



Title VI Program

Montachusett Regional Transit Authority
Fitchburg, MA

March 2024

Version History

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3.0	3/31/15	Updates – removed demographic analysis per FTA Circular	B. Mahoney
3.1	3/20/18	Updated LEP demographics and maps, & Service Stds	B. Mahoney
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3.3	9/30/22	Updated Complaint Forms & EA SOP	B. Mahoney
3.4	3/5/2024	Updated Complaint Forms, LEP Demographics, Maps, and Service Standards	K. Thomas

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Introduction

The Montachusett Regional Transit Authority, (hereafter referred to as MART), is responsible for public transit services in 25 communities within the Montachusett region, and is funded with Federal, state, and local monies. MART was created pursuant to Massachusetts General Laws, Chapter 161B, in August of 1978. MART provides fixed route and demand-response public transit services throughout the greater Fitchburg, Leominster, and Gardner areas that are included in MART's 25 member communities. MART is committed to providing excellent service through a broad range of programs, which meet the needs of the population of its member communities regardless of race, color, national origin, age, or disability. MART serves a broad and diverse community of almost 240,000 people in urban, small-urban, and rural areas.

Program Components

I. Public Notification of Protection under Title VI

The purpose of Title VI of the Civil Rights Act of 1964 is to prevent the denial, reduction, or delay of benefits and services to minority populations, to provide participation by affected populations in transportation decisions, and to ensure that the policies and programs of public agencies avoid producing disproportionately negative effects on minority populations. MART complies with Title VI, and the related statutes and regulations in performing all services, programs, and activities. MART operates without regard to race, color, or national origin. A "Notice of Public Protection Against Discrimination" has been made available to the public in English and in Spanish. MART's website, which includes this notice may be translated into 103 languages other than English. A copy of the notice (in English and Spanish) is contained in this document as Attachment A. This notice is posted in plain view, according to ADA guidelines, in the following locations:

- Intermodal Transportation Center at 100 Main Street, Fitchburg, MA
- MART Office Lobby at 1427R Water Street, Fitchburg, MA
- MART Office Lobby at 840 North Main Street, Leominster, MA
- Dispatch/Ticket Window at 555 Main Street, Gardner, MA
- Dispatch/Ticket Window at 573 School Street, Athol, MA
- MART's website at <https://www.mrta.us/consumers-rights/antidiscrimination/>
- MART public transportation vehicles

II. Complaint Procedures

Any person who believes they have been subjected to an unlawful discrimination practice as defined under Title VI may by themselves, or by a representative, file a written complaint form with Montachusett Regional Transit authority (hereafter referred to as MART). A complaint must be filed no later than 180 days after the date of the alleged discriminatory act. Complainants shall complete all requested information on the form, which will include the following information:

- Name, address and phone number of the complainant
- Name, address, phone number and relationship of representative to the complainant (if applicable)
- Basis of complaint (i.e. race, color, national origin)
- Date of alleged discriminatory act(s)
- Date complaint received by MART
- Description of the complaint containing as many specific details and facts as possible

A copy of MART's Complaint Form in English and translated to Spanish is provided in Appendix B. Complaint procedures listed on the website have also been translated to Spanish. These forms may be obtained at any MART Office or in accessible PDF format on MART's website. In the future, MART intends to create electronic forms for complaints, which may be translated to any language listed on its webpage (over 100 languages).

No one may intimidate, threaten, coerce, or engage in other discriminatory conduct against anyone because he or she has filed a complaint to secure rights protected by the non-discrimination statutes that FTA enforces. Any individual alleging such harassment or intimidation may file a complaint with the Federal Transit Administration.

Tracking System: All filed complaint forms will be maintained at MART's main office by the Civil Rights Officer. These written complaints will be transposed into an electronic database. The complaints database is accessible to all customer service staff for general complaint input, as well as discrimination allegation tracking. Complaints lodged against MART staff will be investigated internally and recorded. Complaints lodged against drivers or dispatch personnel will be handed over to MART's operating company. The same complaints database is accessible to the transportation operator who responds to the complaint with investigations done and any disciplinary actions taken. MART staff monitors the database for resolutions provided by the operating company.

Montachusett RTA Procedures for Investigation of Complaints: Within three (3) days of receipt of a written complaint form, MART will have input the information into the database and notified the complainant of the investigation process. Within seven (7) days, should the complaint have merit, MART shall commence an investigation of the allegation(s). The purpose of an investigation is to determine whether there is a reason to believe that a failure to comply with Title VI of the Civil Rights Act of 1964 occurred. Furthermore MART, or its operating company, will render a recommendation for action in a report of findings or resolution. Within thirty (30) days, MART will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter. If they are dissatisfied with the final decision rendered by MART, the complainant has a right to file a complaint with the FTA directly. The decision letter will notify him/her of this right and how to proceed if necessary.

Resolution of Complaints: If a probable cause of discriminatory practice based on race, color or national origin is found to exist, MART shall endeavor to eliminate said practice by means of a Remedial Action Plan. The Remedial Action Plan shall include: a list of corrective actions accepted by the agency; a description of how the corrective action will be implemented; and a written assurance that the agency will implement the accepted corrective action in the manner discussed in the plan. Where attempts to resolve the complaint fail, the complainant shall be notified in writing of his or her right to submit the complaint to the Federal Transit Administration as cited in FTA Circular 4702.1A.

III. Title VI Investigations/Complaints/Lawsuits

The regulations set forth in the FTA circular require MART to report a list of any public transportation-related Title VI investigations, complaints, or lawsuits filed with the recipient since the time of the last Title VI program submission. No investigations or lawsuits have been filed against MART.

MART received two discrimination complaints during the period of March 1, 2021, to March 1, 2024. Both complaints were reviewed in accordance with the Complaint Procedures and were determined to be without merit. Instead, MART determined that these were general service complaints, which MART addressed internally. Both clients were contacted with this information, and the complaints were resolved to their satisfaction.

IV. Promoting Public Involvement

MART will promote public participation through providing opportunities for dialogue with existing and potential riders, elected officials, and communities regarding their service needs. Public participation will be a key driver for the analysis of potential or proposed service changes. MART provides avenues for communication through its website, the customer complaints phone line, and comments sent to individual MART staff and elected and appointed board members. Service-related comments and requests are directed to the appropriate department for consideration and response. MART staff also attend public meetings held by municipalities and meetings with public officials to address community-specific service issues. In addition, MART conducts specific market or route-based surveys to gather direct input from consumers regarding major service changes or potential new services.

Service Plan outreach efforts are intended to provide members of the public with the opportunity to submit service requests to MART for consideration in development of transit plans. MART, in coordination with the Montachusett Metropolitan Planning Organization (MMPO), solicits ideas for service changes through written comments (submitted online or via postal services), as well as through public meetings in locations within the service area before a draft plan is written. Once a

proposed service change has been formalized, a notification of public hearing for comments is posted on MART’s website and social media page and is open for the public to attend. All public notifications, meetings, and hearings conform to the requirements of the Americans with Disabilities Act, Title VI of the Civil Rights Act of 1964, and MART policies associated with these laws. The MMPO has its own Title VI and LEP program and all public meeting notifications are translated into Spanish.

Public Outreach Activities

MART continued its annual public outreach by attending community events and meeting with stakeholders and potential partners in the Montachusett region to discuss regional needs and opportunities to advance equity in its offerings and services. Some highlights of MART’s outreach activities include:

1. North Central Chamber of Commerce and Boys’ and Girls’ Club of Fitchburg, Leominster, and Gardner
In December of 2022, MART staff met with the President of North Central Chamber of Commerce and the CEO of Boys and Girls Club of Fitchburg, Leominster, and Gardner to discuss transportation needs of youth that attend Boys and Girls Club programming. The goal was to assess need and establish options that would assist with growing Boys and Girls Club membership and making the programs more accessible to area youth.
2. Shriver Job Corps Center, Devens, MA
On February 7, 2023, MART met with the director of Shriver Job Corps Center to discuss potential employment for students of all backgrounds. Driver and staff shortages continue to affect service capabilities at MART, and Shriver serves potentially 300+ students, ages 16 to 24, many of whom are low-income from across the United States. Discussions included assisting students in accessing transportation to work at MART using the existing Devens Workforce Ride program and offering internship and employment opportunities.
3. CHNA9 and Nashoba Associated Boards of Health
In July of 2023, MART met with staff from Community Health Network Association, District 9) and Nashoba Associated Boards of Health to discuss transportation needs in the Montachusett region, specifically regarding the lack of medical transportation for non-MassHealth recipients and day-to-day transportation for college students attending Mount Wachusett Community College and Fitchburg State University. CHNA9’s mission is “to bring together and support diverse voices to promote health equity in our communities.” The agency has fostered ties in the region to address disparities in health, climate justice, education, community safety, and transportation access, among other response needs. Nashoba Associated Boards of Health “provides public health services to member communities in North Central Massachusetts, in partnership with each community’s local elected Board of Health.” MART continues to collaborate with both agencies to address existing inequities and solve problems of transportation in MART’s member communities.
4. Federal Medical Center, Devens, MA
MART met with staff of Federal Medical Center (FMC Devens) in February of 2024, which facilitates a reentry program for incarcerated individuals. Discussions were aimed toward the potential for filling vacancies at MART to help meet placement needs at the facility. Non-white inmates account for roughly 43 percent of the current inmate population. MART’s contracted operating company, Management of Transportation Services, Inc. attended the meeting as well. Discussions regarding individuals that would be eligible for employment at MART and MTS are ongoing. It is a goal of FMC, Devens to continue to lower the federal recidivism rate by providing reentry programming to the individuals under its charge.

V. Limited English Proficiency (LEP)

A key factor in meeting the goal of equal service for everyone is the ability of MART’s consumers to understand all the services MART has to offer. To accomplish this MART has established a comprehensive plan to provide understanding and access to those potential consumers who may have limited proficiency in the English language. A full copy of the plan is attached herein as Appendix C.

VI. MART Advisory Board

Decision-Making Bodies

FTA Circular 4702.1B in Chapter III Section 4.a.(6) states that “Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar decision-

making bodies must provide a table depicting the racial breakdown of the membership of those bodies, and a description of efforts made to encourage the participation of minorities on such decision-making bodies.” MART is a public authority formed under Massachusetts General Law (MGL) 161B. Section 5 of 161B regulates the composition of the Advisory Board. The Advisory Board is to be made up of elected and appointed officials such as a city’s Mayor, a town’s Chairman of the Board, or a Town Administrator. The official may appoint a designee, in writing to the authority, to act on their behalf. MART’s Advisory Board is the only decision-making body for the agency. MART does not have authority over the appointment or election of Advisory Board members; therefore, MART has not included a table depicting the racial breakdown of the board membership.

Title VI Program Approval by Board

A presentation of MART’s Title VI Program was presented to the MART Advisory Board during the quarterly meeting held on March 26, 2024. The presentation included a discussion of key changes to the Title VI document and associated Appendices. A copy of the Board’s approval of the resolution to accept the Title VI program is included as Appendix D.

VII. Service Standards & Policies

Background: Title 49 CFR Section 21.5 states the general prohibition of discrimination on the grounds of race, color, or national origin. Section 21.5(b)(2) specifies that a recipient shall not “utilize criteria or methods of administration which have the effect of subjecting persons to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program with respect to individuals of a particular race, color, or national origin.” Section 21.5(b)(7) requires recipients to “take affirmative action to assure that no person is excluded from participation in or denied the benefits of the program or activity on the grounds of race, color, or national origin.” Finally, Appendix C to 49 CFR part 21 provides in section (3)(iii) that “no person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality of service of transportation service furnished as a part of the project on the basis of race, color, or national origin. Frequency of service, age and quality of vehicles assigned to routes, quality of stations serving different routes, and location of routes may not be determined on the basis of race, color, or national origin.”

FTA requires all transit providers, regardless of operating budget, to develop quantitative standards for the indicators listed below:

- Vehicle load
- Vehicle headway
- On-time performances
- Service availability

FTA requires transit providers, regardless of total annual operating budget, to develop a policy for each of the following service indicators:

- Distribution of Transit Amenities
- Vehicle assignment

Transit providers may set standards and policies for additional indicators which MART has chosen to do. A complete copy of “MART Service Standards & Transit Policies” is attached herein as Appendix E.

Appendix A

Notice of Public Protection against Discrimination

The Montachusett Regional Transit Authority (hereafter referred to as MART) fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in performing all services, programs, and activities. MART operates without regard to race, color, or national origin. Any person who believes they have been subjected to an unlawful discrimination practice under Title VI may file a complaint with MART.

Information about MART's Civil Rights Program, and the procedures to file a complaint, may be obtained by calling (978) 345-7711 (TTY 800-789-0577), or emailing civilrights@mrta.us, or by visiting MART's website at www.mrta.us. You may also visit MART's main office at 1427R Water Street or the Ticket Agency at 100 Main Street – both located in Fitchburg, MA.

Information can be provided in accessible formats and in languages other than English. If you would like accessibility or language accommodation, please contact 978-345-7711 or fax to (978) 345-9867.

La Montachusett Regional Transit Authority (en lo sucesivo denominado MART) cumple totalmente con Título VI de la ley de derechos civiles de 1964 y relacionados con los estatutos y reglamentos en la realización de todos los servicios, programas y actividades. MART opera independientemente de raza, color, o origen nacional. Cualquier persona que cree que ha sido sometido a una práctica de discriminación ilegal bajo el Título VI puede presentar una queja con MART.

Información sobre el programa derechos civiles de MART y los procedimientos para presentar una queja, puede obtenerse llamando al (978) 345-7711 (TTY 800-789-0577), o un correo electrónico a civilrights@mrta.us o visitando MART's sitio web en www.mrta.us. También puede visitar nuestra oficina principal en 1427R Water Street o agencia de entradas en 100 Main Street – ambos ubicados en Fitchburg, MA.

La información se puede proporcionar en formatos accesibles y en idiomas con excepción de inglés. Si usted quisiera la comodidad de la accesibilidad o de la lengua, entrar en contacto con por favor 978-345-7711 o el fax (978) 345-9867.

DISCRIMINATION COMPLAINT AGAINST THE MONTACHUSETT REGIONAL TRANSIT AUTHORITY

ADA Complaint

Title VI/Civil Rights Complaint

Name of Complainant:		Telephone (daytime):		
Street Address:		City, State, Zipcode:		
Name of Representative to the Complainant: (if applicable)		Relationship to the Complainant:		
Full Address (of Representative):		Telephone (daytime):		
Name of MART related Personnel, Organization, or Agency that you believe discriminated against you:				
Location of Alleged Incident:				
Date of Alleged Incident:				
You were discriminated against on the basis of:				
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin (Language)	<input type="checkbox"/> Family Status	<input type="checkbox"/> Religion
<input type="checkbox"/> Retaliation	<input type="checkbox"/> Age	<input type="checkbox"/> Sex	<input type="checkbox"/> Disability	<input type="checkbox"/> Other
<p>Explain as briefly and clearly as possible what happened and how you were discriminated against. Indicate who was involved. Be sure to include how other persons were treated differently than you. Also attach any written material pertaining to your case:</p>				
Signature:			Date	

To Contact Us:

MART's ADA Complaint Officer:

MART's Title VI Officer:

Keary Connors
 ADA & Transit Manager
 1427R Water Street
 Fitchburg, MA 01420
 978-345-7711 ext. 2274
 ada@mrta.us

Keyna Thomas
 Grants Manager
 1427R Water Street
 Fitchburg, MA 01420
 978-345-7711 ext. 2290
 civilrights@mrta.us

QUEJA DE DISCRIMINACIÓN CONTRA EL DEPARTAMENTO DE TRANSPORTACIÓN DE MONTACHUSETT

Queja de ADA

Queja de Título VI/Derechos Civiles

Nombre del/de la Declarante de la Queja:		Teléfono (de día):		
Dirección:		Ciudad, Estado, Código Postal:		
Nombre del/de la Representante de/de la Queja: (si aplica)		Relación con el/la Declarante de la Queja:		
Dirección Completa: (de la Representante):		Teléfono (de día):		
Nombre del Personal de MART, Organización, o Agencia que usted piensa que le haya discriminado:				
El Local del Incidente Alegado:				
La Fecha del Incidente Alegado:				
Le discriminaron a usted por causa de:				
<input type="checkbox"/> Raza	<input type="checkbox"/> Color	<input type="checkbox"/> Origen Nacional (Idioma)	<input type="checkbox"/> Estado Familiar	<input type="checkbox"/> Religión
<input type="checkbox"/> Retaliación	<input type="checkbox"/> Edad	<input type="checkbox"/> Sexo	<input type="checkbox"/> Discapacidad	<input type="checkbox"/> Por Otra Razón
<p>Explique lo más claro y breve posible lo que ocurrió y cómo le discriminaron. Indique quién estuvo (o quiénes estuvieron) envuelto/s. Esté seguro/a de incluir cómo trataron a otras personas diferente a usted. También incluya cualquier información escrita que sea pertinente a su caso.</p>				
Signatura:			Fecha:	

Para contactar con nosotros:

Oficial de quejas de ADA:

Keary Connors
Gerente de ADA y Tránsito
1427R Water Street
Fitchburg, MA 01420
978-345-7711 ext. 2274
ada@mrta.us

Oficial del Título VI:

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Limited English Proficiency (LEP) Access Plan

Updated 3/26/2024

Version History

Version	Date	Description	Prepared By
1.0	4/8/11	Original	B. Mahoney
1.1	2/7/12	Updated census data & related charts/tables	B. Mahoney
1.2	3/6/15	Updated census data, related charts/tables & maps	B. Mahoney
1.3	3/20/18	Updated census data, related charts/tables & maps	B. Mahoney
1.4	3/26/2024	Update census data, related charts/tables & maps	K. Thomas

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Introduction

The Montachusett Regional Transit Authority, (hereafter referred to as MART), is committed to providing excellent service through a broad range of programs that meet the needs of all the members of the communities it serves regardless of race, color, national origin, age, or disability. As a public transit agency serving 25 cities and towns, MART serves a community of diverse clientele. To meet the goal of equitable service for everyone, MART is committed to ensuring that its consumers understand the services MART offers. MART has established a plan to provide understanding and access to consumers that may have limited English proficiency.

Legal Basis for Language Assistance Requirements

LEP legislation has been included under Civil Rights law as follows:

1. Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), interpreted Title VI regulations promulgated by the former Department of Health, Education, and Welfare to hold that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination.
2. Executive Order 13166, —Improving Access to Services for Persons with Limited English Proficiency Reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services. Federal agencies were instructed to publish guidance for their respective recipients in order to assist them with their obligations to LEP persons under Title VI. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

Department of Transportation LEP Guidance:

The U.S. Department of Transportation (DOT) published revised LEP guidance for its recipients on December 15, 2005, which states that Title VI and its implementing regulations require that DOT recipients take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. The Federal Transit Administration published its LEP Guidance in its Circular 4702.1B —Title VI Requirements and Guidelines for FTA Recipients on October 2, 2012, which requires recipients to develop an LEP implementation plan consistent with the provisions of Section VII of the DOT LEP guidance.

The Plan

To prepare its LEP Access Plan, MART conducted a four-factor analysis to identify LEP needs as identified in Executive Order 13166. Key elements of the resulting plan are as follows:

LEP Population Identification

The Census definition of a Limited English Proficient (LEP) person is "...a person who speaks a language other than English at home and does not speak English well or not at all." MART, in its analysis included all persons who speak English "less than very well." This analysis of the 2022 American Community Survey - 5 Year Estimates tract data showed that LEP populations represent 4.98% of the total MART service area. 15.24% of the total population in MART's service area speaks a language other than English at home; the largest LEP group in MART's region is Spanish-speaking individuals (65%). (See Figure 1)

MART was able to obtain two sets of relevant LEP data, one by tract and the other by the label "Leominster-Fitchburg UZA." The tract data did not provide a language breakout, except for Spanish, and grouped most languages into the categories of Spanish, Other Indo-European, Asian/Pacific Islander, and Other Languages. The

UZA data did provide a breakout of the individual languages but is not exhaustive to MART's entire service area. MART's service area is primarily made up of this UZA, but also has an Urban Cluster in Athol, small areas of the Boston and Worcester UZA's, as well as many Rural areas. However, the majority of MART's fixed route service lies within the Leominster-Fitchburg UZA so it is a better representation of the population that will encounter MART's services. MART has some limited fixed routes, mostly commuter shuttles, which lie outside of MART's primary UZA. The tract data was analyzed to see if any tract fell within the "safe harbor threshold" of 5% or 1000 people. None of the tracts in the areas outside the primary UZA fell within the threshold for LEP populations. The highest one was in Athol with 326 LEP Spanish-speaking individuals; there is primarily closed-door service to and from Athol via Route 2.

Analysis showed that most of the urban LEP populations are located along well-served transit corridors. Spanish-speakers were concentrated in the Fitchburg/Leominster area, while other languages were more widespread across both urban and rural communities. GIS maps were created that show concentrations by language groups as they relate to MART's fixed route services. A map using the Census Data has been created showing the Spanish LEP population and how they relate to MART's fixed route services.

LEP Activities

1. Language Assistance: Provide free language assistance for verbal communication and non-vital yet important outreach documents and in-person interpreter services for events where public testimony is solicited.
2. Vital Documents: Determine which documents are vital for translation and choose the format(s) to most effectively communicate the messages contained in those documents.
3. Training: Train all staff to effectively engage and respond to LEP customers.
4. Customer Information: Provide timely, relevant information about MART programs and services to the LEP communities in the key LEP languages.
5. Outreach: Conduct culturally competent outreach to LEP communities to increase awareness and use of MART services and programs.
6. Research and Administration: Develop a means to assess and monitor the effectiveness of MART's LEP Plan internally and externally on two levels:
 - a. Ongoing review to immediately address any critical issues and make changes to the LEP Access Plan as needed.
 - b. Annual review to include any changes in demographics, types of services, or other LEP community needs.

The LEP needs assessment conducted was based on the Four-Factor Framework outlined in the DOT LEP Guidance.

Four-Factor Analysis

Factor 1: The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population.

Using the dataset S1601 "Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over" – 2022 ACS 5-Year Estimate, MART was able to obtain a sample population of 126,611 persons in MART's 25 member communities. Of these persons 24,960 speak a language other than English at home, which is 19.72% of the sample data population. Of the total population 8,505 (6.72%) speak English less than "very well." (See Table 1)

The 2022 ACS tract data did not provide individual language breakdowns (other than Spanish). Therefore, MART used Dataset B16001 "Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over" with a geographical restriction of Metropolitan Statistical Areas – 2022 ACS 5-Year Estimate to obtain figures to analyze LEP population data by language spoken. (See Table 2 & Figure 1) This data included a larger population of 216,935, including both Worcester County (Northwest) and Worcester County

(Northeast). Considering the US DOT definition of LEP “Safe Harbor Thresholds” (5% or 1000 individuals, whichever is less) MART has decided to use the higher standard of “less than very well” to reach these thresholds languages other than Spanish.

- Spanish: 6,295 or 65 percent of Total LEP Population (*using larger tract data*)
- Other Indo-European: 2,629 or 24.2% of Total LEP Population (*using larger tract data*)
 - Portuguese: 794 or 8.6% of Total LEP Population and 0.69% of the overall population (*using the smaller subset of only UZA population*). Since there is a margin of error of 335 MART will continue to monitor this language and population.
 - French & French Creole: 287 or 3.1% of Total LEP Population and 0.25% of the overall population (*using the smaller subset of only UZA population*). MART is going to remove from active monitoring since this is a large drop in population.

Spanish is the only language of the LEP population which meets the guidance thresholds for MART’s vital documents to warrant translation. A Language Assistance Notification flyer was translated into Spanish, French and Portuguese with the 2018 program, and will continue under this updated program, to reach all LEP consumers.

POPULATION BY LANGUAGE SPOKEN AT HOME AND ABILITY TO SPEAK ENGLISH (2022 ACS 5 Year Estimated Data)		
Population 5 years and over	126,611	100.00%
Speak only English or speak English “very well”	118,106	93.28%
Speak a language other than English	24,960	19.71%
Speak English less than very well (LEP)	10,886	6.72%
Spanish	14,980	11.83%
Speak English “very well”	9,353	7.38%
Speak English less than very well	5,627	4.44%
Other Indo-European languages	5,671	4.48%
Speak English “very well”	4,047	3.20%
Speak English less than very well	1,624	1.28%
Asian and Pacific Island languages	2,318	1.83%
Speak English “very well”	1,503	1.19%
Speak English less than very well	815	.64%
All other languages	1,991	1.57 %
Speak English “very well”	1,552	1.23%
Speak English less than very well	518	.35%

Table 1- Language groups by proficiency by City

LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER (2022 ACS)		
Geographic Restriction: Worcester County (Northeast)—Fitchburg, Leominster, and Lunenburg PUMA; Worcester County (Northwest) Gardner PUMA; Massachusetts		
Population 5 years and over	216,935	100.00%
Speak only English	183,976	84.81%
Speak a language other than English	32,959	15.25%
Spanish	18,372	8.47%
Speak English “very well”	11,389	5.25%
Speak English less than very well	6,983	3.22%
Other Indo-European languages	9,315	4.29%
Speak English “very well”	7,042	3.25%
Speak English less than very well	2,272	1.47%
<i>LEP Language Breakdown</i>		
French (incl. Cajun)	482	0.22%
Haitian	108	0.05%
Italian	106	0.05%
Portuguese or Portuguese Creole	1024	0.47%
German	21	0.01%
Yiddish & Other West Germanic	11	0.01%
Greek	21	0.01%
Russian	251	0.12%
Polish	21	0.01%
Serbo-Croatian	0	0.00%
Ukrainian or Other Slavic	35	0.02%
Armenian	24	0.01%
Persian (incl. Farsi, Dari)	3	0.00%
Gujarati	105	0.05%
Hindi	0	0.00%
Urdu	9	0.00%
Punjabi	0	0.00%
Bengali	0	0.00%
Nepali, Marathi, or other Indic	13	0.01%
Other Indo-European	38	0.02%
Asian and Pacific Island languages	2,957	1.36%
Speak English “very well”	1,829	0.84%
Speak English less than very well	1,128	0.52%
<i>LEP Language Breakdown</i>		
Telugu	0	0.00%
Tamil	0	0.00%
Malayalam, Kannada, or other Dravidian languages	0	0.00%
Chinese (incl. Mandarin, Cantonese)	240	0.11%
Japanese	36	0.02%
Korean	213	0.10%
Hmong	126	0.06%
Vietnamese	165	0.08%
Khmer	49	0.02%
Thai, Lao, or other Tai-Kadai languages	153	0.07%
Other Asian	1	0.00%

Tagalog (incl. Filipino)	116	0.05%
Ilocano, Samoan, Hawaiian, or other Austronesian languages:	29	0.01%
All other languages	2,315	1.07%
Speak English "very well"	1,744	0.80%
Speak English less than very well	571	0.26%
<i>LEP Language Breakdown</i>		
Arabic	200	0.09%
Hebrew	0	0.00%
Amharic, Somali, or other Afro-Asiatic languages	37	0.02%
Yoruba, Twi, Igbo, or other languages of Western Africa	142	0.07%
Swahili or other languages of Central, Eastern & Southern Africa	69	0.03%
Navajo	8	0.00%
Other Native North American	0	0.00%
Other and unspecified	115	0.05%

Table 2 - Breakdown of alternate languages spoken

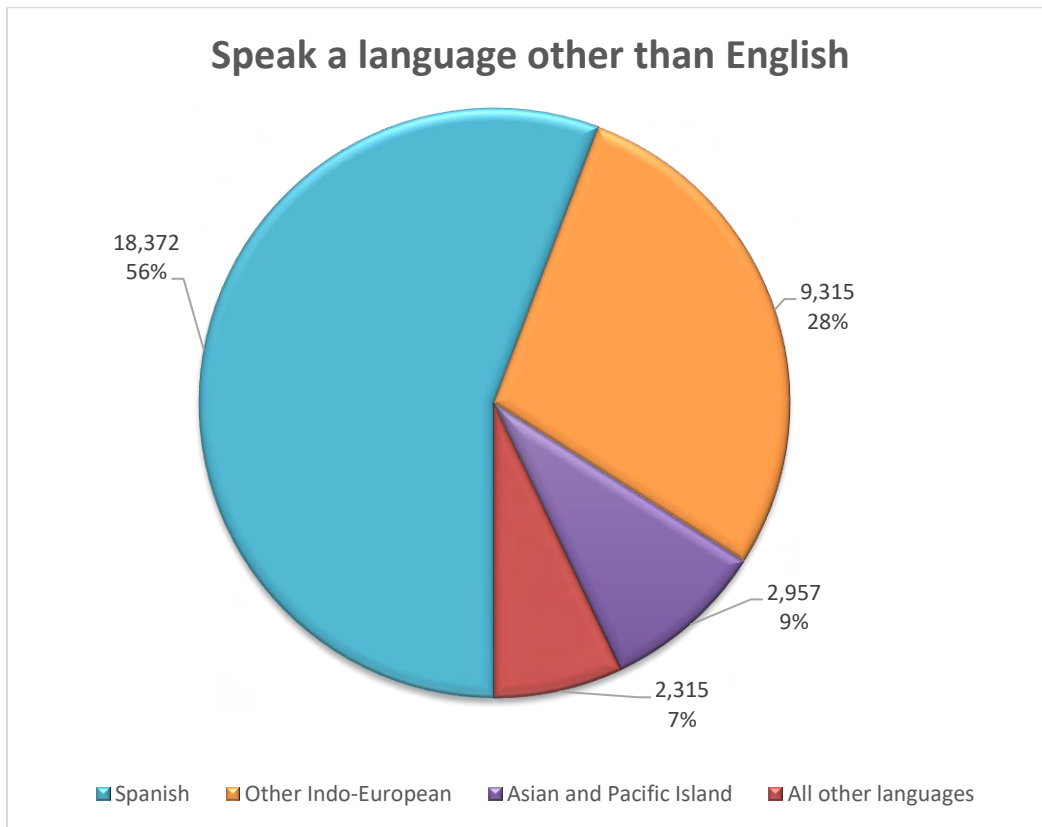


Figure 1

Note 1: Level of English proficiency is not a factor of this graph
Note 2: % of individual languages shown is for total alternate language group

Factor 2: The frequency with which LEP individuals come into contact with your programs, activities, and services

To determine with what frequency LEP individuals are in contact with MART's programs, activities, and services, MART interviewed customer service staff, dispatchers, bus drivers, ticket agency staff, and security personnel. It was determined that the largest LEP population—Spanish-speaking individuals—use MART services daily and call for information throughout the day. In addition, there has been a rising LEP population of Portuguese and Haitian Creole-speaking individuals who regularly engage with MART's programs. Dispatchers also need access to the language line for early morning calls from Para-transit consumers. On rare occasions an LEP individual who speaks a language other than Spanish will come into MART Administrative Offices or Intermodal Bus Station. The services most often encountered by LEP populations are as follows:

- Fixed Route Bus Service
- ADA Para-transit Services
- Job Access Reverse Commute Services
- Subscription Service

Information obtained from meetings with local community organizations and LEP individuals included the need for translated fixed route schedules, as well as a greater frequency of service on certain routes, as well as additional routes and more options for demand-response services.

Factor 3: The Importance to LEP Persons of Your Program, Activities and Services

Fixed Route Services:

Most of MART's riders in urban areas, where much of the LEP population resides, use MART's fixed-route services. MART has fixed route schedules posted to the web and on paper in both English and Spanish. The Fitchburg Community Development Office worked with MART on translating its "How to Ride" brochure into other languages that they have identified through the school district as being vital to families in the region.

Para-transit Services:

Critical to the individuals with disabilities and older adults in all of MART's member communities, not just the urban areas, are MART's ADA and COA services on the Para-transit vans. ADA services are meant for consumers who cannot, due to a disability, ride MART's fixed route buses. ADA clients must complete and have approved an application to receive these services. Once approved there are specific instructions on how to use these services. Translating documents related to the ADA process are considered vital documents. MART also has subscription and taxi-livery services available to the public to use Para-transit services on a set schedule. These services often provide a means to work and cross-district schools. This information is also translated.

Emergency Procedures:

MART currently has no written procedures for emergency evacuation. MART has one transit bus station. This station is manned by a transit security force that personally escorts consumers from the station in case of an emergency, such as a fire. The staff of the transit security force and MART administrative staff, which reside in this facility, have bilingual members that may assist LEP consumers who are at the bus station.

Brokerage Services:

MART is the broker for 82% of the Commonwealth's of Massachusetts Executive Office of Health & Human Services (EOHHS) Human Service Transportation (HST) clientele. The HST office mandates the rules for client eligibility and is responsible for informing the clients about the availability of the services MART provides on their behalf. MART communicates with the clients or client programs directly to arrange transportation with private vendors. A high number of these clients are LEP individuals. The HST Office dictates what measures MART must take to provide quality services to these clients. MART maintains Spanish and Russian speaking staff on hand to provide assistance to these LEP populations in their native language. MART's automated phone system contains verbal prompt menus in Spanish and Russian so there is no confusion before the client reaches an operator.

However, these brokerage services are not specific to MART's member communities, or the LEP population contained within, and MART's fixed route services. One exception is that MART's operating company may act as a private vendor to provide brokered trips on MART vehicles.

Factor 4: The Resources Available to the Recipient and Costs

Language assistance measures currently in place are as follows:

Measure	Cost
Bilingual staff in high LEP contact positions	No additional cost
Vital documents translated into Spanish	Staff time and paper to print extra documents. **
Language-Line available to staff for languages other than Spanish and Russian	\$1.50 per minute
Spanish and Russian menu prompts on automated phone system	Initial staff time to create scripts and record prompts. No additional costs.
I Speak Cards	Cost of paper. Staff time spent creating/maintaining database to track/input languages.

** Documents translated during the process of creating this action plan have consumed 40 hours of staff time, plus 10 hours of volunteer time from the Spanish Community Center.

Additional services MART needs for success of the LEP Access Plan:

1. Staff training modules on LEP Guidelines and Procedures are needed to assure LEP individuals' needs are being met.
2. Annual LEP surveys for monitoring the LEP population and the quality of their access to MART's services.

MART does not have the financial resources to create an LEP Department, so staff from key departments will have to designate a portion of their schedule to assigned LEP activities.

1. The Grants Manager, who is responsible for the Title VI Program, will be responsible for the LEP Access Plan oversight and monitoring.
2. The Human Resources Director shall ensure that LEP training is up-to-date and that all new personnel are trained on the LEP Program as part of their orientation and transit training.
3. MART maintains an ongoing contract to utilize the resources of the Transit Project Manager of The Montachusett Regional Planning Commission (MRPC). MART will use this resource to organize the LEP surveys, just as MRPC conducts other transit surveys and resulting analyses for the agency.

MART will consider these cost effective practices for providing language services:

- Continue the practice of hiring bilingual staff in positions that come in frequent contact with LEP consumers.
- Utilize bilingual staff to translate vital documents.
- Utilize Neighborhood Community Organizations to translate vital documents and perform LEP surveys with their clientele.
- Utilize interns and bilingual staff to conduct LEP surveys on fixed route buses.

LEP Access Plan

The analysis of MART's LEP Population, as previously shown in Factor 1 and Factor 2, determined that the largest segment in need of language assistance speaks Spanish. A smaller percentage speaks Portuguese. Spanish is the language in which MART's vital documents relating to customer programs will be translated. A notice of language assistance availability is translated into all three languages.

*NOTE: Bilingual staff members who speak Russian are available for brokerage clients only.

Language Assistance Measures

MART has established, or will implement in the schedule of this plan, the following language assistance measures:

Staff:

Bilingual administrative staff are present in positions that come into frequent contact with LEP individuals. Staff that only speak English may transfer calls to or call upon bilingual staff for assistance. Many bus and van drivers employed by MART's operating company are bilingual and assist individuals with Limited English Proficiency. Drivers that speak only English are trained in the proper protocols to provide language assistance to individuals with Limited English Proficiency. All employees are trained in MART's LEP procedures and policies which include:

- How staff can obtain language assistance
- How to respond to LEP callers
- How to respond to written communications from LEP persons
- How to respond to LEP individuals in-person
- How to ensure competency of interpreters and translation services

Vital Documents:

Documents which provide important information about MART's services have been translated into Spanish, French, and Portuguese. Front-line staff has been given copies of these documents. Brochures geared toward the general public are posted in common areas of the Intermodal Center, the Administrative Offices at Water Street, and the MART Office in Gardner. Any translated document can be obtained from the Front Office Manager or the Title VI Officer. The translated documents are as follows:

- Fixed Route Schedules
- ADA Application
- ADA Regulation Handbook
- Transportation Access Pass Application
- Individuals with Disabilities/Older Adult (Pink) ID Card Application

- Subscription Services brochure
- JARC Services brochure
- Title VI Discrimination Complaint Procedures & Form
- This Title VI Program document

Language Assistance Protocols:

Scenario 1: LEP Individual Calls Customer Service Line

- a) Bilingual staff answers the call and helps client without incident
- b) English only staff answers the call and transfers call to bilingual staff without incident
- c) Bilingual staff answers the call and does not speak the language of the caller.
 1. Staff member calls the language line and conferences in the caller so that translator can communicate with both client and MART staff.
- d) Bilingual staff answers the call and helps client by mailing out translated documents due to length/complexity of the call or misunderstanding of the consumer. Informs client to call back once they have received and read the documents.

Scenario 2: LEP Individual Comes to Reception Area/Station Ticket Office

- a) Bilingual staff is present to help the client without incident
- b) English only staff greets customer and must wait for bilingual staff to be available at reception counter.
- c) English only staff greets customer, and no bilingual staff are available or the bilingual staff does not speak the customer's language:
 1. Present *I Speak Card* to identify language of individual in need
 2. Present "Customer Service Scenario" card to help customer with different frequent encounters which is translated into the identified language.
 3. Staff member calls language line over the speaker phone

Scenario 3: LEP Individual Sends Written Correspondence

- a) Give written request to bilingual staff for translation into English and to reply in Spanish or Russian.
- b) If the correspondence is in an unknown language, the staff member can use a translation tool to identify the language and put it into English.
 1. Use available community resources or professional translation services to reply to the correspondence in the proper native language.

Scenario 4: LEP Individual boards a MART vehicle

- a) Driver is bilingual and can help the client without incident
- b) Driver only speaks English
 1. Ask other consumers on the vehicles if they speak English and the language of the person in need of help
 2. Call dispatch for assistance over radio
 3. Point consumer in direction of station staff who can utilize language resources

Interpreter/Translation Verification:

MART will ensure that the Translation Service Agency is familiar with the specialized terms and concepts associated with MART's policies and activities. The front office staff assisting the LEP

individual via the language line will perform the following simple tasks before having the translator begin the process of interpretation:

1. Ask the translator if they are familiar with MART's transportation terms
2. Inform the translator that they should not deviate into a role as counselor, legal advisor, or any other role aside from interpreting.
3. Ask the translator to attest that they do not have a conflict of interest on the issues that they would be providing interpretation services.
4. Ask the translator to interpret the first sentence of the information to be provided and ensure the client understands before proceeding with further information.

Training Staff

MART developed a LEP training module, which is a part of MART's new employee orientation curriculum. The following points illustrate the content of this training presentation:

- A summary of MART's responsibilities under the DOT LEP Guidance
- A summary of MART's language assistance plan
- A summary of the number and proportion of LEP persons in MART's service area; the frequency of contact between the LEP population and MART's programs and activities; and the importance of the programs and activities to the population;
- A description of the type of language assistance that the agency is currently providing and instructions on how agency staff can access these products and services.

LEP Notification

MART will provide notice to LEP persons in its service area through the following means:

- Language Assistance signs are posted in MART vehicles and at its customer service areas
- Policy Notices are posted in English, Spanish, and via Pictograms where applicable
- Notice of translated vital documents and availability is posted on MART's website
- Customer service lines
- Information tables at local events and community meetings

Monitoring and Updating the LEP Plan

MART's LEP Plan shall include monitoring of the plan and its activities so that outreach efforts can be tracked, dissemination problems can be discovered early, corrections made, and to find out whether MART's language services have impacted ridership and/or relations with local immigrant communities. Annual updates will be made to the plan as a result of the findings discovered during the monitoring activities. Some of these activities include:

1. MART will re-evaluate the LEP population in its service area as new census data is released and whenever service changes are evaluated.
2. Collection of the *I Speak* cards for data analysis to see if any particular LEP population is growing and in need of reassessment for language assistance.
3. Interview front-line staff to ensure they are using and understand the LEP Plan.
4. Language Resources will be evaluated to see if:
 - a. technological advances can replace manual processes
 - b. existing resources are available and viable
 - c. addition of new resources
 - d. possible fiscal impact on using these new resources

5. LEP Surveys will be conducted every other year to ensure we have proper feedback from the community and LEP individuals themselves on:
 - a. the nature and importance of the LEP activities
 - b. whether or not their needs are being met
 - c. whether they believe MART staff is utilizing and knowledgeable about the LEP Plan

LEP PLAN ATTACHMENTS

Attachment 1: Map of LEP Census Tract Data – Spanish Speaking English less than Very Well

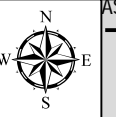
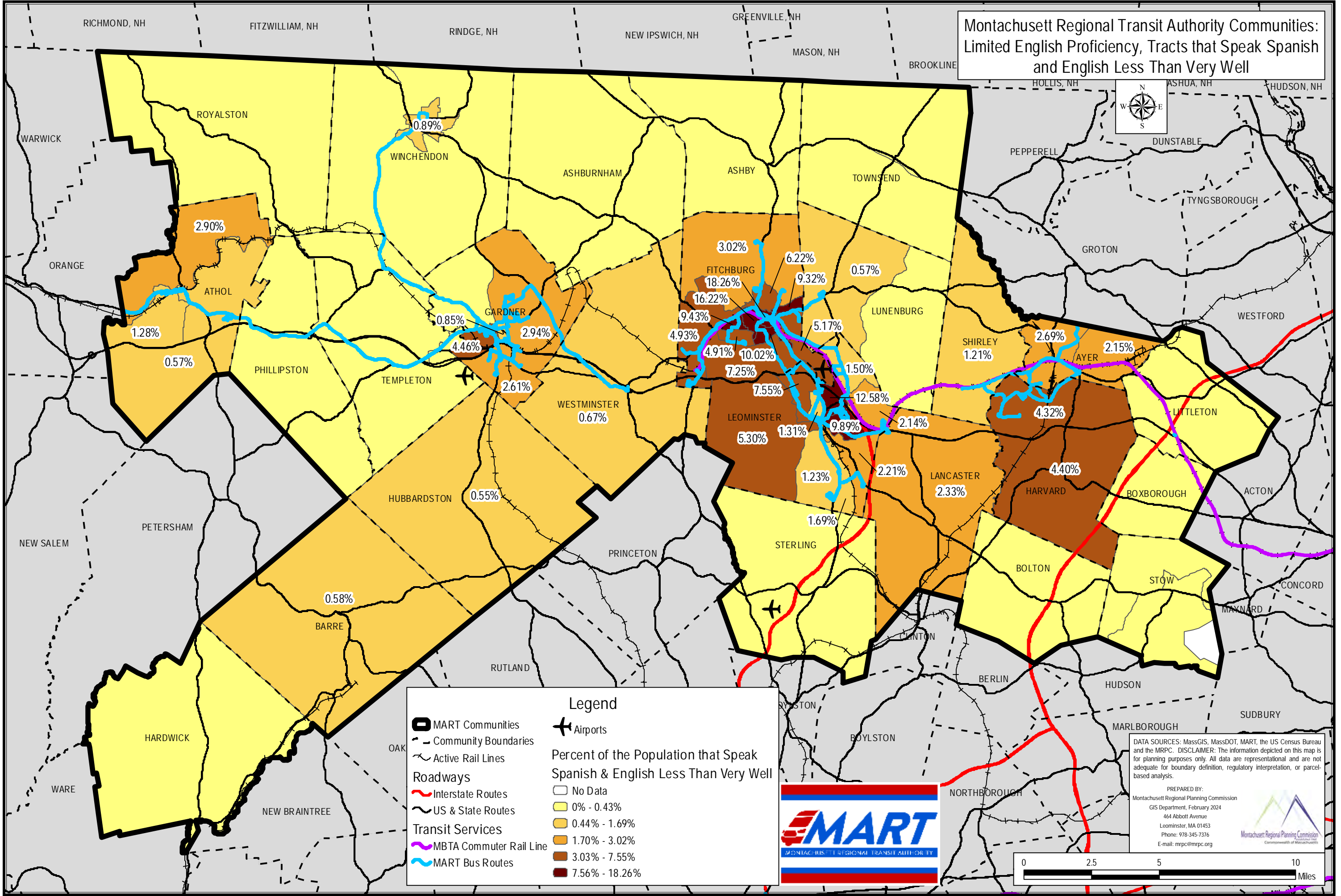
Attachment 2: Map of LEP Census Tract Data – Other Indo-European Languages Speaking English less than Very Well

Attachment 3: Map of LEP Census Tract Data – Asian & Pacific Islander Languages Speaking English less than Very Well

Attachment 4: Employee Training Module

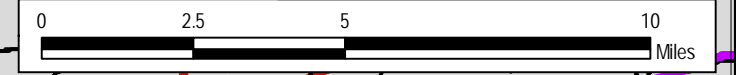
Attachment 5: Language Assistance Notification

Montachusett Regional Transit Authority Communities: Limited English Proficiency, Tracts that Speak Spanish and English Less Than Very Well

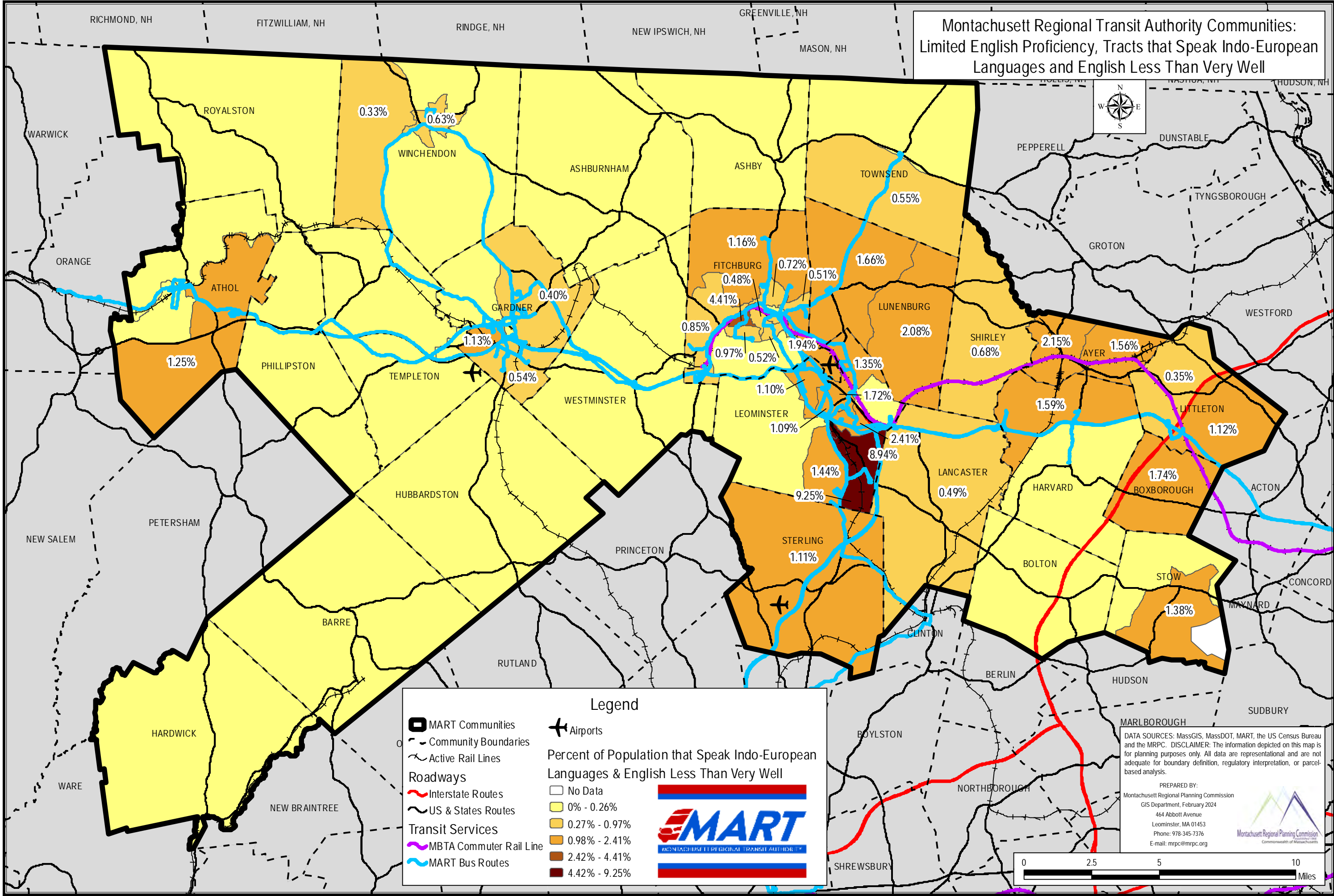


DATA SOURCES: MassGIS, MassDOT, MART, the US Census Bureau and the MRPC. **DISCLAIMER:** The information depicted on this map is for planning purposes only. All data are representational and are not adequate for boundary definition, regulatory interpretation, or parcel-based analysis.

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Montachusett Regional Transit Authority Communities: Limited English Proficiency, Tracts that Speak Indo-European Languages and English Less Than Very Well




Legend

- MART Communities
- Community Boundaries
- Active Rail Lines
- Roadways
 - Interstate Routes
 - US & States Routes
- Transit Services
 - MBTA Commuter Rail Line
 - MART Bus Routes
- Airports


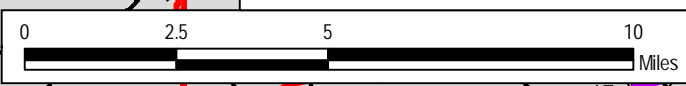
Percent of Population that Speak Indo-European Languages & English Less Than Very Well

- No Data
- 0% - 0.26%
- 0.27% - 0.97%
- 0.98% - 2.41%
- 2.42% - 4.41%
- 4.42% - 9.25%

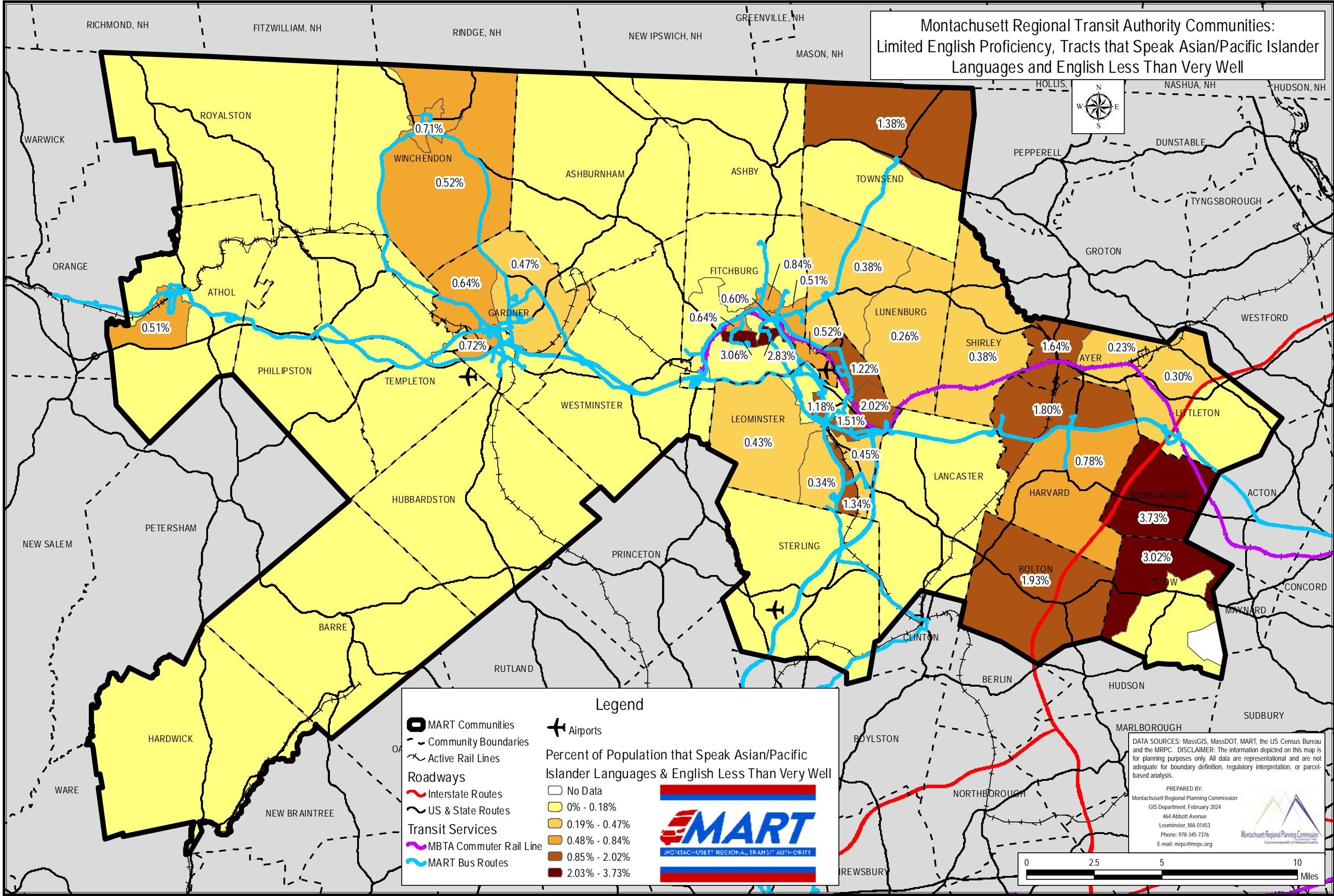
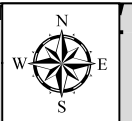


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Montachusett Regional Transit Authority Communities: Limited English Proficiency, Tracts that Speak Asian/Pacific Islander Languages and English Less Than Very Well



Legend

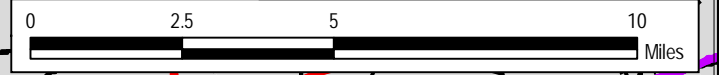
- MART Communities
- Community Boundaries
- Active Rail Lines
- Roadways
 - Interstate Routes
 - US & State Routes
- Transit Services
 - MBTA Commuter Rail Line
 - MART Bus Routes
- Airports

Percent of Population that Speak Asian/Pacific Islander Languages & English Less Than Very Well

- No Data
- 0% - 0.18%
- 0.19% - 0.47%
- 0.48% - 0.84%
- 0.85% - 2.02%
- 2.03% - 3.73%

DATA SOURCES: MassGIS, MassDOT, MART, the US Census Bureau and the MRPC. **DISCLAIMER:** The information depicted on this map is for planning purposes only. All data are representational and are not adequate for boundary definition, regulatory interpretation, or parcel-based analysis.

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Providing Language Access to Persons with Limited English Proficiency

Employee Training Module



Background Information



Who is a limited English proficient (LEP) individual?

- ▶ Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English are Limited English Proficient (LEP).
- ▶ Households where no one over age 14 speaks English well are defined as linguistically isolated.



The LEP population in the United States

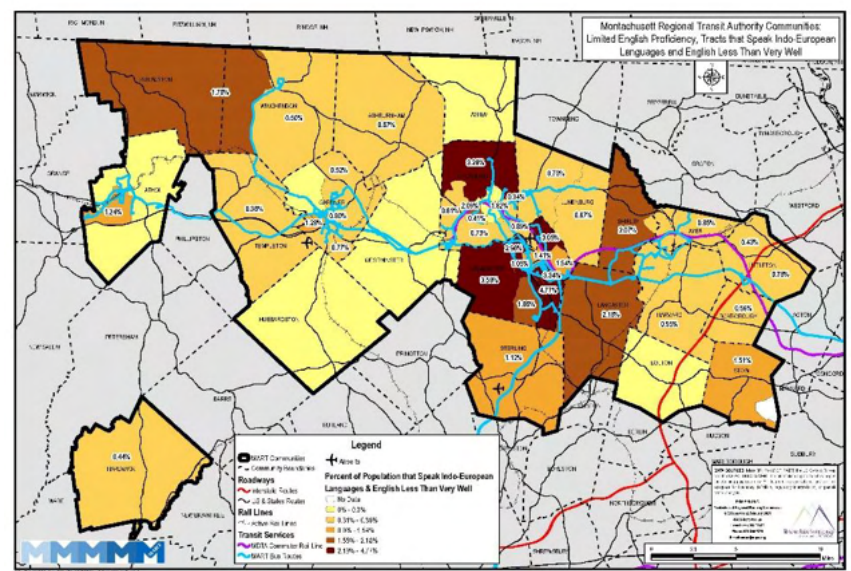
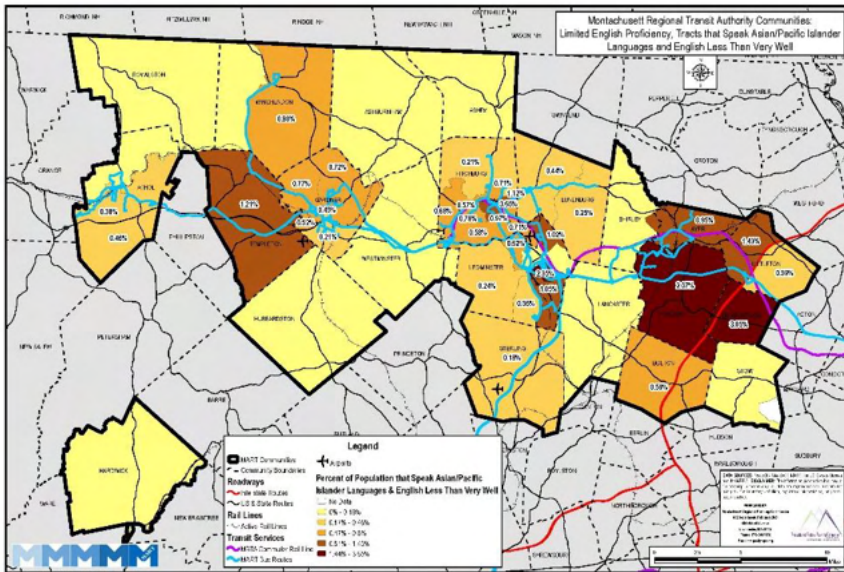
- ▶ More than 25 million people in the United States (8%) do not speak English at all or do not speak English well.
- ▶ The number of persons who do not speak English well or not at all grew by 80% from 1999 to 2016.
- ▶ The most common languages other than English are Spanish, Chinese, Tagalog, Vietnamese, and French.
- ▶ Over 11% of LEP persons aged 16 years and over reported taking transit to work, compared with about 4% of English speakers.



The LEP population in MART's area

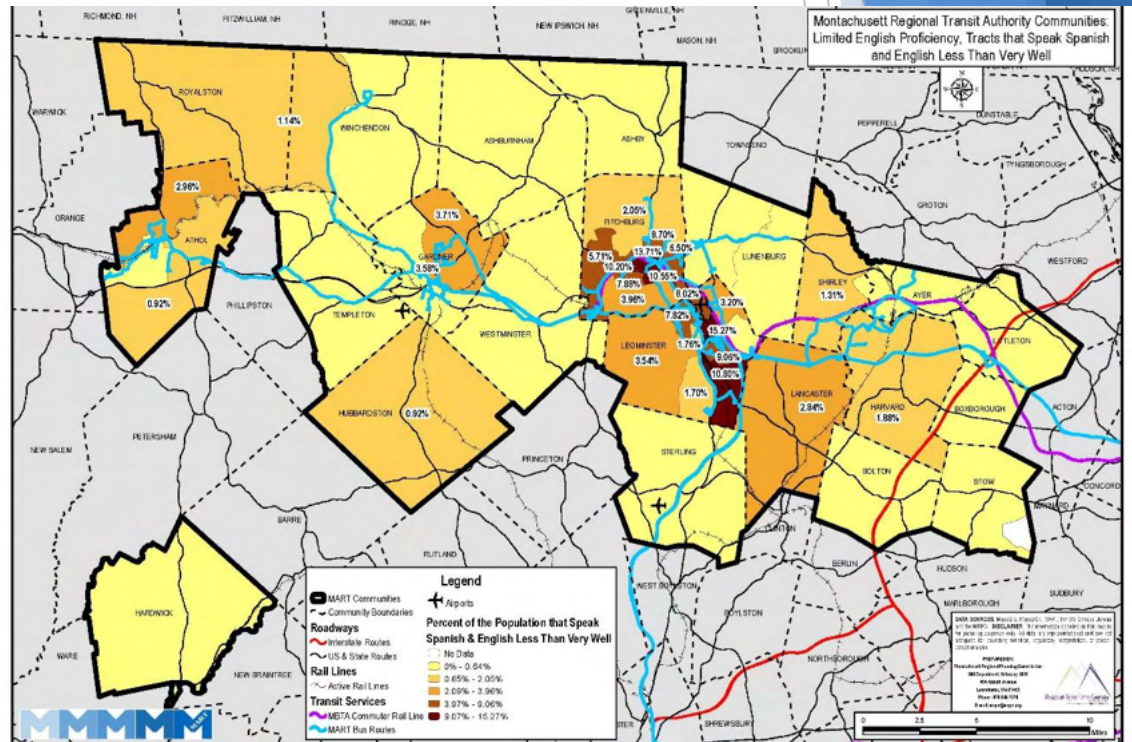
Asian & Pacific Islander

Other Indo-European



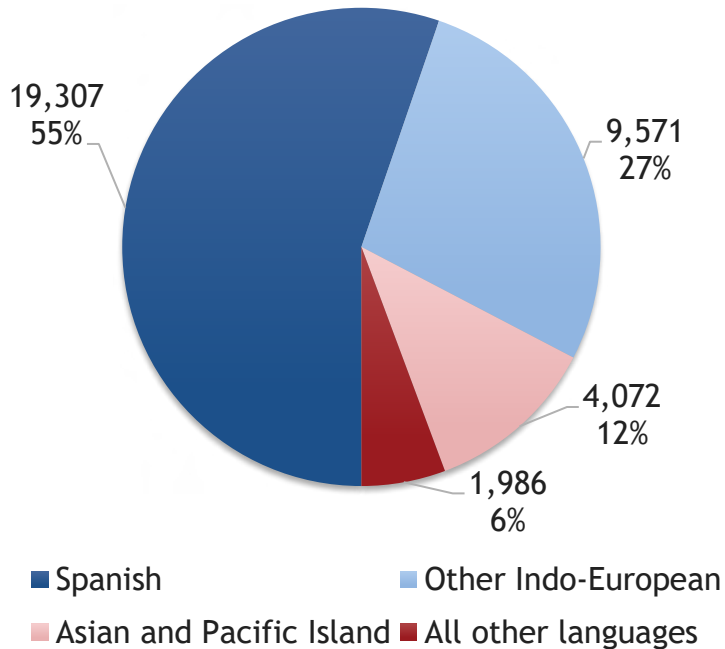
The LEP population in MART's area

- ▶ Spanish is the primary language of the majority of the LEP population in MART's service area.
- ▶ Spanish LEP clients frequent MART's services.
- ▶ This is the language that MART will focus on for our LEP Access Plan.



The LEP population in MART's area

Speak a language other than English



- ▶ Total LEP Population for MART's Service Area 10,886 (4.55%) (2016 ACS Data)
- ▶ Spanish is the highest LEP Population with 6,295
 - ▶ This is 2.63% of the total population but 57.8% of the LEP population
 - ▶ 5,498 of them live within the cities of Fitchburg, Leominster and Gardner
- ▶ Portuguese (Brazilian) is the only other language that comes close to threshold (1000 people or 5%) at 794



LEP Guidance

Why MART has this program

What MART has to do



LEP Guidance

Title VI of 1964 Civil Rights Act

- ▶ “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal Financial Assistance”
- ▶ Lau vs. Nichols, 1974
 - ▶ The Supreme Court ruled that a recipient’s failure to ensure meaningful opportunity to a national origin minority, LEP, to participate in federally funded programs violates Title VI and Title VI regulations.

Executive Order 13166 (c.2000):

“Each Federal agency shall examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services.”



DOT Guidance on oral & written language assistance services

Oral Language Assistance

- ▶ Recipients should consider the competency of the interpreters
- ▶ When interpretation is needed, it should be provided in a timely manner to be effective
- ▶ Recipients should determine how to make best use of bilingual staff
- ▶ Contracting with interpreters is effective when there is no regular need for a particular language skill
- ▶ Consider using telephone interpreter services

Written Language Assistance

- ▶ Translate vital written materials
- ▶ The number of languages into which a document should be translated depends on the four-factor analysis, which is:
 - ▶ 1. The number and proportion of LEP persons in a recipient's area.
 - ▶ 2. The frequency of contact between LEP person and the recipient's services.
 - ▶ 3. The importance of the service provided to the recipient.
 - ▶ 4. The resources available to the recipient and costs.



Effectiveness & Benefits of an LEP Program

- ▶ An effective language assistance plan contains the following elements:
 1. Conducting a needs assessment.
 2. Providing language assistance measures
 3. Training staff
 4. Providing notice to LEP persons
 5. Monitoring and updating the plan
- ▶ Benefits can be achieved through an effective plan
 - ▶ U.S. Government Accountability Office Report, “Better Dissemination and Oversight of DOT’s Guidance Could Lead to Improved Access for Limited-English Proficient Populations.”
 - ▶ LEP populations represent a good portion of both current and potential ridership. Thus, making services accessible to LEP persons could increase ridership





MART's LEP Language Assistance Plan

What MART will do to meet the needs of our LEP consumers.



MART's Language assistance plan

- ▶ Analyze LEP Population
 - ▶ What languages?
 - ▶ What is the frequency of contact
 - ▶ What are the important services?
- ▶ Utilize Bi-Lingual Staff
- ▶ Translate Vital Documents
- ▶ Train Staff on Language Assistance Protocols
- ▶ Interpreter Verification
- ▶ LEP Notification
- ▶ Monitoring & Updating the Plan
 - ▶ Annual Monitoring Analysis



Vital Documents

- ▶ What services are important to the LEP population of MART's service area?
- ▶ The brochures relating to these services are translated into Spanish
 - ▶ Fixed Route Schedules
 - ▶ ADA Application
 - ▶ ADA Regulation Handbook
 - ▶ Transportation Access Pass Application
 - ▶ Elderly/Disabled (Pink) ID Card Application
 - ▶ Subscription Services brochure
 - ▶ Title VI Discrimination Complaint Procedures & Form
- ▶ How to I access these documents?
 - ▶ Front Office @ Water Street
 - ▶ Ticket Agency @ ITC
 - ▶ Title VI Officer
 - ▶ MART Website



Language services available

- ▶ Use Bi-Lingual Staff
 - ▶ This is our first line of defense.
 - ▶ 3 Front Office Staff @ Water Street
 - ▶ Plethora of Call Center Staff @ ITC
 - ▶ Bi-Lingual Drivers, Security & Janitorial Staff
- ▶ Translated Documents & Pictographs
- ▶ I Speak Cards (to use in conjunction with)
- ▶ Toll-Free Language Line
 - ▶ Applied Languages is our current provider
 - ▶ Although their hiring practices ensure expert interpreters - it is MART's responsibility to practice due diligence
 - ▶ Instruction Manual for language-line distributed



Interpreter/Translation Verification

- ▶ Ask the translator if he/she is familiar with MART's transportation terms
- ▶ Inform the translator that he/she should not deviate into a role as counselor, legal advisor, or any other role aside from interpreting.
- ▶ Ask the translator to attest that he/she does not have a conflict of interest on the issues that they would be providing interpretation services.
- ▶ Ask the translator to interpret the first sentence of the information to be provided and ensure the client understands before proceeding with further information.



LEP Contact Scenarios

The Steps to a Successful Interaction with an LEP Individual



LEP Contact Scenarios

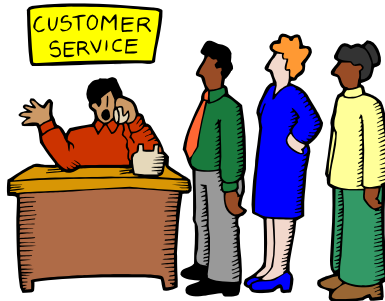


► *Scenario 1: LEP Individual Calls Customer Service Line*

- Bi-lingual staff answers the call and helps the client without incident
- English only staff answers the call and transfers the call to a bi-lingual staff without incident
- Bi-lingual staff answers the call and does not speak the language of the caller
 - Staff member calls the language line and conferences in the caller so that translator can communicate with both the client and MART staff
- Bi-lingual staff answers the call and helps client by mailing out translated documents due to length/complexity of the call or misunderstanding of the consumer. Informs client to call back once they have received and read the documents.



LEP Contact Scenarios



- ▶ **Scenario 2: LEP Individual Comes to Reception Area/Station Ticket Office**
 - ▶ Bi-lingual staff is present to help the client without incident
 - ▶ English only staff greets customer and must wait for bi-lingual staff to be available at counter/window
 - ▶ English only staff greets customer, and no bi-lingual staff are available, or the bi-lingual staff does not speak the customer's language
 - ▶ Present *I Speak Card* to identify language of individual in need
 - ▶ Staff member calls language line over the speaker phone

LEP Contact Scenarios



- ▶ *Scenario 3: LEP Individual Sends Written Correspondence*
 - ▶ Give written request to bilingual staff for translation into English and to reply in Spanish or Russian.
 - ▶ If the correspondence is in an unknown language, the staff member can use a translation tool to identify the language and put it into English.
 - ▶ Use available community resources or professional translation services to reply to the correspondence in the proper native language.
 - ▶ Use only approved resources - verify with Title VI Officer



LEP Contact Scenarios



- ▶ *Scenario 4: LEP Individual boards a MART vehicle*
 - ▶ Driver is bi-lingual and can help the client without incident
 - ▶ Driver only speaks English
 - ▶ Ask other consumers on the vehicles if they speak English and the language of the person in need of help
 - ▶ Call dispatch for assistance over radio
 - ▶ Point consumer in direction of station staff who can utilize language resources



In Summary

- ▶ MART's LEP program is mandated by law to avoid discriminatory practices
- ▶ MART's LEP program will benefit our consumers as well as MART's image & ridership
- ▶ Familiarize yourself with MART's bi-lingual staff and the other resources available
- ▶ MART has language assistance measures available to all staff so they can provide a meaningful and positive customer service experience



Notice of Language Assistance Services

Spanish - Español

La Montachusett Regional Transit Authority desea informar a nuestros consumidores que si usted no habla o entiende inglés muy bien, MART tiene servicios para traducirles sin ningún costo. Le podras decir a la persona que le está ayudando que usted necesita un intérprete en su lenguaje y se le proporcionara el intérprete apropiado disponible para usted. Información sobre las políticas servicios de la MART pueden ser previsto en formatos accesibles y ser traducidos en Español.

French - Français

La Montachusett Regional Transit Authority (MART) tient à informer nos consommateurs que si vous ne parlez ni ne comprenez très bien l'anglais, MART a des services de traduction disponibles sans frais. Dites à la personne pour vous aider que vous devez identifier votre langue et avoir l'interpréteur approprié mis à votre disposition.

Portuguese - Português

A autoridade de trânsito Regional Montachusett (MART) deseja informar nossos consumidores que, se você não falar ou entender inglês muito bem, MART tem serviços de tradução disponíveis sem custo adicional. Informe a pessoa ajudando voce que voce precisa de um interpretador ja que voce nao fale ingles bem.

The Montachusett Regional Transit Authority (MART) wishes to inform consumers that if you do not speak or understand English very well, MART has translation services available at no charge. Tell the person helping you that you need to identify y language and have the appropriate interpreter made available to you. Information about MART policies and services can also be provided in accessible formats and are translated into Spanish.

MART also has TDD services available for patrons that have a hearing or speech impairment. Call 800-789-0577.

If you would like accessibility or language accommodation, please contact MART by phone at (978) 345-7711 or by fax at (978) 345-9867.

Appendix D

The following resolutions were presented and discussed during the MART Advisory Board Meeting on March 26, 2024. The Board unanimously passed the resolution of approval for the updated Service Standards and this updated Title VI Program.

From the Board Meeting Agenda:

V. Administrative Matters (Est. 25 Minutes)

- A. Proposed Transfer of MART Property to City of Fitchburg – Board vote required**
 - i. Two Parcels – Part of Fifth Mass Turnpike Cul de Sac**
 - ii. Subject to Acceptance by the Fitchburg Planning Board and City Council**
- B. Twin City Rail Trail Impact – Fitchburg Intermodal Center**
 - i. Site Improvements**
 - ii. Visitor Parking Eliminated**
 - iii. Real Estate Impacts**
- C. MART’s Title VI Program Presentation**
 - i. Approval of Service Standards**
RESOLUTON – BE IT RESOLVED that the Advisory Board of the Montachusett Regional Transit Authority approves the updated Services Standards, as presented by the Grants Manager
 - ii. Approval of Title VI Program**
RESOLUTON – BE IT RESOLVED that the Advisory Board of the Montachusett Regional Transit Authority approves the 2021 Title VI Program, as presented by the Grants Manager

MART SERVICE STANDARDS & TRANSIT POLICIES

March 2021
Version 1.6

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I. Services & Service Objectives

Services

The Montachusett Regional Transit Authority, hereafter referred to as MART, offers a wide range of transit services operating under two modes – Fixed Route (motorbus) and Paratransit (demand response) service. Much of this policy addresses the fixed route service. Demand response vehicles fall under different guidelines and demand response clients meet various certain criteria, and therefore will be addressed separately.

Fixed Route Bus

For the purposes of this policy, “Bus” encompasses all rubber-tired vehicles, including motor-bus classified diesel, mini-bus diesel, dual-mode shuttle vans, and hybrid buses. MART operates fixed routes services in a small-urban area and an urban cluster along with a connector service. MART also provides a regional rural fixed route service which links to the adjoining RTA’s (Franklin RTA) service.

- Fitchburg/Leominster Region – MART has eleven bus routes that cover the cities of Fitchburg and Leominster with coverage to small parts of Lunenburg and Lancaster. There are two anchor stops, one in each city – MART’s Intermodal Center in Fitchburg and Monument Square in downtown Leominster.
- Gardner Region – MART has three main bus routes in the City of Gardner.
- Intercity/MWCC Service – This route runs from Labor Day to Memorial Day to cover the increased ridership of the area’s college students. It travels through Gardner, Westminster, Fitchburg, and Leominster.
- Wachusett Shuttle – The shuttle runs throughout the day (6:00am to ~750pm with gaps) between downtown Gardner and the Wachusett Commuter Rail Station just off Route 2 in West Fitchburg.
- Clinton Worcester Commuter Services -MART provides commuter shuttle service from Fitchburg to Clinton and Worcester.
- Townsend Commuter Shuttle – MART provides a commuter shuttle service from the Townsend Town Hall to the Fitchburg Intermodal Center.
- Harvard Commuter Shuttle – MART provides a commuter shuttle service from Harvard Town Hall and Senior Center to Littleton Train Station.
- Link Service – Gardner to Athol. This bus route originates in Gardner and travels through the rural communities from Gardner through Athol (up to the town line of Orange) along MA-Route 2A.
- Link Service – Gardner to Winchendon. This bus route originates in Gardner and travels through the small urban corridor between Gardner and Winchendon along MA-Routes 68 and 202.
- Fitchburg Peak/Supplemental Service – extra buses are sent out during peak hours to handle traffic flow and increased ridership capacity in and around the schools.

Para-transit Services

Demand response vehicles are Para-transit (chair car) and ambulatory (passenger) vans. Service standards will differentiate because passenger capacity will never exceed the number of available

seats, and loaded wheelchairs will decrease the seating capacity on most models. However, MART still holds this mode accountable to the reliability and safety standards. MART offers demand response services through various programs to a variety of clientele types.

- ADA Service – available to all members of the MART communities who cannot use a fixed route bus due to a disability. In the cities of Fitchburg, Leominster and Gardner, MART has chosen to allow anyone city wide who qualifies as ADA to have a Para-transit vehicle pick them up at home (origin to destination). This is a deviation from the ¾ mile fixed route standard. However, the ¾ mile rule does apply to the towns of Athol, Lancaster, Lunenburg, Phillipston, Templeton, Westminster and Winchendon where limited fixed route services are provided.
- Evening Ride Service (formerly Job Access Reverse Commute JARC) – this service runs from 8 pm to 11:59 pm. It allows those who work along MART’s fixed route service area to have a demand response service which can get them home after normal bus service has been suspended. This service is a sub-contracted demand taxi service; except where consumers require a paratransit (wheelchair accessible) vehicle.
- Subscription Service – this service is available to anyone who has a set schedule (5 days a week) at the same pickup and destination. This is a prepaid service at rates higher than fixed route – since it is a curb-to-curb service. ~~Prorating for fewer days is available.~~
- Veterans Shuttle – MART provides shuttles from Fitchburg to hospitals and VA centers in the Boston and Worcester regions. Service is open to the general public originating from the Intermodal Center in Fitchburg with various fixed pickup points in MART’s service area.
- Council on Aging Centers – every member community in the MART service area has our support and the option to utilize a MART vehicle to transport their senior and disabled citizens thru the local COA. The COA’s in Fitchburg, Leominster, Gardner, Ashby, Barre, Royalston and Athol are provided transportation through MART’s operating companies.
- Dial-A-Mart Services – these are sponsored trips (non-charter) with a regular daily schedule and list of clients, which will change as the sponsor adds and deletes clients.
- Devens Regional On-Demand – MART provides commuter shuttle service as an on-demand service. The times and stop locations remain the same, but a rider must book a ride for the service to run. This on-demand service is also currently being sub-contracted out to demand-taxi.

Service Objectives

MART’s mission statement:

“To serve people by getting them where they need to go to lead their lives.”

To evaluate progress toward achieving this mission, MART has identified the following Service Objectives:

Accessibility

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

Reliability

Services should be operated as scheduled within the permitted parameters.

Safety

It is MART’s highest commitment to deliver safe, reliable, clean, on-time rides and operate in a secure manner for customers, employees, and the public.

Efficiency

Services should be provided in a manner that promotes efficient use of resources and consumer quality.

Cost Effectiveness

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

II. Service Standards

For each of the Service Objectives, MART has established quantifiable Service Standards, which allow us to evaluate the performance of MART services relative to each of the Service Objectives. These Service Standards are summarized in the following table and are discussed in detail following.

Table 1: Summary of Service Standards

Service Objective	Service Standard/Guideline
Accessibility	<ul style="list-style-type: none"> • Coverage • Span of Service • Frequency of Service
Safety	<ul style="list-style-type: none"> • Vehicle Load
Reliability	<ul style="list-style-type: none"> • Schedule Adherence
Efficiency	<ul style="list-style-type: none"> • ITS Technologies
Cost Effectiveness	<ul style="list-style-type: none"> • Net Cost/passenger

The Service Standards perform two important functions. First, they establish the minimum or maximum acceptable levels of service that MART must provide to achieve the Service Objectives. Second, they provide a framework for measuring the performance of MART services.

It should be noted that the performance of service is often affected by conditions that are beyond the control of MART. For example, buses may run late on some days because of roadwork and weather conditions.

Use of Service Standards is designed to help ensure a cost-effective allocation of service within the overall levels of operations funding, which are determined through the annual budget process. Documented Service Standard violations, which cannot be resolved within the existing fiscal constraints, indicate a failure of the budget to provide sufficient resources to satisfy the Service Objectives. Over time, only increasing the budget or revising the Service Standards can resolve such inconsistencies.

Each of the Service Standards is expressed as either a threshold that must be met, or a guideline that the Authority strives to meet. The following is a discussion of MART’s Service Standards, in the context of the Service Objective to which each applies. These Standards address the fixed route service.

Accessibility Service Standards

The Accessibility standards/guidelines define the minimum levels of service that will provide access to the transit system, in terms of geographic Coverage, the length of the service day (Span of Service) and the Frequency of Service. Each of these standards varies by mode.

Coverage Guidelines

An important aspect of providing the region with adequate access to transit services is the geographic coverage of the system. Coverage is expressed as a guideline rather than a standard because uniform geographic coverage cannot always be achieved due to constraints such as topographical and street network restrictions. In addition, coverage in some areas may not be possible due to the infeasibility of modifying existing routes without negatively affecting their performance. The Coverage guidelines are established specifically for the service area in which fixed route buses operate, as riders most frequently begin their trips on these services on foot.

The guideline is only expressed in terms of fixed route bus service because demand response service encompasses the entire geographic area of the three cities serviced by the fixed route service.

Guideline: Access to transit service will be provided within a 0.5 mile walk to residents of areas served by fixed route bus with the greatest percentage of the population in the combined census block groups of below the poverty level and minority race. Travel destinations will be based on areas of highest interest including area hospitals, colleges, shopping centers, business, and industrial work zones.

Span of Service Standards

Span of Service refers to the hours during which service is accessible. MART has established Span of Service Standards that define the minimum period of time that any given service will operate. This provides riders with the confidence that particular types of services will be available throughout the day.

The Span of Service Standards, stated in Table 2 below, vary by mode and by day of the week, reflecting the predominant travel flows in the region. The standards require that the first trip in the morning in the peak direction of travel must arrive at the scheduled destination at or before the beginning span of service time. At the end of service day, the last trip in the evening in the peak direction of travel must depart from the scheduled destination at or after the end span of service time.

Table 2: Span of Service Standards

FIXED ROUTE HOURS OF SERVICE			
SERVICE AREA	MONDAY-FRIDAY	SATURDAY	SUNDAY
Fitchburg/Leominster	5:15 am to 7:40 pm	9:00 am to 6:52 pm	NO SERVICE
Gardner	6:04 am to 5:58 pm	8:30 am to 5:20 pm	10:00am to 3:56pm
Intercity – Fitchburg/ Leo. to/from Gardner	6:15 am to 10:45am, 11:05 am to 6:05 pm	10:10am to 4:00pm	NO SERVICE
Wachusett Shuttle	5:55am to 6:30 am 6:55 am to 7:40am 7:55am to 8:55am 12:55pm to 1:40pm 4:55pm to 5:40pm 5:55 pm to 6:55 pm	NO SERVICE	NO SERVICE
Gardner to Athol	5:30 am to 6:43 pm	9:45am to 3:43pm	9:45am to 3:43pm
Gardner to Winchendon Link	6:30 am to 9:10 am, 11:30 am to 1:30 pm, 3:30 pm to 4:25 pm	10:10am to 3:30pm	NO SERVICE
Athol-Orange Shuttle	6:00 am to 5:27 pm	10:00 am to 3:27 pm	10:00am to 3:27pm

DEMAND RESPONSE HOURS OF SERVICE		
SERVICE AREA	MONDAY-FRIDAY	SATURDAY
Fitchburg/Leominster	5:00 am to 7:30 pm	9:00 am to 6:30 pm
Gardner	6:00 am to 6:30 pm	8:30 am to 5:30 pm
Intercity cover area	6:00 am to 7:15 pm	NO SERVICE
Athol Link areas	5:30 am to 6:30 pm	9:30am to 4:00pm
Winchendon Link coverage areas	6:00 am to 9:00 am; 11:30 am to 4:00 pm	NO SERVICE

The minimum Span of Service indicated in the tables above may be extended at either end of the day, based on customer demand and in accordance with the other service standards.

Frequency of Service Standards

To maintain accessibility within a reasonable waiting period, MART has established minimum frequency of service levels for each mode, by time of day. Table 3 shows the weekday Time Period definitions used by MART for all modes for both the Frequency of Service and Vehicle Load Standards. Because travel patterns on the weekend are different than on weekdays, specific time periods are not defined for Saturdays. Table 4 shows the Minimum Frequency of Service levels for fixed route by applicable time period.

Table 3: Weekday Time Period Definitions

Time Period	Definition
Early Morning	5:00 AM – 7:00 AM
AM Peak	7:00 AM – 9:00 AM
Midday	9:00 AM – 1:20 PM
PM School Peak	1:20 PM – 3:00 PM
PM Route Peak	3:00 PM – 5:30 PM
Evening	5:30 PM – 7:30 PM
Late Evening (College)	7:30 PM – 12:30 AM

Table 4: Minimum Frequency of Service Standards

Route	Weekday Time Periods	Minimum Frequency
Circle Line (1 & 3) (Separate routes on separate buses headed in opposite direction)	AM & PM Peak	2 trips in the peak direction (additional bus)
	All Other Periods	60-70 minute headway*
Main Line (2 & 9)** (Combined Route - 2 buses that loop each other)	Early Morning	25 minute headway
	AM Peak	2 trips in the peak direction (additional bus)
	Morning/Midday	45 minute headway
	PM School Peak	3 trips in the peak direction (additional bus)
	Evening	45 minute headway
FSC Loop (4)	All Periods	10-minute headway (2 vehicles)
Fitchburg Loop (5)	AM & PM Peak	2 trips in the peak direction (add. bus)
	All Other Periods	50 minute headway
Fitchburg/Lunenburg (6/7) ***	AM Peak	60 minute headway
	Midday	70 minute headway
	All Other Periods	80 minute headway
Leominster (8)	All Other Periods	50 minute headway
	PM Peak-Evening	55 minute headway
Fitchburg (11) – peak service only	AM Peak	30-40 minute headway
	PM Peak	35-45 minute headway
Gardner Main Line 1 & 2 (Separate routes on separate buses headed in opposite direction)	Early Morning (until 7:25) – Route 1 only	38 minute headway
	All Other Periods	65 minute headway
Gardner Route 3 (Express route through the City)	All Periods	15 minute headway

*The Minimum Frequency of Service standards are primarily expressed as “Headways,” which indicate the number of minutes scheduled between stops on a route headed in the same direction.

**This is a combined route that has two anchor stops (Intermodal and Monument Square) and runs on two separate buses. These routes run a single bus early morning then the second bus begins at 8:35AM for the rest of the day circling each other in 1 ½ hour loops with a 45 minute headway in each direction.

***This is a combined route that comes back to the anchor stop (Intermodal Center) at the end of each route. Route 6 is a 30-45 minute loop (depending on time of day) and Route 7 is a 25 minute loop.

Every route that returns to an anchor stop does that, so a consumer does not have to wait the entire headway to transfer to a different route embarking from that anchor stop – i.e. the Intermodal Center.

On heavily used services, the minimum frequency of service levels may not be sufficient to meet customer demand. When load levels indicate that additional service is warranted, as defined in the Vehicle Load Standard, the frequency of service will be increased to provide a sufficient number of vehicles to accommodate passenger demand.

Reliability Service Standards

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

Schedule Adherence

The Schedule Adherence Standard provides an exception to the general rule of minimum and maximum acceptable level. For example, the Span of Service Standard sets the minimum hours of service, and the schedules are built accordingly, so that operation of the service either meets the minimum standard or does not. By contrast, the Schedule Adherence Standard describes the degree of acceptable variability from the published schedules (for evaluation purposes) but does not prescribe the rules of how service is operated. In the field, operators are instructed to adhere to the published schedules as closely as possible (given traffic and road conditions, etc.)—they are not instructed that they have a range of acceptable arrival/departure times.

Schedule Adherence Standards vary by mode and provide the tools for evaluating the on-time performance of individual MART routes. The Schedule Adherence Standards also vary, based on frequency of service; passengers using high-frequency services are generally more interested in regular, even headways than in strict adherence to published timetables, whereas passengers on less frequent services expect arrivals/departures to occur as published.

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

Bus Time Point Tests: To determine whether a bus is on-time at an individual time point, such as the beginning of a route, end of a route or a scheduled point in between, MART uses check points. A route is considered to provide scheduled departure service for any part of the day in which it operates less frequently than one trip every 15 minutes (headway >15 minutes). For scheduled departure services, customers generally time their arrival at bus stops to correspond with the specific scheduled departure times. To be considered on time, a time-point crossing of any trip with a leading headway of 15 minutes or more must meet the relevant condition out of the following:

- **Origin:** The trip must leave its origin time-point between 0 minutes before and 5 minutes after its scheduled departure time.
- **Mid-route:** The trip must leave the mid-route time-point(s) between 0 minutes before and 7 minutes after its scheduled departure time.
- **Destination:** The trip must arrive at its destination time-point between 5 minutes before and 5 minutes after its scheduled arrival time.

The following table lists each of MART's fixed bus routes and their associated three time points:

Table 5: Bus Route Time Points

Route #/Name	Origin Time Point	Mid-Route Time Point	Destination Time Point
1/Circle Line North	Intermodal Center	Food Court	Intermodal Center
2/Main Line - Outbound	Intermodal Center	MART Garage	Monument Square
2/Main Line - Inbound	Monument Square	Erdman Way	Intermodal Center
3/Circle Line South	Intermodal Center	Market Basket	Intermodal Center
4/University	Intermodal Center	Civic Center	Intermodal Center
5/Parkhill Plaza	Intermodal Center	Parkhill Plaza	Intermodal Center
6/Burbank-FHS	Intermodal Center	Fitchburg High	Intermodal Center
7/John Fitch-Lunenburg	Intermodal Center	Lunenburg Crossing	Intermodal Center
8/Whitney-Orchard Hill	Monument Square	Target	Intermodal Center
9/Jytek-Walmart	Monument Square	Walmart	Intermodal Center
11/Waites Corner-Great Wolf Lodge	Intermodal Center	Great Wolf Lodge	Intermodal Center
G1/Gardner Rte. 1	City Hall	Dunn Pond	City Hall
G2/Gardner Rte. 2	City Hall	Timpany Plaza	City Hall
G3/Gardner Rte. 3	Heywood Hospital	Walmart	Heywood Hospital
IC/Intercity-MWCC	MART Facility	Intermodal Center	MART Facility
AL/Athol Link – W	Gardner City Hall	Market Basket	MART Depot/YMCA
AL/Athol Link – E	MART Depot/YMCA	Market Basket	Gardner City Hall
WL/Winchendon Link – N	Gardner City Hall	Lake Dennison	Winchendon Town Hall
WL/Winchendon Link – S	Winch. Town Hall	Baldwinville	Gardner City Hall

Bus Route Test: The second part of the Bus Schedule Adherence Standard determines whether a route is on time, based on the proportion of time-points on the route that are on time over the entire service day. 75% of all time-points on the route over the entire service day must pass their on-time tests.

Table 6: Summary of Bus Schedule Adherence Standard

Time Point Test	Origin Time Point	Mid-Route Time Point(s)	Destination
Scheduled Departure Trips (Headways ≥ 10 minutes):	Start 0 minutes early to 5 minutes late	Depart 0 minutes early to 7 minutes late	Arrive 5 minutes early to 5 minutes late
Route Test	For any given bus route to be in compliance with the Schedule Adherence Standard, 75% of all time points must be on-time according to the above definitions over the service period measured.		

Exception: A schedule may note that certain trips will not leave until another vehicle arrives and allows passengers to transfer. (For instance, the last trip of the Inter-City Bus might wait for passengers from the Commuter Rail (MBTA).) When applying the standard, these trips are not included.

Para-transit Schedule Adherence Standards: The Schedule Adherence Standards for demand response runs vary by program and trip purpose. A client who is going to a medical appointment, work or school must arrive at their destination on time. Sponsored clients who come from a human-services program or daycare center must be picked up on time. Therefore, the standards are set by trip type. There are two main classes of trips: 1) Dial-A-Ride which includes ADA, JARC, Sub Service, Veterans and COA trips; and (2) Dial-A-MART which is the sponsored trips. Each class has its own set of rules with guidelines pertaining to specific trip types. The following is a table which breaks down the types and their associated standards.

Table 7: Demand Response Adherence Standards

Class	Rule	Guideline	Comments
Dial-A-Ride	20-minute window from scheduled pickup time	If there is a set Appointment Time, then a backwards calculation is made based on travel time needed + window	Same rule applies for all trip types except for COA trips not performed by one of MART's operating companies.
Dial-A-MART	No schedule deviation allowed	Each client has a set pickup time. Driver must report to dispatch any route delays.	Sponsor program rules set the time thresholds.

Safety Service Standards

The public's perception of comfort and the reality of public safety are influenced by the number of passengers on the vehicle and whether a seat is available to each rider for all or most of the trip. The Vehicle Load Standards, which vary by mode and time of day, establish the average maximum number of passengers allowed per vehicle to provide a safe and comfortable ride.

Vehicle Load

As indicated in the Frequency of Service Standard, the level of service provided by MART is primarily a function of demand, as demonstrated through the number of customers using the service at different times during the day. On weekends and during most weekday time periods, MART services operate with sufficient frequency to provide every passenger with a seat. However, at the heaviest weekday travel times or locations some passengers may need to stand. During time periods when some passengers will be standing, MART will provide sufficient service so that vehicles are not excessively crowded. The purpose of the Vehicle Load Standard is to define the levels of crowding that are acceptable by mode and time period. The time periods used by MART for all modes, for both the Frequency of Service and Vehicle Load Standards, are defined earlier see Frequency of Service Standards.

The load standards in the following table are expressed as a ratio of the number of passengers on the vehicle to the number of seats on the vehicle. To determine whether a service has an acceptable level of crowding, the vehicle loads are averaged over specified periods of time.

Table 8: Vehicle Load Standards (Transit Bus Only)

Time Period	Passengers/Seats
AM Peak & PM Peak	140%
All Other Periods	100%

In addition to looking at loads within time periods, MART will routinely evaluate loads at the beginning and end of the service day to determine whether changes in frequency and/or span of service are warranted. Because there are several different types of vehicles in MART's fleet at any given time, and because the fleet changes over time, the actual seating capacity and maximum number of passengers allowed by the load standards for each type of vehicle are included below in table 9. This table will be regularly updated as the fleet changes.

Table 9: Load Standards by Vehicle Type

Bus Model	Fleet ID	Number of Seats	Peak Load Standard	Peak Max Load
Gillig Low Floor	4122&4124	32	140%	44
Gillig Low Floor Coach	4140	43	140%	60
Gillig Low Floor	4141-4145	32	140%	44
New Flyer XDE Hybrid	4150-4151	31	140%	43
Gillig Low Floor	4160-4161	26	140%	36
Alexander Dennis E200	4170-4171	24	140%	33
Gillig Low Floor	4180-4182	26	140%	36
Gillig Low Floor	4183-4184	32	140%	44

In addition to the above heavy duty transit buses MART also uses cutaway-style mini-buses that run on lower performing and/or shuttle type routes. These vehicles have no standing capacity so these vehicles will always be at 100% of seat capacity. The vehicles currently used in this capacity and the number of seats is listed in table 10 below. This table will be regularly updated as the fleet changes.

Table 10: Load Standard by Vehicle Type

Bus Model	Fleet ID	Number of Seats
Elkhart Coach ECII 270"	2388, 2391	12
Coach & Equipment Phoenix E2	2450, 2455-2456, 2458-2459	11
Coach & Equipment Phoenix D	3160-3161	18
Elkhart Coach ECII 300"	3170-3171	16
Arboc Spirit of Mobility –CLSD	5010-5011, 5020-5027	14
Arboc Spirit of Mobility-CLSB	5030-5037	22

Cost-Effectiveness Service Standards

The operation of MART service must be conducted within the resource levels budgeted for each mode. It is therefore important to have a measure that can compare the economic productivity of any given route in relation to other routes or to the system average for that mode. The Bus Net Cost per Passenger Standard is copied from a standard set by the MBTA. It is calculated by subtracting the average revenue from the cost of operating a route and dividing it by the number of passengers. This ratio reflects the benefits of a given service (measured in customers) against the public cost of operating the service.

During the regular service planning process, all bus routes and their respective net cost per passenger are compared against the bus system average. Routes that have a net cost per passenger more than three times the system average are considered deficient and are subject to review for modifications that could improve the performance. Exceptions to the net cost per passenger standard can be made, on a case-by-case basis, due to extenuating circumstances such as geographic isolation.

III. Service Policies

Transit Amenities

MART's transit amenities for the public include an Intermodal Center in Downtown Fitchburg where passengers can use bus service, shuttle service, MBTA Commuter Rail service, taxi service and other amenities such as food retailers and public bathrooms. The Intermodal contains a concourse with bench seating where passengers can wait indoors, out of the elements, for the bus or train. The Intermodal Center also houses a four-level parking garage (with two elevators), an outdoor lot, and a kiss-and-ride drop-off site for Commuter Rail passengers. MART also has a multi-level parking garage (with elevator) with bus service and a drop-off site at the North Leominster MBTA Commuter Rail Station, a park-and-ride lot with bus service and a drop-off site at the Wachusett Commuter Rail Station and a park -and-ride lot with a kiss-and-ride at the Ayer Commuter Rail Station.

MART has approximately 25 bus shelters throughout the three cities where fixed route bus service is provided. MART has also added 7 new bus shelters in the Town of Athol. In the coming years MART is looking to add 18 more within the three cities. The bus shelters are often sited at locations central to an activity center such as a hospital or shopping plaza near where the bus turning point is not close to shelter naturally provided by the center itself. There are also shelters on two sides of Monument Square Park in Leominster which is the main transfer point (anchor stop) in that city. Various other shelters are sited around the cities at the request of city officials or public demand to city officials. The shelters have been retrofitted with solar lights for lighting on early winter nights and added security. The shelters have been retrofitted with display boxes that house schedules, route map, and public notices.

Route maps and schedules are available in any fixed route bus, at the Ticket Agency in the Intermodal Center and in any MART Administrative or Maintenance facility, as well as MART's website. Other vital documents are also available at these MART facilities. MART bus routes are configured to pass by, or very close to, every MART facility so the public has access.

Vehicle Assignment Policy

MART's bus fleet varies in age and capacity. It is MART's policy that the newest vehicles in the fleet will be used for all major routes. In cases where the newest vehicle is not available due to mechanical failure or preventative maintenance, then the next oldest vehicle shall be used. If the seating capacity of the vehicle is less than the vehicle being replaced, then the route with the least demand will get a lower capacity vehicle. Bus Routes with the highest frequency of service and vehicle load factors will utilize the most reliable high-capacity vehicles.—Low performing routes in low density areas are assigned cutaway style vehicles for cost efficiency.

MART's demand response fleet also varies in age and capacity. The multiple types of services, which MART performs including ADA, are spread throughout the fleet by driver assigned work bid on by the driver. Senior drivers and agency trips get the newest vehicles, but the older vehicles are used for backup. COA vans are distributed based upon ridership levels.

Transit Security Policy

MART has implemented security cameras in each of its four administrative/maintenance and four park-and-ride facilities. These cameras are monitored by Security personnel 24-7-365, and the footage burns to DVR 24 hours a day. MART also employs a Head of Security who supervises three shifts of security guards to provide safe surroundings for MART properties and community members and passengers at the Intermodal Transportation Center. These guards make rounds and upload checkpoint data to a server at MART headquarters. They also protect staff that collect funds from the parking pay stations at the park-and-ride facilities.

All MART revenue vehicles are also equipped with video cameras which record on an internal recording device on the vehicle. Footage can be downloaded if an incident needs to be reviewed. MART and its Operating Company assert that consumer safety is the first priority. MART's operating company has set policies for handling emergencies on the vehicles, and for dealing with customers who may be a danger to others. A copy of their "Rules and Regulations for Employees" may be obtained if requested.

Efficiency of Service Policy

MART has spent a great deal of time and money in automating its transit services with Intelligent Transportation Systems (ITS) such as an Automated Scheduling & Dispatching system, Automatic Vehicle Locators (AVL) with electronic manifests, automated stop annunciation systems, and automated fare collection (AFC) devices. MART has instituted these systems to promote efficient use of resources and to improve consumer quality of service, as well as capture service indicators with better accuracy.

Automated Scheduling & Dispatching

This system is in place to aid the schedulers in creating routing options for demand response trips, as well as create fixed route manifests for the automated stop annunciation system. These routing options should calculate for minimal drive time and maximum vehicle load. The Dispatching module allows electronic transactions for manifest add-ons, cancellations and no-shows, as well as message communication to/from the drivers.

Automated Vehicle Location

Every vehicle (fixed route and Para-transit) has an AVL device which allows dispatch and the consumers to know (once a minute) its location. The dispatch center has software that visually displays the locations of all the vehicles. MART's website is equipped with a version of this software so that a consumer leaving a location with internet access can see when the bus will be closed.

These AVL devices are also equipped with electronic driver manifests. Fixed route buses are automatically arrived and performed when the bus's GPS device enters a perimeter zone of the scheduled stop and makes the announcement of approaching. Para-transit drivers must manually arrive and performs stops as they are made. These functions allow electronically captured timestamps as indicators of schedule performance.

Automated Vehicle Location

MART has implemented an Automated Passenger Counting System (APC) in all the fixed route vehicles. The goal is to utilize the capability of the system to understand where and when all passengers board on and off the vehicle. This information will be utilized to help design the bus stop locations, bus stop sign locations to better communicate to the ridership the safest and most efficient pickup points on any of MARTS fixed routes. The data available will also be able to let ridership know where the fixed route vehicle is and how far it is from the stop, announce verbally as to where the fixed route vehicle is and have visual announcement for the ridership to use the service with ease, comfort, and confidence.

Automated Fare Collection

MART's fixed route buses and shuttle vans are equipped with Genfare Fare Collection equipment. The Genfare Fare Collections systems also includes MART on the go, a mobile application for fare payment. MART also has 2 ticket vending machines at the Intermodal Center in Fitchburg and will be placing more throughout the service area in the coming years.

IV. Service Planning Process

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

Bus Service Planning Process

The bus service planning process is the on-going evaluation and implementation of incremental service changes. The data used for all service evaluations are collected on a periodic basis through various means to track and evaluate the performance of services against each of the Service Standards (as defined in Section II). There is also a longer-term planning process which is conducted through the Montachusett Metropolitan Planning Organization (MMPO), which MART considers in making potential changes.

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

Major changes are ones that will have a significant effect on riders, resource requirements, route structure, or service delivery (as defined in Table 8). These are evaluated through the MMPO Transportation Planning Process, (except for new services associated with a major capital investment), and only implemented after Public Participation through publicly held meetings.

Table 11: Minor & Major Service Changes

Magnitude:	Type:	Resource Implications:
Minor	<ul style="list-style-type: none"> • Running time adjustments • Departure time adjustments • Headway changes to match ridership and service levels (provided the frequency and loading standards are still met) • Changes to bus stop locations • Alignment changes • Span of service changes within 1 hour or less • Route extensions of 1 mile or less • Route variation modifications 	Changes that can be implemented with existing equipment and within the adopted budget
Major	<ul style="list-style-type: none"> • Major Service restructuring • Implementation of new routes or services • Elimination of a route or service • Elimination of part of a route • Span of service changes greater than 1 hour • Any change to the fare structure 	Changes that will have a significant effect on resources and may potentially have a significant effect on riders

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

- service requests and/or complaints from the public;
- feedback from staff within MART's Operating Company, such as drivers, garage superintendents, or schedule makers;
- proposals made by MART Operations staff;
- studies completed by MRPC (for MMPO), by other regional entities, or by municipalities

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

- Performance measured against the Service Standards
- The rationale for the change
- Net cost per new passenger
- Net savings per lost passenger
- Changes in ridership
- Changes in travel time for existing riders
- Changes in operating costs
- Changes in fare revenue
- Key characteristics and demographics of the market
- Contribution to the achievement of external mandates, such as Title VI
- Other factors, as appropriate

Evaluate Service Changes Process

If Major Service changes are proposed, MART will evaluate these changes to ensure that the effects of these changes will be equitable to the consumers who utilize said services.

The following criteria will be analyzed in the following manner:

- Assess route changes for effects on minority and low-income populations by comparing old route maps with new proposed routes overlaying demographic map;
- Assess span of service changes for effects on work/school schedules of affected population;
- Assess fare changes for effects on minority and low-income populations;
- Assess the alternatives available for populations affected by the proposed changes;
- Describe actions MART will take to minimize these effects;
- Analyze if the proposed changes are disproportional to minority and low-income consumers.

Public Participation

Public participation will promote a regular dialogue with existing and potential riders, elected officials, and communities regarding their ever-changing service needs. This is the key to successful analysis of the proposed service changes.

MART provides avenues for on-going communication through its website, as well as the customer complaints phone line and comments sent to individual MART officials. Service-related comments/ requests are directed to the appropriate department for consideration and response. Upon request, MART staff will also attend public meetings held by municipalities and meetings with public officials to address specific service issues. In addition, from time to time, MART may conduct specific market or route-based surveys to gather direct input on a major service change or potential new service.

Service Plan outreach efforts are intended to provide members of the public with the opportunity to submit service requests to MART for consideration in development of transit plans. To this end MART, in conjunction with MMPO, solicits ideas for service changes through written comments (submitted on-line or via the mail), as well as through public meetings throughout the service area before a draft plan is written.

Once a proposed service change has been formalized a notification of public hearing for comments is posted and is open for all to attend. All public notifications, meetings, and hearings will conform to the requirements of the Americans with Disabilities Act, Title VI of the Civil Rights Act of 1964, and MART policies associated with these laws.

Public Hearing Procedures

MART's public meeting process to discuss fare increases and major service reductions will incorporate the following considerations:

- Meetings will be held in locations that are accessible by MART's fixed route bus service. ADA Para-transit service will be available as well;
- Meetings will be held after business hours to accommodate the working public;
- Due to COVID-19 restrictions virtual meetings will be held until further notice – this may actually allow for greater participation since transportation is not a barrier;

- Meetings will be publicized in the local newspapers and public access television serving the communities 48 hours in advance of the meeting. MART will also post the notice on its website and in MART's bus station and customer service facilities;
- LEP, elderly, and disabled community partners will be informed directly and asked to encourage their members to attend the meetings;
- The elected official representing the MART community (and MART's Advisory board) where the public meeting is hosted will be encouraged to attend;
- Spanish translators will attend all public hearings to accommodate MART's limited English population. All posted notices will also be translated into Spanish;
- Visualization techniques will be used to describe the meeting content;
- Information presented at the public meetings shall be made available in electronically accessible formats on MART's website;
- A comment period of two weeks after the public meeting shall be available for submission of public input on the presented information.

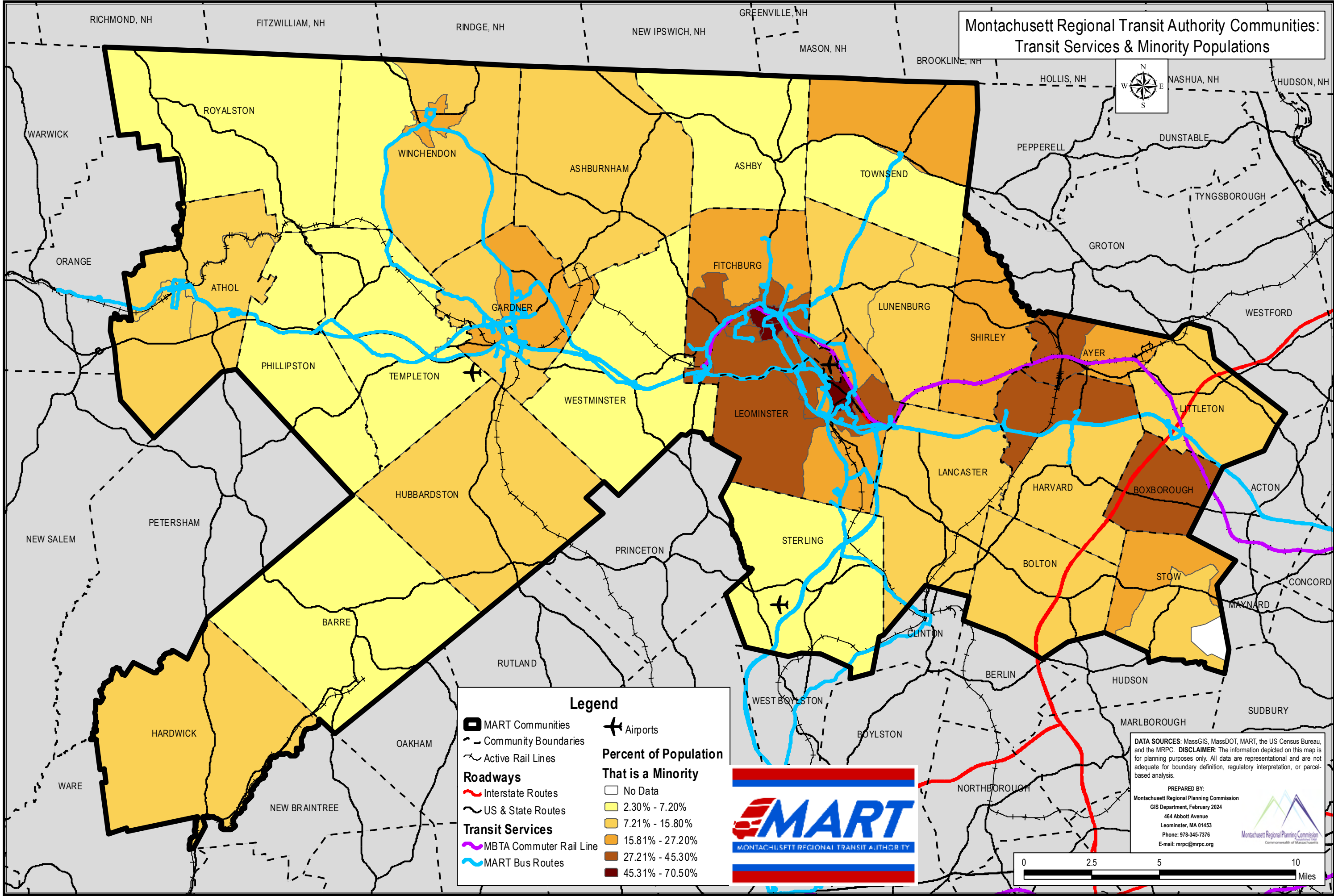
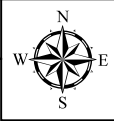
All information gleaned from the public meeting process will be reviewed by MART Management for merit, environmental justice, and efficient transit service. Final configurations of the service shall be presented to the MART Advisory Board for resolution to implement.

Appendix F

Map 1: Minority Populations in all Member Communities with all Fixed Routes and Buffer Zones

Map 2: Poverty Level in all Member Communities with all Fixed Routes and Buffer Zones

Montachusett Regional Transit Authority Communities: Transit Services & Minority Populations



Legend

- MART Communities
- Community Boundaries
- Active Rail Lines
- Interstate Routes
- US & State Routes
- MBTA Commuter Rail Line
- MART Bus Routes
- Airports

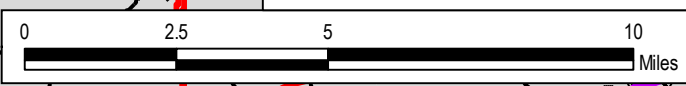
Percent of Population That is a Minority

- No Data
- 2.30% - 7.20%
- 7.21% - 15.80%
- 15.81% - 27.20%
- 27.21% - 45.30%
- 45.31% - 70.50%

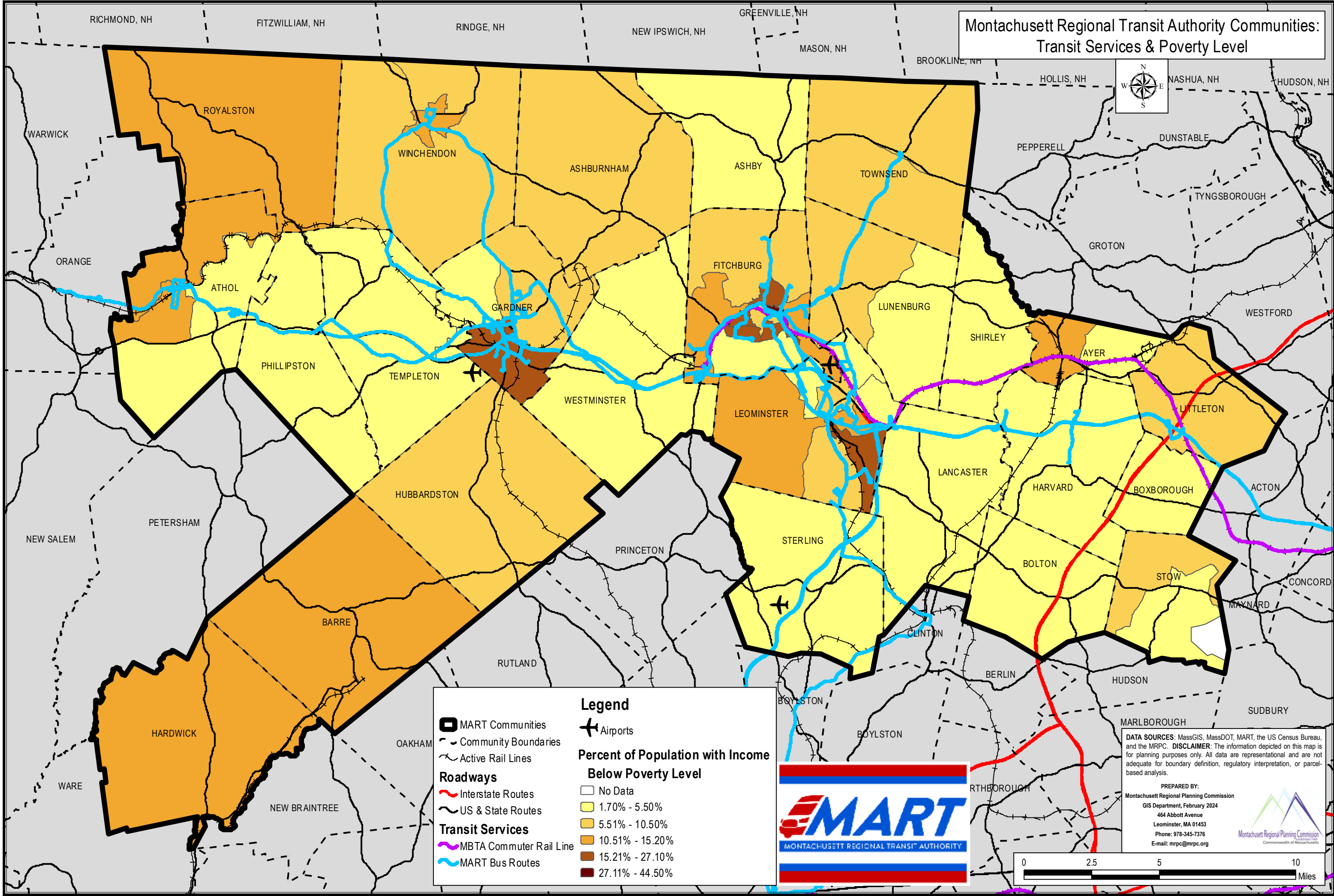
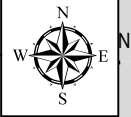


DATA SOURCES: MassGIS, MassDOT, MART, the US Census Bureau, and the MRPC. **DISCLAIMER:** The information depicted on this map is for planning purposes only. All data are representational and are not adequate for boundary definition, regulatory interpretation, or parcel-based analysis.

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Montachusett Regional Transit Authority Communities: Transit Services & Poverty Level



Legend

- MART Communities
- Community Boundaries
- Active Rail Lines
- Roadways**
- Interstate Routes
- US & State Routes
- Transit Services**
- MBTA Commuter Rail Line
- MART Bus Routes
- Airports

Percent of Population with Income Below Poverty Level

- No Data
- 1.70% - 5.50%
- 5.51% - 10.50%
- 10.51% - 15.20%
- 15.21% - 27.10%
- 27.11% - 44.50%



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