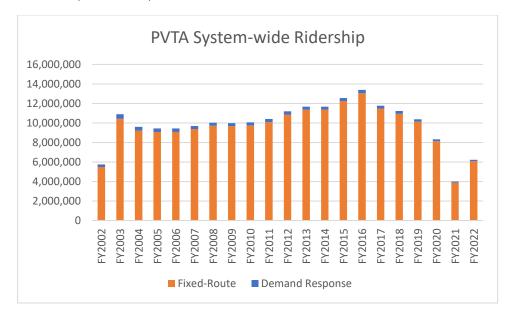
Since September 2021 PVTA has been operating reduced service schedules on some fixed-routes due to a shortage of qualified CDL driver applicants (necessary for heavy vehicle operation with public passengers) and the introduction of the new Massachusetts Paid Family and Medical Leave laws. Senior Service Van Transportation and Paratransit utilize a skilled driver workforce without CDL qualification. Light Vehicles used for demand response transportation are not restricted to drivers with the CDL qualification. MV Transit, the contracted operator for these two services has met the labor needs of expanded service as demonstrated through a pilot program.

MV Transit operates two of PVTA's demand response van transportation services: the complementary paratransit services for persons with doctor-verified disabilities as required by the Americans with Disabilities Act (ADA), which operates in the same geographic areas and hours as PVTA's fixed routes; and the Senior Service van transportation programs, available to any resident of PVTA's service area age 60 and older Monday through Friday from 8:00 AM to 4:30 PM (except holidays) at the same fare as ADA service.

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¹ Estimated from 2021 5-Year ACS Census Estimates.

Figure 1: PVTA Demand Response Ridership



In FY 2021, during the COVID pandemic, PVTA provided nearly 4 million passenger trips. National recovery promises growth in the coming years. 2.61% of all PVTA trips are demand response trips. 25.5% of all demand response passenger trips are Senior Service Van Transportation rides.

Much of PVTA's operations funding (5307, 5311, and 5310) and capital projects (5339) (both discretionary and formula) are determined using ridership as an important component. Transit agencies maximize ridership to better serve the residents of the service area.

Weekend and evening service is most requested. The 2022 Northern System Customer Survey (Fixed-route) is indicative of other responses to surveys and public outreach opportunities.

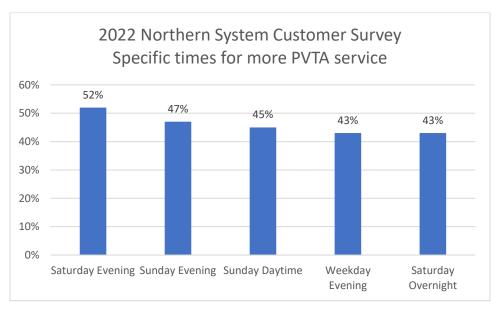
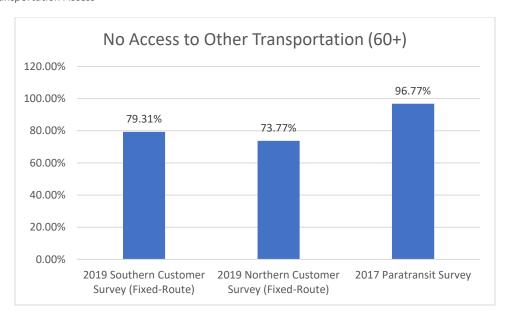


Figure 2: Transportation Access²

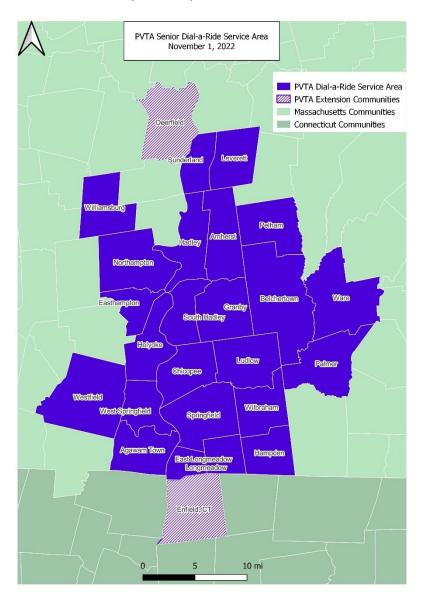


For those using public transit in the Pioneer Valley, alternative transportation methods are not available to many. The above chart shows the extent that public transit provides a necessary link to the community. Without other data, PVTA assumes Dial-a-Ride riders are represented in the 2017 Paratransit Customer Survey filtered for responses by those 60 years of age or older.

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² The 2017 Paratransit Customer Survey included multiple alternative options for transportation: Drive myself; Get a ride from family or friends; Take a van operated by local senior center; Take a taxi, Uber, or other private service; None-I cannot make trips without the ADA Van; Other (write in). 77 out of 164 respondents chose "Get a ride from family or friends." Requesting favors from friends and family can overextend relationships upsetting relationship dynamics. PVTA does not believe these rides to be a reliable long-term source and are not included as those who have access to other transportation.

Figure 3: PVTA Senior Dial-a-Ride Service Area by Community³



Senior Service van transportation is generally offered by regional transit authorities to rural communities unable to sustain dedicated fixed-route services. PVTA continues to offer this service throughout the service area, including more urban areas, Springfield, Chicopee, Holyoke, and Amherst. PVTA's Senior Service van transportation compliments senior van service offered by Councils on Aging including Agawam, Hadley, East Longmeadow, Longmeadow, and Hampden.

Senior Service van transportation has retained more riders than the fixed-route service and even ADA Paratransit. While paratransit decreased ridership Senior Service van transportation ridership has represented the steadiest ridership of all PVTA services, dropping just 30.9% after the COVID pandemic

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³ Excludes 5011(f) funded extension communities.

shutdown⁴. This service also increased in share during the pandemic from 18.8% of demand response trips until February 2020 to 21.6% from January throughout calendar year 2021. The pilot program has extended the gains in proportion. Senior Service Van Transportation continues to represent a higher share of ridership even as ridership continues to recover.



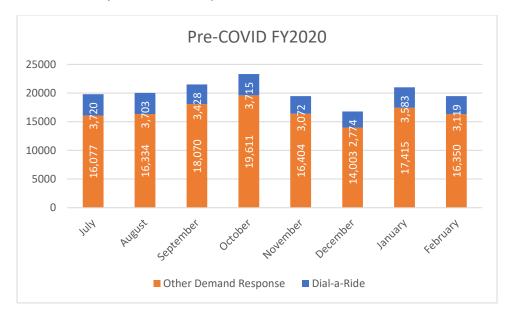
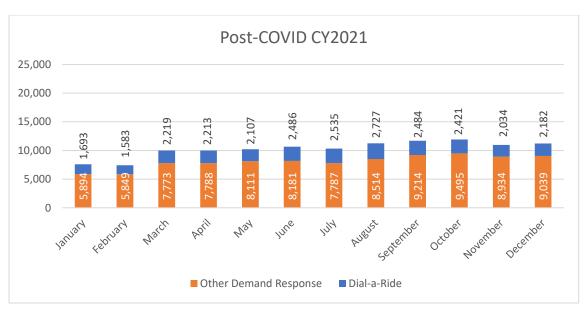


Figure 5: PVTA Post-COVID Travel Restrictions



⁴ Average taken from July 2019 to February 2020 as compared to March 2021 to December 2021. The end of February 2021 saw an easement of COVID restrictions by the CDC and state and local health officials allowing additional travel and commerce.

3. PVTA Ridership Demographics

3.1 Senior Van Service Customer Demographics

As an Agency specific discretionary program Senior Service Van Transportation does not have the same certifications, requirements, responsibilities and authorizations necessary as the federally supported programs. 2011 was the most recent year a customer survey as conducted on this service. PVTA performed a general comparison of 2011 Customer Survey results to the 2017 ADA Paratransit Customer Survey, filtering for riders over 60 years old, a sample size of 164. Results appeared similar in distribution, within the margin of error of 7.82%.

Figure 6: Income by Survey Comparison

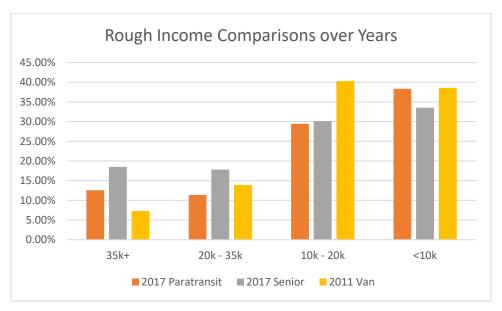


Figure 7: Race and Ethnicity by Survey Comparison

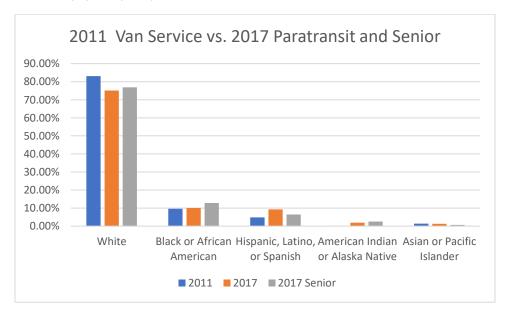
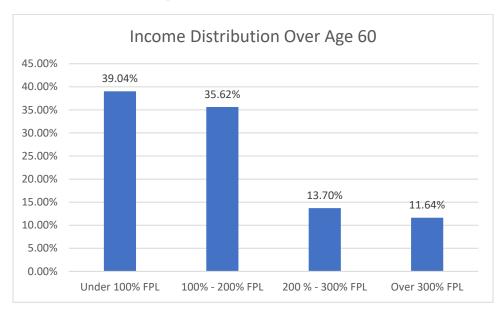


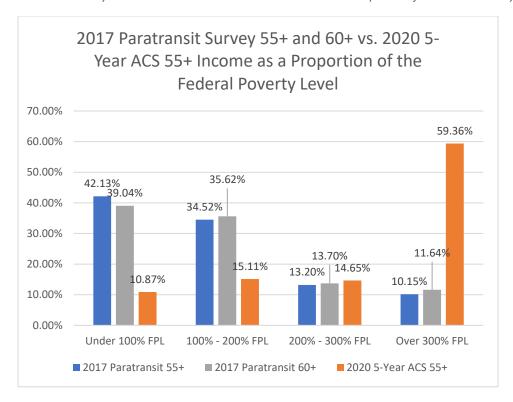
Figure 8: 60+ 2017 Paratransit Customer Survey



PVTA accepts the 2017 ADA Paratransit Survey Results filtered for responses over 60 years old as the income breakdown for Senior Service Van Transportation demographics. The Dial-a-Ride service provides rides to many who are considered low income, consistent with other PVTA transit modes. This chart shows 4 in 10 have income below the Federal Poverty Level. The Federal Poverty Level is based on household size. The household income is compared with the Federal Poverty Level with the same household size to determine the Federal Poverty Level Percentage for each household.

Income skews substantially lower than that of the region as seen in Figure 9. While the region skews toward higher income, riders of Senior Service Van Transportation skew to lower income levels.

Figure 9: 2017 Paratransit Survey 55+ and 60+ vs. 2020 5-Year ACS 55+ Income as a Proportion of the Federal Poverty Level⁵

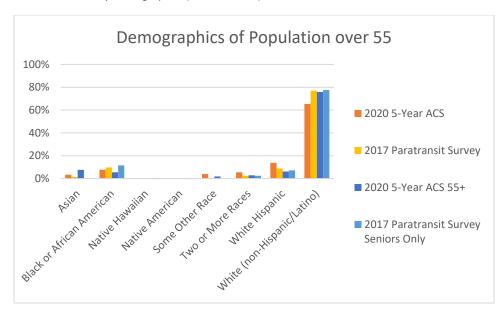


3.1.2 Race and Ethnicity

Similarities also exist for race groups between the two surveys:

⁵ ACS crosstab datasets by age are limited. PVTA chose to include individuals over 55 in the 2017 Survey data for direct comparison purposes to the 2020 5-Year ACS income by age dataset. PVTA uses only responses over 60 from the 2017 Paratransit Customer Survey to determine the actual distribution of income for Senior Service Van Transportation, also displayed.

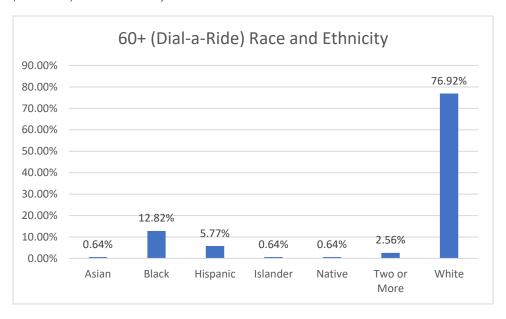
Figure 10: PVTA Race and Ethnicity Demographics (All vs. Over 55)⁶



Seniors in the PVTA area tend to be less racially and ethnically diverse as seen Figure 10: PVTA Race and Ethnicity Demographics (All vs. Over 55). Participants of the 2017 Paratransit Customer Survey wrote in exact ages allowing for an exact race comparison by age.

PVTA chooses to use the 2017 ADA Paratransit survey results filtered for riders over 60 years old to describe the racial and ethnic breakdowns of the Senior Service Van Transportation.

Figure 11: 60+ (Dial-a-Ride) Race and Ethnicity



⁶ Comparison classes are determined by limitations in Census class designations.

Over 60 years old: White non-Hispanic/Latino seniors make up the largest racial demographic with an estimated 76.92% of the ridership. Those considered black or African American make up the next largest group followed by those considered Hispanic or Latino (12.82% and 5.77% respectively).

3.1.3 Language

PVTA's region is diverse in language. The 2017 Paratransit Customer Survey asked the question "13. What language do you speak most often at home? (Please select one)." The terminology used likely limited the diversity of languages spoken in the area by requesting riders choose just one language in contract to the Census which asks about all languages.

PVTA takes the view that all individuals who speak languages other than English be provided the same level of service as those who speak English.

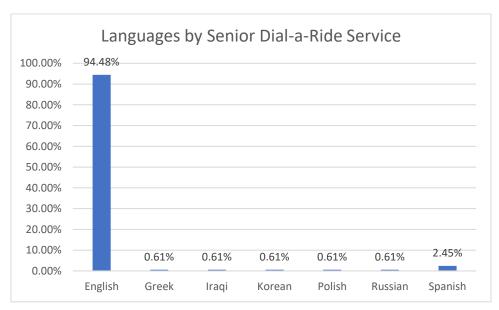
Figure 12: 60+ Language Most Often Spoken at Home describes the languages spoken by those using the Senior Dial-a-Ride service with the caveats discussed above.

Table 2: Most common languages spoken at home

MOST COMMON LANGUAGES SPOKEN AT HOME

English	Greek	Iraqi ⁷	Korean	Polish	Russian	Spanish
94.48%	0.61%	0.61%	0.61%	0.61%	0.61%	2.45%

Figure 12: 60+ Language Most Often Spoken at Home



English remains the dominant language spoken within Senior Service Van Transportation. Therefore, there would be little impact to persons who English is not their spoken language. PVTA is not satisfied to dismiss language as a barrier to Senior Dial-a-Ride service. PVTA strives to reach all who speak languages other than English, offering physical Spanish documents when requested and a webpage with google

⁷ Some respondents wrote in other options. When these options are not decipherable to one of the defined fields, PVTA has chosen to display the written option verbatim.

translation services and follows a strict language, translation and interpretation plans within the Public Participation Plan for all public materials, public meetings and public hearings.

3.1.4 Age

PVTA Senior Service van transportation is available only to people who are residents of a PVTA member community (Table 1: Table of PVTA Service Area Cities/Towns; Figure 3: PVTA Senior Dial-a-Ride Service Area by Community) and who are age 60 and older.

Figure 13: Age (60+) 2017 Paratransit Customer Survey vs. 5-Year ACS Census shows breakdowns in 5- to 10-year categories) of 164 seniors who completed the 2017 Paratransit Customer Survey. Senior Service Van Transportation shows a decline in participation with age in-line with populations at similar intervals.

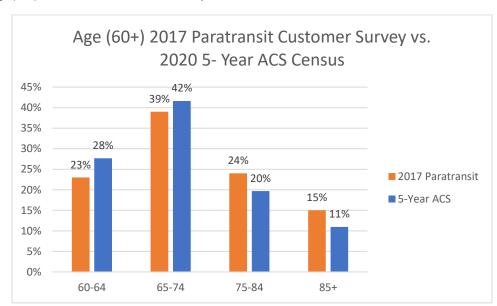


Figure 13: Age (60+) 2017 Paratransit Customer Survey vs. 5-Year ACS Census

The distribution of ages served by Senior Service Van Transportation and the distribution of ages identified by the 2020 5-Year ACS data are within the margin of error. The Dial-a-Ride is a representative sample of ages compared to the PVTA service area.

4. Expanded Senior Dial-a-Ride Span of Service Description

MV Transit will continue prioritizing ADA Paratransit Service, providing Senior Dial-a-Ride service on an "as available" basis. ADA Paratransit service will continue without interruption. Resources used for Senior Service Van Transportation and ADA Paratransit service are not interchangeable with fixed-route service and cannot reduce CDL labor related concerns due to employee qualification differences. Scheduling and procedures will continue without change.

Senior Dial-a-Ride service is complimentary to the PVTA area. Service is provided through the same contracted service operator as paratransit service but is offered when resources allow without disruption to scheduled federally mandated ADA Paratransit rides. Service levels are determined at the community level. Communities that have fixed-route service also receive 8am – 4:30pm service Mondays through Fridays. Hampden receives PVTA supported senior service van transportation from 9am – 3pm through the Tri-Town Trolley agreement with PVTA, Longmeadow and East Longmeadow.

The service expansion will increase services to communities based on the times and days of fixed-route service. Hampden, which does not receive fixed-route service, is an exception to this and will receive service comparable to East Longmeadow and Longmeadow. This expands service another two and a half hours in the afternoons and adds weekday service levels to Saturday.

PVTA's service expansion pilot program appears as a success. Deep into the COVID pandemic, ridership stabilized averaging 2,397 per month in the later half of 2021. Now, after six months of the pilot program, ridership shows growth to an average of 2,884 passengers per month (a 20.32% growth from 2021 and reaching 84.78% recovery from 2019⁸).

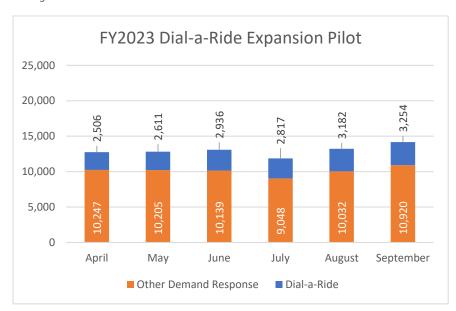


Figure 14: PVTA Pilot Program

Table 3 describes the changes in hours for each community. The difference in their service hours are described in Table 4. A summation of weekly hours of operation per community prior to the Pilot Program is 1007.5 hours. The expanded service will add 541.5 hours each week, adding new opportunities for afternoon medical appointments, connecting through afternoon community events and longer shopping trips among other opportunities for the region's seniors. This is an increase of 53.7% of service each week.

⁸ July through December 2019 saw an average ridership of 3,402 per month.

Table 3: New PVTA Senior Dial-a-Ride Service Span

	Original Hours		Proposed Hours		Proposed Hours	
	Monday	- Friday	Monday – Friday		Satu	rday
Community	Start	End	New Start	New End	New Start	New End
Agawam ⁹	8:00 AM	4:30 PM	8:00 AM	7:00 PM	8:00 AM	6:00 PM
Amherst	8:00 AM	4:30 PM	8:00 AM	7:00 PM	8:00 AM	7:00 PM
Belchertown ¹⁰	8:00 AM	4:30 PM	8:00 AM	7:00 PM	No Service	
Chicopee	8:00 AM	4:30 PM	8:00 AM	7:00 PM	8:00 AM	7:00 PM
East Longmeadow ¹¹	8:00 AM	4:30 PM	8:00 AM	7:00 PM	8:00 AM	7:00 PM
Easthampton	8:00 AM	4:30 PM	8:00 AM	7:00 PM	8:00 AM	7:00 PM
Enfield, CT ¹²	No Service				No Service	
Granby	8:00 AM	4:30 PM	8:00 AM	7:00 PM	8:30 AM	7:00 PM
Hadley	8:00 AM	4:30 PM	8:00 AM	7:00 PM	8:00 AM	7:00 PM
Hampden	9:00 AM	3:00 PM	8:00 AM	7:00 PM	8:00 AM	7:00 PM
Holyoke	8:00 AM	4:30 PM	8:00 AM	7:00 PM	8:00 AM	7:00 PM
Leverett	8:00 AM	4:30 PM	8:00 AM	7:00 PM	8:00 AM	7:00 PM
Longmeadow	8:00 AM	4:30 PM	8:00 AM	7:00 PM	8:00 AM	7:00 PM
Ludlow	8:00 AM	4:30 PM	8:00 AM	7:00 PM	8:00 AM	7:00 PM
Northampton	8:00 AM	4:30 PM	8:00 AM	7:00 PM	8:00 AM	7:00 PM
Palmer ¹³	8:00 AM	4:30 PM	8:00 AM	7:00 PM	No Service	
Pelham	8:00 AM	4:30 PM	8:00 AM	7:00 PM	8:00 AM	7:00 PM
South Deerfield	No Service				No Service	
South Hadley	8:00 AM	4:30 PM	8:00 AM	7:00 PM	8:00 AM	7:00 PM
Springfield	8:00 AM	4:30 PM	8:00 AM	7:00 PM	8:00 AM	7:00 PM
Sunderland	8:00 AM	4:30 PM	8:00 AM	7:00 PM	8:00 AM	7:00 PM
Ware	8:00 AM	4:30 PM	8:00 AM	7:00 PM	No Service	
Westfield	8:00 AM	4:30 PM	8:00 AM	7:00 PM	8:00 AM	7:00 PM
West Springfield	8:00 AM	4:30 PM	8:00 AM	7:00 PM	8:00 AM	7:00 PM
Wilbraham	8:00 AM	4:30 PM	8:00 AM	7:00 PM	8:00 AM	7:00 PM
Williamsburg ¹⁴	8:00 AM	4:30 PM	8:00 AM	7:00 PM	8:00 AM	6:30 PM

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⁹ Fixed-route Saturday service in Agawam ends early, therefore Agawam Saturday Dial-a-Ride service ends at 6:00 PM.

¹⁰ Belchertown does not receive fixed-route Saturday service and therefore does not have Dial-a-Ride service on Saturdays.

 $^{^{11}}$ East Longmeadow, Longmeadow and Hampden participate in comparable Dial-a-Ride service through the Tri-Town Trolley between the hours of 9:00 AM - 3:00 PM Weekdays. Traditional PVTA Dial-a-Ride service is available at service hours beyond Tri-Town Trolley service hours.

¹² Enfield, CT and South Deerfield both receive ADA Paratransit service within ¾ mile of the fixed-route bus service but are not part of the PVTA defined Service Area and do not receive Senior Service Van Transportation.

¹³ Palmer and Ware do not have fixed-route service on Saturdays and therefore do not have Senior Dial-a-Ride Saturday service.

¹⁴ Fixed-route Saturday service in Williamsburg ends early, therefore Williamsburg Saturday Dial-a-Ride Service ends at 6:30 PM.

Table 4: Comparison of Hours of Service by Community

Community	Original Hours of Service	New Hours of Se	New Hours of Service		
	Weekly (Weekdays Only) Service Hours	New Per Weekday Service Hours	New Per Saturday Service Hours	Total Weekly Service Hours	Weekly Additional Hours
Agawam	42.5	11	10	65	22.5
Amherst	42.5	11	11	66	23.5
Belchertown	42.5	11		55	12.5
Chicopee	42.5	11	11	66	23.5
East Longmeadow	42.5	11	11	66	23.5
Easthampton	42.5	11	11	66	23.5
Enfield, CT		No Service			
Granby	42.5	11	10.5	65.5	23
Hadley	42.5	11	11	66	23.5
Hampden	30	11	11	66	36
Holyoke	42.5	11	11	66	23.5
Leverett	42.5	11	11	66	23.5
Longmeadow	42.5	11	11	66	23.5
Ludlow	42.5	11	11	66	23.5
Northampton	42.5	11	11	66	23.5
Palmer	42.5	11		55	12.5
Pelham	42.5	11	11	66	23.5
South Deerfield		No Service			
South Hadley	42.5	11	11	66	23.5
Springfield	42.5	11	11	66	23.5
Sunderland	42.5	11	11	66	23.5
Ware	42.5	11		55	12.5
Westfield	42.5	11	11	66	23.5
West Springfield	42.5	11	11	66	23.5
Wilbraham	42.5	11	11	66	23.5
Williamsburg	42.5	11	10.5	65.5	23
Total	1007.5			1549	541.5

5. DI/BD Analysis

The expansion of Senior Service Van Transportation meets the Major Service Change definition as adopted as Appendix K of the Title VI Update FY2021.

While the definition of a major service change is explicit for fixed-route service, PVTA does not explicitly define major service changes for demand response service within the Title VI program. The PVTA Administration assumes changes that impact the span of service hours by more than 7.5% meets the major service change definition. This definition assumes parity between fixed-route vehicle revenue hours and paratransit hours of operation. Fixed-route vehicle revenue hours are fixed and do not vary by customer demand. For Dial-a-Ride, vehicle revenue hours are substantially variable and are a direct

function of customer demand. Hours of operation are fixed. This interpretation provides the PVTA Advisory Board an equitable review of Dial-a-Ride service in-line with fixed-route service.

5.1 Disproportionate Burden Analysis

Disproportionate burden is determined by the difference between the proportion of low-income riders impacted by the change and the proportion of higher-income riders impacted by the change. This difference is represented by a percentage. Percentages with an absolute value greater than 20% demonstrate a Disproportionate Buden.

Consistent with fixed-route bus rider demographics, a review of the Senior Van Services Transportation ridership as compared to the general community shows income levels skew substantially lower for riders. While the 53.7% increase in service span may have a positive impact on riders, just under 40% of the change is borne on low-income riders.

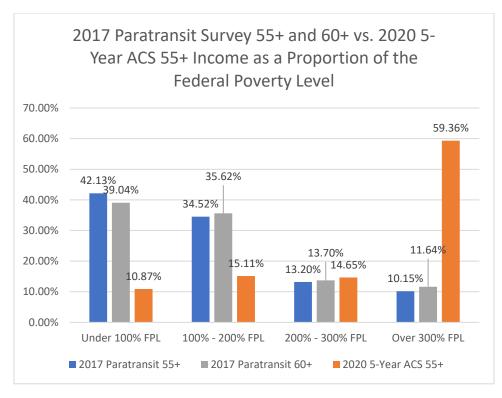


Figure 15: Income as a Proportion of Federal Poverty Level (55+ and 65+)

Riders by income of Senior Service Van Transportation contrasts that of the region with a much higher percentage of individuals of low-income. The change borne on low-income residents is the difference between the change on riders of low income and higher income. This amounts to 21.92%, greater than the 20% variance (+/-) threshold to meet a Disproportionate Burden designation.

5.2 Disparate Impact Analysis

Disparate impact is determined by the difference between the proportion of people of color (minority) riders impacted by the change and the proportion of non-people of color riders impacted by the change.

This difference is represented by a percentage. Percentages with an absolute value greater than 20% demonstrate a Disparate Impact.

The change borne on people of color (minority) communities is greater than the 20% variance that determines a disparate impact. The change borne on people of color is the difference between the change on people of color (23.08%) and white riders (76.92%). This difference is -53.84%. The absolute difference being greater than the 20% variance (+/-), this change in service exceeds the disparate impact on people of color designation.

PVTA Senior Service Van Transportation reaches an identical proportion of people of color 60 years or older to the region (within 2%).

6. Public Outreach and Hearings

Per the PVTA Public Participation Plan, PVTA must conduct public hearings and outreach on any Title VI Equity Analysis. Two public hearings were conducted to represent the sentiments of the Northern System (Hampshire County communities) and the Southern System (Hampden County communities). The Southern System public hearing took place at PVTA Administration Building 2808 Main Street, Springfield, Massachusetts. This first hearing also served as a virtual hearing for those who are unable to attend in person. A second hearing in the Northern System at the Bangs Community Center in Amherst was held for in person comments.

The PVTA Advisory Board accepted a plan on October 4, 2022 at 1:00 PM to hold two public hearings for this expansion of service. The two public hearings were held as follows:

- December 6, 2022, (Session #1) 11:00 AM 11:30 AM In-Person and Online meeting held at the PVTA Administration Offices at 2808 Main Street, Springfield, MA within the Southern System
- December 6, 2022, (Session #2) 3:00 PM 3:30 PM In-Person held at the Bangs Community Center, 70 Boltwood Walk, Amherst, MA within the Northern System

After each presentation which PVTA presented the plan to expand services, PVTA heard comments from the public. In attendance was a local news organization. 22 News WWLP recorded two responses (all responses received) over the course of both events as heard at the PVTA Administration Building.

"I'm lucky enough to be healthy enough to be able to work. I do work at Walmart, been there for 14 years, and my hours are exactly what I need to work. I work full time, I'll be 90 on Tuesday, and I really need my rides. It's very important for me and I don't have a car," said Theresa Spooner of Chicopee.

"To hear that a service here like in Springfield is helping elderly women, it's great to hear that, very good for the community," said Ramon Soto of Springfield.¹⁵

Becker, S. (2022). PVTA hears positive feedback from community members for Dial-a-Ride program. Springfield: 22 News WWLP.com. Retrieved 12 08, 2022, from https://www.wwlp.com/news/local-news/hampden-county/pvta-hears-positive-feedback-from-community-members-for-dial-a-ride-program/

All comments expressed positive thinking toward expanding Senior Service Van Transportation. These two comments are in-line with PVTA's current motivations. Neither indicate a need for mitigation.

Public Outreach Online Surveys

In addition to traditional public hearings, PVTA performed outreach to Councils on Aging throughout the Pioneer Valley to solicit additional opinions regarding the Dial-a-Ride expansion. The survey was completed by 19 individuals. The accompanying report (Appendix C) is a breakdown of all results. Here are select results from that survey:

Prior to taking the survey, ten respondents were not existing users of any PVTA services.

Table 5: Survey Question 1: Do you Currently Use Dial-a-Ride or another PVTA Service?

Q1 Do you currently use Dial A Ride or another PVTA	Number of	Percent of
Service?	Responses	Responses
Yes Dial A Ride	4	22.22%
Yes Paratransit Service	0	0.00%
Yes Fixed Route buses	3	16.67%
Yes Dial A Ride and Paratransit	0	0.00%
Yes Fixed Ride and Dial A Ride or Paratransit	1	5.56%
No. Do not use any PVTA service	10	55.56%
Total Responses	18	

After a review of the extended services, many of those who did not previously use PVTA services felt more compelled to use PVTA in the future. 74% of all respondents stated they were likely or very likely to use weekday evening service hours while 71% stated they were likely or very likely to use new hours on Saturdays.

Table 6: Survey Question 3: How likely are you to use the following expanded services?

	Very likely to use	Likely to use	Neither likely or unlikely to use	Unlikely to use	Very unlikely to use	N/A	Total Responses
Extended Service Monday through Friday from 4:30 PM to 7:00 PM	37%	37%	21%	0%	5%	0%	19
Extending the service to Saturday from 8:00 AM to 7:00 PM	24%	47%	18%	6%	6%	0%	17

84.2% believe these proposed changes will better meet their needs while just 15.8% see no change in meeting their needs. In addition, 56.3% believe the expansion is sufficient to their needs.

Verbatim comments were generally positive. The new expanded service would provide access to jobs (Six Flags) and medical appointments.

Two described reasons the service may be difficult to use. One discussed limitations imposed on quick trips. A quick trip includes a two hour wait. Another stated that the 8:00 AM start time for the service was too late as they worked 8-4pm.

On the first comment, the service is constrained by technology among other factors. PVTA is not planning to make changes to the existing booking structure or processes that would impact the ability to perform "quick" trips. PVTA periodically reviews the performance of the booking process and will consider these comments moving forward.

On the second comment, PVTA is fiscally constrained. At this time, PVTA is considering only an expansion to 7pm in most communities on weekdays and from 8am – 7pm on Saturdays. PVTA will consider further expansion as demand for this current expansion of service is determined.

7. Conclusion

The new expanded services will better meet the needs of the riders and meet the motivations PVTA has set for this service. PVTA has 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,
- Increasing ridership in-line with PVTA's mission and business practices.

The goals of this service have been reached. This service expansion will add 53.7% service hours from initial service levels. This is an addition of 22.5 hours per community per week. A pilot program proved to successfully expand ridership by nearly 15% year over year, with gains continuing. The success of the pilot program suggests that expansion to all communities based on fixed-route service hours will increase ridership further.

Labor resource sharing between transit modes is limited by applicant qualification differences. This service will not impact fixed-route service and resources used for Senior Service Van Transportation cannot be used for fixed-route service. ADA Paratransit service will continue to be prioritized. Scheduling and procedures will continue as before.

This expansion has 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. Mitigation is considered in cases when the difference has a negative impact on a rider population. The increase in service will positively impact both people of color and low-income riders.

The pilot program displays the positive impact of expanded service. Demographics of the riders suggests the expansion will continue serving a larger proportion of low-income riders than that of residents within the service area. The expansion will also continue serving a similar proportion of people of color to that of residents within the service area.

Appendix A: PVTA Advisory Board Meeting Minutes October 4, 2022 PVTA'S DIAL-A-RIDE PILOT: EXTENSION OF PVTA'S DIAL-A-RIDE PILOT AND APPROVAL OF PUBLIC HEARINGS & TITLE VI ANALYSIS TO MAKE EXTENDED DIAL-A-RIDE SCHEDULE PERMANENT Paul Burns, Director of Transit Operations, reported the following:

The Board approved a pilot in March to extend PVTA's Dial-A-Ride service hours to 7:00 PM, Monday through Friday, and to extend service to Saturdays with the restriction that Saturday service would be available only in communities that also have paratransit service.

PVTA is asking the Board to approve extending this pilot through January 31, 2023 and for approval to hold public hearings to seek comments on the Title VI Analysis & making the expansion of Dial-A-Ride service hours from 8:00 AM to 7:00 PM, Monday through Saturday, permanent.

Chairman Slaughter asked the Board for a motion to approve extending PVTA's Dial-A-Ride pilot through January 31, 2023 and for approval to hold public hearings to seek comments on the Title VI Analysis & making the expansion of Dial-A-Ride service hours from 8:00 AM to 7:00 PM, Monday through Saturday, permanent.

<u>Motion:</u> Moved and seconded (Sorrell/Gold) to approve extending PVTA's Dial-A-Ride pilot though January 31, 2023 and for approval to hold public hearings to seek comments on the Title VI Analysis & making the expansion of Dial-A-Ride service hours from 8:00 AM to 7:00 PM, Monday through Saturday, permanent.

Chairman Slaughter asked if the Board had any discussion.

JM Sorrell: Are there any downsides to continuing the program.

Paul Burns: Only the possibility of capacity issues but MV is operating the service much more efficiently than previous contractors.

Chairman Slaughter asked if the Board had any further discussion. Hearing none; asked for a roll call vote.

Agawam Amherst Belchertown Chicopee	<u>Yes</u> Michael Squindo Douglas Slaughter	<u>No</u>	<u>Abstained</u>
East Longmeadow Easthampton	Erin Koebler		
Granby			
Hadley	David Moskin		
Hampden	Becky Moriarty		
Holyoke			
Leverett			
Longmeadow	Mark Gold		
Ludlow			
Northampton			
Palmer	Benjamin Hood		

Pelham

South Hadley

Springfield Tim Sheehan

Sunderland Ware

West Springfield

Allyson Manuel

Westfield

Wilbraham Paula Dubord Williamsburg J.M. Sorrell

ADA Representative Rider Representative

Motion passed by a vote of 33.41.

Appendix B: PVTA Senior Service Van Transportation Expansion Public Hearing Presentation

PVTA Senior Service Van Transportation Expansion

PREPARED BY PVPC 2022

Authorities and Responsibilities

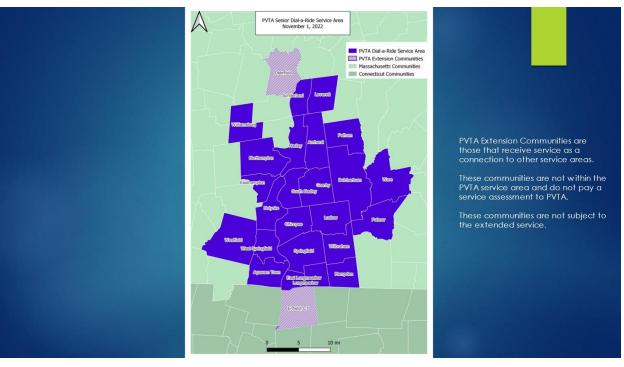
- M.G.L. Chapter 161B establishes Transit Authorities in Massachusetts
 - Section 9 establishes a city and town assessments to pay obligations proportionate to fixed-route service
- ▶ Under Title VI of the Civil Rights Act of 1964 and subsequent executive orders and FTA Circular 4702.1B, PVTA must conduct an analysis of any major service change
- ▶ The following service change qualifies for this analysis under the major service changes definition:
 - Expanded Senior Service Van Transportation to 7pm on weekdays, expanding service to Saturdays

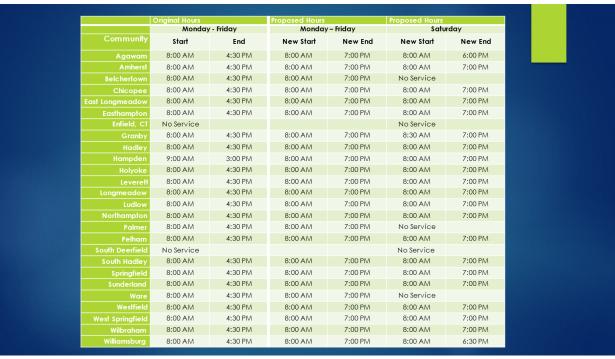
The Motivation

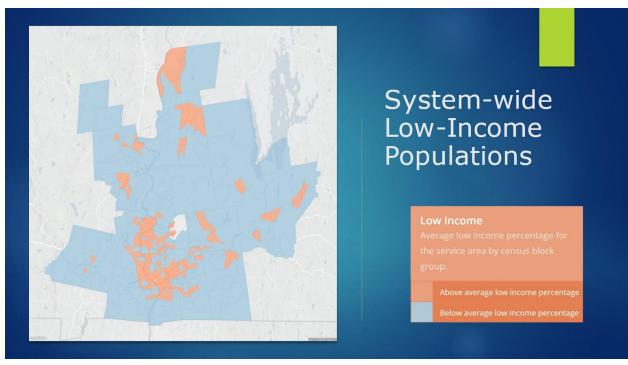
- Senior Service Van Transportation is limited to available resources after ADA Paratransit is fulfilled
 - Offer additional opportunities to seniors to decrease conflicts of limited resources
- Expansion to Evening and Saturday service is a consistent request by riders
- PVTA's business model emphasizes increasing ridership when possible

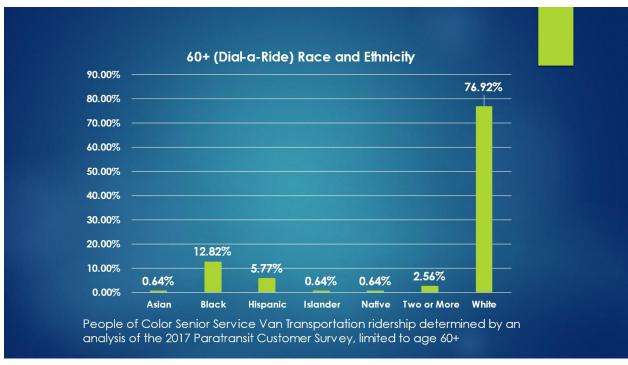
Adjustments and Benefits

- ▶ All 24 PVTA Communities will see an expansion in service hours
 - ▶ The nature of city and town assessments dictates each service to be apportioned to each town based on existing fixed -route service
 - The span of Senior Service Van Transportation within each community does not exceed the proportion of fixed-route service within that community
- Most communities receive the full expansion:
 - Previous Hours: Monday Friday 8:00 AM 4:30 PM
 - Proposed Hours: Monday Saturday 8:00 AM 7:00 PM
- ▶ Benefits are an expansion of service hours by 53.7% throughout the service area









Community	Original Hours of Service	New Hours of Service			Difference in Hours of Service
	Weekly (Weekdays Only) Service Hours	New Per Weekday Service Hours	New Per Saturday Service Hours	Total Weekly Service Hours	Weekly Additional Hours
Agawam	42.5	11	10	65	22.5
Amherst	42.5	11	11	66	23.5
Belchertown	42.5	11		55	12.5
Chicopee	42.5	11	11	66	23.5
East Longmeadow	42.5	11	11	66	23.5
Easthampton	42.5	11	11	66	23.5
Enfield, CT		No Service			
Granby	42.5	11	10.5	65.5	23
Hadley	42.5	11	11	66	23.5
Hampden	30	11	11	66	36
Holyoke	42.5	11	11	66	23.5
Leverett	42.5	11	11	66	23.5
Longmeadow	42.5	11	11	66	23.5
Ludlow	42.5	11	11	66	23.5
Northampton	42.5	11	11	66	23.5
Palmer	42.5	11		55	12.5
Pelham	42.5	11	11	66	23.5
South Deerfield		No Service			
South Hadley	42.5	11	11	66	23.5
Springfield	42.5	11	11	66	23.5
Sunderland	42.5	11	11	66	23.5
Ware	42.5	11		55	12.5
Westfield	42.5	11	11	66	23.5
West Springfield	42.5	11	11	66	23.5
Wilbraham	42.5	11	11	66	23.5
Williamsburg	42.5	11	10.5	65.5	23
Total	1007.5			1549	541.5

Senior Service Van Transportation Expansion Title VI DI/DB

	Hours per Week	Proposed Hours per Week	Service Change	People of Color %	Riders of Color/Month
	4,030	6,196	153.7%	23.08%	341
Expanded Senior Service Van Transp.				% Burden	23.08%
	Hours per Week	Proposed Hours per Week	Service Change	Low Income %	Low Income Riders/Month
	4,030	6.196	153.7%	39.04%	577

This change signifies a disparate impact on People of Color, reaching the threshold of 20% borne on those with Low Income.

This change signifies a disproportionate burden on riders of low me, reaching the threshold of 20% borne on People of Color (Minority).

Riders Impacted per Week is estimated using an average 0.83 Riders per hour of service estimate from October 2010(Q0X0) to t Pandemic. This ratio was applied to the increase in service hours by town, then multiplied by the estimated percendoporopole of wincome.

Appendix C: Council on Aging Dial-A-Ride Online Survey

Verbatim comments:

This change would make it easier to book medical appointments, which is so important 12/24/2022 05:06 PM

I could get a job at Six Flags 12/23/2022 10:39 PM

I never knew about this service. Will definitely look into it. 12/22/2022 09:01 AM

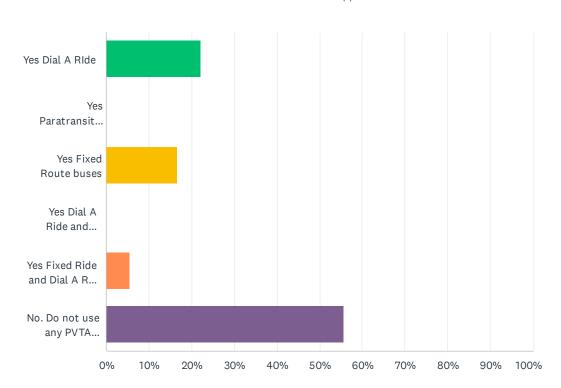
I'd use the service much more often if one-trip round trips were available. I avoid using PVTA if I have to go to the bank or drop my pet off at the vet. My last "quick" trip to the bank left me waiting for more than two hours for a ride home.

12/21/2022 01:33 PM

It would be nice to have early morning service before 8:00. I work from 8-4 $12/20/2022\ 01:11\ PM$

Q1 Do you currently use Dial A Ride or another PVTA service?

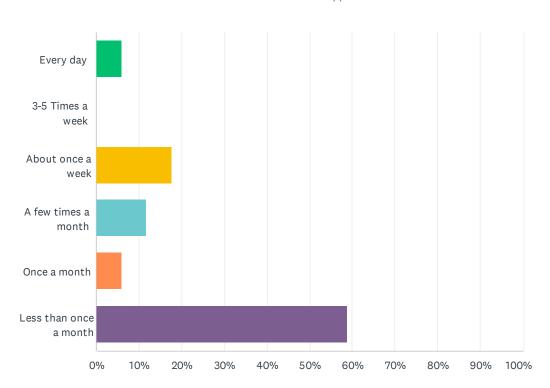




ANSWER CHOICES	RESPONSES	
Yes Dial A RIde	22.22%	4
Yes Paratransit Service	0.00%	0
Yes Fixed Route buses	16.67%	3
Yes Dial A Ride and Paratransit	0.00%	0
Yes Fixed Ride and Dial A Ride or Paratransit	5.56%	1
No. Do not use any PVTA service	55.56%	10
TOTAL		18

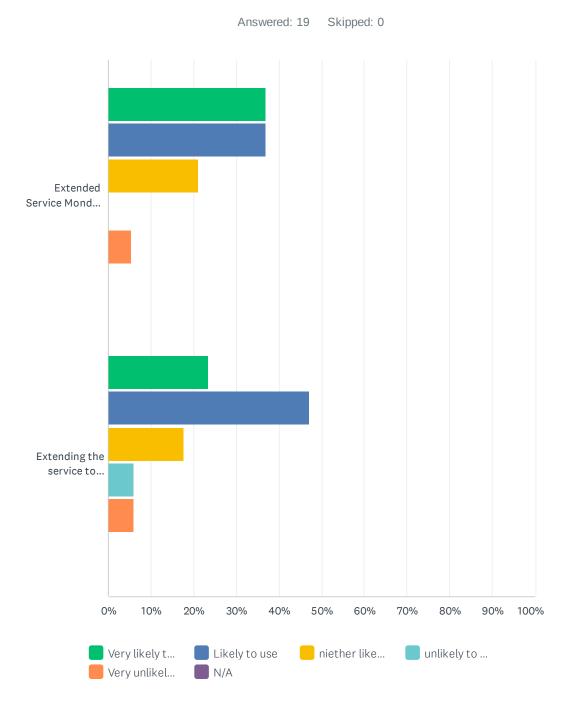
Q2 How often do you ride PVTA vehicles?





ANSWER CHOICES	RESPONSES	
Every day	5.88%	1
3-5 Times a week	0.00%	0
About once a week	17.65%	3
A few times a month	11.76%	2
Once a month	5.88%	1
Less than once a month	58.82%	10
TOTAL		17

Q3 PVTA is currently testing expanded Dial-A-Ride service hours for adults aged 60 and over. The expanded service will include the aspects noted below. Please rank each one in terms of how likely you are to use the expanded service.

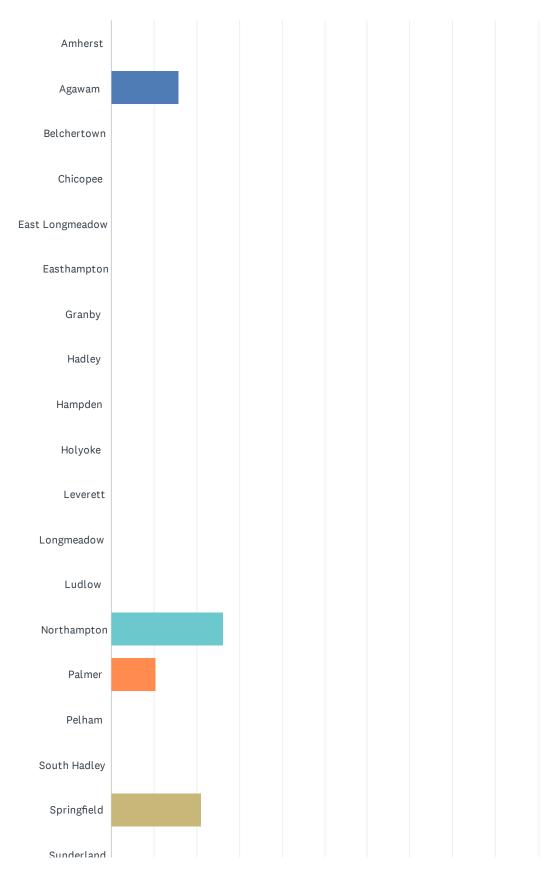


Dial A Ride Service Expansion

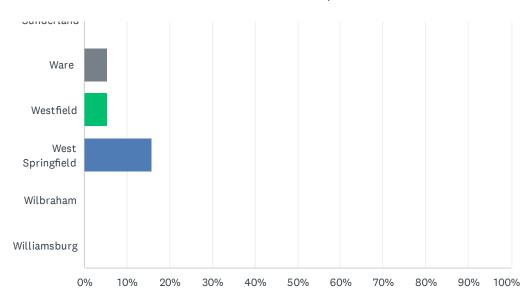
	VERY LIKELY TO USE	LIKELY TO USE	NIETHER LIKELY OR UNLIKELY TO USE	UNLIKELY TO USE	VERY UNLIKELY TO USE	N/A	TOTAL	WEIGHTED AVERAGE
Extended Service Monday through Friday from 4:30 PM to 7:00 PM	36.84% 7	36.84% 7	21.05% 4	0.00%	5.26% 1	0.00%	19	2.00
Extending the service to Saturday from 8:00 AM to 7:00 PM	23.53%	47.06% 8	17.65% 3	5.88% 1	5.88%	0.00%	17	2.24

Q4 What PVTA member community do you live in?





Dial A Ride Service Expansion

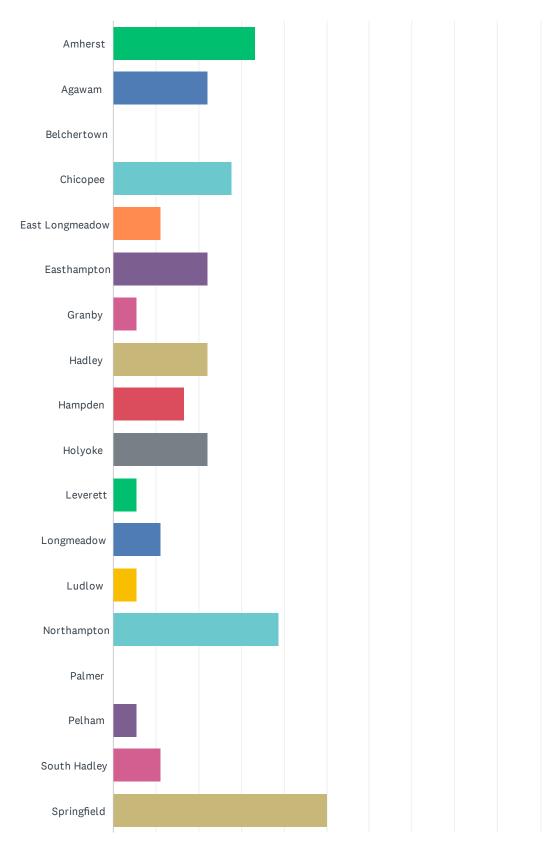


Dial A Ride Service Expansion

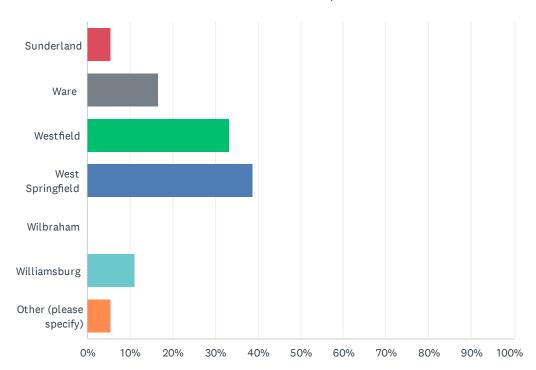
ANSWER CHOICES	RESPONSES	
Amherst	0.00%	0
Agawam	15.79%	3
Belchertown	0.00%	0
Chicopee	0.00%	0
East Longmeadow	0.00%	0
Easthampton	0.00%	0
Granby	0.00%	0
Hadley	0.00%	0
Hampden	0.00%	0
Holyoke	0.00%	0
Leverett	0.00%	0
Longmeadow	0.00%	0
Ludlow	0.00%	0
Northampton	26.32%	5
Palmer	10.53%	2
Pelham	0.00%	0
South Hadley	0.00%	0
Springfield	21.05%	4
Sunderland	0.00%	0
Ware	5.26%	1
Westfield	5.26%	1
West Springfield	15.79%	3
Wilbraham	0.00%	0
Williamsburg	0.00%	0
TOTAL		19

Q5 What community (ies) do you or would you travel to if Dial-A-Ride service were available there?





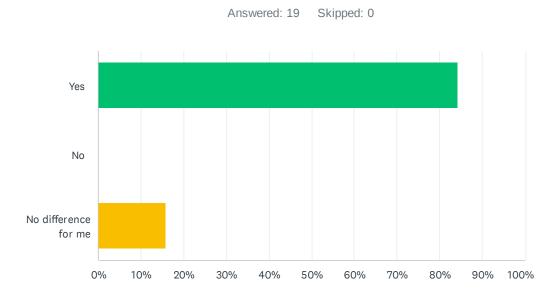
Dial A Ride Service Expansion



Dial A Ride Service Expansion

Agawam 33.33% 6 Agawam 22.22% 4 Belchertown 0.00% 0 Chicopee 27.78% 5 East Longmeadow 11.11% 2 Easthampton 22.22% 4 Granby 5.56% 1 Hadley 22.22% 4 Hampden 16.67% 3 Holyoke 22.22% 4 Leverett 5.56% 1 Longmeadow 11.11% 2 Ludlow 5.56% 1 Northampton 38.89% 7 Palmer 0.00% 0 South Hadley 11.11% 2 Springfield 5.56% 1 Sounderland 5.56% 1 Ware 16.67% 3 West Springfield 38.89% 7 West Springfield 38.89% 7 Williamsburg 11.11% 2 Other (please specify) 5.56% 1	ANSWER CHOICES	RESPONSES	
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Longmeadow 11.11% 2 Ludlow 5.56% 1 Northampton 38.89% 7 Palmer 0.00% 0 Pelham 5.56% 1 South Hadley 11.11% 2 Springfield 50.00% 9 Sunderland 5.56% 1 Ware 16.67% 3 West Springfield 38.89% 7 Williamsburg 0.00% 0 Williamsburg 11.11% 2 Other (please specify) 5.56% 1	Holyoke	22.22%	4
Ludlow 5.56% 1 Northampton 38.89% 7 Palmer 0.00% 0 Pelham 5.56% 1 South Hadley 11.11% 2 Springfield 50.00% 9 Sunderland 5.56% 1 Ware 16.67% 3 Westfield 33.33% 6 West Springfield 38.89% 7 Willbraham 0.00% 0 Williamsburg 11.11% 2 Other (please specify) 5.56% 1	Leverett	5.56%	1
Northampton 38.89% 7 Palmer 0.00% 0 Pelham 5.56% 1 South Hadley 11.11% 2 Springfield 50.00% 9 Sunderland 5.56% 1 Ware 16.67% 3 Westfield 33.33% 6 West Springfield 38.89% 7 Wilbraham 0.00% 0 Williamsburg 11.11% 2 Other (please specify) 5.56% 1	Longmeadow	11.11%	2
Palmer 0.00% 0 Pelham 5.56% 1 South Hadley 11.11% 2 Springfield 50.00% 9 Sunderland 5.56% 1 Ware 16.67% 3 Westfield 33.33% 6 West Springfield 38.89% 7 Willbraham 0.00% 0 Williamsburg 11.11% 2 Other (please specify) 5.56% 1	Ludlow	5.56%	1
Pelham 5.56% 1 South Hadley 11.11% 2 Springfield 50.00% 9 Sunderland 5.56% 1 Ware 16.67% 3 West Springfield 33.33% 6 West Springfield 38.89% 7 Wilbraham 0.00% 0 Williamsburg 11.11% 2 Other (please specify) 5.56% 1	Northampton	38.89%	7
South Hadley 11.11% 2 Springfield 50.00% 9 Sunderland 5.56% 1 Ware 16.67% 3 Westfield 33.33% 6 West Springfield 38.89% 7 Wilbraham 0.00% 0 Williamsburg 11.11% 2 Other (please specify) 5.56% 1	Palmer	0.00%	0
Springfield 50.00% 9 Sunderland 5.56% 1 Ware 16.67% 3 Westfield 33.33% 6 West Springfield 38.89% 7 Wilbraham 0.00% 0 Williamsburg 11.11% 2 Other (please specify) 5.56% 1	Pelham	5.56%	1
Sunderland 5.56% 1 Ware 16.67% 3 Westfield 33.33% 6 West Springfield 38.89% 7 Wilbraham 0.00% 0 Williamsburg 11.11% 2 Other (please specify) 5.56% 1	South Hadley	11.11%	2
Ware 16.67% 3 Westfield 33.33% 6 West Springfield 38.89% 7 Wilbraham 0.00% 0 Williamsburg 11.11% 2 Other (please specify) 5.56% 1	Springfield	50.00%	9
Westfield 33.33% 6 West Springfield 38.89% 7 Wilbraham 0.00% 0 Williamsburg 11.11% 2 Other (please specify) 5.56% 1	Sunderland	5.56%	1
West Springfield 38.89% 7 Wilbraham 0.00% 0 Williamsburg 11.11% 2 Other (please specify) 5.56% 1	Ware	16.67%	3
Williamsburg 0.00% 0 Williamsburg 11.11% 2 Other (please specify) 5.56% 1	Westfield	33.33%	6
Williamsburg 11.11% 2 Other (please specify) 5.56% 1	West Springfield	38.89%	7
Other (please specify) 5.56% 1	Wilbraham	0.00%	0
Carlot (process speeding)	Williamsburg	11.11%	2
Total Respondents: 18	Other (please specify)	5.56%	1
	Total Respondents: 18		

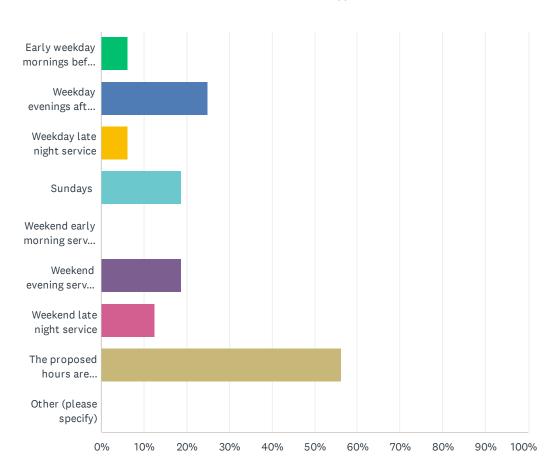
Q6 Do the proposed changes (expanded weekday service till 7:00 PM and the addition of Saturday service) better meet your needs?



ANSWER CHOICES	RESPONSES	
Yes	84.21%	16
No	0.00%	0
No difference for me	15.79%	3
TOTAL		19

Q7 Are there other days or times when you would be likely to use Dial A Ride service if it were offered?





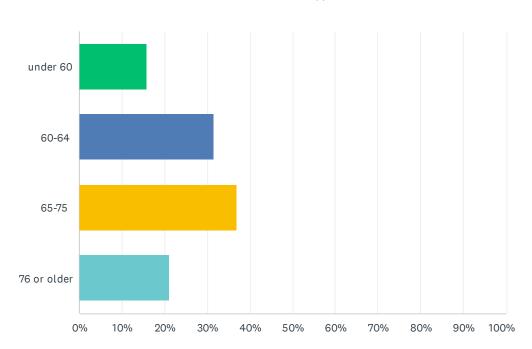
ANSWER CHOICES	RESPONSES	
Early weekday mornings before 8:00 AM	6.25%	1
Weekday evenings after 7:00 PM	25.00%	4
Weekday late night service	6.25%	1
Sundays	18.75%	3
Weekend early morning service before 8:00 AM	0.00%	0
Weekend evening service after 7:00 PM	18.75%	3
Weekend late night service	12.50%	2
The proposed hours are sufficient	56.25%	9
Other (please specify)	0.00%	0
Total Respondents: 16		

Q8 Please provide us with any comments you may have regarding this change.

Answered: 5 Skipped: 14

Q9 What is your age?

Answered: 19 Skipped: 0



ANSWER CHOICES	RESPONSES	
under 60	15.79%	3
60-64	31.58%	6
65-75	36.84%	7
76 or older	21.05%	4
Total Respondents: 19		