

PVTA Title VI Program Update



Submitted October 2018



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September 19, 2018
Ms. Margaret Griffin
Region I Civil Rights Officer
U.S. Department of Transportation
55 Broadway, Suite 904
Cambridge, MA 02142-1093

SUBJECT: Submittal of PVTA Title VI Civil Rights Program Update effective
October 1, 2018

Dear Ms. Griffin:

The Pioneer Valley Transit Authority is pleased to submit the enclosed 2018-2021 three-year update of our Title VI Civil Rights Program. This program was presented to and adopted by the PVTA Advisory Board on September 19, 2018.

Please feel free to contact me directly should you have any questions or require additional materials. We will upload the plan in TrAMS on 9/21/18.

Sincerely,

A handwritten signature in blue ink, appearing to read "Sandra E. Sheehan".

Sandra E. Sheehan
ADMINISTRATOR

CC: Dana Roscoe, PVPC

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MEMORADUM OF EXECUTIVE APPROVAL

To: All Employees
From: Sandra E. Sheehan, Administrator
Date: September 19, 2018
Subject: Title VI 2018 Program Update

The Pioneer Valley Transit Authority (PVTA) is committed to providing equitable services to all customers throughout its service region in accordance with the regulations and requirements of the U.S. Department of Transportation Title VI (49 CFR part 21), as well as the 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.

As part of its fulfillment of this commitment, PVTA every three years submits to the Federal Transit Administration (FTA) a Title VI Civil Rights Program Update. PVTA's Title VI Program Update for 2018 has been prepared in accordance with the guidance given in FTA Circular 4702.1b of October 1, 2012, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients."

I hereby approve the attached Title VI 2018 Program Update. Please review and familiarize yourself with these documents, which are available on our website at <http://www.pvta.com/vitalDocs.php>.

Thank you!

A handwritten signature in blue ink, appearing to read "Sandra E. Sheehan", is written over a horizontal line.

Sandra E. Sheehan, Administrator

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Date

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Table of Contents

A.	Introduction	1
B.	FTA Checklist	1
1	Title VI Notice to the Public and Locations Where It Is Posted	3
2	Title VI Complaint Procedures	3
3	Title VI Complaint Form	3
4	Transit-Related Title VI Investigations, Complaints, and Lawsuits	3
5	Public Participation Plan	3
6	Language Assistance Plan	4
7	Advisory Board Membership and Demographics	4
8	Subrecipient Monitoring Procedures.....	5
9	Title VI Capital Construction Equity Analyses	6
10	Title VI Program Approval.....	6
11	Service Standards.....	6
12	Service Policies.....	7
13	Demographic and Service Profiles	8
14	Demographic Ridership and Travel Patterns	14
15	Monitoring Program Results	16
16	Major Service Change, Disparate Impact, and Disproportionate Burden Public Processes.....	20
17	Title VI Fare and Service Equity Analyses.....	20

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A. Introduction

This 2018 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). The date arranged by FTA for submittal of the PVTA 2018 Update is October 1, 2018

PVTA is the largest Regional Transit Authority in Massachusetts. PVTA's geographic service area covers approximately 627 square miles, encompassing 24 communities that contain urban center, suburban and rural areas. PVTA oversees the operation of 188 buses on a system that includes 43 fixed route bus-routes and three community shuttles. PVTA customers have made approximately 11 million bus trips in FY2018. PVTA also oversees an extensive paratransit van service that provided approximately 300,000 trips for people with disabilities and senior citizens in FY2018.

PVTA's Annual cost of fixed route operation was \$47 million in FY2018.

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. PVTA's most recent bus rider surveys found that 4 of every 5 customers have no other way, other than PVTA, to make their trips. For these residents, PVTA brings essential daily access to places of work, education and shopping. For the region's businesses and institutions, PVTA provides essential links to economic, academic and cultural activity centers.

This 2018 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 discriminatory treatment of people on the basis of race, color or national origin.

B. 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 Title VI Notice to the Public and Locations Where It Is 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 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 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 Transit-Related Title VI Investigations, Complaints, and Lawsuits

Since the 2015 submission, PVTA has had no complaints on the basis of race, color, or national origin.

5 Public Participation Plan

The PVTA Advisory Board adopted an updated Public Participation Plan on November 15th, 2017. This included a public process to update several elements of the plan, including new digital/electronic elements of required outreach. The Public Participation Plan can be found as **Appendix D**.

A list of public outreach efforts in the past three years includes the following:

- 25 Advisory Board meetings
- 9 Pioneer Valley Regional Coordinating Council and Hilltown Regional Coordinating Council meetings
- 74 meetings and/or hearings related to fare increases and service changes
- 4 public meetings related to service equity analysis
- 4 meetings with stakeholders related to capital projects
- 24 media releases
- 6 meetings with Van Riders
- 16 meetings regarding bus stop consolidation
- 5 meetings regarding updating the Public Participation Plan
- 13 public meetings regarding the implementation of the Smart Card
- Outreach regarding the move from Peter Pan Bus Station to Union Station
- Reprinting of all PVRTA schedules in bi-lingual format (English/Spanish)
- Production and posting of all public hearing notices in bilingual format
- Translation availability information included on all public notices
- Spanish translation provided at all public hearings
- Translation and distribution of press releases in Spanish
- Mystery Rider fixed route field observation checklist updated to include Title VI and ADA items: Title VI notice in English and Spanish
- Outreach to non-English speaking customers and residents of the PVRTA service area for public hearings, bus rider forums, and van rider meetings
- “I Speak” language flash cards available to all Customer Service staff and all vehicles with training to staff on the use of the cards
- Survey of Customer Service counter personnel on languages encountered in customer interactions
- Survey of bus drivers on languages encountered in riders
- Participation in PVPC’s 2016 event with Dr. Beverly Scott to enhance the transportation planning capacity of underrepresented residents of Springfield in their municipal Complete Streets and Transit Planning projects
- Attendance and participation in more than 25 meetings of neighborhood associations and community based organizations
- Strategic planning meetings with academic institutions (including Five Colleges Inc., UMass Amherst, Westfield)
- Participation in Quaboag Region Transportation Committee
- Participation in municipal transportation committee and commission meetings as requested

6 Language Assistance Plan

The Language Assistance Plan can be found in **Appendix E**.

7 Advisory Board Membership and Demographics

Pioneer Valley Transit Authority staff conducted a survey of Advisory Board members in June 2018. The results showed that of the 23 respondents (out of 26 members), 95.7% of the Advisory Board is non-Hispanic White, and 4.3% (one member) identified as non-Hispanic Black or African-American.

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 two member-community 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.

8 Subrecipient Monitoring Procedures

The Pioneer Valley Transit Authority has one 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** in *Chapter IV. Demographic Profile*.

The Planning Commission does not provide any transportation services. A copy of their Title VI Program can be found in **Appendix I**.

9 Title VI Capital Construction Equity Analyses

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

10 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 9/19/2018 showing the consideration, awareness, and approval of the above items can be found in **Appendix J**.

11 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 average peak and off-peak vehicle loads. This standard is calculated by looking at average vehicle load during peak hours and off-peak hours and comparing it to the average seating capacity for the vehicles typically operating on that route.

Table 1. Average Vehicle Loading Maximums

	BRT/ KEY REGIONAL TIER I	KEY REGIONAL TIER II	URBAN RADIAL	CAMPUS SHUTTLES	FIVE COLLEGES	VILLAGE CONNECTORS	COMMUNITY/ FLEX	EXPRESS
Peak	120%	120%	120%	120%	120%	120%	100%	100%
Off-Peak	100%	100%	100%	100%	100%	100%	100%	—

Note: Maximums are averages over one-hour periods; individual trips may exceed averages.

11.2 Vehicle Headway

Vehicle headway varies considerably by service type. In general, Tier I routes have the most frequent headways while the village connectors have the least frequent.

Table 2. Service Frequency Guidelines

	BRT/ KEY REGIONAL TIER I	KEY REGIONAL TIER II	URBAN RADIAL	CAMPUS SHUTTLES	FIVE COLLEGES	VILLAGE CONNECTORS	COMMUNITY/ FLEX	EXPRESS
Weekdays								
Early AM	30	60	60	60	60	60	—	60*
AM Peak	15/20	30	30	15	60	60	60	60*
Midday	15/20	30	60	15	60	60	60	60*
PM Peak	15/20	30	30	15	60	60	60	60*
Night	30	60	60	60*	60*	60	—	60*
Saturdays								
Day	30	30	60	60	60	60	—	—
Night	30	60	60	60	60	60	—	—
Sundays								
All Day	60	60	60	60	60	—	—	—

Note: "—" indicates that the guideline does not apply.

* Varies by route (i.e. Thursday, Friday and Saturday night may warrant higher frequencies).

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 has developed service guidelines regarding stop spacing based on service type and population density.

	BRT/ KEY REGIONAL TIER I	KEY REGIONAL TIER II	URBAN RADIAL	CAMPUS SHUTTLES	FIVE COLLEGES	VILLAGE CONNECTOR	COMMUNITY/ FLEX	EXPRESS
Minimum Stop Spacing (feet)								
Moderate to High Density Areas	900	900	900	660	900	660	660	900
Low Density Areas	1,100*	1,300	1,300	1,100	1,100	1,100	1,100	1,100
Maximum Stops per Mile								
Moderate to High Density Areas	6	6	6	8	6	8	6	6
Low Density Areas	4	4	4	5	5	5	5	5

Notes: Moderate to high density = greater than or equal to 4,000 persons per square mile; low density = less than 4,000 persons per square mile

*BRT stops vary by type and the surrounding environment

12 Service Policies

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

12.1 Transit Amenities

Transit amenities such as shelters are provided as a convenience to passengers. Shelters are placed at high-traffic bus stops where there are heavier boarding levels, major landmarks, and major transfer points. PVRTA currently is surveying our bus stops for the Transit Asset Management Plan, which will be completed in October 2018.

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 is continuously monitoring existing bus shelters and installing new shelters in areas which warrant them. As a part of this process, the PVRTA has developed a procedure in which the public can request a bus shelter at any bus stop. If a bus stop has an average ridership of more than 60 passengers per day, this stop would be a strong candidate for shelter installation. However, there are many other factors to consider when installing a shelter, such as existing infrastructure and approval from the host city or property owner. The PVRTA is also dedicated to prioritizing low-income and minority populations to provide equitable amenities throughout the fixed-route system.

In some cases a bench without a shelter is more appropriate due to a number of factors. In some situations a shelter may not physically fit near the bus stop due to a lack of space, or the terrain may not be favorable to properly secure the shelter to the ground itself. Additionally, the bus stop may not meet the 60 passengers per day requirement. In these situations, if the stop has more than 40 passengers in a day, this stop may be a strong candidate for a bench.

12.2 Vehicle Assignment

Vehicle assignment is 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 at PVRTA's three fixed route garages to provide equitable service among routes. PVRTA 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 Demographic and Service Profiles

The PVRTA 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 PVRTA member communities is 34.4%, and the average low-income population is 14.6%. "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.

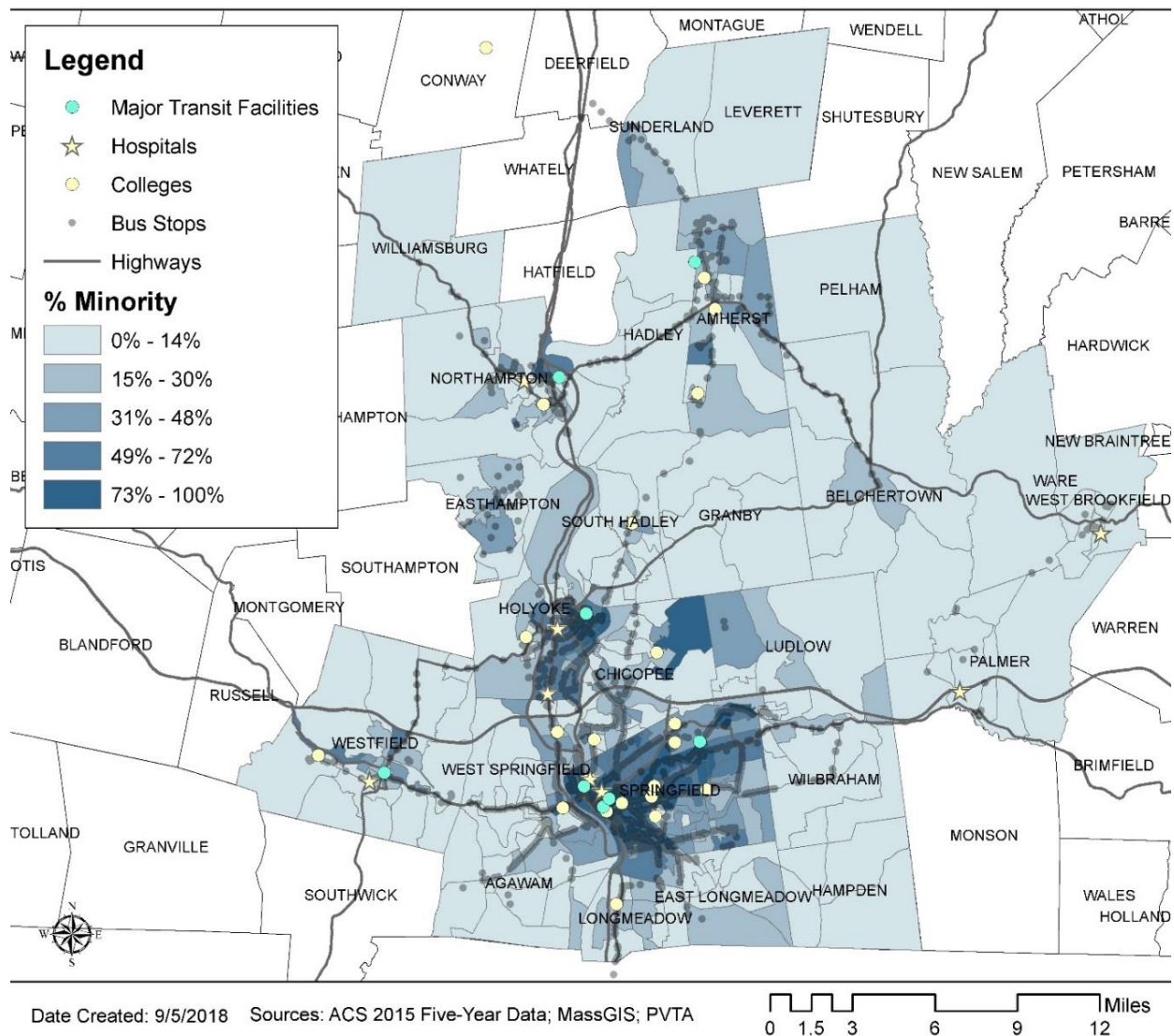
The following demographic maps show the information required in FTA circular 4701.1B on page IV-8.

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:

1. Transit stops
2. Transit facilities
3. Major activity centers (Hospitals and post-secondary institutions)
4. Highways
5. Block group data depicting minority populations

Map 1: Block Group Minority/Non-Minority Population

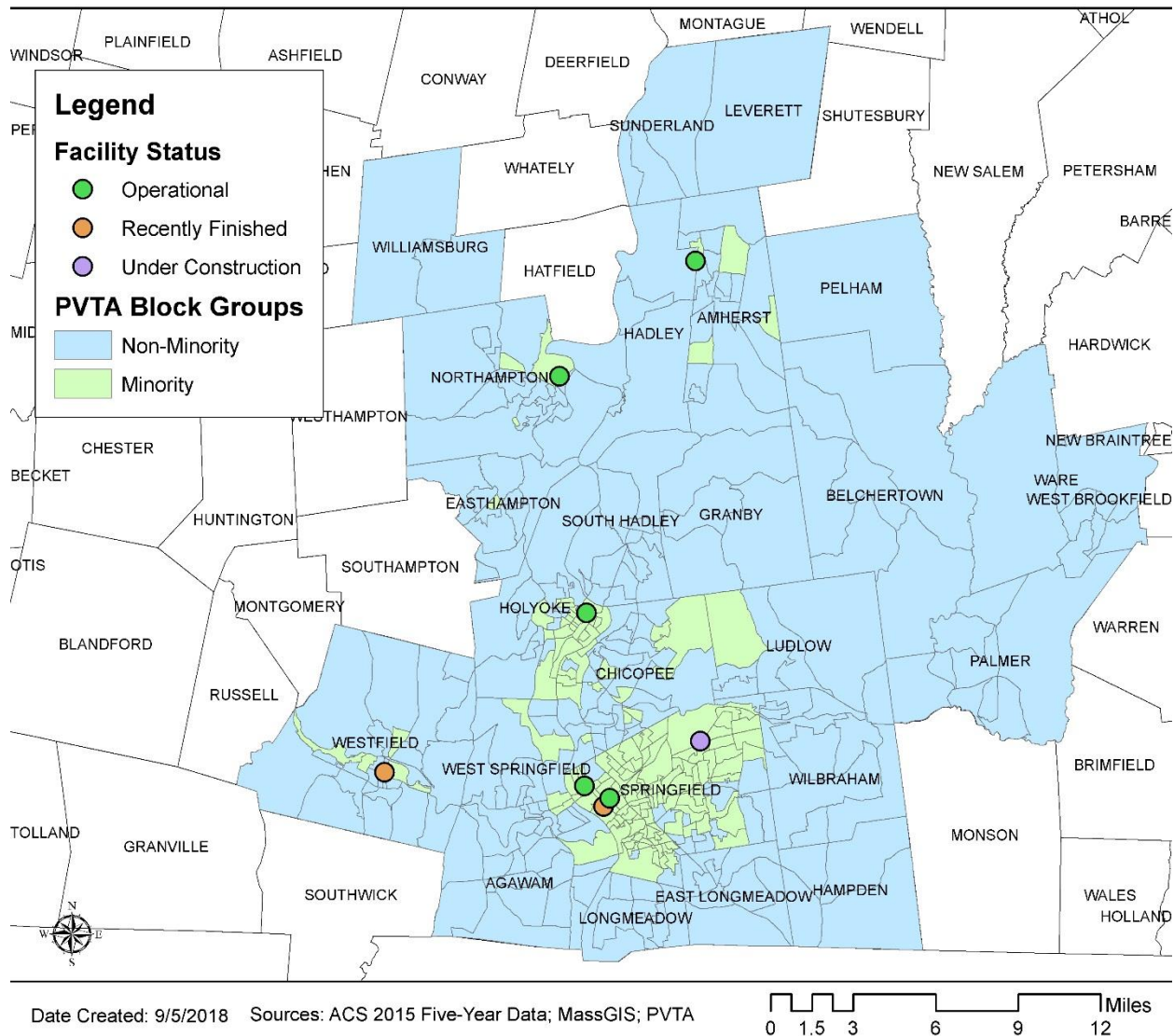


13.2 Demographic Map 2

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:

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

Map 2: Transit Facilities Status

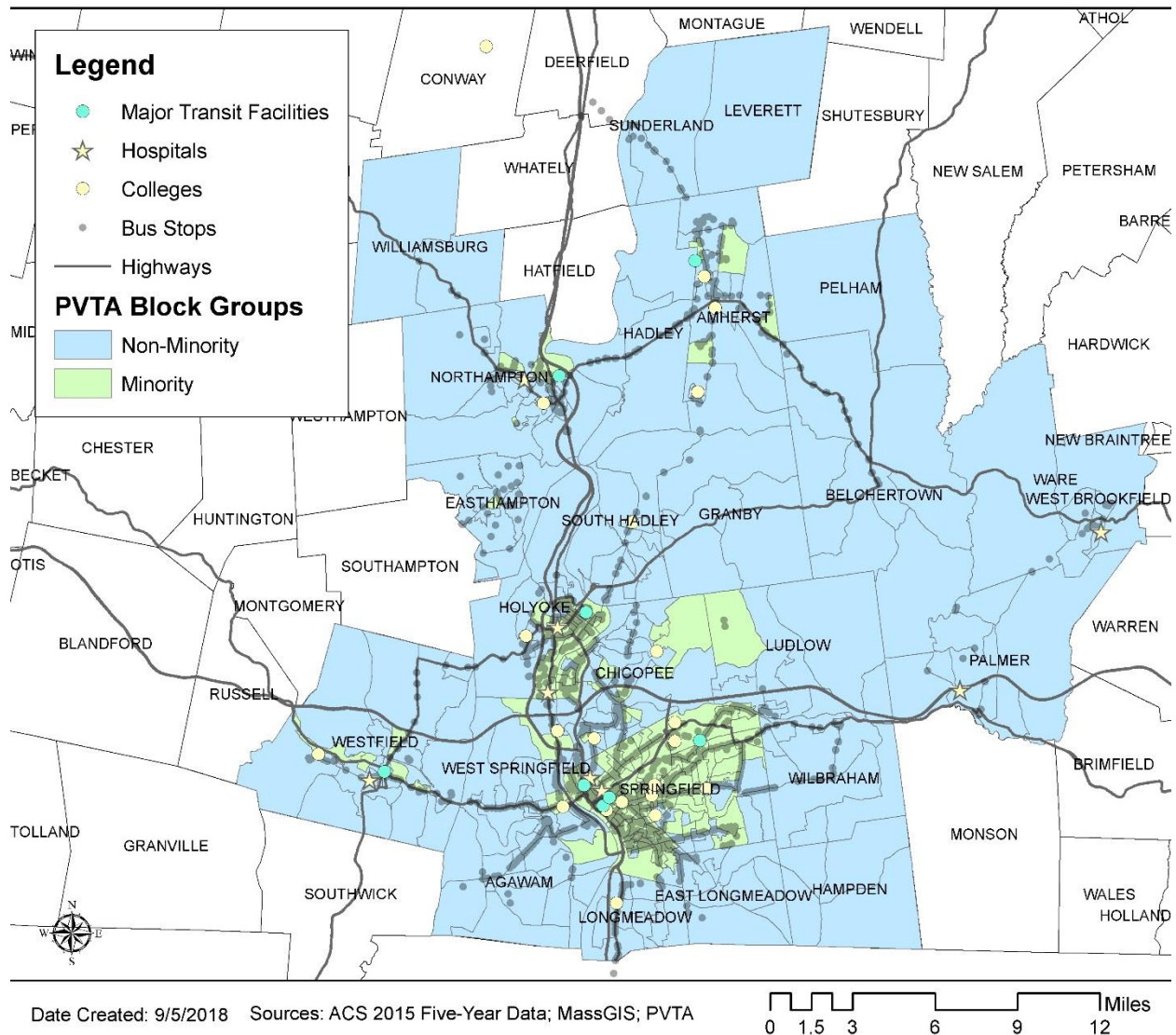


13.3 Demographic Map 3

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:

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

Map 3: Minority and Non-Minority Block Groups

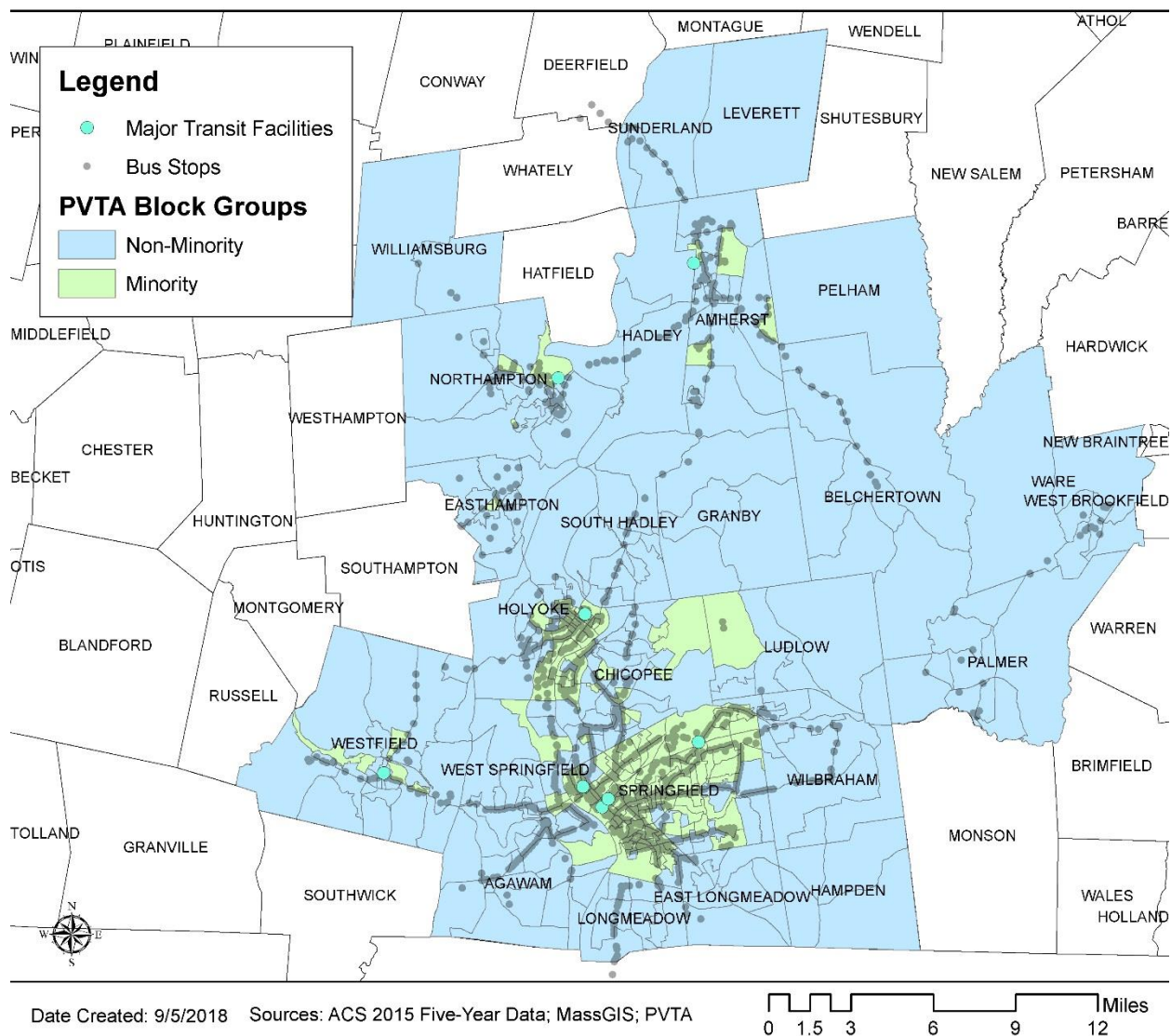


13.4 Demographic Map 4

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:

1. Major Transit Facilities
2. Bus Stops
3. Block groups with a larger-than-average minority population

Map 4: Minority Block Groups and Transit Facilities

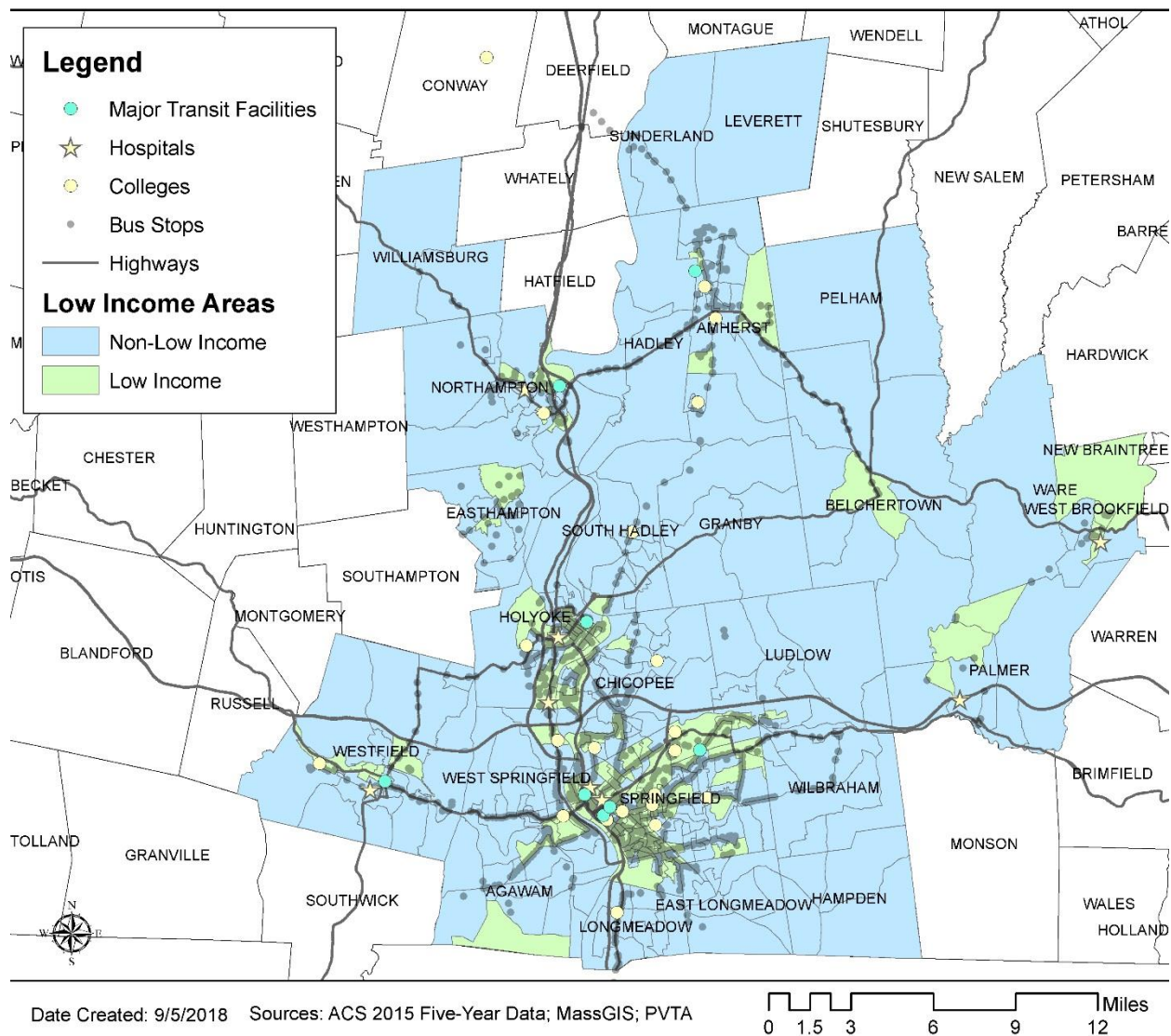


13.5 Demographic Map 5

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:

1. Transit stops
2. Transit facilities
3. Major activity centers (Hospitals and post-secondary institutions)
4. Highways
5. Block groups with a larger-than-average low-income population

Map 5: Low Income Block Groups



14 Demographic Ridership and Travel Patterns

The PVTA conducted on-board customer surveys in 2015 (southern area) and 2016 (northern area) collecting ridership and customer information. As outlined in circular 4701.1B pages IV-8 to IV-9, the PVTA 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 3. Race/Ethnicity of Customers

Race/Ethnicity	Percent
Asian/Pacific Islander	7.5%
Black/African American	16.5%
Hispanic/Latino	34.2%
Native American/American Indian	1.0%
Other	4.3%
Two or more races	8.5%
White	28.0%

Table 4. Language Spoken at Home by Customers

Language	Percent
English Only	59.9%
Spanish Only	1.0%
Another Language	5.3%
English and Another Language	11.6%
English and Spanish	22.1%

Table 5. Reported Income of Customers

Income	Percent
Less Than \$11,770	61.2%
\$11,771 - \$19,999	18.1%
\$20,000 - \$34,999	12.2%
\$35,000 - \$50,000	5.5%
\$50,000 Or More	3.0%

Table 6. Fare Type Usage by Race/Ethnicity

Fare Type	Asian/ Pacific Islander	Black/ African American	Hispanic/ Latino	Native American/ Indian	Other Race	Two or more races	White
Full Fare or 1-day pass cash onboard	0.4%	7.7%	14.2%	0.1%	1.3%	3.4%	9.3%
E&D Discount Fare: Cash	0.0%	0.8%	1.3%	0.1%	0.0%	0.1%	1.8%
Free (Prepaid)	6.8%	3.4%	3.6%	0.1%	1.2%	2.3%	21.0%
31-day E&D pass	0.0%	1.1%	2.4%	0.1%	0.1%	0.4%	3.3%
31-day and 7-day pass	0.2%	2.4%	4.4%	0.1%	0.3%	1.1%	3.6%

Table 7. Fare Type Usage by Income Category

Income Category	Full Fare or 1- day pass cash onboard	E&D Discount Cash onboard	"Free" (prepaid)	31-day E&D pass	31-day or 7- day pass
Less than \$11,700/year	19.3%	2.1%	29.7%	3.9%	6.3%
\$11,700 to \$19,999/year	7.9%	0.9%	5.1%	1.5%	2.7%
\$20,000 to \$34,999/year	5.7%	0.3%	3.1%	1.0%	1.9%
\$35,000 to \$50,000/year	2.6%	0.4%	1.3%	0.5%	0.8%
More than \$50,000/year	0.9%	0.2%	1.6%	0.1%	0.3%

Table 8. Travel Patterns by Race

Trip Purpose	Asian/ Pacific Islander	Black/ African American	Hispanic/ Latino	Native American/ Indian	Other	Two or More Races	White
College	5.0%	2.7%	2.6%	0.1%	0.8%	1.5%	14.9%
Medical	0.1%	1.6%	4.7%	0.0%	0.4%	0.7%	3.0%
Other	0.3%	2.1%	3.6%	0.1%	0.3%	1.2%	3.1%
School 1 - 12	0.5%	0.7%	1.5%	0.0%	0.2%	0.4%	1.0%
Shopping	0.5%	1.9%	3.9%	0.0%	0.2%	0.6%	5.4%
Social/ Recreation	0.3%	1.3%	1.4%	0.1%	0.2%	0.4%	4.4%
Work	0.8%	5.1%	8.8%	0.2%	0.9%	2.5%	7.7%

15 Monitoring Program Results

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.

15.1 Route Performance

The circular requires that, “Transit providers shall assess the performance of each minority and non-minority 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 9. Route Performance

Route	Tier	Minority Route	% Headway Standard Met	OTP	Peak Hour Vehicle Loading	% Stop Spacing Standard Met
B12	Express	Yes	N/A	60.0%	70.0%	4166.7%
B17	Urban Radial	Yes	37.5%	73.5%	91.6%	130.5%
B23	Village Connector	No	62.5%	87.8%	58.4%	378.4%
B4	Tier II	Yes	37.5%	81.4%	68.7%	89.4%
B6	Tier II	Yes	100.0%	71.9%	42.8%	129.1%
B7	Tier I	Yes	87.5%	74.2%	56.5%	104.4%
G1	Tier I	Yes	87.5%	60.3%	46.4%	80.2%
G2	Tier I	Yes	75.0%	72.4%	55.6%	102.8%
G3	Tier II	Yes	50.0%	86.1%	60.6%	97.0%
G5	Urban Radial	Yes	37.5%	68.2%	45.6%	148.0%
P11	Express	Yes	75.0%	80.3%	56.4%	476.8%
P20	Tier II	Yes	100.0%	78.1%	44.2%	138.3%
P21	Tier II	Yes	100.0%	79.0%	49.1%	99.7%
R10	Urban Radial	No	75.0%	86.9%	53.2%	168.2%
R14	Urban Radial	No	50.0%	61.0%	74.7%	189.7%
R24	Urban Radial	Yes	37.5%	86.3%	34.2%	99.5%
R29	Express	No	37.5%	76.7%	45.0%	48.6%
X90	Tier II	Yes	87.5%	73.3%	45.0%	176.6%
X92	Tier II	Yes	12.5%	68.1%	96.0%	113.0%
30	Tier I	No	62.5%	92.2%	51.3%	178.1%
31	Tier I	No	37.5%	94.7%	48.6%	299.1%
33	Campus Services	No	12.5%	94.7%	23.4%	236.7%

Route	Tier	Minority Route	% Headway Standard Met	OTP	Peak Hour Vehicle Loading	% Stop Spacing Standard Met
34	Campus Services	No	50.0%	97.3%	37.5%	195.3%
35	Campus Services	No	87.5%	94.6%	31.4%	212.1%
38	Campus Services	No	37.5%	95.5%	24.8%	422.9%
39	Campus Services	No	0.0%	90.7%	17.4%	572.5%
45	Campus Services	No	N/A	86.3%	35.3%	48.4%
46	Campus Services	No	N/A	89.6%	14.6%	31.9%
B43	Tier I	No	62.5%	73.0%	40.6%	347.8%
B48	Tier II	No	37.5%	65.7%	23.8%	970.5%
R41	Village Connector	No	75.0%	81.9%	19.9%	23.9%
R42	Village Connector	No	62.5%	63.7%	15.1%	24.8%
R44	Village Connector	No	75.0%	81.6%	37.8%	45.3%
X98	Tier II	No	0.0%	38.9%	10.7%	153.3%

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 10 shows the results of that analysis.

Table 10. Routes Standards Attainment

Route	Tier	Minority Route	Headway Standard Met	OTP Standard Met	Vehicle Loading Standard Met	Stop Spacing Standard Met
B12	Express	Yes	N/A*	No	Yes	Yes
B17	Urban Radial	Yes	No	No	Yes	Yes
B23	Village Connector	No	No	No	Yes	Yes
B4	Tier II	Yes	No	No	Yes	No
B6	Tier II	Yes	Yes	No	Yes	Yes
B7	Tier I	Yes	No	No	Yes	Yes
G1	Tier I	Yes	No	No	Yes	No
G2	Tier I	Yes	No	No	Yes	Yes
G3	Tier II	Yes	No	No	Yes	No
G5	Urban Radial	Yes	No	No	Yes	Yes

Route	Tier	Minority Route	Headway Standard Met	OTP Standard Met	Vehicle Loading Standard Met	Stop Spacing Standard Met
P11	Express	Yes	No	No	Yes	Yes
P20	Tier II	Yes	Yes	No	Yes	Yes
P21	Tier II	Yes	Yes	No	Yes	No
R10	Urban Radial	No	No	No	Yes	Yes
R14	Urban Radial	No	No	No	Yes	Yes
R24	Urban Radial	Yes	No	No	Yes	No
R29	Express	No	No	No	Yes	No
X90	Tier II	Yes	No	No	Yes	Yes
X92	Tier II	Yes	No	No	Yes	Yes
30	Tier I	No	No	Yes	Yes	Yes
31	Tier I	No	No	Yes	Yes	Yes
33	Campus Services	No	No	Yes	Yes	Yes
34	Campus Services	No	No	Yes	Yes	Yes
35	Campus Services	No	No	Yes	Yes	Yes
38	Campus Services	No	No	Yes	Yes	Yes
39	Campus Services	No	No	Yes	Yes	Yes
45	Campus Services	No	N/A*	No	Yes	No
46	Campus Services	No	N/A*	No	Yes	No
B43	Tier I	No	No	No	Yes	Yes
B48	Tier II	No	No	No	Yes	Yes
R41	Village Connector	No	No	No	Yes	No
R42	Village Connector	No	No	No	Yes	No
R44	Village Connector	No	No	No	Yes	No
X98	Tier II	No	No	No	Yes	Yes

*Denoted routes are considered “Commuter” routes with significant mid-day gaps and are not included in reporting.

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.

- **Headway Standard** – The agency is planning on undertaking an update to its Comprehensive Service Analysis in 2019, and will use that as an opportunity to examine headways of routes with a goal of refining route classifications and adjusting appropriate headways. The agency has undertaken multiple service cuts over the past two years, and so some routes may need to be reclassified. In cases where a route definitely falls into a classification with headway goals more frequent than they are achieving, the agency will look for ways to fund increased frequency within the constraints of the budget.
- **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.
- **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 on a similar effort.

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 over 100 bus stop ADA landing pads in Springfield, which is dominated by Environmental Justice block groups. As funding becomes available, PVTA will improve other Tier I bus stops in the service area.

With the completion of the Transit Asset Management Plan and the full stop inventory for the system (anticipated fall 2018), PVTA will be able to more systematically prioritize and install transit amenities consistent with its policy.

15.5 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 11. Average Performance for Minority and Non-Minority Routes

Route Category	% Headway Goal Achieved	On-Time Performance	% Vehicle Loading Goal Achieved	% Stop Spacing Goal Achieved
Goal	> 100%	> 90%	< 100%	> 100%
Minority Routes	66.1%	74.2%	57.5%	410.1%
Non-Minority Routes	48.5%	81.7%	34.9%	239.3%

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.

15.6 Advisory Board Consideration, Awareness, and Approval of Monitoring Program

The Advisory Board meeting minutes from 9/19/2018 showing the Advisory Board’s consideration, awareness, and approval of the Monitoring Program can be found in **Appendix J**.

16 Major Service Change, Disparate Impact, and Disproportionate Burden Public Processes

The public was consulted on the proposed Major Service Change, Disparate Impact, and Disproportionate Burden policies through four public meetings. These public meetings took place on the following dates:

- August 7, 2018 – Springfield
- August 8, 2018 – Northampton
- August 14, 2018 – Amherst
- August 16, 2018 – Holyoke

Comments were taken via the following methods:

1. In-person at public meetings
2. Online via the public comment form
3. By phone via the general PVTA number

The Major Service Change, Disparate Impact, and Disproportionate Burden policies as adopted by the board can be found in **Appendix K**. Comments on the three policies are included in **Appendix L**.

17 Title VI Fare and Service Equity Analyses

The Pioneer Valley Transit Authority performed eight Title VI analyses during the three year reporting period for this Title VI Program. You can find copies of the analyses in **Appendix L** through **Appendix T**. The Advisory Board agendas demonstrating that the board considered, was aware of, and approved the analyses can be found in **Appendix U**. Relevant agenda items are highlighted, and board meeting minutes can be provided upon request.