



CAPE COD REGIONAL TRANSIT AUTHORITY

Title VI Program

May, 2017

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PURPOSE:

The purpose of this document is to set forth the Cape Cod Regional Transit Authority's (CCRTA's) policies and procedures necessary to comply with the U.S. Department of Transportation's (DOT) Title VI regulations (49 CFR part 21), to integrate these rules into our programs and activities as expressed in the Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons (70 FR 74087, December 14, 2005), and FTA Circular 4702.1B "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," dated October 1, 2012. This program incorporates specific guidance for service to geographic areas with a population of 200,000 people or greater under 49 U.S.C. 5307

It is the policy of CCRTA that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any of its transportation programs. Consequently, CCRTA makes achieving environmental justice an integral part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its transportation programs, policies, and activities on minority populations and low-income populations.

Environmental Justice is achieved by CCRTA by making part of its mission to identify and address the effects of all programs, policies and activities on "minority populations and low-income populations." In order to accomplish this, CCRTA must appropriately address the concerns of individuals potentially affected by our activities. Those individuals must appropriately be involved in the development of projects that fit harmoniously within their communities without sacrificing safety or mobility.

Three fundamental principles of environmental justice include but are not limited to the following:

- Ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
- Avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.
- Prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

Additionally, Title VI allows an otherwise facially neutral program, policy, or activity that will have a discriminatory impact on minority populations (but does not include low-income populations). That program, policy, or activity may be carried out if (1) CCRTA can demonstrate a substantial legitimate justification for the program, policy, or activity; (2) there are no comparably effective alternative practices that would result in less-disparate impacts; and (3) the justification for the program, policy or activity is not a pretext for discrimination. Whereas, EO 12898 and the DOT Order on EJ, posits if a CCRTA program, policy, or activity will have a disproportionately high and adverse effect on minority or low-income populations, that program, policy, or activity may only be carried out if further mitigation measures or alternatives that would reduce the disproportionately high and adverse effects are not practicable. In determining whether a mitigation measure or an alternative is “practicable,” the social, economic (including costs) and environmental effects of avoiding or mitigating the adverse effects will be taken into account. Although these two programs, Title VI and EJ, are separate and slightly different programs it is the mission of CCRTA to conduct its transportation programs so that both of them are integrated into our policies and procedures to the fullest extent possible.

OBJECTIVES:

1. Ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner;
2. Promote full and fair participation in public transportation decision-making without regard to race, color, or national origin;
3. Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

DEFINITIONS USED IN THIS DOCUMENT:

Disparate impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient’s policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.

Disproportionate burden refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.

Disparate treatment refers to actions that result in circumstances where similarly situated persons are intentionally treated differently (i.e., less favorably) than others because of their race, color, or national origin.

Limited English Proficient (LEP) Persons are persons for whom English is not their primary language and who have a limited ability to speak, understand, read, or write English. It includes people who reported to the U.S. Census that they do not speak English well or do not speak English at all. CCRTA uses the lower of either 1000 people or 5% as the threshold for incorporating foreign languages into its policy for dissemination of transit information.

Low-Income means a person whose median household income is at or below the Department of Health and Human Services' poverty guidelines.

Low-Income Population means any readily identifiable groups of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed DOT program, policy, or activity.

Minority Persons include the following:

- American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
- Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent.
- Black or African American Populations, which refers to peoples having origins in any of the Black racial groups of Africa.
- Hispanic or Latino Populations, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- Native Hawaiian and Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

Minority Population means any readily identifiable group of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient populations (such as migrant workers or Native Americans) who will be similarly affected by a proposed DOT program, policy, or activity.

Minority transit route means a route that has at least 1/3 of its total revenue mileage in a Census block or block group, or traffic analysis zone(s) with a percentage of minority population that exceeds the percentage of minority population in the transit service area. A recipient may supplement this service area data with route-specific ridership data in cases where ridership does not reflect the characteristics of the census block, block group, or traffic analysis zone.

National Origin means the particular nation in which a person was born, or where the person's parents or ancestors were born.

Predominantly Minority Area means a geographic area, such as a neighborhood, Census tract, or traffic analysis zone, where the proportion of minority persons residing in that area exceeds the average proportion of minority persons in CCRTA's service area.

Predominantly Low-Income Area means a geographic area, such as a neighborhood, Census tract, or traffic analysis zone, where the proportion of low-income persons residing in that area exceeds the average proportion of low-income persons in CCRTA's service area.

Service Area refers to either the geographic area in which a transit agency is authorized by its charter to provide service to the public or to the planning area of a State Department of Transportation or Metropolitan Planning Organization.

Service Standards/Policy means an established policy or service performance measure used by a transit provider as a means to plan or distribute services and benefits within its service area.

GENERAL REQUIREMENTS AND GUIDELINES

REQUIREMENT TO PROVIDE TITLE VI ASSURANCES

In accordance with 49 CFR Section 21.7(a), CCRTA has submitted an assurance to the FTA that it will carry out the program in compliance with DOT's Title VI regulations. CCRTA fulfills this requirement it submits its annual certifications and assurances to FTA.

PROGRAM REQUIREMENTS

CCRTA'S TITLE VI Program includes the following information:

A copy of the recipient's Title VI notice to the public that indicates CCRTA complies with Title VI, and informs members of the public of the protections against discrimination afforded to them by Title VI.

A copy of CCRTA's instructions to the public regarding how to file a Title VI discrimination complaint, including a copy of the complaint form. Complaint procedures are in Appendix C and a copy CCRTA's Title VI complaint form is in Appendix D.

A list of any public transportation-related Title VI investigations, complaints, or lawsuits filed with CCRTA since the time of the last submission is contained in Appendix E. This list includes only those investigations, complaints, or lawsuits that pertain to allegations of discrimination on the basis of race, color, and/or national origin in transit-related activities and programs and have been submitted to CCRTA.

A public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Program submission. CCRTA's targeted public participation plan for minority populations is part

of efforts that extend more broadly to include other constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others.

CCRTA's plan for providing language assistance to persons with limited English proficiency, based on the DOT LEP Guidance.

CCRTA's transit-related Board of Directors is made up of one elected official of each town in its service area and is not selected by the Administrator of CCRTA. Therefore, it has not submitted a table depicting the racial breakdown of the membership of this committee, nor a description of efforts made to encourage the participation of minorities on such committees or councils.

CCRTA does not have any advisory boards that it appoints. The CCRTA ADA Paratransit Program is coordinated, supervised, and administered by CCRTA Deputy Administrator. The Deputy Administrator gathers feedback during her extensive outreach to all social service agencies on Cape Cod. The Deputy Administrator administers the Brokerage Program that provides rides for various State agencies whose riders require special transportation arrangements. She is intimately familiar with ADA issues both from the perspective of the customer and transit provider.

CCRTA ensures its contractors are complying with Title VI by setting the policies and procedures that the contractor must follow and monitoring their compliance on a daily basis. A sample of the items monitored is included in Appendix J.

The contractor adopts CCRTA's Title VI policies and procedures as its own. CCRTA does not pass FTA funds through to subrecipients. All FTA funds are strictly controlled and administered by CCRTA. CCRTA makes achieving environmental justice an integral part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its transportation programs, policies, and activities on minority populations and low-income populations. As a result of these programs and policies the expenses of its contractors are reviewed by the Chief Financial Officer (CFO) for compliance with Title VI. This review includes all purchases made by the contractor. On a monthly basis the contractor submits its operating invoice to the CFO for reimbursement. The CFO ensures that every invoice is backed by appropriate documentation and is in compliance with all CCRTA policies. With the exception of labor costs and non-capital small purchases at the Maintenance Center, for office supplies and incidentals, all purchases are made by CCRTA and are approved for payment by the CFO and the Administrator. All transit planning concerning routes, schedules, fares, and driver/dispatcher performance are set by the CCRTA Administrator and monitored by his staff to ensure compliance with Title VI and other FTA regulations. There are on-site CCRTA employees at the contractor's site whose job is to monitor their performance involving all FTA regulations. CCRTA's Title VI policy is distributed to the contractor and employee training is conducted in Title VI and other FTA regulations on a continuing basis.

CCRTA constructed an operations center, the Hyannis Transportation Center, in 2001, a maintenance facility in South Dennis in 2006 (starting with land purchase in 2001), and an expanded parking lot and driver training area at the maintenance facility in 2012. Copies of the Title VI equity analyses conducted during the planning stage with regard to the location of the facilities are included as Appendix F.

REQUIREMENT TO NOTIFY BENEFICIARIES OF PROTECTION UNDER TITLE VI.

Title 49 CFR Section 21.9(d) requires CCRTA to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. CCRTA fulfills this requirement to disseminate this information to the public by posting a Title VI notice on its website and in public areas of the Hyannis Transportation Center, the Administrative Office's reception area, and on transit vehicles. CCRTA's Title VI notice to the public is provided in Appendix B.

The CCRTA Title VI includes:

- A statement that CCRTA operates programs without regard to race, color, or national origin.
- A description of the procedures that members of the public should follow in order to request additional information concerning CCRTA's Title VI obligations.
- A description of the procedures that members of the public shall follow in order to file a Title VI discrimination complaint against CCRTA.
- CCRTA's Practices for Fulfilling the Notification Requirement.

Dissemination. CCRTA informs the public of their rights under Title VI through posting the Title VI notice on its web site and through posters placed at the Hyannis Transportation Center and in transit vehicles. The poster at the Hyannis Transportation is in English and Portuguese and is ever present. Signs are posted on transit vehicles semi-annually in order to keep them in good looking condition.

Document translation. Notices detailing CCRTA's Title VI obligations and complaint procedures may be translated into languages other than English at all times by accessing the CCRTA web site (Capita Translation and Interpreting: Translation for 140 languages by ALS) and/or requesting a written translation from the CCRTA Administrative offices at the HTC.

Subrecipients. CCRTA considers its contracted transit providers part of the CCRTA and as such, all vehicles, whether owned by CCRTA or the contractor, carry the CCRTA Title VI Notice requirement to develop Title VI Complaint Procedures And Complaint form

In order to comply with the reporting requirements established in 49 CFR Section 21.9(b), CCRTA has developed procedures for investigating and tracking Title VI complaints filed against it and has made its procedures for filing a complaint available to members of the public. CCRTA has developed a Title VI complaint form, and the procedure for filing a complaint is available on its website. The CCRTA procedure and complaint forms are located in Appendices C and D.

REQUIREMENT TO RECORD AND REPORT TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS AND LAWSUITS

In order to comply with the reporting requirements of 49 CFR Section 21.9(b), CCRTA prepares and maintains a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations conducted by entities other than FTA; lawsuits; and complaints naming the recipient. This list shall include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to, the investigation, lawsuit, or complaint. This list is included in the Title VI Program submitted to FTA every three years. See Appendix E for CCRTA's report of this information.

PROMOTING INCLUSIVE PUBLIC PARTICIPATION

The content and considerations of Title VI, the Executive Order on LEP, and the DOT LEP Guidance has been integrated into CCRTA's established public participation plan. CCRTA's plan is to reach as many of its constituents as possible by using public meetings, public notices, social media, and its own web site to reach and involve minority and LEP populations in public participation activities. CCRTA has developed comprehensive measures to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in a recipient's decision-making process:

- a. CCRTA ensures that it schedules meetings at times and locations that are convenient and accessible for minority and LEP communities. Meetings are scheduled both during the day and into the evening and are, at a minimum conducted on the upper-, lower-, and mid- Cape locations to encourage maximum participation.
- b. In addition to different meeting locations CCRTA attempts to hold meetings at those locations and organizations that might encourage minority and the LEP community as members.
- c. CCRTA coordinates with community- and faith-based organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities.
- d. CCRTA uses radio, television, or newspaper ads on stations and in publications that serve LEP populations. CCRTA is especially involved in its outreach to all public transit users through the entire Social Media: Twitter (<https://twitter.com/CapeCodRTA>), Facebook

(<https://www.facebook.com/pages/Cape-Cod-RTA/130127686997831?ref=sgm>), and its website (<http://capecodrta.org/index.htm>) to encourage participation in its planning activities.

- e. CCRTA is a member of many organizations and boards with the aim of fostering input and involvement from as many sources as possible in the planning activities of the CCRTA. This representational list of organizations and meetings in the past several years is included as Appendix G.
- f. CCRTA personnel have distributed business cards, applications for ACCESS passes, and applications for ADA passes at all of these meetings along with the request for input and public participation in the CCRTA administration processes. The majority of this effort involves minority and low-income people in public involvement activities and has included both comprehensive measures, such as placing public notices at the Hyannis Transportation Center and in all vehicles, and measures targeted to overcome linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and low-income people and populations from effectively participating in a recipient's decision-making process. CCRTA is implementing DOT's policy guidance concerning recipients' responsibilities to LEP persons to overcome barriers to public participation.
- g. CCRTA's management team reaches out to agencies and organizations who work with and advocate for minority, low-income and persons with disabilities, as well as consumers of CCRTA fixed route and DART (dial-a-ride services). On a regular basis, CCRTA staff attends these meetings at which news from the Authority and the transit operator is reported and consumer concerns, issues and suggestions are heard. These meetings are regularly scheduled and held at the organization's location and/or accessible locations on the bus line at times that are convenient for the attendees. DART provides transportation to the meetings for eligible riders. Announcements of meetings are posted as public service announcements in the HTC and posted on CCRTA vehicles and CCRTA's web site and social media. There is an extensive mailing list made up of consumers and advocates for consumers that is maintained for the purpose of obtaining the maximum public input.
- h. CCRTA's website includes schedule information and route maps for all fixed route services, as well as information about ADA and senior transportation. It also includes the latest CCRTA news and a form for customer comments, as well as links to other transportation services and member communities. The website allows for translation of all information into different languages through the use of Capita Translation and Interpreting: Translation for 140 languages by ALS.
- i. CCRTA issues press releases in the appropriate local newspapers to announce service changes, new vehicles and other news items of interest. The Administrator is interviewed by the local newspaper whenever anything of note occurs within the CCRTA system.

REQUIREMENT TO PROVIDE MEANINGFUL ACCESS TO LEP PERSONS

Consistent with Title VI of the Civil Rights Act of 1964, DOT's implementing regulations, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121, Aug. 11, 2000), CCRTA has taken reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of its programs and activities for individuals who are limited-English proficient (LEP). CCRTA's Language Assistance Plan consists of the Four-factor analysis described in the DOT LEP Guidance from December 14, 2005 (70 FR 74087, Dec. 14, 2005) and updated in May 2011 through the document Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted Programs, in order to determine what steps are necessary to provide meaningful access.

1.) The number and proportion of LEP persons served or encountered in the eligible service population:

LEP persons are persons whose primary language is not English and who have a limited ability to speak, read, write, or understand English. The 2000 Census data has the most current official population estimates. The 2000 Census Summary File 3, Table PCT10 identified languages spoken at home without regard for the ability to speak English. This table is helpful in identifying numbers of persons in CCRTA who speak different languages, but it does not identify those persons in need of language assistance measures; it only identifies LEP persons by four major language groups.

In 2010, the first five-year American Community Survey (ACS) Census data became available, which provides data for all of CCRTA's communities. The ACS data is based on a smaller number of estimates than the decennial data; therefore, it is considered to be less reliable and has a larger margin of error. It does, however, provide more detailed language data for LEP persons, identifying 39 possible languages spoken.

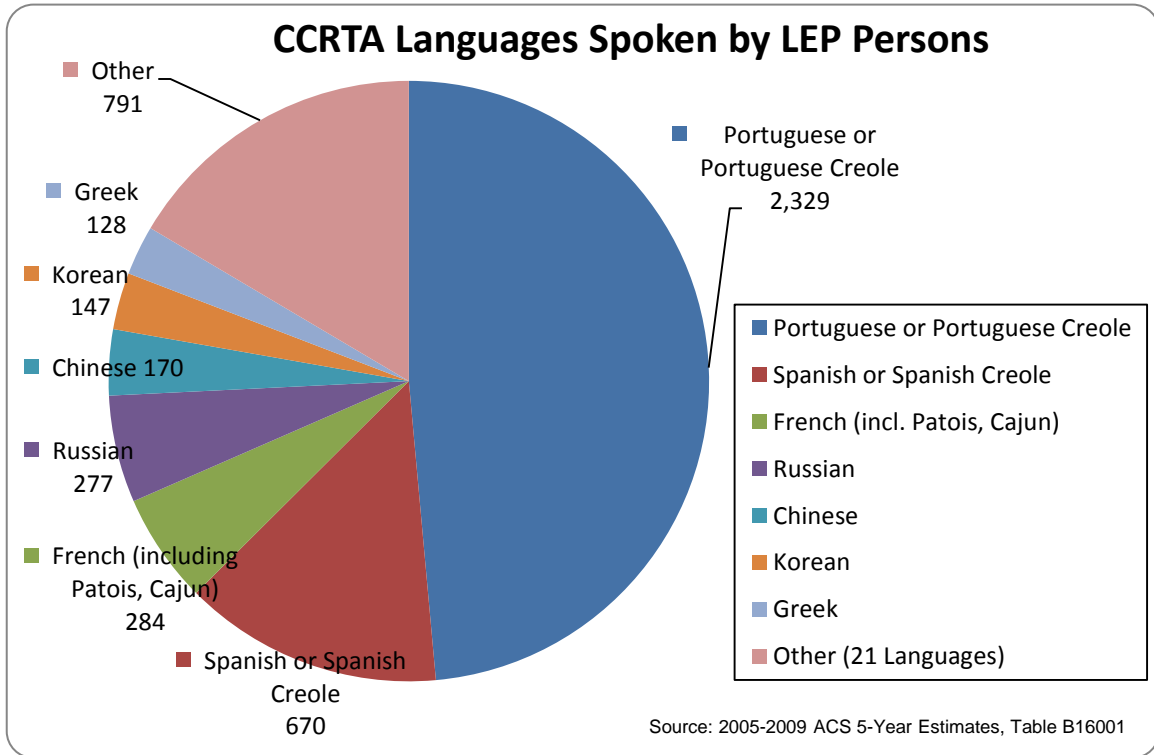
CCRTA's 2014 Language Assistance Plan uses the 2000 Census estimates for totals of LEP persons by community and census tract. The 2005-2010 ACS data is used to identify languages spoken by community. In future years, language data in this Plan will be updated according to the best and most recent data available with the 5-year ACS estimates.

IDENTIFICATION OF LANGUAGE GROUPS AND LEP PERSONS WITHIN CCRTA

According to the 2000 US Census data, the total population of the CCRTA service area that speaks English "not well" or "not at all" is 2.73%. Only the community of Barnstable exceeds this percentage of LEP population. The highest percentage of the total CCRTA population of

LEP persons in any one language is 5.24% and their primary language is Portuguese (49% speak Portuguese). At least 27 other languages are spoken in much smaller proportion.

LEP PERCENTAGES IN CCRTA SERVICE AREA



Town	Population	Speak English less than "very well"	% LEP
Barnstable	44,909	2,351	5.24%
Brewster	9,692	39	0.40%
Chatham	6,588	22	0.33%
Dennis	15,091	410	2.72%
Eastham	5,344	54	1.01%
Falmouth	31,674	773	2.44%
Harwich	11,645	250	2.20%
Mashpee	13,534	274	2.02%
Orleans	6,097	31	0.51%
Provincetown	3,379	60	1.78%
Truro	1,938	30	1.55%
Wellfleet	3,041	37	1.22%
Yarmouth	22,683	459	2.02%
Total CCRTA	175,615	4,796	2.73%

Source: 2005-2009 ACS 5-Year Estimates, Table B16001

2.) The frequency with which LEP individuals come into contact with the program, activity, or service:

Interviews with transit vehicle drivers revealed a very infrequent need to communicate with LEP individuals. Requests for information from LEP persons are automatically routed to a language phone tree and the information office at the HTC will coordinate these requests for help in foreign languages directly with those requesting help. Title VI surveys to monitor quality of services in 2010 were available in Portuguese and Spanish translations; however, no foreign language surveys were requested or used. There have been a few requests for the provision of sign-language at CCRTA public meetings but this also is infrequent. A recent onboard survey and observation of every route gave no indication of LEP individuals using the service.

However, CCRTA is prepared for the occurrence through its notices of the availability of foreign language publications upon request. CCRTA provides translation of vital documents consistent with the Safe Harbor Provision. This assistance is consistent with the findings in the Four Factor Analysis in that any language can be made available to the public upon request. This notice is posted on the CCRTA website and is known to all employees who come into contact with the public. All documents mailed out of the Administrative offices contain a statement that they are available in other languages upon a phone call to the office. Bus drivers are made aware of the foreign language population consistent with this document and are advised as to how to contact the Administrative Offices for help in interpretation while on duty. CCRTA has an outside consultant that it employs to sample its bus routes to monitor and evaluate and update as necessary its language access plan. The consultant rides all CCRTA routes with questionnaires, a part of which requests the need for foreign language assistance, and in which language required. The Administrative Office staff participate in this survey by responding as to any inquiries made of them that required foreign language assistance either verbally or through document requests. If the monitor finds that another foreign language has become more and/or as dominant as Portuguese (as shown above) then the Notices of Title VI and documents (such as ADA Eligibility Forms) most commonly requested will be printed for dissemination as requested. Several Staff have a thorough knowledge of Portuguese and write/interpret/review all documents available to the public.

3) The nature and importance of the program, activity or service provided by the program: CCRTA's transportation services are lifeline services that are considered vital to all users, including LEP persons.

4) The resources available to the recipient and costs: CCRTA's budget for the printing of multi-language schedules and brochures is limited at this time. Low and no-cost measures must be used to create meaningful access for LEP persons.

AVAILABILITY OF LANGUAGE ASSISTANCE FOR LEP INDIVIDUALS

Language assistance measures include CCRTA's website information translation into 140 different languages through the use of Capita Translation and Interpreting. CCRTA has a contract with the State contractor "Language Line Services" that provides on-demand, over the phone interpreter services in over 170 languages as well as written translation services. Staff is instructed in how to use this service. All Administrative and Operations staff that come into contact with the public (including dispatchers and bus drivers) receive training in how to obtain foreign language assistance in person, via telephone, or through the website. Staff are trained in how to contact the "Language Line Services" either through the Administrative Office, the Dispatch Office or the Maintenance Office. The request for information is immediately transmitted to the Language Line Services" who will come on the phone and speak directly to the person needing assistance or give instructions and assistance to the office/bus dispatcher personnel in how to aid the person. This service is available all hours that the CCRTA is in operation and information as to its availability is disseminated widely to staff. Training of all bus drivers includes a section on foreign language assistance to customers. This service will help with unknown languages, provide an interpreter, and provide written translation services. They will assist with contacting a limited English speaker and/or can be conference-called-in to help with a person who has called CCRTA and by-passed the foreign language assistance phone tree.

Written translation services and interpretation services at meetings are available through outside organizations and are available upon request at any public meeting. CCRTA has developed pictographic signs as appropriate and translated signs for the office, Hyannis Transportation Center (HTC), and the buses that indicate there are translators available and that selected information documents, such as the ADA brochure, and the ADA application can be made available in any language needed. Notice of Title VI protections and translation assistance is posted on the CCRTA website, in the office, and at the HTC. Bus routes and schedule information is depicted visually on printed schedules with the major destinations coded by number and matched to the schedule time. Schedules contain a notice that translation and interpretation assistance is available at the website and at the CCRTA offices. Notice of Public Hearings and other community outreach efforts may be translated and posted on the CCRTA website, on social media sites, at the HTC, and at the community sites where LEP persons are likely to encounter it. This LEP Plan will be monitored annually and updated as required.

In-house training of staff occurs after each annual sample which includes a review of the LEP Plan for updating as required. Title VI - LEP training is provided to the bus drivers/dispatchers on an annual basis through our contractor unless changes in the Plan require a more immediate update.

REQUIREMENT TO SET SYSTEM-WIDE SERVICE STANDARDS AND POLICIES

These requirements apply to all fixed route providers of public transportation service. 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 “[n]o 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.”

1) CCRTA has set service standards and policies for each specific fixed route mode of service it provides. Fixed route modes of service included are local bus and commuter bus, The CCRTA Service Delivery Policy sets standards and policies of how service is distributed across the transit system and ensures that the manner of the distribution affords users access to these assets. The Service Delivery Policy is attached as Appendix H.

The level of service provided by the CCRTA 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 some weekday time periods, most CCRTA 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. (See Page 9 of Service Delivery Policy)

During time periods when some passengers will be standing, the CCRTA 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.

By time period, the acceptable levels of crowding are shown in the following table. The load standards in the 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. Due to scheduling constraints and peaking characteristics, some individual trips may exceed the load levels expressed in the standards.

For bus the load standards shown represent average maximum loads over any time period on weekdays. On weekdays the loads cannot exceed the standard when averaged over any 60-minute segment of an Early AM, AM Peak, Midday, PM Peak period, or Late Evening period.

Vehicle Load Standards

Time Period	Passengers/Seats Vehicle Load Standard is based on the ratio of passengers to seated capacity at maximum load.
AM Peak and PM Peak	140%
Early AM, Midday, Evening	100%

Vehicle Load

Bus	Number of Seats	Peak Load Standard	Peak Max Load
Gillig 29'	25	140%	35
Gillig 35'	35	140%	49
Gillig 29'	30	140%	42
Ford 29'	18	140%	25

In addition to looking at loads within time periods, the CCRTA 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. The Net Cost/Passenger Standard will be used as one means of flagging routes that may be candidates for such changes.

Vehicle headway

Frequency of Service Standards - To maintain accessibility to the transportation network within a reasonable waiting period, the CCRTA has established minimum frequency of service levels for each route. These minimum levels dictate the frequency of service regardless of customer demand.

Table 4 shows the weekday Time Period definitions used by the CCRTA for all routes 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 5 shows the Minimum Frequency of Service levels for each route.

Table 4 Time Period Definition

Early AM	5:30
AM Peak	6:30
Mid-Day	12:30
PM Peak	5:30
Late PM	7:30

Table 5 Minimum Frequency of Service Standards

Bus Routes	Weekday Periods	Minimum Frequency
SeaLine	All day	60-minute headway
Hyannis- Orleans	All day	60-minute headway
Sandwich	PM Peak	60-minute headway
	All Other Periods	180-240 minute headway
Bourne	AM Peak	75-minute headway
	All Other Periods	60-minute headway
Barnstable	All day	60-minute headway
Flex	AM Peak	120-minute headway
	Midway	60-minute headway
	PM Peak	180-minute headway

The Minimum Frequency of Service standards are primarily expressed as “Headways,” which indicate the number of minutes scheduled between trips on a route.

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 reviewed with the possibility of increasing service to provide a sufficient number of vehicles to accommodate passenger demand.

On Time Performance

The on-time performance of service is affected by many variables, including traffic congestion, accidents, weather, road conditions, 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, the CCRTA 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: Schedule Adherence Standards provide the tools for evaluating the on-time performance of individual CCRTA routes. The Schedule Adherence Standards are based on frequency of service; passengers are generally more interested in strict adherence to published timetables and 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.

1. **Bus Timepoint Tests:** To determine whether a bus is on-time at an individual timepoint, such as the beginning of a route, end of a route, or a scheduled point in between, the CCRTA uses the following test based on service frequency:
 - a. **Scheduled Departure Service:** 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.
 - b. **On Time Test for Scheduled Departure Timepoints:** To be considered on time, a timepoint crossing of any trip with a leading headway of 60-minutes or more must meet the relevant condition out of the following:
 1. **Origin:** The trip must leave its origin timepoint between 0 minutes before and 3 minutes after its scheduled departure time.
 2. **Mid-route timepoint:** The trip must leave the mid-route timepoint(s) between 0 minutes before and 7 minutes after its scheduled departure time.
 3. **Destination:** The trip must arrive at its destination timepoint between 3 minutes before and 5 minutes after its scheduled arrival time.
2. **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 timepoints on the route that are on

time over the entire service day. 75% of all timepoints 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 Timepoint	Mid-Route TimePoint(s)	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 timepoints must be on-time according to the above definitions over the service period measured		

Exceptions:

A schedule may note that certain trips will not leave until another vehicle arrives and allows passengers to transfer. (For instance, the last bus trip of the day might wait for passengers from the last ferryboat of the day.) When applying the standard, these trips are not included.

The first trip of the day, which does not have a leading headway, is considered a scheduled departure trip.

Service availability An important aspect of providing the Barnstable County area with adequate access to transit service 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.

Coverage guidelines are established specifically for the service area in which local buses and flex buses operate as riders most frequently begin their trips on these services by foot.

Service Days	Minimum Coverage
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Weekdays & Saturday	Access to transit service will be provided within a ¼ mile walk to residents of areas served by bus with a population density of greater than 5,000 persons per sq/mile.
Sunday	Sunday service is available during the summer period only. Sunday service is directed to the tourist/customer to provide rides to the seashore and its attractions.

Distribution of transit amenities. Transit amenities are items of comfort and convenience available to the general riding public. For CCRTA’s purposes these items include benches, shelters, route maps and timetables, trash receptacles located at the HTC and sprinkled along the major bus routes where possible. All transit users have equal access to these amenities. The installation of transit amenities along bus routes are based on the number of passenger boardings that occur at stops along the routes, requests for an amenity, and safely locating that amenity. CCRTA is responsible for amenities such as bus shelters that are installed and maintained under contract between the transit agency and the operations’ contractor.

Printed signs, system maps, route maps, and schedules including digital equipment such as next vehicle arrival time signs (electronic signage that depicts when a transit vehicle will next arrive, in adaptive formats (ADA) are available at the HTC as are elevators for accessibility to the 2nd floor Administrative Offices at CCRTA.

Vehicle assignment for each mode. Vehicle assignment refers to the process by which transit vehicles are placed into service on routes throughout the CCRTA’s system. CCRTA’s policy is to assign vehicles on a rotating basis throughout the system. There is no one vehicle that serves the same route day after day. In this way there is no discrimination based on equipment between minority and non-minority areas in the system.

Service availability. Service availability is a measure of the distribution of routes within an agency’s service area. CCRTA’s policy is to distribute service so that 90 percent of all residents in the service area are within one-fourth to one-half of a mile of bus service. The measure between stops varies by population density and rural areas. This standard is based on the rural areas being less densely populated and therefore the percentage of the total population within one-fourth of a mile to routes is lower. The above stated standard applies to existing services as well as proposed changes in levels of service (e.g., expansion, addition, or deletion of routes).

APPENDIX A – ENABLING AUTHORITY

Enabling Legislation:

The Cape Cod Regional Transit Authority was established on October 13, 1976, pursuant to the provisions of Chapter 161B of the General Laws of the Commonwealth of Massachusetts. The Authority is a body politic, corporate and a political subdivision of the Commonwealth. The territorial area of the Authority consists of 15 member towns including Barnstable, Bourne, Brewster, Chatham, Dennis, Eastham, Falmouth, Harwich, Mashpee, Orleans, Provincetown, Sandwich, Truro, Wellfleet and Yarmouth as original members. The Act provides a procedure for the addition to the Authority of cities and towns contiguous to the area constituting the Authority and for the withdrawal of cities and towns from the Authority.

The Authority is given general responsibility to develop, finance and contract for the operation of mass transportation facilities within its territory. It is authorized to improve, modify or extend existing facilities, acquire or construct new facilities and enter into agreements with other parties, including government agencies, municipalities, authorities, private transportation companies, railroads, corporations and other concerns, providing for construction, operation and use by such other party of any mass transportation facility or equipment. The Authority is also authorized to issue bonds and notes to pay capital costs as provided in the Act.

The affairs of the Authority are managed by an Administrator, who is appointed by and serves at the pleasure of the Advisory Board.

THE CAPE COD REGIONAL TRANSIT AUTHORITY OPERATES ITS PROGRAMS AND SERVICES WITHOUT REGARD TO RACE, COLOR, AND NATIONAL ORIGIN IN ACCORDANCE WITH TITLE VI OF THE CIVIL RIGHTS ACT. THIS POLICY COMPLIES WITH CODE OF FEDERAL REGULATIONS UNDER 49 CFR SECTION 21.9 (D).

Reviewed and Approved by:

Thomas S. Cahir
Administrator
March 31, 2014

Membership of Advisory Board

The Cape Cod Regional Transit Authority Advisory Board was established pursuant to Massachusetts General Law (MGL), Chapter 161B Section 5. Section 5 starts as follows: *There shall be an advisory board to each authority consisting of the city manager, in the case of a Plan D or Plan E city, or the mayor of each other city, and the chairman of the board of selectmen of each town having such board, or the town manager or town administrator of each other town. Each mayor or city manager and each chairman, may, by writing filed with the authority, from time to time appoint a designee to act for him on the advisory board.*

Under that statute, the Advisory Board Membership is comprised of fifteen Town Managers (or their designee) representing the Cape Cod Towns of: Barnstable, Bourne, Brewster, Chatham, Dennis, Eastham, Falmouth, Harwich, Mashpee, Orleans, Provincetown, Sandwich, Truro, Wellfleet and Yarmouth. The Statute further specifies the appointment of one member of the “Disabled Commuter” population and one member of the “Rider Community” population whose appointment rotates annually from one Town to the next. As such, the Advisory Board members as of May, 2017 are:

- Barnstable - Town Manager
- Bourne - Chairman of CCRTA Board, Town Administrator
- Brewster - Fire Chief
- Chatham - Town Manager
- Dennis - Assistant Town Administrator
- Eastham - Barnstable County Human Rights Commission
- Falmouth - Commission on Disabilities Chairman
- Harwich - Town Engineer
- Mashpee - Board of Selectmen Chairman
- Orleans - Assistant Town Administrator
- Provincetown - Town Manager
- Sandwich - Clerk of CCRTA Board, Town Manager
- Truro - Town Administrator
- Wellfleet - Council on Aging Director
- Yarmouth - Vice Chairman of CCRTA Board, Town Administrator
- Disabled Commuter Rep. - Disability Commission
- Rider Community Rep. - Vacant

While the Cape Cod Regional Transit Authority encourages participation of minorities, all of the members are appointed by individuals or bodies other than the Cape Cod Regional Transit Authority; they are designated based on their official position or in the case of the Disabled Commuter Representative, elected by the Disability Commission Senior Membership.

APPENDIX B - TITLE VI NOTICE TO THE PUBLIC

CAPE COD REGIONAL TRANSIT AUTHORITY NOTICE OF PUBLICS' RIGHTS UNDER TITLE VI

THE CAPE COD REGIONAL TRANSIT AUTHORITY OPERATES ITS PROGRAMS AND SERVICES WITHOUT REGARD TO RACE, COLOR, AND NATIONAL ORIGIN IN ACCORDANCE WITH TITLE VI OF THE CIVIL RIGHTS ACT. THIS POLICY COMPLIES WITH CODE OF FEDERAL REGULATIONS UNDER 49 CFR SECTION 21.9 (D).

MEMBERS OF THE PUBLIC WHO FEEL THAT MAY HAVE BEEN DISCRIMINATED AGAINST MAY FILE A COMPLAINT AT THE ADDRESS BELOW AND MUST INCLUDE NAME AND ADDRESS. E-MAIL IS ALSO ACCEPTABLE AT THE CCRTA ADDRESS BUT MUST INCLUDE NAME AND ADDRESS FOR CONTACT PURPOSES.

**CCRTA ADMINISTRATOR
HYANNIS TRANSPORTATION CENTER
215 IYANNOUGH ROAD
PO BOX 1988
HYANNIS, MA 02601**

FOR MORE INFORMATION ON THE CCRTA'S CIVIL RIGHTS PROGRAM AND THE PROCEDURES TO FILE A COMPLAINT, CONTACT 508-775-8504; OR VISIT OUR ADMINISTRATIVE OFFICES AT THE ADDRESS ABOVE, 2ND FLOOR. FOR MORE INFORMATION VISIT: WWW.CAPECODRTA.ORG.

A COMPLAINANT MAY FILE A COMPLAINT DIRECTLY WITH THE FEDERAL TRANSIT ADMINISTRATION BY FILING A COMPLAINT WITH THE OFFICE OF CIVIL RIGHTS, ATTENTION: TITLE VI PROGRAM COORDINATOR, EAST BUILDING, 5TH FLOOR-TCR, 1200 NEW JERSEY AVE, SE, WASHINGTON, DC 20590

If information is needed in another language please contact: 508-775-8504.

To meet the safe harbor provisions of the regulation this Notice will also be posted in the Portuguese language:

TÍTULO VI COMUNICADO AO PÚBLICO

CAPE COD AUTORIDADE REGIONAL DO TRÂNSITO AVISO DE PÚBLICOS 'DIREITOS TÍTULO VI UNDER

O Cape Cod Regional Transit Authority opera seus programas e serviços, independentemente de raça, cor e origem nacional nos termos do Título VI da Lei DIREITOS CIVIS. ESTA POLÍTICA EM CONFORMIDADE COM Code of Federal Regulations UNDER 49 CFR SEÇÃO 21,9 (D).

Os membros do público que sentem que PODEM forão discriminados podem apresentar uma morada queixa na morada abaixo e deve incluir nome. E-MAIL TAMBÉM É ACEITÁVEL NO ENDEREÇO CCRTA mas devem incluir nome e endereço para fins de contato.

**CCRTA ADMINISTRATOR
HYANNIS TRANSPORTATION CENTER
215 IYANNOUGH ROAD
PO BOX 1988
HYANNIS, MA 02601**

PARA MAIS INFORMAÇÕES SOBRE DIREITOS CIVIS DO PROGRAMA CCRTA E OS PROCEDIMENTOS para registrar uma queixa, deve contactar 508-775-8504; ou visite nossos escritórios administrativos no endereço acima, 2º andar indicado. PARA MAIS INFORMAÇÕES VISITE: WWW.CAPECODRTA.ORG.

O queixoso pode apresentar uma reclamação directamente com a Administração Federal de Trânsito mediante a apresentação de uma queixa junto do ESCRITÓRIO DE DIREITOS CIVIS, ATENÇÃO: TITLE VI Program Coordinator, East Building, 5th Floor TCR, 1200 NEW JERSEY AVE, SE, Washington, DC 20590

Se a informação é necessária em outro idioma por favor contacte: 508-775-8504.

APPENDIX C - COMPLAINT PROCEDURES

CAPE COD REGIONAL TRANSIT AUTHORITY(CCRTA) TITLE VI COMPLAINT PROCEDURE – POSTED WWW.CAPECODRTA.ORG

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the CCRTA may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. The CCRTA investigates complaints received no more than 180 days after the alleged incident. The Authority will process complaints that are complete.

Once the complaint is received, the CCRTA will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

The CCRTA has 30 days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, the CCRTA can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has 15 days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590. If information is needed in another language please contact: 508-775-8504.

To meet the safe harbor provisions of the regulation the sentence above will also be posted on the web site in the Portuguese language:

TITLE VI COMPLAINT PROCEDURE

Procedimentos de reclamação

CAPE COD REGIONAL TRANSIT AUTHORITY (CCRТА)

TÍTULO VI procedimento de reclamação - PUBLICADO EM WWW.CAPECODRTA.ORG
Qualquer pessoa que acredita ou que tenha sido vítima de discriminação com base em raça, cor ou origem nacional pelo CCRТА pode apresentar uma queixa Título VI, preenchendo e enviando o Título VI Formulário de Denúncia da agência. O CCRТА investiga. Quando investiga casos que tenham ocorrido a menos de 180 dias. A Autoridade irá processar reclamações que são completas.

Quando reclamação é recebida, o CCRТА irá analisá-la para determinar se o nosso escritório tem jurisdição. O denunciante receberá uma carta de confirmação, informando a ela / ele se a denúncia será investigada por nosso escritório.

O CCRТА tem 30 dias para investigar a denúncia. Se forem necessárias mais informações para resolver o caso, a Autoridade pode contactar o queixoso. O queixoso tem 10 dias úteis a partir da data da carta para enviar as informações solicitadas para o investigador designado para o caso. Se o investigador não é contactado pelo queixoso ou não recebe as informações adicionais no prazo de 10 dias úteis, a CCRТА pode fechar administrativamente o caso. Um caso pode ser administrativamente fechado também se o queixoso não pretende continuar a perseguir o seu caso.

Depois que o investigador analisá a queixa, ela / ele vai emitir uma das duas cartas ao queixoso: uma carta de encerramento ou uma carta de encontrar (LOF). A carta de encerramento resume as acusações e afirma que não houve uma violação do Título VI e que o caso será encerrado. Um LOF resume as alegações e as entrevistas sobre o suposto incidente, e explica se eventuais medidas disciplinares, treinamento adicional do funcionário, ou outra ação ocorrerá. Se o queixoso pretende recorrer da decisão, que ele / ela tem 15 dias após a data da carta ou a LOF para fazê-lo.

A pessoa também pode registrar uma reclamação diretamente com a Administração Federal de Trânsito, a FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590. Se a informação é necessária em outro idioma por favor contacte: 508-775-8504.

APPENDIX D - COMPLAINT FORM

Background

CCRTA makes available a Title VI Complaint Form for use by customers who wish to file a Title VI complaint on its website www.capecodrta.org. The Title VI Complaint Form specifies the three classes protected by Title VI—race, color, and national origin—and allows the complainant to select one or more of those protected classes as the basis/bases for discrimination. This form may be translated on the web site into many foreign languages, especially Portuguese.

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party: _____				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
Section III:				
I believe the discrimination I experienced was based on (check all that apply):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin				
Date of Alleged Discrimination (Month, Day, Year): _____				
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.				

Apêndice D - Formulário de denúncia

Fundo

CCRTA torna disponível um formulário de reclamação do Título VI para utilização pelos clientes que desejam apresentar uma queixa do título VI no seu site www.capecodrta.org. O Título VI denúncia formulário especifica as três categorias protegidas pelo Título VI-raça, cor e origem nacional e permite que o queixoso para selecionar uma ou mais dessas classes protegidas como base/bases de discriminação.

Seção I:				
Nome:				
Endereço:				
Telefone (Home):			Telefone (Trabalho):	
Endereço de correio electrónico:				
Requisitos de formato acessível?	Impressão Grande		Fitas de áudio	
	TDD		Outros	
Seção II:				
Você arquivamento desta queixa em seu nome?			Sim*	Não
* Se você respondeu "sim" a esta pergunta, vá para a Seção III.				
Se não, favor fornecer o nome e a relação da pessoa para quem você está reclamando:				
Explique porque você ter arquivado para um terceiro: _____				
Confirme que você obteve a permissão da parte lesada se você estiver depósito em nome de um terceiro.			Sim	Não
Seção III:				
Creio que a discriminação I experiente foi baseado no (marque todas as opções que se aplicam):				
<input type="checkbox"/> Corrida <input type="checkbox"/> Cor <input type="checkbox"/> Origem nacional				
Data de alegada discriminação (Mês, Dia, Ano): _____				
Explicar o mais claramente possível o que aconteceu e por que você acredita que foram discriminados. Descrever todas as pessoas que estiveram envolvidas. Incluir o nome e informações de contato da pessoa(s) que discriminados você (se conhecido) bem como nomes e informações de contato de quaisquer testemunhas. Se for necessário mais espaço, por favor use o verso deste formulário.				

Secção IV:		
Você já apresentado uma queixa do título VI com esta agência?	Sim	Não
Secção V		
<p>Você já apresentado esta queixa com qualquer outro federal, estadual ou agência local ou com qualquer tribunal federal ou estadual?</p> <p><input type="checkbox"/> Sim <input type="checkbox"/> Não</p> <p>Se sim, marque todos que se aplicam:</p> <p><input type="checkbox"/> Agência Federal: _____</p> <p><input type="checkbox"/> Tribunal Federal: _____ <input type="checkbox"/> Agência de estado: _____</p> <p><input type="checkbox"/> Tribunal de estado: _____ <input type="checkbox"/> A Agência Local: _____</p> <p>Forneça informações sobre uma pessoa de contato na agência/tribunal onde a queixa foi arquivada.</p> <p>Nome:</p> <p>Título:</p> <p>Agência:</p> <p>Endereço:</p> <p>Telefone:</p>		
Secção VI		
Nome da agência é a reclamação contra:		
Pessoa a contactar:		
Título:		
Telefone:		

Você pode anexar todos os materiais escritos ou outras informações que você acha que é relevante para a sua queixa.

Assinatura e Data Requerida abaixo

Assinatura

Data

Envie este formulário em pessoa no endereço abaixo, ou correio este formulário para:

CCRTA
ADMINISTRATOR
HYANNIS TRANSPORTATION CENTER
215 IYANNOUGH ROAD
PO BOX 1988
HYANNIS, MA 02601

APPENDIX E - LIST OF COMPLAINTS SINCE LAST SUBMISSION

CCRTA has maintained a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the recipient.

This list includes the date that the transit-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the CCRTA in response, or final findings related to the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program submitted to FTA every three years.

List of Investigations, Lawsuits and Complaints

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.	None			
2.				
Lawsuits				
1.	None			
2.				
Complaints				
1.	None			
2.				

APPENDIX F - TITLE VI EQUITY ANALYSIS PERFORMED FOR THE CONSTRUCTION OF THE HYANNIS TRANSPORTATION CENTER

To: Margaret Griffin, Civil Rights Officer, FTA, Region 1

From: Dennis Walsh, Assistant Administrator

Date: March 15, 2001

Subject: **Title VI Minority Impact Report for Intermodal Facility at Hyannis, MA**

An Overview

The Hyannis Transportation Center will bring together a full range of transportation services in a central location in the heart of the Cape, Hyannis, Massachusetts. It will provide many transportation choices for the Hyannis area minority community, and it will lessen the effect of traffic in the Cape's most congested region. The 11-acre site is located on state-owned land along an existing railway in downtown Hyannis.

The 17,300 sq. ft. centers will offer direct access to the minority community to CCRTA buses, intercity buses, rail service, airport shuttles, taxis, and bicycle and pedestrian paths, as well as connections to island ferries to Nantucket and Martha's Vineyard.

The property has been a railroad yard since the middle of the 19th Century as the Old Colony Branch of the New York, New Haven and Hartford Railroad. In recent years, the former railroad yard was owned by the Commonwealth of Massachusetts, the property has been misused and has been a blighting impact on the neighborhood. The construction of the architecturally attractive intermodal center will bring vitality back to the East End of the Hyannis Central Business District and the surrounding area.

Bus and car access to the site will be available from Center Street and Route 28. Limited on-site parking and "kiss-and-ride" drop-off areas will provide incentives for the minority community to use public transportation.

For the most part, the site is surrounded by commercial and industrial properties, such as automobile dealerships, an automobile repair facility, warehouses, a bus terminal, a candle making company, a retail outlet, parking lot for the Steamship Authority and mini golf course. There are a few residential buildings located on Ridgewood Ave. near the western border of the property.

CCRTA has held many meetings, all open to the public, to receive public input and suggestions for this intermodal terminal. Local project coordination was started in 1987 when a Hyannis Regional Transportation Terminal Task Force was formed by CCRTA. The task force members consisted of CCRTA staff and Advisory Board members, and representatives from Plymouth and Brockton Street Railway Company, Town of Barnstable Planning Department, Cape Cod Planning and Economic Development Commission, Cape Cod and Hyannis Railroad, the Steamship Authority, Barnstable Municipal Airport, HyLine and EOTC. CCRTA has also worked closely with the Hyannis Main Street Waterfront Historic District.

The Center will be a vital economic development tool for the region, linking workers with jobs, seniors with medical services and shopping, and providing visitors with easy access to many destinations. Destinations linked to the Center include the Steamship Authority ferries, Cape Cod Hospital, downtown Hyannis, commercial establishments along Route 132, the Hyannis airport and the Hyannis industrial park, and bus connections to most towns on Cape Cod, Boston and Providence (see service profile map below).

Demographic and Service Profile Maps

GIS analyses for this report were performed by staff and students at The Geographics Laboratory at the J. Joseph Moakley Center for Technological Applications at Bridgewater State College, Bridgewater, Massachusetts. CCRTA gratefully acknowledge the work of Mr. Larry Harman, Dr. Uma Shama, Mr. Timothy McCombe, Ms Heather Cabral and Mr. Brendan Kidwell.

Demographic Analysis

Census data for 1990 was used for this study. Since Barnstable and Yarmouth are within a one-mile radius of the new terminal in Hyannis, the Block Group Data for these towns is used. All percentages and numbers are reflective of the block group data for the Barnstable/Yarmouth Service areas.

Minority or Minority Group Persons as defined by the FTA include the following:

- “Black Americans,” which includes persons having origins in any of the Black racial groups of Africa;
- “Hispanic Americans,” which includes persons of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish or Portuguese culture or origin, regardless of race;
- “Native Americans,” which includes persons who are American Indians, Eskimos, Aleuts, or Native Hawaiians;
- “Asian-Pacific Americans” which includes persons whose origins are from Japan, China, Taiwan, Korea, Vietnam, Laos, Cambodia, the Philippines, Samoa, Guam, the U.S. Trust Territories of the Pacific, and the Northern Marianas; and
- “Asian-Indian Americans,” which includes persons whose origins are from India, Pakistan, and Bangladesh.

Using these minority groups as the reference, the appropriate fields were selected from Caliper’s 1990 Block Group Data CD and then themes developed using the GIS software Maptitude. The information was themed using an equal number of features and divided into four categories. The data that is depicted on the attached map (Fig. 1) is based on the information in Table 1. The block areas that are considered to be most influenced by the new terminal are those that touch or are within a one-mile radius of the new terminal. Table 2 is the list of those block groups that touch or are within the one-mile radius and the percent of minorities that can be found within those areas. It is found that of all the block group data used in this analysis the area that is within one mile of the terminal has the highest percentage of minorities. In conclusion, the minority community in Hyannis will be well served by the many transportation links provided by the Intermodal facility.

Service Profile Maps

The Hyannis Intermodal Terminal will be the hub for the extensive public transportation services offered by CCRTA. The integrated Hyannis area Villager summer 2001 bus service (Fig. 2) will combine the previously operated services of the Villager, Hyannis Area Trolleys and the Park & Ride Shuttle, as well as offer a new service to the East end (Bearses Way) and Sea Street area of Hyannis. This Hyannis Villager route will provide improved service, that is 20-minute headway during peak hours and 45-minute headway during the evening hours. Thus, this integrated route will offer more frequent service to the customer and serve more neighborhoods. The off-season Villager service will revert to 45-minute headway. The Town of Barnstable (Hyannis) may continue some limited service to the East end (Bearses Way) and Sea Street area of Hyannis.

Finally, the Hyannis Villager service will be fully coordinated with the existing year-round SeaLine, H20Line and private Inter- City Bus routes that originate in Hyannis (Fig.3). Overlay of census tract data (Fig.1) indicated the Villager SeaLine and H20Line routes would service areas in Hyannis that have the highest concentrations of the minority community and households with public assistance.

Table 1

ID	AREA	POPULATION	MINORITY	PCT_MIN	BLACK	AMINDIANES	ASIANPACIF	HISPANIC_O	WHITE
16746	2.20	806	0	0.00%	0	0	0	0	806
16768	1.72	210	0	0.00%	0	0	0	0	210
16795	1.06	335	19	5.67%	0	0	0	19	316
16821	1.09	837	6	0.72%	6	0	0	0	825
16847	1.85	2017	100	4.96%	40	24	7	29	1895
16872	2.15	1460	222	15.21%	144	27	0	51	1256
16902	1.20	1265	61	4.82%	21	0	30	10	1214
16930	0.90	835	44	5.27%	0	0	0	44	803
16952	0.76	1489	34	2.28%	26	0	0	8	1463
16974	0.66	1428	30	2.10%	9	6	5	10	1408
16994	2.06	2605	100	3.84%	18	8	54	20	2517
17027	0.96	804	0	0.00%	0	0	0	0	804

17051	0.37	640	53	8.28%	14	5	0	34	605
17076	0.57	1045	0	0.00%	0	0	0	0	1045
17103	1.04	854	18	2.11%	0	10	8	0	827
17128	0.55	266	0	0.00%	0	0	0	0	266
17151	0.42	769	69	8.97%	15	0	0	54	754
17171	0.51	225	0	0.00%	0	0	0	0	225
17192	0.43	899	77	8.57%	29	5	24	19	834
17218	0.34	793	81	10.21%	74	0	7	0	701
17245	0.64	1574	132	8.39%	101	25	0	6	1415
17267	0.31	999	242	24.22%	189	0	18	35	670
17289	1.00	1849	66	3.57%	11	43	0	12	1738
17312	0.35	1084	203	18.73%	154	6	37	6	887
17334	0.20	684	48	7.02%	8	12	0	28	664
17356	0.13	527	20	3.80%	12	8	0	0	507
17376	4.43	473	42	8.88%	22	17	0	3	434
17416	0.34	488	37	7.58%	0	0	0	37	488
17439	0.35	866	86	9.93%	34	31	7	14	718
17460	0.44	1262	164	13.00%	50	22	0	92	1166
17497	0.34	1097	180	16.41%	92	7	7	74	922
17521	0.72	719	29	4.03%	13	9	0	7	697
28421	2.12	1484	85	5.73%	28	0	26	31	1430
28449	3.87	537	8	1.49%	0	0	0	8	537
28479	12.37	1624	20	1.23%	12	0	8	0	1604
28525	2.44	888	42	4.73%	12	7	10	13	853
28556	2.10	1253	36	2.87%	5	31	0	0	1217
28585	1.33	591	16	2.71%	6	0	0	10	575
28614	1.44	494	38	7.69%	0	0	20	18	456
28640	0.35	506	4	0.79%	4	0	0	0	502
28662	0.74	572	40	6.99%	14	4	0	22	540
28684	0.52	880	54	6.14%	9	23	0	22	839
28710	0.68	729	32	4.39%	8	4	0	20	717
28733	2.11	1467	83	5.66%	29	6	21	27	1405
28765	0.43	473	33	6.98%	0	0	0	33	455
28789	0.49	364	40	10.99%	34	0	0	6	330
28815	0.75	1440	46	3.19%	21	0	0	25	1419
28841	0.47	856	23	2.69%	0	0	23	0	833
28867	0.46	1141	20	1.75%	0	0	0	20	1141
28891	0.50	1173	14	1.19%	0	0	14	0	1159
28912	2.06	953	0	0.00%	0	0	0	0	953
28956	0.82	970	23	2.37%	23	0	0	0	947
28983	1.71	1175	28	2.38%	0	0	6	22	1169
29009	0.73	1222	6	0.49%	0	0	0	6	1222

Table 2

ID	AREA	POPULATION	MNORITY	PCT_MIN	BLACK	AMINDIANES	ASIANPACIF	HISPANIC_O	WHITE
17218	0.34	793	81	10.21%	74	0	7	0	701
17312	0.35	1084	203	18.73%	154	6	37	6	887
17334	0.20	684	48	7.02%	8	12	0	28	664
17356	0.13	527	20	3.80%	12	8	0	0	507
17376	4.43	473	42	8.88%	22	17	0	3	434
17416	0.34	488	37	7.58%	0	0	0	37	488
17439	0.35	866	86	9.93%	34	31	7	14	718
17460	0.44	1262	164	13.00%	50	22	0	92	1166
17497	0.34	1097	180	16.41%	92	7	7	74	922
17521	0.72	719	29	4.03%	13	9	0	7	697
28421	2.12	1484	85	5.73%	28	0	26	31	1430

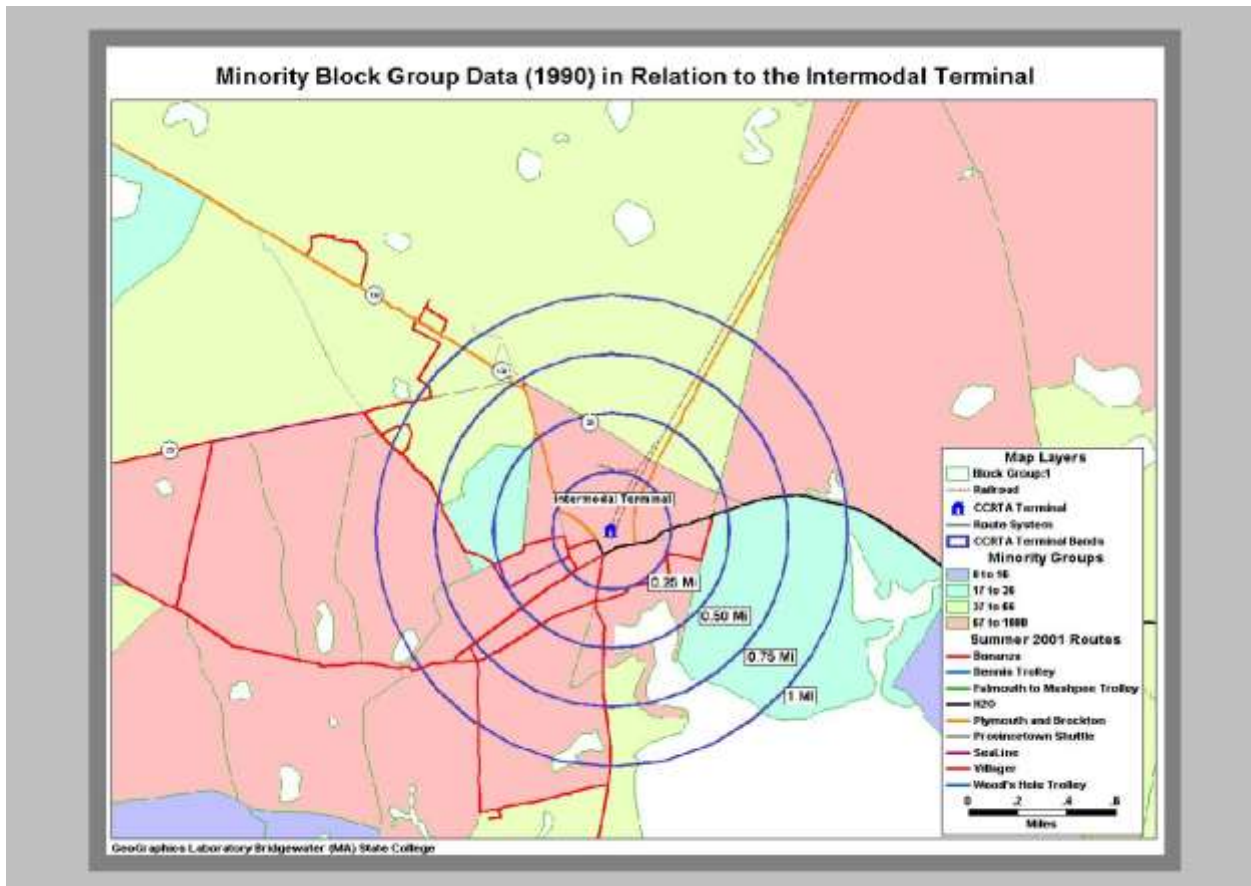


Fig. 1 Minority block group data within one mile of proposed Intermodal Terminal overlaid on public/private transportation routes in the Hyannis area.

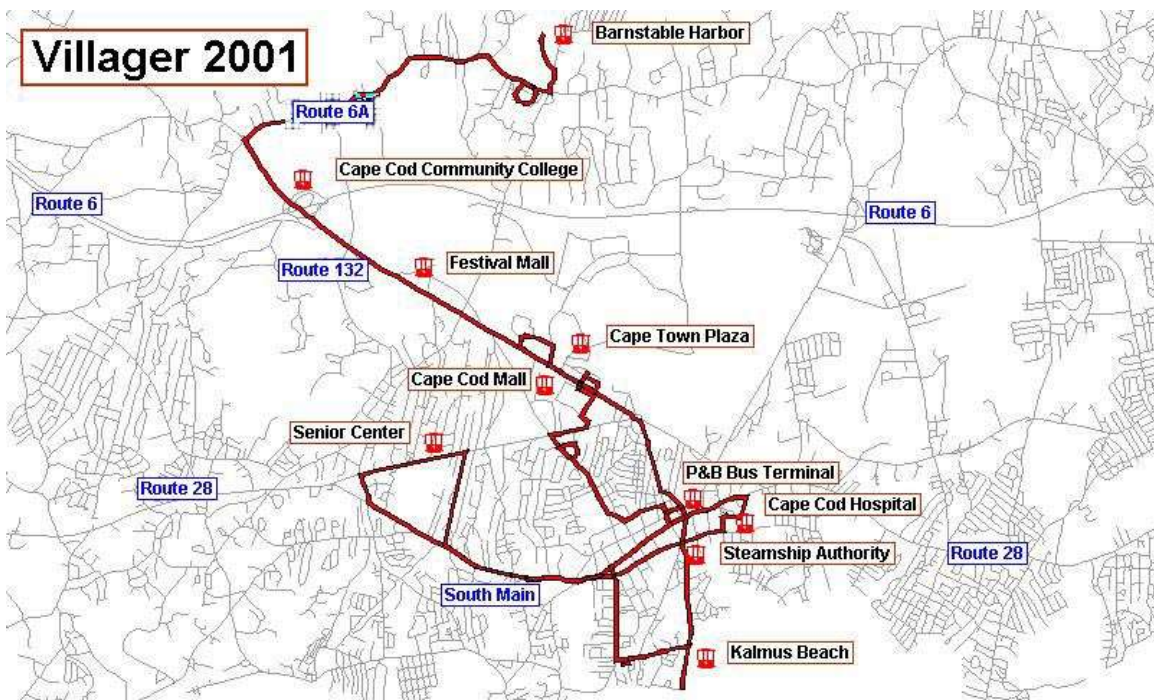


Fig. 2 Integrated Hyannis Villager Bus Service for summer 2001.
(Note: New Intermodal Center will be located across the street from current P&B Bus Terminal)

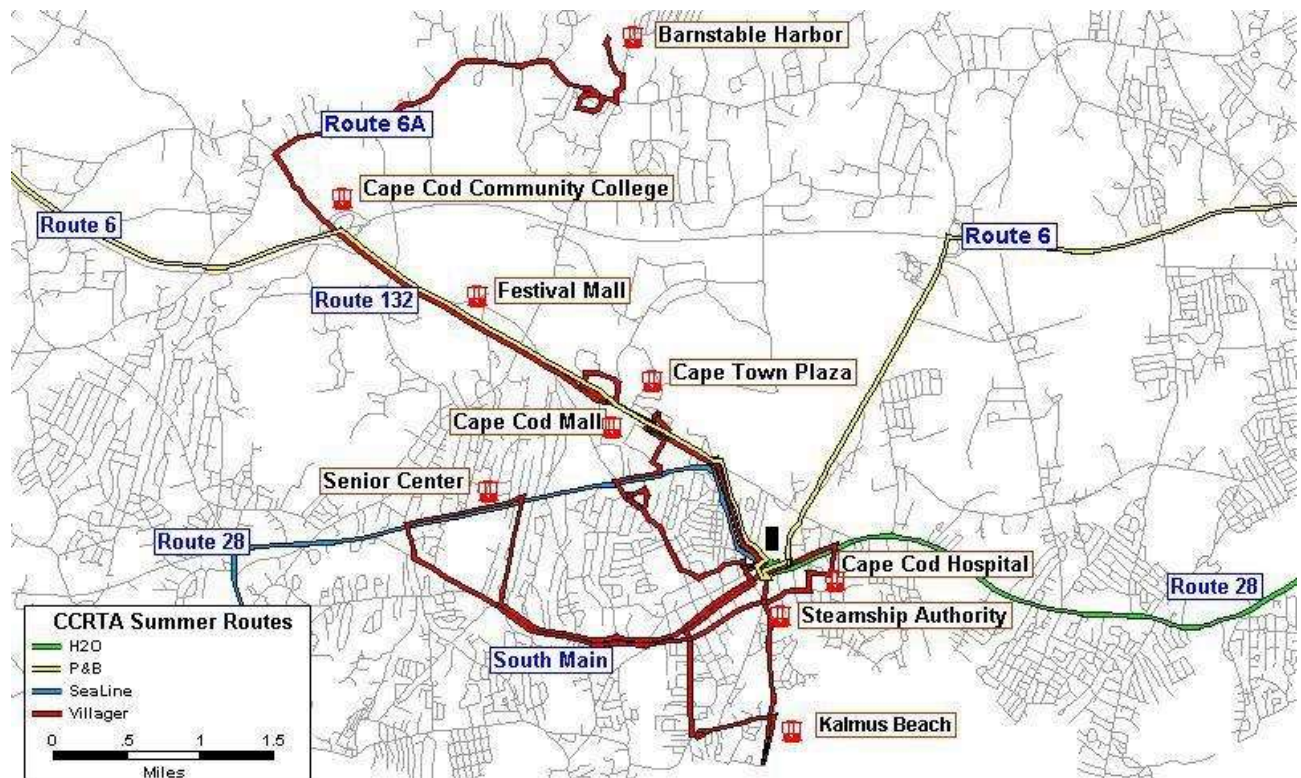


Fig.3 CCRTA Summer Fixed Route System for Hyannis, MA including the Inter-City Bus Route (Provincetown-Hyannis-Boston) of Plymouth & Brockton Street Railroad Company. Black rectangle indicates site of proposed Hyannis Intermodal Center.

APPENDIX G - LIST OF OUTREACH ACTIVITIES

Following is a list of committees and boards to which the management of CCRTA belongs. The aim of the involvement of CCRTA in these activities is to foster input and involvement from as many sources as possible in the planning activities of the CCRTA.

Advisory Committees and Boards

1. MArtap Advisory Committee (Chair)
2. Elder Services Board of Directors
3. Human Service Transportation Area Advisory Council (Chair)
4. Cape Organization for the Rights of the Disabled (Secretary)
5. Barnstable County Regional Emergency Planning Committee
6. Housing Assistance Family Self Sufficiency Advisory Committee
7. Cape & Islands Youth Council
8. Department of Transitional Assistance Advisory Board
9. Massachusetts Veterans Transportation Coalition
10. Cape Cod Healthcare Board of Directors
11. Cape Cod Chamber of Commerce Board of Directors
12. Cape Cod Cooperative Bank Board of Directors
13. Executive Order 530 – Commission for the Reform of Community, Social Service and Paratransit Transportation Services
14. MA Statewide Coordinating Council on Community Transportation
15. Cape Cod Regional Coordinating Committee
16. Cape Cod Baseball League Board of Directors

APPENDIX G (Continued) - LIST OF OUTREACH ACTIVITIES

Transit Presentations and Outreach Activities

1. Cape Cod Community College Workforce Resource Fair
2. Career Opportunities Job Fair
3. Cape Cod Commission Smart Transportation Week
4. Elder Services Case Managers
5. Housing Assistance Corp Roundtable
6. Department of Transitional Assistance Case Workers
7. Housing Assistance Corp Case Workers
8. Elder Services Vendor Fair
9. Barnstable Senior Center
10. Cape Cod Community College Project Forward
11. Harwich Senior Center
12. Cape Cod Apartments
13. Brewster Senior Center
14. Orleans Senior Center
15. Mashpee Senior Center
16. Bourne Health and Wellness Fair
17. Brewster Senior H
18. Barnstable County Regional Emergency Planning Committee Table Annual Table Top Exercises
19. Life, Inc. Mashpee
20. Fellowship Health
21. Community Connections, Inc.
22. Housing Assistance Corp Angel House
23. Falmouth Senior Center
24. Sandwich Senior Center
25. Riverview School Sandwich
26. Earth Day Cape Cod Community College
27. Senior Transportation Forum
28. Work Without Limits Coordination Transportation
29. Sight Loss Services of Cape Cod; Dennis group and Sandwich group,
30. Fairwinds Club House in Falmouth,
31. Lower Cape EXPO in Eastham
32. Travel Training Network Meetings

APPENDIX G (Continued) - LIST OF OUTREACH ACTIVITIES

33. Baybridge Club House Hyannis
34. ACCESS Program of the Cape Cod Community College
35. South Bay Mental Health Program in Sandwich
36. Lower Cape Job Fair
37. Charting the Course for Senior Transportation
38. Aging and Disability Forum I and II
39. Spaulding Rehab Hospital Cape Cod and Islands Stroke Support Group
40. Spaulding Rehab Hospital the Aging Driver's Dilemma Program
41. MBTA Board Presentation
42. APT Annual Benefit - RailBlazer Award
43. Moving Together 2013 (MT13) workshop
44. BFDC Annual Meeting
45. Cape Cod Bicycle Summit
46. Barnstable This Morning, Talk Show (TV)
47. WOMR, Talk Show (Radio)
48. Sunday Chronicle (Radio)
49. Barnstable Town Council
50. NE Rail Club Expo discussion
51. Upper Cape Tech
52. Issues & Alliance Committee
53. Reality Fair
54. Healthy Cyclists/Healthy Community
55. Youth Summit
56. Youth Council
57. Wellness Day, Sandwich
58. Cape Cod Senior Residences

APPENDIX H - CCRTA SERVICE DELIVERY POLICY

CCRTA Service Delivery Policy 2015

Introduction

Purpose

The purpose of the *Service Delivery Policy* is to ensure that the Cape Cod Regional Transit Authority (CCRTA) provides quality transit services that meet the needs of the riding public and are consistent with the CCRTA's enabling legislation and other external mandates, such as Title VI of the Civil Rights Act of 1964 and subsequent Environmental Justice (EJ) regulations and policies, by:

- establishing Service Objectives that define the key performance characteristics of quality transit services;
- identifying quantifiable Service Standards that are used to measure whether or not the CCRTA's transit services achieve the Service Objectives and to evaluate whether CCRTA services are provided in an equitable manner (as defined by Title VI and EJ);
- outlining a Service Planning Process that applies the Service Standards in an objective, uniform, and accountable manner; and
- involving the public in the Service Planning Process in a consistent, fair and thorough manner.

Background

This document is based on a request by MassDOT that CCRTA establish and publish performance standards as part of its public information systems. The basis of CCRTA's service standards and service planning methods was derived by examining those most common to other North American transit systems. The intent is to improve the CCRTA's performance by adopting best-practice techniques for planning and evaluating services.

In particular, as new technologies that will enhance the CCRTA's ability to collect and analyze data are adopted, policy modifications are needed to adapt the use of this information for service planning purposes. Future revisions to the service standards or the service planning process are reviewed by the public as part of the system's public policy relative to transparency and approved by the CCRTA Board of Directors.

Services

This policy addresses the CCRTA's fixed route services, including:

Bus

Local Bus Routes provide full weekday service between 5:40 AM and 8:00 PM, depending on the route, for all trip purposes. In general, stops on local routes are closely spaced (where practical), and pick-ups/drop-offs are allowed at wherever safe and practicable over the entire route.

Flexible Route provides full weekday and Saturday service between 7:00 AM and 8:00 PM. Flex picks up and drops off passengers at designated stops (fixed route) and also flexes off its route up to ¾ of a mile to serve people who have difficulty getting to a regular bus stop. Service runs between Harwich and Provincetown.

Summer Service Trolley Routes Seasonal shuttle services that operate Monday through Saturday from 7:00 AM to Midnight from Memorial Day weekend in May through the last weekend in September.

Service Objectives

The CCRTA is a transit system built upon customer service excellence, accessibility, reliability, state-of-the-art technology, and a diverse workforce that reflects our commitment to the communities we serve.

To evaluate progress toward achieving this mission, the CCRTA has identified the following Service Objectives, which the Authority believes represent the most important characteristics of an outstanding transit system:

Accessibility

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

Reliability

Services should be operated as scheduled

Safety

Services should be provided in a safe manner

Comfort

Services should offer a pleasant and comfortable riding environment

Cost Effectiveness

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

Service Standards

For each of the Service Objectives, the CCRTA has established quantifiable Service Standards, which allow the CCRTA to evaluate the performance of CCRTA services relative to each of the Service Objectives. These Service Standards are summarized in the following table and are discussed in detail in Chapter 3.

Table 1: Summary of Service Standards

<u>Service Objective</u>	<u>Service Standard/Guideline</u>
Accessibility	<u>Accessibility</u> Coverage Span of Service Frequency of Service
Reliability	Schedule Adherence
Safety & Comfort	Vehicle Load
Cost Effectiveness	Net Cost/passenger

Coverage Guidelines

An important aspect of providing the Barnstable County area with adequate access to transit service 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.

Coverage guidelines are established specifically for the service area in which local buses and flex buses operate as riders most frequently begin their trips on these services by foot.

Service Days

Minimum Coverage

Weekdays & Saturday

Access to transit service will be provided within a ¼ mile walk to residents of areas served by bus with a population density of greater than 5,000 persons per sq/mile.

Sunday

Sunday service is available during the summer period only. Sunday service is directed to the tourist/customer to provide rides to the seashore and its attractions.

Span of Service Standards

Span of Service refers to the hours during which service is accessible. The CCRTA 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 3. below, vary by route reflecting the predominant destinations of travel on Cape Cod. The standards require that the first trip in the morning to all major destinations leave the Hyannis Transportation Center (HTC) at or before the beginning span of service time (e.g., 5:30 AM for local routes). At the end of service day, the

last trip in the evening must depart from the HTC at or after the ending span of service time (e.g., 8:30 PM for local routes).

Table 3 Span of Service Standards

<u>Mode Day</u>	<u>Minimum Span of Service</u>
SeaLine Route	Weekday 5:30 AM - 8:15 PM Saturday 9:00 AM - 8:15 PM
H2O Hyannis – Orleans	Weekday 5:45 AM - 8:22 PM Saturday 8:30 AM - 8:22 PM
Barnstable Route	Weekday-Saturday 7:30 AM - 6:25 PM
Sandwich Route	Weekday 7:00 AM – 7:50 PM
Bourne Route	Weekday-Saturday 6:50 AM - 7:12 PM
Flex Route	Weekday-Saturday 7:00 AM – 7:45 PM

Frequency of Service Standards

To maintain accessibility to the transportation network within a reasonable waiting period, the CCRTA has established minimum frequency of service levels for each route. These minimum levels dictate the frequency of service regardless of customer demand.

Table 4 shows the weekday Time Period definitions used by the CCRTA for all routes 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 5 shows the Minimum Frequency of Service levels for each route.

Table 4 Time Period Definition

Early AM	5:30
AM Peak	6:30

Mid Day	12:30
PM Peak	5:30
Late PM	7:30

Table 5 Minimum Frequency of Service Standards

Bus Routes	Weekday Periods	Minimum Frequency
SeaLine	All day	60-minute headway
Hyannis- Orleans	All day	60-minute headway
Sandwich	PM Peak	60-minute headway
	All Other Periods	180-240 minute headway
Bourne	AM Peak	75-minute headway
	All Other Periods	60-minute headway
Barnstable	All day	60-minute headway
Flex	AM Peak	120-minute headway
	Midway	60-minute headway
	PM Peak	180-minute headway

The Minimum Frequency of Service standards are primarily expressed as “Headways,” which indicate the number of minutes scheduled between trips on a route.

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 reviewed with the possibility of increasing service 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, 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, the CCRTA 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

Schedule Adherence Standards provide the tools for evaluating the on-time performance of individual CCRTA routes. The Schedule Adherence Standards are based on frequency of service; passengers are generally more interested in strict adherence to published timetables and 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.

2. **Bus Timepoint Tests:** To determine whether a bus is on-time at an individual timepoint, such as the beginning of a route, end of a route, or a scheduled point in between, the CCRTA uses the following test based on service frequency:

c. **Scheduled Departure Service:** 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.

d. **On Time Test for Scheduled Departure Timepoints:** To be considered on time, a timepoint crossing of any trip with a leading headway of 60-minutes or more must meet the relevant condition out of the following:

4. Origin: The trip must leave its origin timepoint between 0 minutes before and 3 minutes after its scheduled departure time.
5. Mid-route timepoint: The trip must leave the mid-route timepoint(s) between 0 minutes before and 7 minutes after its scheduled departure time.
6. Destination: The trip must arrive at its destination timepoint between 3 minutes before and 5 minutes after its scheduled arrival time.

2. **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 timepoints on the route that are on time over the entire service day. 75% of all timepoints 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 Timepoint	Mid-Route TimePoint(s)	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 timepoints must be on-time according to the above definitions over the service period measured		

Exceptions:

A schedule may note that certain trips will not leave until another vehicle arrives and allows passengers to transfer. (For instance, the last bus trip of the day might wait for passengers from the last ferryboat of the day.) When applying the standard, these trips are not included.

The first trip of the day, which does not have a leading headway, is considered a scheduled departure trip.

Safety & Comfort Service Standard

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 time of day, establish the average maximum number of passengers allowed per vehicle to provide a safe and comfortable ride.

Cost-Effectiveness Service Standard

The operation of CCRTA 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. As a part of the Service Delivery Policy, CCRTA has developed the Net Cost per Passenger standard to measure the cost-effectiveness of bus routes.

Bus Net Cost per Passenger Standard

Net cost per passenger 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.

Table 11: Bus Cost-Effectiveness Service Standard

Net Cost/Passenger: Boarding Customers	<u>Operating Costs – Service Revenue/</u>
Deficient Route:	= 3 times the system average

Service Planning Process

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

Service Planning Process

The service planning process is the on-going evaluation and implementation of incremental service changes that occur on a continual basis, at least semi-annually, and on an over-arching basis that involves major changes and requires public participation. The winter and summer schedules are developed and printed on a semi-annual basis. This can include major restructuring of existing routes and proposals for new services.

The data used for all service evaluations are collected on a regular basis through various means to track and evaluate the performance of services against each of the Service Standards (as defined in Chapter 3).

Minor changes to transit 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 12). These are evaluated and implemented only through development of CCRTA’s public participation plan (with the exception of new services associated with a major capital investment).

Table 12: Minor & Major Service Changes

Minor	
Running time adjustments <ul style="list-style-type: none"> • Departure time adjustments • Headway changes to match ridership and service levels (provided the frequency and loading standards are still met) • Changes to stop locations • 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	
Major Service restructuring <ul style="list-style-type: none"> • 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 • Route extensions of greater than 1 mile • Elimination of part of a route 	Changes that will have a significant effect on resources, and may potentially have a significant effect on riders

The On-going Service Planning Process pertains to service changes that are evaluated in the on-going service planning process and 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 Contracted Operations staff, such as managers and drivers ; and
- proposals made by the CCRTA Service Planning staff.

Service Planning staff 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 area served
- Contribution to the achievement of external mandates, such as Title VI and EJ
- Other factors, as appropriate

Minor changes that are approved by the Administrator, and that can be made within the adopted budget, are implemented as soon as possible—usually in the next semi-annual schedule change.

Annually, CCRTA develops a report that describes the performance of its fixed route services:

- a description of the performance of existing services;
- recommendations for major service changes;
- a discussion of service changes that were considered and/or evaluated, but are not recommended at the time; and
- a general review of the effectiveness of previous major service changes (major service changes would not be reported on in the service planning cycle immediately after their implementation, but would be evaluated in the following planning cycle to allow time for ridership to build).

A key component of the annual service planning process is an evaluation of the performance of existing services, as measured using the Service Standards found in Chapter 3 of this policy. Based on this analysis, the Service Planning function proposes major service changes that will improve the performance of services that fail any of the Service Standards. To complete the evaluation, Service Planning creates a list of all proposed service increases and reductions. The proposed service increases are ranked using the net cost per new passenger: those that garner the most new passengers at the lowest incremental cost are ranked highest priority for implementation.

After the rankings are completed, the savings from the major service reductions are compared to the cost of major service enhancements to help select the proposed service changes. The goal is to maximize ridership and service performance in a cost-effective manner. The recommendations that result from this process are reviewed by the Administrator to assess the feasibility of implementation. Major changes are made available to the public for review and comment (as described later in this chapter). A list of the final recommendations, an indication of the routes that still violate one or more of the service standards, and the Title VI/EJ analysis are then submitted to the CCRTA Board of Directors for final approval before the changes are implemented.

Table 13: Summary of Service Planning Processes

Magnitude of changes	Minor	Major
Initiation of changes:	<ul style="list-style-type: none"> • Requests/complaints from public • Bus Contractor Operations feedback • Service Planning Staff 	<ul style="list-style-type: none"> • Requests/complaints from public • Bus Contractor Operations feedback • Service Planning Staff • Public Meetings

Evaluation of changes:	Review by Administrator	<ul style="list-style-type: none"> • Comparative evaluation of proposed service changes, and possible new services\ • Review by Administrator • Public review and comment • Title VI/EJ analysis
Implementation of changes:	Approval of the Administrator	Approval of the Board of Directors

Public Participation

Public participation in the service planning process occurs as both an on-going process and as a Service Plan specific process. The purpose of public involvement in the service planning process is to promote a regular dialogue with existing and potential riders, elected officials, and communities regarding their ever-changing service needs.

On-Going Public Outreach

The CCRTA provides avenues for on-going communication through the CCRTA’s website, as well as the customer complaints phone line and comments sent to CCRTA through its various communication forms of Twitter and Facebook. Service related comments/requests are directed to the appropriate department for consideration and response. Upon request, CCRTA staff also attend public meetings held by municipalities and meetings with public agencies to address specific service issues. In addition, from time to time, the CCRTA may conduct specific market or route-based surveys to gather direct input on a major service change or potential new service. These outreach efforts are intended to provide members of the public with the opportunity to submit service comments and requests to the CCRTA for consideration. To this end, the CCRTA 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. The CCRTA schedules open public meetings in appropriate locations and presents the analysis and issues behind the proposed service changes and solicits public comments on them. CCRTA staff then assesses and analyze the suggestions made through the public comments and, as appropriate, incorporate them into the final recommendations that go to the CCRTA Board of Directors for approval before implementation.

All Service Plan 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, Environmental Justice regulations, Open-Meeting rules, and CCRTA policies associated with these laws.

Glossary of Terms & Acronyms

CAD/AVL: Computer Assisted Dispatch/Automatic Vehicle Locator

Coverage: The geographic coverage of the CCRTA system (specifically for the service area in which buses operate). Coverage is a service guideline that is used to measure progress toward achieving the Accessibility Service Objective.

Fixed Route Service: CCRTA services that operate on designated routes with published Timetables.

Frequency of Service: The number of trips/hour provided on a route (e.g., a route that operates every 15 minutes has a frequency of 4 trips/hour). Frequency of Service is one of the Service Standards that are used to measure progress toward achieving the Accessibility Service Objective.

Headway: The number of minutes between scheduled trips on a route (e.g., a route that operates 4 trips/hour has a 15-minute headway).

Net Cost/Passenger: Reflects the benefits of a given service (measured in customers) against the public cost of operating the service. Net Cost/Passenger is the Service Standard that is used to measure progress toward achieving the Cost-Effectiveness Service Objective.

Schedule Adherence: An indication of on-time performance, or how reliably services adhere to the published schedules. Schedule Adherence is the Service Standard that is used to measure progress toward achieving the Reliability Service Objective.

Service Evaluation Process: Through the Service Evaluation Process, data collected on CCRTA services are compared against the Service Standards to determine whether or not individual existing services perform at acceptable levels and to evaluate the potential of possible service changes. The Service Evaluation Process also uses the Service Standards to compare the performance of existing services, with those of proposed service changes and/or possible new services, to prioritize the allocation of resources within the system.

Service Objectives: To evaluate progress toward achieving its mission, the CCRTA has identified five Service Objectives that the Authority believes represent the most important characteristics of high quality service: 1) Accessibility—services should be geographically available throughout the community and should operate at convenient times and frequencies; 2) Reliability—services should be operated as scheduled; 3) Safety—services should be provided a safe manner; 4) Comfort—services should offer a pleasant and comfortable riding environment; and 5) Cost Effectiveness—services should be tailored to target markets in a financially sound and cost-effective manner.

Service Plan: Through preparation of a Service Plan, the CCRTA ensures that the CCRTA uses available funds in the most effective manner by evaluating the performance of existing services against the Service Standards. Based on this analysis, the Service Planning may propose new service and/or major changes to existing services to improve their performance on the Service Standards.

Service Planning Process: The CCRTA regularly evaluates the performance of its services through the service planning process. The primary objective of the service planning process is to ensure that the CCRTA uses available resources in the most effective manner by developing strategies to improve performance and/or to reallocate service within the system.

Service Standards/Guidelines: The Service Standards/Guidelines perform two important functions: 1) they establish the minimum or maximum acceptable levels of service that the CCRTA must provide to achieve the Service Objectives; and 2) they provide a framework for measuring the performance of CCRTA services in the Service Evaluation Process.

Span of Service: Refers to the hours during which service is accessible and is defined by the times that a service begins in the morning and ends in the evening. Span of Service is one of the Service Standards that are used to measure progress toward achieving the Accessibility Service Objective.

Title VI: Title VI of the Civil Rights Act of 1964 requires that transit agencies that receive federal funding demonstrate that they do not discriminate in the provision of services on the basis of race, color, or national origin.

Vehicle Load: Defines the level of passenger crowding that is acceptable for a safe and comfortable ride. Vehicle Load is expressed as a ratio of the number of passengers on the vehicle to the number of seats on the vehicle. Vehicle Load is the Service Standard that is used to measure progress toward achieving the Safety and Comfort Service Objectives.

APPENDIX I - LIMITED ENGLISH PROFICIENCY PLAN

CAPE COD REGIONAL TRANSIT AUTHORITY

TITLE VI COORDINATOR

JOHN FULLER, GRANTS MANAGER

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INTRODUCTION

This *Limited English Proficiency Plan* has been prepared to address the Cape Cod Regional Transit Authority's (CCRTA) responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English proficiency language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled *Improving Access to Services for Persons with Limited English Proficiency*, indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, which includes CCRTA.

Plan Summary

The CCRTA has developed this *Limited English Proficiency Plan* to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided. As defined Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, the CCRTA used the four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served by the CCRTA.
2. The frequency with which LEP persons come in contact with CCRTA services.
3. The nature and importance of services provided by the CCRTA to the LEP population.

4. The interpretation services available to the CCRTA and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is in the following section.

MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS

1. The number or proportion of LEP persons in the service area who may be served or are likely to require CCRTA services.

The CCRTA staff reviewed the 2000 U.S. Census Report and determined that 4,796 persons out of 175,615 in CCRTA's area of service have limited English proficiency; that is, they speak English "not well" or "not at all", this is only a 2.73% of the overall population in the service area.

2. The frequency with which LEP persons come in contact with CCRTA services.

The CCRTA staff reviewed the frequency with which the board, office staff and bus/van drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. To date, the CCRTA has had no requests for interpreters and no requests for translated program documents. The board, office staff and bus/van drivers have had very little contact with LEP persons.

3. The nature and importance of services provided by the CCRTA to the LEP population.

There is no large geographic concentration of any type of LEP individuals in the service area for the CCRTA. The overwhelming majority of the population speak only English. As a result, there are few social, service, professional and leadership organizations within the CCRTA service area that focus on outreach to LEP individuals. The CCRTA board, office staff and bus/van drivers are most likely to encounter LEP individuals through bus/van rides, office visits, phone conversations, and attendance at Board/Council meetings.

4. The resources available to the CCRTA, and overall costs to provide LEP assistance.

The CCRTA reviewed its available resources that could be used for providing LEP assistance, which of its documents would be most valuable to be translated if the need should arise, and contacted local citizens that would be willing to provide voluntary Spanish translation if needed within a reasonable time period. Other language translation if needed would be provided through a telephone interpreter line for which the city would pay a fee.

LANGUAGE ASSISTANCE

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to CCRTA services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

How the CCRTA staff may identify an LEP person who needs language assistance:

- Post notice of LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand.
- All CCRTA staff will be provided with "I Speak" cards to assist in identifying the language interpretation needed if the occasion arises.
- All CCRTA staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.
- When the CCRTA sponsors an informational meeting or event, an advanced public notice of the event should be published including special needs related to offering a translator (LEP) or interpreter (sign language for hearing impaired individuals). Additionally, a staff person may greet participants as they arrive. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English. Although translation may not be able to be provided at the event it will help identify the need for future events.

LANGUAGE ASSISTANCE MEASURES

Although there is a very low percentage in the CCRTA of LEP individuals, that is, persons who speak English "not well" or "not at all", it will strive to offer the following measures:

1. The CCRTA staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English.
2. The following resources will be available to accommodate LEP persons:
 - Volunteer interpreters for the Spanish language are available and will be provided within a reasonable time period.

STAFF TRAINING

The following training will be provided to all staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of the "I Speak" cards.
- Documentation of language assistance requests.
- How to handle a potential Title VI/LEP complaint.

All contractors or subcontractors performing work for the CCRTA will be required to follow the Title VI/LEP guidelines.

TRANSLATION OF DOCUMENTS

The CCRTA weighed the cost and benefits of translating documents for potential LEP groups. Considering the expense of translating the documents, the likelihood of frequent changes in documents and other relevant factors, at this time it is an unnecessary burden to have any documents translated.

Due to the very small local LEP population, the CCRTA does not have a formal outreach procedure in place, as of 2015. Translation resources have been identified and are limited in this region. However, when and if the need arises for LEP outreach, the CCRTA will consider the following options:

- When staff prepares a document, or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

MONITORING

Monitoring and Updating the LEP Plan - The CCRTA will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated when data from the 2010 U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in the CCRTA service area. Updates will include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether the CCRTA's financial resources are sufficient to fund language assistance resources needed.
- Determine whether the CCRTA fully complies with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.
- Maintain a Title VI complaint log, including LEP to determine issues and basis of complaints.

DISSEMINATION OF THE CCRTA LEP PLAN

- Post signs at conspicuous and accessible locations notifying LEP persons of the LEP Plan and how to access language services.
- State on agendas and public notices in the language that LEP persons would understand that documents are available in that language upon request at CCRTA's administrative offices located at the Hyannis Transportation Center.

APPENDIX J - CCRTA MONITORING RESPONSIBILITIES

Title VI compliance requires the monitoring of all program areas to ensure that all CCRTA and its contractors activities are conducted in a nondiscriminatory manner and appropriate procedures are in place for the collection of related data. Program areas throughout CCRTA will be monitored to ensure compliance on an annual basis. Management and appropriate authorities are required to cooperate in these efforts.

WHAT ACTIVITIES ARE MONITORED

The following areas are a representation of the type activities that may be monitored in each area, although some program areas may not be involved in every activity:

- Information related to studies conducted that provided data relative to minority persons, neighborhoods, income levels, physical environment and travel habits.
- The number of public meetings and hearings held during the reporting period.
- Efforts used to ensure citizen participation in public meetings and hearings, particularly minorities, women, elderly, disabled and low-income persons.
- Title VI training provided by CCRTA, FTA, and NTI sponsored programs and training.
- Major accomplishments made regarding Title VI during the year - including instances where Title VI issues were identified and discrimination was prevented.
- The number of pre-draft Environmental Impact Statements (EIS) reviewed.
- Issues addressed in Environmental Impact Statements where minorities, women, elderly, disabled and low-income persons were adversely impacted.
- Whether there was a need to utilize bilingual or non-English advertisements, announcements, notices, etc. to meet Limited English Proficiency (LEP) needs.
- Whether interpreters were present when needed to assist with LEP needs.
- Whether negotiation reports related to real estate transactions indicated a disparity in negotiation procedures between minorities and non-minorities.
- Mechanisms used to identify what communities (minorities, women, elderly, disabled, and low- income) were represented in the negotiation phase.
- The number of construction projects initiated in the reporting period.
- Procedures in place to monitor Title VI compliance as it relates to special emphasis programs such as the Disadvantaged Business Enterprise program, On the Job Training program, etc.
- The number of Title VI complaints received, status of complaints, resolution of complaints, etc.

APPENDIX K - CCRTA OPERATING CONTRACTOR OVERSIGHT PROCEDURES

Purpose

The purpose of these Operating Contractor Oversight Procedures is to:

- Ensure that all technical specifications and contract requirements are met by contractors
- Monitor compliance with FTA requirements for FTA-funded vehicles or facilities that are leased to service providers, or maintained under contract by other than the CCRTA employees
- Identify performance issues and address them in a timely manner
- Track information regarding performance quality for the purposes of evaluating contractors for future procurements
- Ensure that all construction is performed in accordance with the design intent agreed upon in the original contract or through an approved change order or modification.

These procedures explain methods of monitoring, persons responsible, frequency, and expected deliverables associated with managing performance and compliance monitoring systems for rolling stock, ADA paratransit, and fixed route services. Performance and compliance monitoring for third-party contractors is distinguished from compliance monitoring of public entities operating federally-funded services, rolling stock, and facilities.

Scope and Applicability

This Procedure applies to monitoring performance and compliance for the following types of projects/programs:

- Rolling Stock
- ADA Paratransit
- Fixed Route, Services

The frequency and type of monitoring will be based upon the following: a) size of the grant or contract, b) associated risks, c) service complexity, and d) type of grant or contract.

References to Legislative and Regulatory Documents

- FTA Circular 4220.1F, "Third Party Contracting Guidance"
- 49 CFR Part 18
- OMB Circular A-133 Compliance Supplement 2013

Definitions

- **Contractor Performance Monitoring:** The process by which CCRTA oversees and tracks contractor performance to ensure that the performance and quality assurance standards set forth in the contract/solicitation are met. Performance requirements are specified in solicitations such as Request for Proposals and are included in contracts. Performance measures typically relate to scheduling/timeliness, customer service, and

nonconformance. Performance data is also considered in the evaluation of a particular contractor for participation in future projects.

- **Contractor Compliance Monitoring:** When federally-funded services, rolling stock, and facilities are operated by a contractor other than CCRTA, they must be subject to regular reviews by the CCRTA to ensure compliance with FTA requirements.
- **Other Public Entity Compliance Monitoring:** When federally-funded services, rolling stock, and facilities are operated by a public entity other than CCRTA, they must be subject to regular reviews by the CCRTA to ensure compliance with FTA requirements.

General Oversight Procedures for Services Providers

▪ Title VI Monitoring Procedures

The third-party contractor must ensure that no person shall, on the grounds of race, color, or national origin, be excluded from participating in, or be denied the benefits of, or be subject to discrimination under any program, or activity receiving Federal financial assistance. The third-party contractor must ensure that federally supported transit services and/or related benefits are distributed in an equitable manner. Third-party contractors are responsible for ensuring that they comply with Title VI requirements such as; notifying customers of their rights under Title VI; having Title VI complaint procedures; taking reasonable steps to ensure access to Limited English Proficiency (LEP) populations; and seeking out the viewpoints of minority, low-income and LEP populations when conducting public outreach and involvement activities. CCRTA should be informed of any Title VI complaints received by its third-party contractors.

Key Requirement:

- Third-party contractors delivering transportation services with FTA funds must notify CCRTA immediately (within 48 hours) of any complaints received.
- Revisions to Title VI Plans must be submitted to CCRTA within 30 days of FTA approval. Revisions are required every three years.

▪ Drug and Alcohol

CCRTA requires its contractors to maintain records on Drug and Alcohol program administration and the test results of individuals for whom it has testing responsibility. CCRTA must take the following measures to monitor compliance with FTA requirements, 49 CFR Part 655 Prevention of Alcohol Misuse and Prohibited Drug Use in Transit Operations, as amended, and 49 CFR Part 40 Procedures for Transportation Workplace Drug and Alcohol Testing Programs, as amended.

- Contractors will maintain Drug and Alcohol program records in a secure location for a minimum of up to five (5) years. These records must be available to CCRTA for inspection at any time during normal business hours.
- CCRTA will provide technical assistance in understanding and meeting the program requirements, and overseeing the drug and alcohol programs of third-party contractors with safety-sensitive employees.

- CCRTA will review third-party contractor programs using standardized compliance checklists to ensure that all required elements are present and that the right type of testing is conducted, the proper forms are used and completed correctly, and records are stored in a secure location and maintained for the required amount of time.
- Contractors will ensure the quality of testing services by establishing a written contract with each testing provider and verifying that the vendor is HHS certified. Proof of this certification must be filed at least annually when submitting Drug & Alcohol results to CCRTA.
- CCRTA will hold periodic contractor site visits, investigate reports of flawed procedures, and document training aimed at correcting any deficiencies.

▪ **Equal Employment Opportunity (EEO):**

Third-party contractors must ensure that no person in the United States shall on the grounds of race, color, religion, national origin, sex, age, or disability be excluded from participating in, or denied the benefits of, or be subject to discrimination in employment under any project, program, or activity receiving Federal financial assistance under the Federal transit laws. (Note: EEOC's regulation only identifies/recognizes religion and not creed as one of the protected groups.) Contractors that receive capital or operating assistance in excess of \$1 million or planning assistance in excess of \$250,000 and employ 50 or more transit related employees must submit to CCRTA an EEO plan. Program updates are due every three years.

▪ **Compliance Record Keeping**

CCRTA must fully document all compliance monitoring efforts conducted on third-party contractors. A "Compliance Monitoring File" is maintained for each organization, which includes the following items:

- Pre-award assessment checklist
- Periodic reports from third-party contractor
- On-site visit report
- Corrective action plan, if any
- Annual reports checklist

Copies of e-mail, memos, or other written correspondence will be maintained in compliance with Massachusetts Records Retention Policies.

In addition, CCRTA maintains evidence that vendors and contractors are being monitored to ensure they perform in accordance with the terms, conditions and specifications contained in their contracts or purchase orders. All records of inspections and approvals, deliverables provided or services performed are kept for evidence that CCRTA is making sure vendors and contractors adhere to contract requirements. The correspondence between CCRTA and its contractors is stored for evidence of ongoing contract administration. Once an issue is discovered, CCRTA follows up with its contractor to ensure that corrective action is taken. Efforts, including the follow-up on findings, are documented.

▪ **Customer Complaint Procedures**

Customer complaint management is critical to successful program implementation. CCRTA must elicit customer feedback to increase customer satisfaction and ensure that its third-party contractors are meeting the needs of the public. The following methods will be used to track customer satisfaction:

- Conduct an annual review of customer satisfaction data collected by third-party contractors operating transit services.
 - Post complaint forms on the CCRTA website allowing customers to submit their complaints online, and offer a number for customers to call to submit complaints on issues such as driver courtesy, on-time performance, passenger safety and other service standards. Responses to customer complaints must be delivered via written response within ten days of the complaint.
 - Maintain a formal complaint and tracking procedure that is shared with third-party contractors providing transit services.
- **Final Financial and Program Reports Closeout**

The final financial and program reports must be submitted within 90 days of project completion or expiration of funding. All expenditure obligations must be paid prior to filing the final reports. The close out reports should be clearly identified as final. They must show that all activities and expenditures associated with the grant are completed and the grant is ready to close. The final program report should include a detailed description of the project with a focus on program outcomes.

The program report should include quantitative data regarding the effectiveness of the program, if applicable. The program report will detail how the program met the identified needs and the specific intentions of the grant award.

The contractor will be required to maintain all books, documents, payroll documentation, accounting records, and other evidence pertaining to costs incurred under a federal grant awards during the period of the grant and for three years thereafter. These records must be available for inspection by any authorized representatives of CCRTA or the Federal Government.

Disadvantaged Business Enterprise (DBE) Monitoring

Third-party contractors must comply with 49 CFR Part 26 to ensure nondiscrimination in the award and administration of DOT-assisted contracts. Written DBE programs are required of FTA subrecipients of planning, capital, and/or operating assistance that will have contracting opportunities (excluding transit vehicle purchases) exceeding \$250,000 with those funds in a Federal fiscal year.

The CCRTA and its prime contractor are required to follow the CCRTA approved DBE program. The program will be updated by the CCRTA every three years or when significant changes occur.

Subrecipients and prime contractors must following all aspects of the CCRTA DBE Program:

1. A contract clause ensuring non-discrimination,
 2. A contract clause requiring prompt payment and retainage,
 3. Provision for DBE subcontractor termination and
 4. Project invoicing must explicitly show progress on DBE goals.
- DBE liaison must be invited to all project meetings to make sure DBE requirements and goals are met. Project updates must include an update on payments to DBE's and the overall DBE goal. DBE reports are generated every 6 months by the DBELO. DBE reports must be submitted to CCRTA on the following schedule;

Report Due Date	For Filing Period
May 1	October 1 through March 31
November 1	April 1 through September 30

Rolling Stock Oversight Procedures

To monitor FTA-funded vehicles or facilities that are maintained under contract by other than the CCRTA employees, CCRTA requires that contracts address maintenance standards and maintenance performance indicators. Contractors are required to develop their own maintenance plan which meets CCRTA approval or adopt the CCRTA maintenance plan. Written reports on maintenance activities must be submitted to CCRTA as part of each contractors monthly filing. CCRTA will also conduct periodic reviews of maintenance records and inspections of FTA-funded vehicles and facilities.

ADA Paratransit, Fixed Route, and Charter Services Oversight Procedures

In prohibiting discrimination in the provision of transportation services against persons with disabilities, the Americans with Disabilities Act of 1990 requires that vehicles purchased or leased after August 25, 1990, and new and altered facilities designed and constructed (as marked by the notice to proceed) after January 25, 1992, must comply with the applicable standards of accessibility in 49 CFR parts 37 and 38 (42 USC 12101-12213). CCRTA requires that third-party contractors comply with these standards of accessibility, including the provision of equivalent services.

- **ADA Compliance Monitoring Procedures**

Third-party contractors are required to follow titles II and III of the Americans with Disabilities Act (ADA) of 1990. ADA provides that no organization shall discriminate against an individual with a disability in connection with the provision of transportation service. The law sets forth specific requirements for a subrecipient's vehicle and facility accessibility and the provision of service, including complementary paratransit service.

CCRTA utilizes the following monitoring methods to ensure that third-party contractors operating ADA Paratransit services are in compliance:

1. Review the third-party contractor's ADA-related policies and monitor compliance with the policies.
2. CCRTA informs third-party contractors of the ADA requirements via training. This training ensures that personnel operate vehicles and equipment safely, assist passengers properly, and treat persons with disabilities who use the service in a

respectful and courteous way, with appropriate attention to the differences among persons with disabilities. All contracts for the operation of ADA Paratransit service must include mandatory driver training requirements. Training provisions must include requirements regarding curriculum, length of training period, resources, and assurances. Contracts must call for initial driver training and annual refresher trainings. Training programs must also include passenger assistance techniques and disability sensitivity modules.

3. For prime contractors, CCRTA will employ surveys, checklists and interview forms, as well as follow-up correspondence to effectively document compliance. For lesser third party providers, CCRTA will rely on spot visits and desk audits to monitor performance. All documentation reflecting monitoring results is maintained as evidence of oversight.
4. Maintain a record keeping system for monitoring on-time performance and tracking these indicators of capacity constraints. At any given time, CCRTA should be able to demonstrate that the denials it does have, as well as the missed trips, late pickups, etc., are not an operational pattern or practice that significantly limits the availability of ADA paratransit service.
5. Track ADA-eligible trips separately from non-eligible trips. To confirm that a caller can reach a reservation agent, CCRTA uses TASKE reports to collect data on average call wait time, number of missed calls, call abandonment rates, and other indicators of performance to determine compliance.
6. Monitor service capacity constraints and review no-show policies.
7. Ensure that all third-party contractor vehicle accessibility features, such as wheelchair lifts, ramps, securement devices, signs, and communication equipment for persons with disabilities, be maintained and operational.

▪ **Fixed Route Service Monitoring**

For a contractor's fixed route service supported with Section 5307 assistance, fares charged elderly persons, persons with disabilities or an individual presenting a Medicare card during off peak hours will not be more than half the peak hour fare. The CCRTA is responsible for ensuring that contractors and lessees that operate services to which the half fare requirement applies follow applicable guidelines.

▪ **Third Party Contractor Maintenance Monitoring**

Third party contractors must keep Federally-funded equipment and facilities in good operating order and maintain ADA accessibility features.

- As identified in Rolling Stock Oversight, third party contractors are required to have a current written maintenance program that has been approved by CCRTA for FTA-funded rolling stock that documents the maintenance plan. The third party contractors must follow its maintenance program for equipment.
- The third party contractor's FTA-funded vehicles must be maintained regardless of who operates and maintains them. Third-party contractors and lessees "stand in the shoes" of the CCRTA as far as FTA maintenance requirements are concerned.

- If the third party contractor has equipment purchased with Federal funds under warranty, FTA requires that they have a system for identifying warranty claims, recording claims, and enforcing claims with the manufacturers.

- **Frequency of Performance Reviews and Oversight**
 - At a minimum, formal performance reviews will be completed annually, with documented corrective actions, for larger and more complex projects.
 - For contractors with multi-year contracts, a formal review every twelve months will be done to assist in determining whether the contract should be extended.

Service Provider Compliance Monitoring Checklist

Evaluation Area	Spot	Annual Onsite Review
Vehicle Maintenance Reviews (including wheelchair lifts and other accessibility features)		
Warranty Recovery Program		
Physical Inventory of FTA Property		
Passenger Fare Notices Posted in all rolling stock		
Vehicle cleanliness		
Safety Policy Changes (Training)		
Driver Training		
ADA Compliance		
Phone Reservation Hold Time		
Phone Reservation Dropped Calls		
Phone Reservation Missed Calls		
Title VI Compliance		
DBE Program Adherence		
Drug and Alcohol Contractor Monitoring		
Annual MIS Reports for D&A		
Review of bi-monthly assessment of each Scheduler and Dispatcher		
Facility Upkeep and appearance		
CORI Records up to date		
OSHA Environmental Compliance Report		
Procurement Policies Followed		
Monthly Reporting (Prime Contractor)		

- Total Passengers		
- Total Vehicle Miles		
- Total Vehicle Hours		
- Wheelchair Transports		
- Total Number of Bicycles		
- Miles Between Maintenance Calls		
- Fixed Route Lift Failures		
- Number of Complaints/1000 passengers		
- Accidents per 100,000 miles		
- Preventable Accidents per 100,000 miles		
- Passenger accidents per 100,000 miles		
- Preventive Maintenance Report		
- Missed Trips		
- Cancellations		
- No-Shows		
- On-Time Performance		
- Complaints Received by Customer Type		
- Employees Trained		
- PCA's and Companions Transported		
- Total Late Trips		
- Payroll Periods reported late		

REVIEWER: _____

DATE: _____