



TITLE VI PROGRAM

Montachusett Regional Transit Authority
Fitchburg, MA

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Version History

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2.0	2/16/12	Updates	B. Mahoney
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Introduction

The Montachusett Regional Transit Authority, (hereafter referred to as MART), is responsible for public transit services in twenty-two (22) 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 a part of the 22 member communities. MART is committed to providing the best service, through a broad range of programs, which meets the needs of the entire population of our member communities regardless of race, color, national origin, age or disability. MART serves a broad and diverse community of almost 229,000 people in both small-urban and rural areas.

FTA's new Title VI Circular 4702.1B, released in October 2012, changes MART's Title VI Program significantly because MART is no longer required to perform certain tasks that were required under the previous circular (4702.1A). The change is prompted by the fact that although MART's total service area population surpasses 200,000, we do not operate 50 or more fixed route vehicles. However since demographic and service profile maps are easy enough to update with census data, MART has provided updated maps in Appendix F.

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, 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. The Montachusett Regional Transit Authority (MART) fully complies with Title VI, and related statutes and regulations, in performing all services, programs and activities. MART operates without regard to race, color, national origin, gender, age, or disability. A "Notice of Public Protection Against Discrimination" has been made available to the general public in English and in Spanish. A copy of the notice 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 @ 100 Main St, Fitchburg, MA
- MART Office Lobby @ 1427R Water St, Fitchburg, MA
- Dispatch/Ticket Window @ 555 Main Street, Gardner, MA
- MART's website at <http://www.mrta.us/AntiDiscrimination.html>
- MART public transportation vehicles
- MART bus shelters

II. Complaint Procedures

Any person who believes he/she has been subjected to an unlawful discrimination practice as defined under Title VI may by him/herself, or by a representative, file a written complaint form with 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 complete copy of the Complaint Form is provided in Appendix B. This form, along with the full complaint procedures, has been translated into Spanish. These forms can be obtained at any MART Office or in accessible PDF format on our website.

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 our 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 our 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. MART is glad to report that there have been no investigations or lawsuits filed against MART.

MART did receive one complaint about language assistance which came to us through the Massachusetts DOT's Civil Rights Office. The client in question does not live in MART's fixed route bus service area and is a MassHealth client, for which MART is a broker of HST transportation for 73% of the state. The client's complaint was that the automated phone system did not have a Portuguese menu and that her English was not strong enough to get to an operator who could have used the language line to assist the client. MART does not have the resources to put an automated menu in more languages than the 3 it already has, nor does the Portuguese speaking population warrant such an investment. Steps were taken in conjunction with the HST Office and the client's doctor to assist her in the future. However, MART has changed our brokerage call phone menu to add a simple "NO ENGLISH" prompt which will take the LEP client to a special queue where the agent will know that the incoming call requires the language assistance line.

IV. Promoting Public Involvement

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 any potential service changes. MART provides avenues for on-going communication through our 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 our MPO, 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 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 MPO has its own Title VI and LEP program and all public meeting notifications are translated into Spanish.

Public Outreach Activities

1. 2012 Monitoring Survey

The survey was conducted over two typical service days along all our routes and shuttle lines. Over 500 surveys were passed out and 297 surveys were returned. The survey was translated into Spanish as well to meet the needs of our LEP population. 24 respondents chose to leave the section on race/language blank. 46 respondents noted that they spoke English less than very well. 185 ranked the service as good, 70 as fair, 13 as poor, and 24 left than question blank. The respondents who marked 'Poor' spoke English very well, except for two Caucasian individuals and their primary language was not indicated.

2. 2013-14 Summer/Winter Transit Passenger Surveys

The Montachusett Regional Planning Commission (MRPC) often performs surveys for MART as a joint effort for various planning documents to improve and maintain bus service. MRPC conducted a 24 question bus survey in the summer of 2013 and the winter of 2014. Almost 1500 people were surveyed between both sessions. The surveys were done in English and Spanish. The questions ranged from “How did you get to the bus stop?” to personal identifiers such as age, gender, race/ethnic origin, household income, as well as rating the bus service. For purposes of this program MART focused on the personal identifiers and found the majority of those who answered the survey fell along the poverty level margins, worked part-time or not at all, were Caucasian, and spoke English very well. 65% of the respondents rated the service as “Good.”

3. 2015 Regional Transit Plan public meetings on Transit

Two public meetings were both held on February 18, 2015 and conducted by the MPO for the transit section of the Regional Transit Plan. Feedback from the afternoon session of the RTP meetings was focused on better information dissemination and travel training to consumers in terms of MART’s fixed route services and other programs. Comments from the night session also mentioned better information on buses, but the majority of the comments focused on enhancing and expanding the route between Mount Wachusett Community College and Fitchburg State University as well as expanded bus or JARC hours between 9 and 10pm.

4. 2015 LEP needs assessment at the Cleghorn Neighborhood Center

MART’s Director of Operations met with the Lead Organizer of the United Neighbors of Fitchburg, Inc. and some citizens at the Cleghorn Neighborhood Center in Fitchburg on March 20, 2015 to discuss MART’s fixed route system. The purpose of the meeting was to see if MART and our system were meeting the needs of this low-income, high minority, and high LEP population area. The results of the meeting are that they are happy with the level of language assistance and the translated documentation, as well as MART’s Para-transit services. All MART translated documents were brought to the meeting to have at the Center for the citizens. The concern with MART’s “big-bus” system is that the frequency is not often enough and does not run late enough in the evening (which is a system-wide concern). The route that runs through their neighborhood is also often running very late in the afternoon (morning is fine). It was explained to them that when the bus is late, a van will be run to help the bus “catch-up.” Their response was that they didn’t know and that MART should find a way to inform the consumers of the “big-bus” delay and the addition of the van. We also discussed the CharlieCard™ system. They were aware that MART had the card for passes but were not familiar with the concept of “stored-value.” They were excited to realize that it was like cash, could be used on other RTA systems, and that it created an automatic transfer on the card. Asking the driver for a transfer is sometimes an issue with language.

V. Limited English Proficiency (LEP)

A key factor in meeting the goal of equal service for everyone is the ability of our consumers to understand all the services which 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 directs the composition of the Advisory Board. The Advisory Board is to be made up of elected 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 his behalf. Since MART’s Advisory Board is the only decision-making body governing us, and is composed of only elected officials; MART has not enclosed 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 31, 2015. The presentation included a discussion on the changes to MART’s program due to changes in the Circular, as well as the public outreach efforts made since the last program update. 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 as appropriate which MART has chosen to do. A complete copy of “MART Service Standards and Transit Policies” is included in Appendix E.

Appendix A

Notice of Public Protection against Discrimination

The Montachusett Regional Transit Authority (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, national origin, gender, age, or disability. Any person who believes he/she has 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 visit our website at www.mrta.us. You may also visit our main office at 1427R Water Street or 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 (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, origen nacional, género, edad o discapacidad. 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 visite nuestro 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.

LIMITED ENGLISH PROFICIENCY (LEP) ACCESS PLAN

LEP Section of Title VI Program
for the
Montachusett Regional Transit Authority

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

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I. Introduction

The Montachusett Regional Transit Authority, (hereafter referred to as MART), is committed to providing the best service, through a broad range of programs, that meets the needs of all the members of our communities regardless of race, color, national origin, age or disability. As a public transit agency, MART serves a broad and diverse community. A key factor, in meeting the goal of equal service for everyone, is the ability of our consumers to understand all the services which MART has to offer. To accomplish this MART has established a plan to provide understanding and access to those potential consumers who may have limited proficiency in the English language.

Legal Basis for Language Assistance Requirements

LEP legislation comes directly out of the civil rights movement:

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 4702.1A —Title VI and Title VI Dependent Guidelines for FTA Recipients|| on April 13, 2007, 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 a useful LEP Access Plan, MART conducted a LEP needs assessment 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 another language other than English at home and does not speak English well or not at all.” MART, in our analysis included all persons who speak English “less than very well.” It should be noted that since our last submission MART has added a new member community. This analysis of the 2010 U.S. Census (2013 ACS 5 Year Estimate) data showed that LEP populations represent only 4.84 percent of the total MART service area. 13.96% of the total population in our service area speaks a language other than English at home; the largest group is the Spanish-speakers (48%), followed distantly by French (16%), Portuguese (6%), and Chinese (4%). The data as compared to the 2009 ACS 5 Year Estimate data analyzed for our previous Title VI program submission shows an increase in Spanish and a slight

decrease in French and Portuguese. The Portuguese LEP population slipped below the 1000 person safe harbor threshold. The data set is using ACS 5-Year estimates so MART is going to assume an error in this calculation and keep our previous Portuguese identifier as active. These percentages are based on language spoken at home and not their ability to speak English. Two groups have a LEP population that surpassed the 5% or 1000 people safe-harbor threshold – Spanish and French (all dialects) speakers.

Analysis showed that most of the urban LEP populations located themselves along well-served transit corridors. Spanish-speakers were concentrated in the Fitchburg/Leominster area, while other languages were more wide spread 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 front-line and other 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 2010 Census Bureau Dataset B16001 “Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over” – 2013 ACS 5-Year Estimate, MART was able to get a sample population of 219,342 persons in MART’s 22 member communities. Of these persons 30,616 speak a language other than English at home, which is 13.96% of the sample data population. Of these persons 10,626 (4.84%) speak English less than “very well.” 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 in languages other than Spanish.

- ✓ Spanish: 5,349 or 50.34% of Total LEP Population
- ✓ Other Indo-European: 2,970 or 27.95% of Total LEP Population
 - French & French Creole: 1251 or 11.77% of Total LEP Population
 - Portuguese: 829 or 7.80% of Total LEP Population

Spanish is the only language of the LEP population which meets the guidance thresholds for MART’s vital documents to warrant translation. French alone does not meet the threshold but combined with French Creole does surpass 1000 people – further evaluation will be done to determine if vital documents need to be translated into French. A Language Assistance Notification flyer will be translated into Spanish, French and Portuguese to reach all LEP consumers.

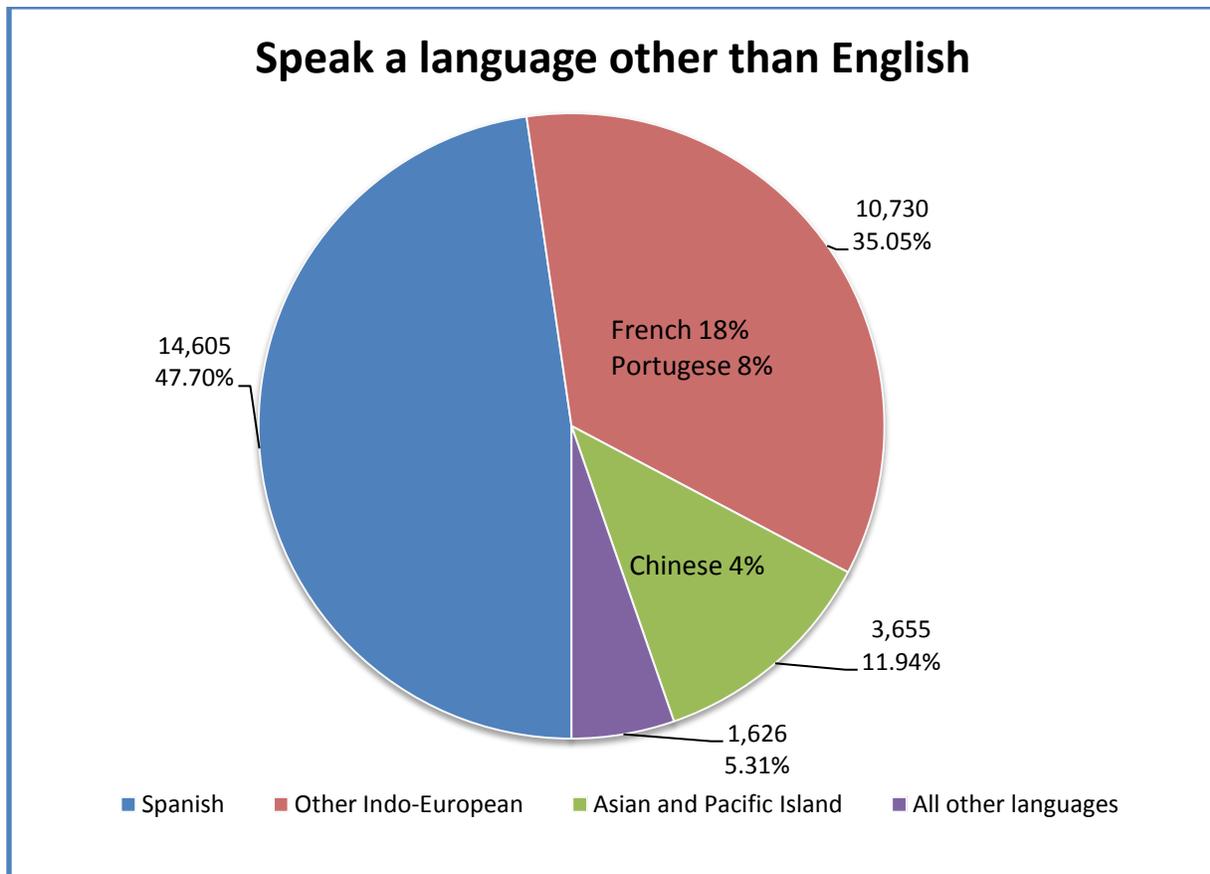


Figure 1

Note 1: Level of English proficiency is not a factor of this graph

Note 2: % of individual languages shown is for total alternate language population – not subset group

POPULATION BY LANGUAGE SPOKEN AT HOME AND ABILITY TO SPEAK ENGLISH (2013 ACS 5 Year Estimated Data)			
Population 5 years and over	219,342	100.00%	
Speak only English	188,726	86.04%	
Speak a language other than English	30,616	13.96%	
Spanish			
Speak English “very well”	9,256	63.38%	4.22%
Speak English “less than very well”	5,349	36.62%	2.44%
Other Indo-European languages			
Speak English “very well”	7,760	72.32%	3.54%
Speak English “less than very well”	2,970	27.68%	1.35%
Other Indo-European Languages over or close to Safe Harbor Threshold			
French incl. Patois, Cajun & French Creole	4,838	45.09%	2.21%
Speak English “very well”	3,587	33.43%	1.64%
Speak English “less than very well”	1,251	11.66%	0.57%
Portuguese or Portuguese Creole	1,918	17.88%	0.87%
Speak English “very well”	1,089	10.15%	0.50%
Speak English “less than very well”	829	7.73%	0.38%
Asian and Pacific Island languages			
Speak English “very well”	1,879	51.41%	0.86%
Speak English “less than very well”	1,776	48.59%	0.81%
Asian/Pacific Island Languages close to Safe Harbor Threshold			
Chinese	1,207	33.02%	0.55%
Speak English “very well”	697	19.07%	0.32%
Speak English “less than very well”	510	13.95%	0.23%
All other languages			
Speak English “very well”	1,626	128.84%	0.74%
Speak English “less than very well”	1,095	86.77%	0.50%
	531	42.08%	0.24%

TABLE 1- LANGUAGE GROUPS BY PROFICIENCY

POPULATION 5 YRS & OVER BY LANGUAGE SPOKEN AT HOME & ABILITY TO SPEAK ENGLISH		
Population 5 years and over	219,342	100.00%
Speak only English	188,726	86.04%
Speak a language other than English	30,616	13.96%
Spanish	14,605	6.66%
Speak English “very well”	9,256	4.22%
Speak English less than very well	5,349	2.44%
Other Indo-European languages	10,730	4.89%
Speak English “very well”	7,760	3.54%
Speak English less than very well	2,970	1.35%
Language Breakdown		
French incl. Patois, Cajun	3,889	1.77%

French Creole	949	0.43%
Italian	845	0.39%
Portuguese or Portuguese Creole	1,918	0.87%
German	616	0.28%
Yiddish	2	0.00%
Other West Germanic lang.	122	0.06%
Scandinavian	140	0.06%
Greek	514	0.23%
Russian	363	0.17%
Polish	131	0.06%
Serbo-Croatian	33	0.02%
Other Slavic	35	0.02%
Armenian	69	0.03%
Persian	174	0.08%
Gujarati	46	0.02%
Hindi	34	0.02%
Urdu	192	0.09%
Other Indic	230	0.10%
Other Indo-European	114	0.05%
Asian and Pacific Island languages	3,655	1.67%
Speak English “very well”	1,879	0.86%
Speak English less than very well	1,776	0.81%
<i>Language Breakdown</i>		
Chinese	1,207	0.55%
Japanese	208	0.09%
Korean	322	0.15%
Mon-Khmer, Cambodian	47	0.02%
Hmong	248	0.11%
Thai	40	0.02%
Laotian	325	0.15%
Vietnamese	411	0.19%
Other Asian	434	0.20%
Tagalog	371	0.17%
Other Pacific Island	42	0.02%
All other languages	1,626	0.74%
Speak English “very well”	1,095	0.50%
Speak English less than very well	531	0.24%
<i>Language Breakdown</i>		
Navajo	0	0.00%
Other Native North American	98	0.04%
Hungarian	41	0.02%
Arabic	213	0.10%
Hebrew	93	0.04%
African	845	0.39%
Other and unspecified	336	0.15%

TABLE 2- BREAKDOWN OF ALTERNATE LANGUAGES SPOKEN

Note 1: Level of English proficiency is not part of this Language Breakdown

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

Once the LEP population was identified under the first factor, MART had to determine with what frequency MART came into contact with LEP consumers. To accomplish this MART interviewed customer service staff, dispatchers, bus drivers, ticket agency staff, and security personnel. The general consensus was that the largest LEP population encountered spoke Spanish. Spanish speaking individuals use our services on a daily basis and call for information throughout the day. This LEP population often needs language assistance services. This reinforces the need for Spanish speaking staff members in front-line positions. 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 our 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.

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

Fixed Route Services:

The majority of MART's consumers ride, and most noticeable to the general public in our urban areas where the LEP population resides, is MART's fixed route buses. Community organizations, such as the Cleghorn Neighborhood Center, have expressed the need for translation of fixed route schedules for the Spanish population in their area, where our fixed route services run. Translating documents which inform MART's consumers of how to ride the fixed route buses is of vital importance. The vital instructions are published on our schedules and are translated.

Para-transit Services:

Critical to the disabled and elderly population in all of MART's member communities, not just the urban areas, is MART's ADA and COA services on the Para-transit vans. ADA services are meant for consumers who cannot, due to a physical limitation, ride MART's fixed route buses. ADA clients must fill-out, and have approved, an application to avail these services. Once approved there are specific instructions on how to use these services. Translating documents related to the ADA process are vitally important. MART also has subscription and JARC services available to the general 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 our emergency evacuation. MART has one transit bus station. This station is manned by our transit security force who personally escorts consumers from the station in the 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 can speak to any LEP consumers who may be at the bus station.

Brokerage Services:

MART is the broker for 73% 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 related 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
Bi-lingual 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 our 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 Director of Operations, 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 all new personnel are trained on the LEP Program as part of their orientation and transit training.

3. MART maintains an on-going contract to utilize the resources of the Transit Project Manager of our regional planning commission (MRPC). MART will use this resource to organize the LEP surveys, just as they conduct MART's other transit surveys and resulting analyses.

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

- Continue the practice of hiring bi-lingual staff in positions that come in frequent contact with LEP consumers.
- Utilize bi-lingual staff to translate vital documents.
- Utilize Neighborhood Community Organizations to translate vital documents and perform LEP surveys with their clientele.
- Utilize interns and bi-lingual 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 French Canadian and an even 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: Bi-lingual staff members who speak Russian are available for our brokerage clients only.

Language Assistance Measures

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

Staff:

Bi-lingual administrative staff has been placed in positions that come into frequent contact with LEP individuals. Staff persons that only speak English can transfer to or call upon bi-lingual staff for assistance. A high percentage of bi-lingual drivers are employed by our operating company for our buses and Para-transit vans. Drivers that only speak English have protocols they can use to provide language assistance. All employees are/will be 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. 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
- Elderly/Disabled (Pink) ID Card Application
- Subscription Services brochure
- JARC Services brochure
- Title VI Discrimination Complaint Procedures & Form

Language Assistance Protocols:

Scenario 1: LEP Individual Calls Customer Service Line

- a) Bi-lingual staff answers the call and helps client without incident
- b) English only staff answers the call and transfers call to bi-lingual staff without incident
- c) Bi-lingual 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) 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.

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

- a) Bi-lingual staff is present to help the client without incident
- b) English only staff greets customer and must wait for bi-lingual staff to be available at reception counter.
- c) English only staff greets customer and no bi-lingual staff are available or the bi-lingual staff does not speak the customer's language:
 1. Present *I Speak Card* to identify language of individual in need
 2. Staff member calls language line over the speaker phone

Scenario 3: LEP Individual Sends Written Correspondence

- a) Give written request to bi-lingual 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 bi-lingual 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 he/she is familiar with MART's transportation terms
2. Inform the translator that he/she should not deviate into a role as counselor, legal advisor, or any other role aside from interpreting.
3. 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.
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 our service area through the following means:

- Language Assistance signs are posted in our vehicles, at the Intermodal Center, and in MART bus shelters.
- 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 our LEP population through-out the 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

ATTACHMENT 1

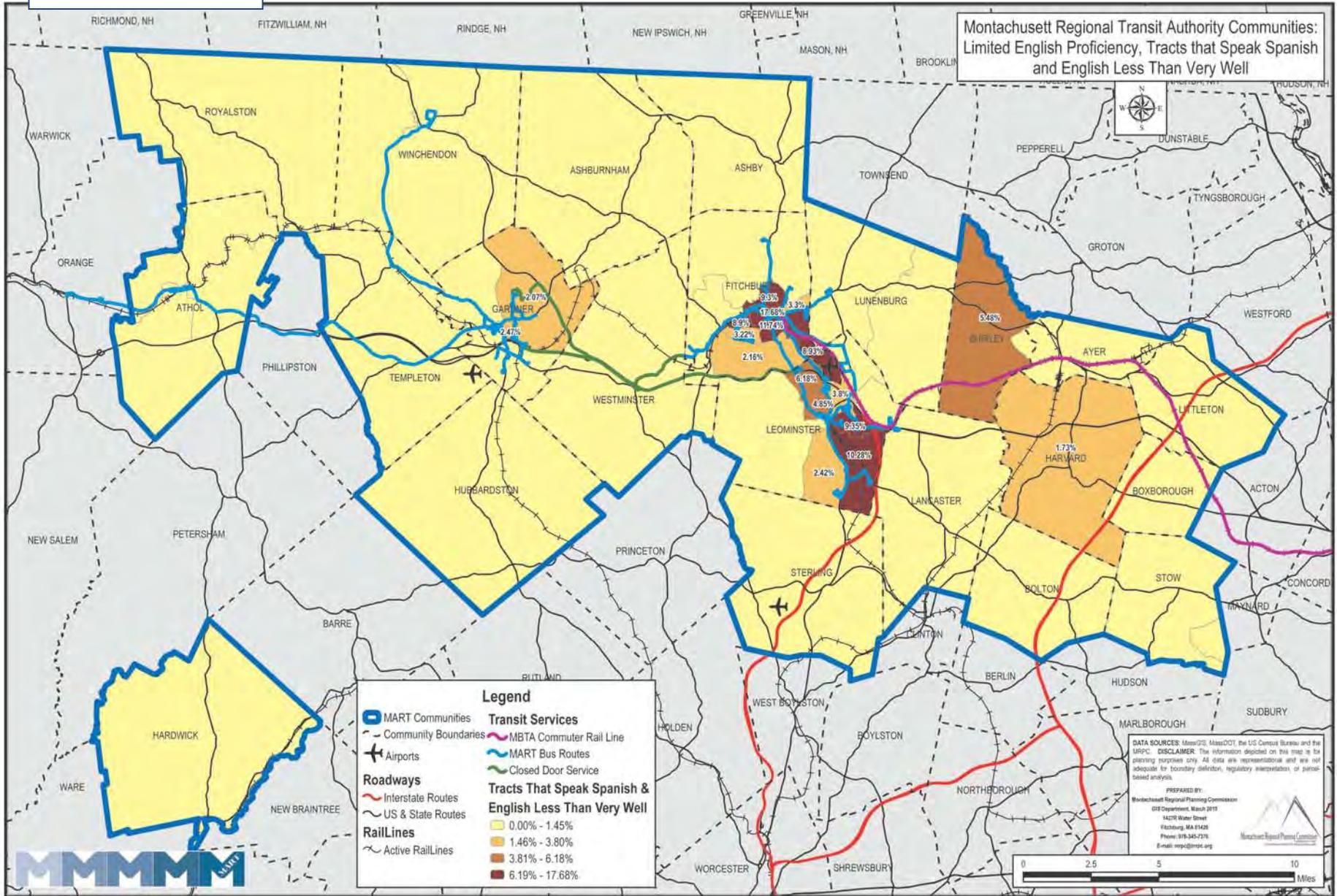


FIGURE 2: SPANISH

ATTACHMENT 2

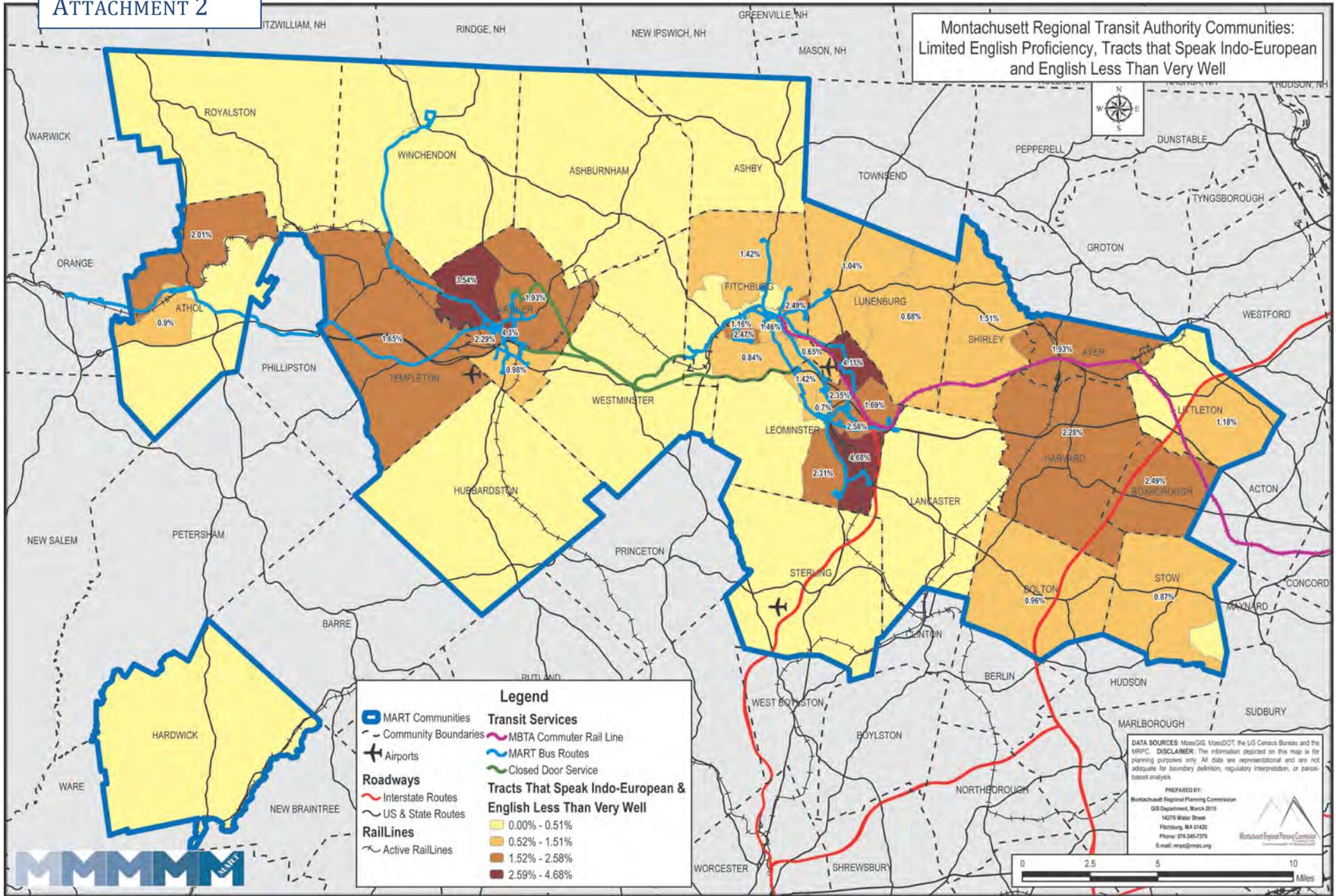


FIGURE 3: OTHER INDO-EUROPEAN



**PROVIDING LANGUAGE ACCESS
TO PERSONS WITH LIMITED
ENGLISH PROFICIENCY**
Employee Training Module

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 podrás decir a la persona que le está ayudando que usted necesita un intérprete en su lenguaje y se le proporcionará el intérprete apropiado disponible para usted. Información sobre las pólizas 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'interprète 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 você que você precisa de um intérprete já que você não fale inglês bem.

The Montachusett Regional Transit Authority ('MART') wishes to inform our 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 your 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 our 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 resolution was presented to the full board and discussed during the MART Advisory Board Meeting on March 31, 2015. The Board unanimously passed the resolution of approval and Mayor Mark Hawke, the Board Chairperson, signed the resolution on behalf.

RESOLUTION – K. Bergman moved that the Advisory Board of the Montachusett Regional Transit Authority approves the Title VI Program, as presented by the Grants Director of Operations. The motions was seconded and passed unanimously.



Chairman of the Board
Mayor Mark Hawke, Gardner

MART SERVICE STANDARDS & TRANSIT POLICIES

March 2015
Version 1.2

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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 Complimentary Para-transit (demand response) service. The majority 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 new hybrid buses. MART operates fixed routes services in two separate small-urban areas 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 two main bus routes in the City of Gardner.
- Inter-City Service – This route runs twice a day all year round (commuter runs) and more times seasonally (Labor Day to Memorial Day) to cover the increased ridership of the area’s college students. It originates in Gardner, except for at the 8:00AM hour when it starts at the Fitchburg Intermodal. It travels through Gardner, Fitchburg and Leominster. The Commuter Runs (AM & PM) connect with the Link services.
- Link Service – Gardner to Orange. This bus route originates in Gardner and travels through the rural communities between Gardner and Orange along MA-Route 2A.
- Link Service – Gardner to Winchendon. This bus route originates in Gardner and travels through the rural communities 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 (tripper service).

• Complimentary 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 van models. However, MART still holds this mode accountable to the reliability and safety standards. MART offers demand response services thru various programs to a variety of clientele types.

- ADA Service – available to all members of the MART communities who cannot avail a fixed route bus due to a disability. In the cities of Fitchburg, Leominster and Gardner MART has chosen to allow anyone who qualifies as ADA to have a Para-transit vehicle pick them up at home (curb-to-curb). This is a deviation from the ¾ mile fixed route standard. However the ¾ mile rule does apply to the towns of Lancaster, Lunenburg, Templeton and Winchendon where limited fixed route services are provided.
- Job Access Reverse Commute (JARC) – this service runs from 10 pm to 11:30 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 service has been suspended. This service is run on paratransit vehicles as well as a sub-contracted taxi service.

- Subscription Service – this service is available to anyone (6 yrs and older who does not require a booster seat) 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 our service area. A fare schedule is set at a higher rate based on destination region (Boston or Worcester).
- 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, and Ashby are provided transportation through MART's operating company.
- Dial-A-Mart Services – these are sponsored human service agency trips with a regular daily schedule and list of clientele, which will change as the agency adds and deletes clients.

Service Objectives

MART's mission statement:

“To provide safe, reliable, efficient and cost-effective transit, paratransit and brokerage services to our customers contributing to the social well-being and economic vitality of the region and the Commonwealth.”

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

Services should be provided in a manner that is safe for the community, the consumers and employees alike.

• Efficiency

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

• 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.

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

Table 1: Summary of Service Standards

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 as a result of roadwork, weather conditions, or lack of snow removal by a municipality. When such factors are known to be a source of poor performance for a particular service, MART will work with the other involved parties, and the remedies developed for improving the service may be different than when external factors are not a known issue.

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. 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 by foot.

The guideline is only expressed in terms of fixed route bus service because demand response service encompasses the entire geographic area of the urban 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 customers 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 ending span of service time.

FIXED ROUTE HOURS OF SERVICE		
SERVICE AREA	MONDAY-FRIDAY	SATURDAY
Fitchburg/Leominster	5:15 am to 7:00 pm	8:45 am to 6:15 pm
Gardner	6:20 am to 5:15 pm	8:45 am to 4:35 pm
Intercity – Fitchburg/ Leominster to/from Gardner	6:15 am to 9:15 am, 1:00 pm to 4:10 pm, and 6:40 pm to 7:30 pm	NO SERVICE
Gardner to Orange	5:15 am to 9:00 am, 12:00 pm to 2:00 pm, and 3:00 pm to 7:00 pm	NO SERVICE
Gardner to Winchendon	6:00 am to 9:25 am, 11:30 am to 1:25 pm, and 3:30 pm to 4:30 pm	NO SERVICE

DEMAND RESPONSE HOURS OF SERVICE		
SERVICE AREA	MONDAY-FRIDAY	SATURDAY
Fitchburg/Leominster	5:00 am to 7:00 pm	9:00 am to 5:45 pm
Gardner	6:00 am to 4:30 pm	9:00 am to 4:00 pm
Fitchburg/Leominster To/From Gardner	6:15 am to 9:15 am and 12:00 pm to 4:30 pm	NO SERVICE

Table 2: Span of Service Standards

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.

Time Period	Definition
Early Morning	5:00 AM – 6:25 AM
AM Peak	6:25 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 – 7:00 PM
Late Evening (College)	7:00 PM – 12:30 AM

Table 3: Weekday Time Period Definitions

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 minute headway*
Main Line (2 & 9)** (Combined Route - 2 buses that loop each other)	Early Morning	35-minute headway
	AM Peak	1 trip in the peak direction (additional bus)
	Morning/Midday	45-minute headway
	PM School Peak	2 trips in the peak direction (additional buses)
	Evening	45-minute headway
FSC Loop (4)	All Periods	10-minute headway (2 vehicles)
Fitchburg (5/5A/6) ***	AM & PM Peak	2 trips in the peak direction (add. bus) – 30 minute HW
	All Other Periods	60-minute headway
Fitchburg/Lunenburg (7 & 11) †	AM Peak	35-minute headway
	All Other Periods	60-minute headway
Leominster (8 & 10) ‡	Early AM	1 st trip at 15 minutes (9 only) and 2 nd trip at 50 minutes (8 & 9)
	All Other Periods	60-minute headway
Gardner Main Line 1 & 2 (Separate routes on separate buses headed in opposite direction)	AM & PM Peak	1 trip in each peak direction (additional bus)
	All Periods	60 minute headway

Table 4: Minimum Frequency of Service Standards

*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 are separate in the early morning but then combine at 7:45AM for the rest of the day circling each other in 1 ½ 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 5/5A returns at 15 minutes past the hour and Route 6 returns at 10 minutes before the hour.

† This is a combined route that comes back to the anchor stop (Intermodal Center) at the end of each route. Route 7 returns at half past the hour and Route 11 returns at the top of the hour.

‡ This is a combined route that comes back to the anchor stop (Monument Square) at the end of each route segment. Route 8 returns at the top of the hour and Route 10 returns at 40 past the hour.

Every route that returns to an anchor stop does so that 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/track conditions, infrastructure 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 10 minutes (headway >10 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 10 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 3 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 3 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:

Route #/Name	Origin Time Point	Mid-Route Time Point	Destination Time Point
1/Circle Line North	Intermodal Center	Market Basket	Intermodal Center
2/Main Line	Intermodal Center	Monument Square	Intermodal Center
3/Circle Line South	Intermodal Center	Market Basket	Intermodal Center
4/University	Intermodal Center	Fitchburg State	Intermodal Center
5/Parkhill Plaza	Intermodal Center	Joseph House	Intermodal Center
6/Burbank-FHS	Intermodal Center	Fitchburg High	Intermodal Center
7/JohnFitch-Lunenburg	Intermodal Center	Lunenburg Crossing	Intermodal Center
8/Whitney-Orchard Hill	Monument Square	Whitney Field FoodCt	Intermodal Center
9/Jytek-Walmart	Monument Square	Jytek Park/Walmart	Intermodal Center
10/Water Tower-Hospital	Monument Square	Leominster Hospital	Intermodal Center
11/Waites Crnr-MontyTech	Intermodal Center	Monty Tech HS	Intermodal Center
G1/Gardner Main Line – SE	Mount Wachusett CC	Timpany Plaza	Mount Wachusett CC
G2/Gardner Main Line – SW	Mount Wachusett CC	Walmart Plaza	Mount Wachusett CC
IC/Intercity-MWCC	MART Facility	Intermodal Center	MART Facility
AO/Athol-Orange Link – W	Mount Wachusett CC	Phillipston	Orange Center
AO/Athol-Orange Link – E	Orange Center	Phillipston	Mount Wachusett CC
WL/Winchendon Link – N	Gardner City Hall	Lake Dennison	Winch. Town Hall
WL/Winchendon Link – S	Winch. Town Hall	Baldwinville	Gardner City Hall

Table 5: Bus Route Time Points

Bus Route Test: The second part of the Bus Schedule Adherence Standard determines whether or not 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.

Time Point Test	Origin Time Point	Mid-Route Time Point	Destination
Scheduled Departure Trips (Headways ≥ 10 minutes):	Start 0 minutes early to 3 minutes late	Depart 0 minutes early to 7 minutes late	Arrive 3 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.		

Table 6: Summary of Bus Schedule Adherence Standard

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.

Paratransit 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 has to arrive at their destination on time. Sponsored clients who are coming from a human-services program or daycare center have to 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.

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.

Table 7: Demand Response Adherence Standards

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 or not 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 will 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 in this chapter (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.

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

Table 8: Vehicle Load Standards (Bus Only)

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 a number of 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 in Table 9 below. This will be regularly updated as the fleet changes.

Bus Model	Fleet ID	Number of Seats	Peak Load Standard	Peak Max Load
TRANSMARK RE	4091-4092	26	140%	36
BLUEBIRD C1FE	4093	26	140%	36
Gillig Phantom (04-05)	4100-4111	35	140%	49
Gillig Phantom	4112-4113	29	140%	40
Gillig Low Floor	4120-4124	32	140%	44
International Hybrid-HC	4130-4132	38	140%	53
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

Table 9: Load Standards by Vehicle Type

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 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 avail 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.

MART has a number of bus shelters throughout the three cities where fixed route bus service is provided. 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 side 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. MART is also in the process of retrofitting the shelters with display boxes that will house a schedule, 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 the lower capacity vehicle. Bus Routes with the highest frequency of service and vehicle load factors will utilize the most reliable high capacity vehicles. The distance a route travels from a MART Maintenance Facility may also be a factor. 30 foot buses are utilized in Gardner due to the geographic make-up of the routes.

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 our five administrative/maintenance and two park-and-ride facilities. These cameras are monitored by designated staff during regular business hours, and the footage burns to DVR 24 hours a day. MART also has a Security Guard on duty at our Intermodal Transportation Center in two shifts. These guards make rounds and upload checkpoint data

to a server in our headquarters. They also provide protection for staff that collects funds from the parking pay stations at the park-and-ride facilities.

MART and its Operating Company believe that safety of the consumer is our 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 our 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 paratransit) has an AVL device which allows dispatch and the consumers to know its location. The dispatch center has software that visually displays the locations of all the vehicles. The Intermodal Center in Fitchburg is equipped with a large monitor that allows the consumers waiting for a bus to see the bus's location and estimated time of arrival to the station. MART's website is also equipped with a version of this software so that a consumer leaving from a location with internet access can see when the bus will be close.

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 time-stamps as indicators of schedule performance.

• Automated Fare Collection

MART's fixed route buses and shuttle vans are equipped with Scheidt & Bachmann Automated Fare Collection equipment that is fully interoperable with the MBTA's Charlie Card™ system so that a single recognizable smartcard fare media can be used state-wide. The system accomplishes better automation and accountability of fare collections and ridership counts.

Appendix F

Map 1: Base Map of Fitchburg/Leominster Routes with Facilities

Map 2: Map of Minority Populations in Fitchburg/Leominster with Routes Overlaid

Map 3: Base Map of Gardner Routes with Facilities

Map 4: Map of Minority Populations in Fitchburg/Leominster with Routes Overlaid

Map 5: Base Map of Link Routes with Facilities

Map 6: Minority Populations in all Member Communities with all Fixed Routes and Buffer Zones

Map 7: Elderly Populations in all Member Communities with all Fixed Routes and Buffer Zones

Map 8: Disabled Populations in all Member Communities with all Fixed Routes and Buffer Zones

Map 9: Poverty Level in all Member Communities with all Fixed Routes and Buffer Zones