

**Southeastern Regional Transit  
Authority**

# **Title VI Program**

**February 2022**

*Adopted by the Southeastern Regional Transit  
Authority Advisory Board on 02/24/2022.*





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# **1 INTRODUCTION**

This Title VI report has been prepared by the Southeastern Regional Transit Authority (SRTA) in compliance with the Federal Transit Administration (FTA) of the United States Department of Transportation's (USDOT's) Title VI guidance. The purpose of this report is to ensure the SRTA's policies and programs meet the civil rights guidelines and obligations established by FTA's current Title VI circular (FTA C 4702.1B) to provide equitable transit services and benefits across the SRTA's service area.

## **1.1 ABOUT TITLE VI**

Title VI of the Civil Rights Act of 1964 requires that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance". This provision of the Civil Rights Act is followed by agencies that receive federal financial assistance.

The FTA maintains a guiding document that describes the requirements of the Title VI program and establishes rules federal funding recipients must follow. This document, called a 'circular', was first published by the FTA on May 26, 1988, as FTA C 4701.1. The circular was updated on May 13, 2007 as FTA C 4701.1A, and again on October 1, 2012 as FTA C 4702.1B. The 2012 circular is the current guidance that this report follows. Appendix A of this document includes a checklist demonstrating this Title VI Program's compliance with the circular.

## **1.2 ABOUT SRTA**

### **Authorization and Origins**

SRTA was established under Massachusetts General Law (MGL) 161B in 1974. The SRTA service area covers 289 square miles, 322,845 residents, and serves Acushnet, Dartmouth, Fairhaven, Freetown, Mattapoisett, New Bedford, Somerset, Swansea, and Westport with fixed-route and demand-response public transit.<sup>1</sup>

### **Service Area Overview**

SRTA's fixed-route and demand-response systems are dispatched from two garages: one in Fall River and one in New Bedford. Fall River fixed-route service originates from the Fall River Terminal on 4th Street. New Bedford fixed-route service originates from the New Bedford Terminal on Elm Street. The two terminals are connected via the New Bedford/Fall River intercity local and express routes. SRTA provides approximately 2.7 million fixed-route passenger trips and 83,000 demand-response passenger trips annually.<sup>2</sup>

Maps showing SRTA's service area, fixed routes, facilities, and key service area destinations are in Figure 1 through Figure 3.

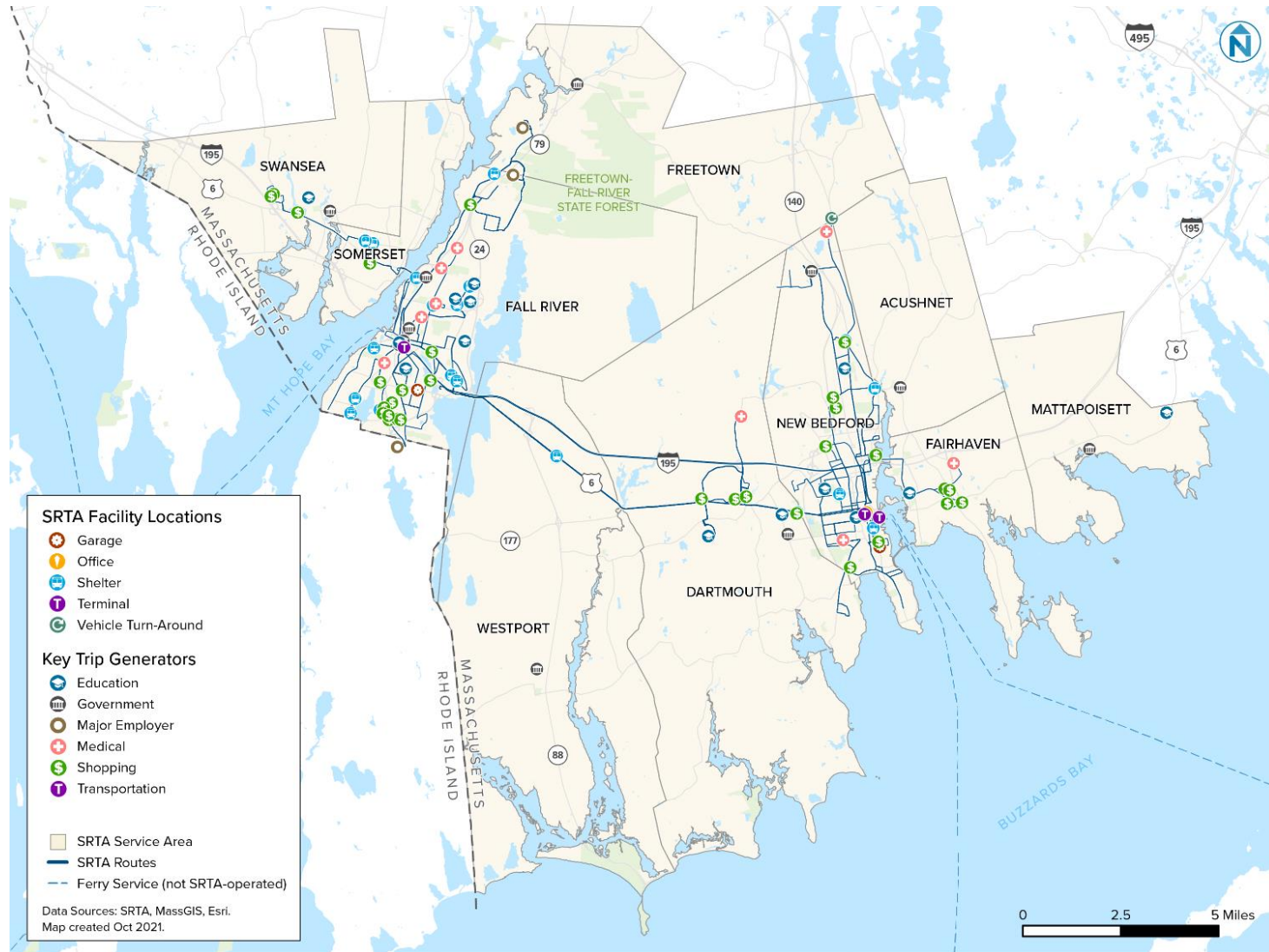
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<sup>1</sup> Federal Transit Administration. Southeastern Regional Transit Authority 2019 Annual Agency Profile.  
<[https://www7.fta.dot.gov/sites/fta.dot.gov/files/transit\\_agency\\_profile\\_doc/2019/10006.pdf](https://www7.fta.dot.gov/sites/fta.dot.gov/files/transit_agency_profile_doc/2019/10006.pdf)>

<sup>2</sup> Ibid.

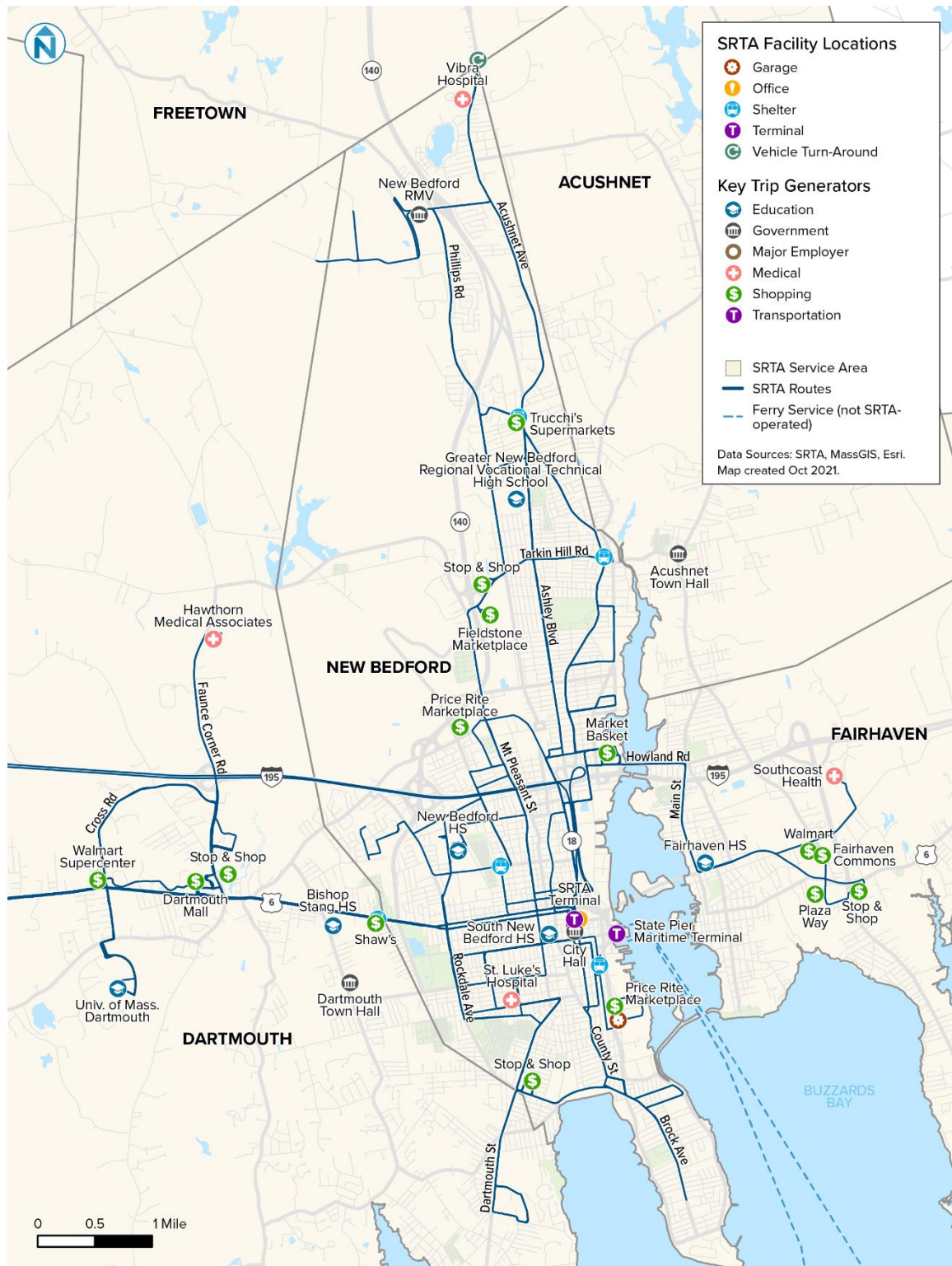
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Figure 1 Map of SRTA Service Area with SRTA Facilities and Key Trip Generators



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**Figure 2 Map of New Bedford with SRTA Facilities and Key Trip Generators**





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**Figure 3 Map of Fall River with SRTA Facilities and Key Trip Generators**





## **Service Overview**

SRTA fixed-route service is provided on 24 routes with a weekday span of service from approximately 6:00 a.m. to 10:00 p.m. Saturday fixed-route service operates from approximately 6:00 a.m. to 8:00 p.m. There is no fixed-route service on Sundays and holiday service follows a Saturday schedule. Demand-response service is available in all ten service-area communities on every day of the week, and exceeds the minimum coverage prescribed by the Americans with Disabilities Act (ADA) of 1990.

## **Budget, Governance, and Operations**

The SRTA annual operating budget is approximately \$19 million<sup>3</sup>, and revenue is earned through rider fares, advertising on physical assets, assessments to service area communities, Commonwealth contract and capital assistance grants, and federal grants for capital and operating expenses. SRTA is governed by an advisory board of chief elected officials from each service area community, a disabled community representative, and a rider representative. The advisory board appoints the administrator, approves the annual budget, establishes levels of service and fares, and approves the purchase and sale of real property.

In accordance with MGL 161B, fixed-route and demand-response transit operations must be contracted with an operating company. SRTA's current operating company, South Coast Transit Management (SCTM), is a wholly owned subsidiary of First Transit. SCTM is responsible for providing operators and maintenance staff, operating fixed-route and demand-response service, maintaining capital assets, and reporting system performance to SRTA. The operating contract with SCTM was renewed in 2021, with SCTM providing a general manager and an assistant general manager of operations.

## **Mission Statement**

*SRTA's mission is to provide safe, convenient, and economical transportation opportunities for people that supports economic development and improved quality of life for South Coast residents.*

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<sup>3</sup> Ibid.

## Title VI Program Update

This Title VI Program is an update of SRTA's 2019 Title VI Program, and was prepared by SRTA and its consultant, Nelson\Nygaard Consulting Associates, Inc. SRTA is responsible for the final layout and contents of the report. Questions or comments about the content of this report can be addressed to:

**Shayne M. Trimbell, AICP**  
Director of Transit Planning  
Southeastern Regional Transit Authority  
700 Pleasant Street, Suite 530  
New Bedford, MA 02740

### 1.3 ABOUT THIS TITLE VI PROGRAM

This Title VI Program has been prepared in accordance with FTA C 4702.1B. In the Title VI Program, FTA guidance is addressed using various analytical methods (e.g., maps, charts, tables), using quantitative and qualitative data.

- **Chapter 1** introduces federal Title VI law, SRTA, and this Title VI Program.
- **Chapter 2** includes SRTA's general Title VI compliance documents and procedures and summarizes Title VI complaints lodged since SRTA's last Title VI Program was submitted.
- **Chapter 3** summarizes SRTA's public participation plan (PPP), including tactics for engaging with minority and limited-English proficient (LEP) people. This chapter also lists outreach activities conducted by SRTA since submission of the agency's last Title VI Program.
- **Chapter 4** includes SRTA's Language Assistance Plan (LEP Plan), which includes the four-factor analysis that describes the number of LEP people likely to be encountered by SRTA. This chapter also describes how SRTA engages with these populations.
- **Chapter 5** describes SRTA's service area demographic profile and distribution of low-income and minority people. This chapter classifies SRTA routes based on the area they serve as minority or non-minority.
- **Chapter 6** describes SRTA's service standards and policies, including those for vehicle load, vehicle headway, on-time performance, service availability, distribution of transit amenities, and vehicle assignment.

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- **Chapter 7** reports the results of SRTA's service monitoring program, identifying routes that do or do not meet standard, and applying the disparate impact policy to route performance.
- **Chapter 8** defines SRTA's major service change policy, and the agency's disparate impact and disproportionate burden policies, which may be applied if a major service change adversely affects low-income or minority populations. This chapter also includes any equity analyses that were completed since SRTA's last Title VI Program submission.

## **2 GENERAL REPORTING REQUIREMENTS**


### **2.1 TITLE VI NOTICE TO THE PUBLIC**

The Title VI Notice to the Public is an essential document that indicates SRTA complies with Title VI and informs the public of their Title VI protections against discrimination. The English version of this document is in Figure 4, and translated versions of this document are in Appendix B. This notice is posted in the following locations:

- Driver's lobby
- Fall River Terminal lobby
- Maintenance office
- New Bedford Terminal lobby
- Onboard all demand-response vehicles
- Onboard all fixed-route vehicles
- Public areas of SRTA's administrative office, including at the reception desk and in meeting rooms
- SRTA website ([www.srtabus.com](http://www.srtabus.com))

Figure 4 Title VI Notice to the Public

## TITLE VI NOTICE TO THE PUBLIC



### About Title VI

Southeastern Regional Transit Authority (SRTA) gives public notice that it complies with Title VI of the Civil Rights Act of 1964 and all related statutes.

Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." SRTA operates its programs and services without regard to race, color, and national origin in accordance with Title VI.

For more information on SRTA's Title VI Program, obligations, procedures and/or to file a complaint, please call (508) 997-6767 and ask for the Title VI Coordinator. You can also learn more at SRTA's website: [www.srtabus.com](http://www.srtabus.com).

### How to file a Title VI complaint

Title VI complaint procedures and forms are available on SRTA's website, [www.srtabus.com](http://www.srtabus.com). To file a complaint, complete the complaint form and mail the form to:

*Shayne Trimbell, Title VI Coordinator  
Southeastern Regional Transit Authority  
700 Pleasant Street, Suite 530  
New Bedford, MA 02740*

You can also file a complaint by visiting SRTA's offices, which are located at the address written above, or by e-mailing a completed complaint form to [info@srtabus.com](mailto:info@srtabus.com).

A complaint may also be filed directly with the Federal Transit Administration by contacting:

*Federal Transit Administration Office of Civil Rights, Region 1  
Attention: Title VI Program Coordinator  
55 Broadway, Suite 920  
Cambridge, MA 02142*

### Language assistance

If information is needed in another language, please call (508) 997-6767.

Si se necesita información en otro idioma, por favor llame al (508) 997-6767.

Se a informação for necessária em outra língua, por favor ligue para (508) 997-6767.

Si enfòmasyon nesesè nan yon lòt lang, tanpri rele (508) 997-6767.

Southeastern Regional Transit Authority  
(508) 999-5211  
[info@srtabus.com](mailto:info@srtabus.com)



## **2.2 TITLE VI COMPLAINT PROCEDURES AND FORMS**

Community members have the right to file a Title VI complain with SRTA. Community members also have the right to file a complaint with an external entity such as USDOT, a federal or state agency, or a federal or state court.

The Title VI complaint procedure is described below.

1. When a complaint is received by SRTA, the Title VI Coordinator will acknowledge the complaint within ten days by a phone call or mail, depending on contact information provided. If a complaint is incomplete, additional information will be requested, and the complainant will have 30 business days to submit the required information. If the information is not received within 30 business days, the case can be administratively closed by SRTA. A case can also be administratively closed if the complainant no longer wishes to pursue their case.
2. Should a complaint be filed with SRTA and an external entity simultaneously, the external complaint shall supersede the SRTA complaint and SRTA's complaint procedures will be suspended, pending the external entity's findings.
3. Within 15 business days from receipt of a complete complaint to SRTA, a determination will be made if the complaint has sufficient merit to warrant investigation as a Title VI complaint. The complainant will be notified of the decision within five days of the date the decision is made. If the decision is not to investigate the complaint as a Title VI complaint, the notification shall specifically state the reason for the decision.
4. Investigation:
  - The investigation will address complaints against SRTA and be conducted in conjunction with and under the advice of the Title VI Coordinator.
  - The investigation may include discussion of the complaint with all affected parties to determine the problem. The complainant may be represented by an attorney or other representative of his/her own choosing and may bring witnesses and present testimony and evidence during the investigation.
  - The investigation will be conducted and completed within 60 days of the acceptance of the formal complaint.

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- Based on all the information received, an investigation report will be written by the Title VI Coordinator for submittal to the SRTA Administrator.
- 5. The complainant will receive a letter stating the final decision of the Administrator by the end of the 60-day limit. The complainant shall be notified of their right to appeal the decision.


The public is made aware of their right to file a complaint through the SRTA Title VI Complaint Instructions and Procedures document, which is available at the SRTA administrative offices and on SRTA's website ([www.srtabus.com](http://www.srtabus.com)). This document is shown below in

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Figure 5, and translated versions are in Appendix C.

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Figure 5 Title VI Complaint Instructions and Procedure

<div style="display: flex; justify-content: space-between; align-items: center;"><div><h2 style="margin: 0;">TITLE VI COMPLAINT INSTRUCTIONS AND PROCEDURE</h2><h3 style="margin: 10px 0;">About Title VI complaints</h3><p>Any person who believes they have been discriminated against on the basis of race, color, or national origin by the Southeastern Regional Transit Authority (SRTA) may file a Title VI complaint by completing and submitting SRTA's Title VI complaint form. Complaint forms must be filed no later than 180 calendar days following the date of the incident in question.</p><h3 style="margin: 10px 0;">How to file a Title VI complaint</h3><p>The preferred method is to file a complaint in writing by completing SRTA's Title VI Complaint Form, which is available on SRTA's website, <a href="http://www.srtabus.com">www.srtabus.com</a>. If you do not use SRTA's Title VI Complaint Form, your written complaint must be signed and—at a minimum—contain the following:</p><ul style="list-style-type: none"><li>▪ Contact information including name, mailing address, telephone number, and e-mail</li><li>▪ A description of how, when, where, and why you believe you were discriminated against, including location, names, and contact information of any witnesses</li><li>▪ Other information you think is important</li></ul><h3 style="margin: 10px 0;">Submitting a Title VI complaint to SRTA</h3><p>There are three ways to submit a Title VI complaint: by mail, by e-mail, or in person.</p><p><b>FILING A COMPLAINT BY MAIL:</b></p><p>A complaint can be filed in writing and mailed to the following address:</p><p style="margin-left: 40px;"><i>Shayne Trimbell, Title VI Coordinator Southeastern Regional Transit Authority 700 Pleasant Street, Suite 530 New Bedford, MA 02740</i></p><p><b>FILING A COMPLAINT BY E-MAIL:</b></p><p>A complaint can be filed by e-mailing a completed complaint form to <a href="mailto:info@srtabus.com">info@srtabus.com</a>.</p><p><b>FILING A COMPLAINT IN PERSON:</b></p><p>A complaint can be filed in person at the SRTA office: 700 Pleasant St., Suite 530, in New Bedford.</p><div style="text-align: center; margin-top: 20px;"><small>Southeastern Regional Transit Authority (508) 999-5211 <a href="mailto:info@srtabus.com">info@srtabus.com</a></small></div></div><div></div></div>	<h3 style="margin: 0;">Language assistance</h3> <p>If information is needed in another language, please call (508) 997-6767.</p> <p>Si se necesita información en otro idioma, por favor llame al (508) 997-6767.</p> <p>Se a informação for necessária em outra língua, por favor ligue para (508) 997-6767.</p> <p>Si enfòmasyon nesesè nan yon lòt lang, tanpri rele (508) 997-6767.</p> <div style="text-align: center; margin-top: 20px;"><small>Southeastern Regional Transit Authority (508) 999-5211 <a href="mailto:info@srtabus.com">info@srtabus.com</a></small></div>
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Although a Title VI complaint can be filed verbally by calling the SRTA Title VI Coordinator at (508) 997-6767, x3312, SRTA's preferred method for receiving complaints is through the complaint form. Complaint forms are on the SRTA website ([www.srtabus.com](http://www.srtabus.com)), in SRTA's New Bedford offices, and can be requested by phone or mail. The English version of the complaint form is in




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Figure 6 and translated versions are in Appendix C.

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Figure 6 Title VI Complaint Form

<b>SRTA/ADA/TITLE VI COMPLAINT FORM</b>	
<div style="display: flex; justify-content: space-between; align-items: center;"><div><small>Complete this form to file an Americans with Disabilities Act (ADA), Title VI, or other service complaint with the Southeastern Regional Transit Authority (SRTA).</small></div><div style="text-align: right;"></div></div>	
<b>Section 1</b>	
Name: _____	
Address: _____ <div style="display: flex; justify-content: space-between; font-size: small;"><span>Street Address</span><span>City</span><span>State</span><span>Zip Code</span></div>	
Telephone (Home): _____ Telephone (Alternate): _____	
E-mail Address: _____	
If you require accessible format(s), please check the appropriate box(es).	
<input type="checkbox"/> Large print <input type="checkbox"/> Audio tape <input type="checkbox"/> TDD <input type="checkbox"/> Other, please specify _____	
<b>Section 2</b>	
Are you filing this complaint on your own?	
<input type="checkbox"/> Yes <i>(If yes, go to Section 3)</i> <input type="checkbox"/> No <i>(If no, go to next line)</i>	
Please provide the name and address of the person who alleges discrimination.	
Name: _____	
Address: _____ <div style="display: flex; justify-content: space-between; font-size: small;"><span>Street Address</span><span>City</span><span>State</span><span>Zip Code</span></div>	
Please explain why you are filing this complaint for someone else:	
Do you have permission to file this complaint from the person alleging discrimination?	
<input type="checkbox"/> Yes <input type="checkbox"/> No	
<small>Southeastern Regional Transit Authority (508) 999-5211 <a href="mailto:info@srtabus.com">info@srtabus.com</a></small>	

<b>Section 3</b>	
I believe the discrimination experienced was based on (check all that apply):	
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National origin (includes limited English proficiency) <input type="checkbox"/> Disability	
Date of alleged discrimination (Month, Day, Year): _____	
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all people who were involved and 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 the form or another sheet of paper.	
<b>Section 4</b>	
Have you previously filed a complaint with SRTA?	
<input type="checkbox"/> Yes <input type="checkbox"/> No	
<b>Section 5</b>	
Have you filed this complaint with any other federal, state, or local agency, or with any federal or state court?	
<input type="checkbox"/> Yes <input type="checkbox"/> No <i>If yes, check all that apply below and provide the name of the agency or court.</i>	
<input type="checkbox"/> Federal Agency: _____ <input type="checkbox"/> Federal Court: _____	
<input type="checkbox"/> State Agency: _____ <input type="checkbox"/> State Court: _____	
<input type="checkbox"/> Local Agency: _____	
Please provide contact information for a person at the agency/court where the complaint was filed.	
Name: _____ Title: _____	
Agency: _____ Telephone Number: _____	
Address: _____	
<small>Southeastern Regional Transit Authority (508) 999-5211 <a href="mailto:info@srtabus.com">info@srtabus.com</a></small>	

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Section 6	
<i>You may attach any written materials or other information you think is relevant to your complaint.</i>	
I affirm that I have read the above and that it is true to the best of my knowledge, information, and belief. <b><u>Signature and date required.</u></b>	
_____	_____
Complainant's Signature	Date
Please submit this form and any additional materials in person, via e-mail to <a href="mailto:info@srtabus.com">info@srtabus.com</a> or mail to:	
<i>Title VI Coordinator, Southeastern Regional Transit Authority</i>	
<i>700 Pleasant Street, Suite 530</i>	
<i>New Bedford, MA 02740</i>	
If information is needed in another language, please call (508) 997-6767.	
Si se necesita información en otro idioma, por favor llame al (508) 997-6767.	
Se a informação for necessária em outra língua, por favor ligue para (508) 997-6767.	
Si enfòmasyon nesesè nan yon lòt lang, tanpri rele (508) 997-6767.	
SRTA administration use only: Date received: _____ Person receiving complaint: _____	

Southeastern Regional Transit Authority  
(508) 999-5211  
[info@srtabus.com](mailto:info@srtabus.com)

## **2.3 PRIOR COMPLAINTS AND INVESTIGATIONS**

SRTA tracks Title VI investigations, lawsuits, and complaints. The SRTA Title VI Coordinator is responsible for maintaining this list, which records complaints using the following fields:

- |  |                                     |
|--|-------------------------------------|
| ▪ Case number  | ▪ Acknowledgement due date          |
| ▪ Case type (investigation, lawsuit, complaint)            | ▪ Acknowledgement sent date         |
| ▪ Name   | ▪ Decision to investigate           |
| ▪ Address  | ▪ Complainant notification due date |
| ▪ Basis of complaint (race, color, and/or national origin) | ▪ Complainant notification date     |
| ▪ Summary of complaint                                     | ▪ Investigation completion due date |
| ▪ Date submitted   | ▪ Investigation completion date     |
| ▪ Date of alleged incident                                 | ▪ Action taken                      |
| ▪ Complaint complete                                       | ▪ Complaint status                  |

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SRTA acknowledged and investigated two Title VI complaints between February 1, 2019 and February 1, 2022 (Figure 7). Only one of the complaints was determined to be a valid Title VI complaint and is under investigation as of the date of this Title VI Program.

Figure 7 Summary Table of Acknowledged and Investigated Title VI Complaints

Complaint Basis and Date Submitted	Date of Alleged Incident	Complaint Summary	Comments	Actions Taken	Status
National Origin, 2/20/20	2/20/20	Operator engaged in argument with complainant as they were boarding and during argument made a rude, national-origin based comment to complainant. Complainant was denied service.	Customer could not be reached to confirm complaint and gather more details needed to investigate under the Title VI policy.	N/A	Closed
Race, 7/1/21	Specific dates identified in complaint	Former employee alleges racial discrimination on the job. Complainant filed a complaint through the Massachusetts Commission Against Discrimination (MCAD).	MCAD will investigate this complaint. Under SRTA Title VI policy, the MCAD investigation supersedes SRTA's and the outcome will be accepted and placed on file.	MCAD investigation is ongoing.	Open

## **2.4 OTHER TITLE VI REQUIREMENTS**

This section includes documentation of the relevant Title VI guidance that is not applicable to SRTA.

### **Minority Representation on Appointed Committees**

SRTA does not have any non-elected planning boards, advisory councils, or committees for which the membership is selected by SRTA. SRTA Advisory Board members are appointed by member communities.

### **Subrecipient Monitoring**

SRTA does not have any sub-recipients.

### **Equity Analysis for Constructed Facilities**

SRTA has not constructed any facilities since the previous Title VI Program was submitted to the FTA on February 21, 2019.



## 3 PUBLIC PARTICIPATION PLAN

### 3.1 OVERVIEW

Public participation is integral to the planning process for SRTA service and occurs before major changes to service and fares. Including the public in the decision-making process is the right thing to do and required by statute under 49 U.S.C. sections 5307(b) and 5307(c)(1)(I).

This chapter describes SRTA's public participation plan (PPP), which includes outreach methods and tactics for engaging minority and LEP people. The chapter also summarizes public engagement activities since February 21, 2019, when the previous Title VI Program was submitted.

Public participation is most effective when it includes all people, regardless of race, color, national origin, or their ability to speak and understand English. Moreover, it is important that community members have confidence they will be heard, that their input will be valued, and that their input will be considered properly when decisions are made. There may be times when a decision is unpopular, just as there are times when a decision is lauded by the community. Regardless of a decision's popularity, the public should always have ample opportunity to participate in the decision-making process.

### 3.2 PUBLIC ENGAGEMENT METHODS

In accordance with 49 U.S.C. Sections 5307(b) and 5307(c)(1)(I), public participation is required prior to raising fares or implementing a major service change. **SRTA defines a major service change as one in which an individual fixed route's, or the full fixed-route system's daily revenue mileage is permanently increased or decreased by more than 25%, or in which a demand-response service area's size or daily span of service is permanently increased or decreased by more than 25%. Public participation is also required prior to constructing transit facilities.**

In addition to statutory requirements for public participation, SRTA uses several methods for public engagement, which are described below.

## **Open Forum**

The open forum is the most open, least structured form of public engagement employed by SRTA; the first open forum was held in June 2017. Open forums are held periodically and without a specific topic to be addressed but rather as a way for the public to speak directly with SRTA planning and administrative staff and provide ideas for improvement, share experiences with the service, and communicate directly to SRTA. The forums are held in the Fall River and New Bedford terminals with staff on hand to speak with customers. Open forums are scheduled during times of the day when passenger volumes are greatest in the terminals and held on multiple days to provide ample opportunities for engagement.

## **Public Meeting**

Public meetings are more formal than open forums and are held when a specific issue is being addressed. Public meetings are the first point of contact with the public to present proposed service or fare changes. Public meetings include large-format visualizations of proposals, staff to speak with members of the public, a formal presentation at scheduled times, surveys, and other methods to record public input.

Public meetings are held as close to potentially impacted communities as possible so members of the impacted community do not need to travel far to participate. Meetings are publicly accessible and ADA-compliant. When applicable, meetings are scheduled for times when the affected route or service operates.

Visualizations are an important element of public meetings. Visualizations are typically large-format posters with descriptions, maps, or design concepts. Posters can be used to describe the issue being discussed and can also collect input by providing community members an opportunity to interact with the display. Interactive visualizations ask meeting participants to mark areas of importance, provide prioritization of concepts, and provide feedback on areas of concern.

Notices of public meetings are made no less than two weeks prior to the meeting date. Notices are posted in the SRTA terminal and buses that serve the affected area (i.e., meetings held in Fall River are posted in the Fall River Terminal and buses; meetings held in New Bedford are posted in the New Bedford Terminal and buses). Meeting notices are posted online via Facebook, Twitter, and on SRTA's website.

Notices are also sent to local agencies that may serve affected populations, for distribution to their networks.

Public meetings are staffed with people able to interpret Portuguese, Spanish, and Haitian Creole, and language assistance information is included on the posted meeting notice. Meeting notices are prepared in English, Portuguese, Spanish, and Haitian Creole, the four most prevalent languages spoken in the SRTA service area.

During public meetings, attendees are asked to provide optional basic personal information, such as name, address, phone number, and e-mail address. The record of attendees is kept on file, along with a summary of the meeting and issues discussed.

## **Public Hearing**

Public hearings are the most formal method of public involvement and are held to receive public comment on a specific service change or fare change. The testimony provided during the hearing is recorded and transcribed verbatim and kept on file as part of the project record. The hearing testimony is reviewed and an assessment of whether the public comment supports or refutes the proposal is provided with the hearing record.

Public hearings are held in places accessible by the SRTA fixed-route system and in buildings with access for people with disabilities. Public hearings are scheduled at times that allow the public to use the SRTA system as a means of transportation to and from the hearing. Hearings are staffed with people able to interpret Portuguese, Spanish, and Haitian Creole, and language assistance information is included on the posted meeting notice. Hearing notices are prepared in English, Portuguese, Spanish, and Haitian Creole, the four most prevalent languages spoken in the SRTA service area.

Notices of public hearings are made no less than two weeks prior to the hearing date. Notices are posted in the SRTA terminal and buses that serve the affected area. Hearing notices are posted online via Facebook, Twitter, and on SRTA's website. Notices are also sent to local agencies that may serve affected populations, for distribution to their networks.

During public hearings, attendees are asked to provide a name and city of residence before starting their testimony. This information is included in the hearing record so comments can be properly attributed.

Public hearings are held on the last day of the 30-day public comment period for service and fare change proposals. Public comment periods extend no fewer than thirty days from the date of the public hearing; written comments are accepted by SRTA via mail, e-mail, or in-person delivery, and are given equal consideration to verbal testimony.

All comments received prior to the hearing will be entered into the record at the hearing and considered with the same weight and value as those presented during the hearing. The decision to implement a proposed service or fare change occurs after the public comment period is closed, comments are recorded to the project file, and an assessment of public comments is complete. Public comments are considered as part of the decision to implement a service or fare change; some circumstances, however, require a change is implemented despite public opposition.

Public comments are an important part of the decision-making process, and in most cases, a decision is supported by public comments. There are rare cases where a decision may not be supported by public comment, yet circumstances dictate a change is necessary. These instances are rare and generally driven by SRTA resource availability. Changes that are not supported by public comments are implemented so long as measures are in place to mitigate any disparate impact on minority populations or disproportionate burden on low-income populations.

## **Advisory Board Meetings**

SRTA is governed by a twelve-member advisory board, with one representative from each of the service area communities, one representative of the disabled community, and one rider representative. The Advisory Board meets periodically throughout the year with an annual minimum requirement of six meetings. Meetings alternate between Fall River and New Bedford city halls. Advisory Board meetings are public and subject to public meeting laws.

Advisory Board agendas include time for the public to testify to the board on any subject. Comments received during this period are recorded in the meeting minutes and, when relevant to an ongoing project, the minutes are retained with the project file.

## **Customer Survey**

Customer surveys are a way to collect and record passenger data in a uniform manner that allows for analysis and reporting of results. Surveys are used for

specific issues or proposals, such as a service or fare change, or for developing a customer demographic profile, identifying changes in customer opinions and riding trends, or understanding transit demand in unserved areas. Surveys are conducted in terminals, on buses, at the sites of proposed service changes, or any relevant location. Surveys are generally distributed, completed, and collected in-person. When appropriate, a digital survey is administered either in-person with a tablet computer or remotely, as an internet survey. SRTA prepares surveys in English, Portuguese, Spanish, and Haitian Creole.

## **Demand-Response Consumer Advisory Meetings**

SRTA hosts quarterly Demand-Response Consumer Advisory meetings in which demand-response riders are encouraged to participate and provide feedback on their experience with the service. The meetings bring together customers, operations managers, and customer service staff for the purpose of discussing the service and identifying areas for improvement. These meetings are held as roundtable discussions and are important opportunities for demand-response riders to speak candidly about their service experiences, raise complaints and commendations, and discuss ideas to improve the service.

Consumer advisory meetings are open to the public and advertised on demand-response vehicles. An e-mail meeting notice is also sent to demand-response customers that have registered their e-mail address with SRTA. Demand-response customers that wish to attend a meeting in person receive a zero-fare ride to and from the meeting. A meeting summary is prepared, distributed via e-mail to those that attended, and kept on file.

## **Ad Hoc Meetings with Social Service Agencies and Business Groups**

SRTA staff sometimes meet with social service agencies and business groups to understand how potential changes may affect demand for service. Engagement with various stakeholders differs and is typically issue-specific. As such, these meetings and engagement do not generally occur on a regular basis.

## **Social Media and Online Engagement**

SRTA recognizes the ubiquity of social media and has accounts on Facebook, Twitter, and Instagram. These accounts allow SRTA to share information directly with customers.

Social media platforms include translation tools that let users translate SRTA communications into a language of their choosing. These translation tools reduce the translation burden on both SRTA and users, enabling better access to information for LEP people.

Social media also lets customers provide feedback by posting comments or sending messages that are then reviewed by SRTA staff. Post comments are kept private because commenters occasionally use obscene language and SRTA does not have the staff resources to review each comment.

### **3.3 PUBLIC PARTICIPATION PROCEDURES**

The public engagement methods described above are used differently, depending on the type(s) of engagement needed. The public participation procedures below show how SRTA determines the appropriate engagement method(s) and ensures community members and SRTA riders can participate meaningfully and substantially. The procedures below are guidelines that can be followed for most SRTA projects or initiatives.

#### **Step 1: Determine if public participation is required or appropriate**

The first step in engaging the public is to determine if the topic or issue requires public participation. SRTA engages the public for all fare changes and for any service change that is considered a major service change. Public participation is also required prior to constructing transit facilities. This standard ensures the public is engaged for service or fare changes that will affect a substantial portion of the service they use, and also gives SRTA the ability to make minor changes (such as adding a stop on a route or changing a trip departure time slightly) without engaging the public.

#### **Step 2: Identify the affected population**

If the results of Step 1 indicate public participation is appropriate, the next step is to identify the likely population affected by the proposed change. For fare changes, the affected population is all riders and residents of the SRTA service area, however smaller service changes are likely to affect only a subset of the service area population. SRTA keeps demographic information in a geographic information system (GIS), organized by route. As part of developing the proposed service change, SRTA will analyze demographic information to identify the affected population, determine the minority and low-income status of the affected population, and determine the languages likely spoken by the affected population.



### **Step 3: Determine the appropriate method of engagement**

The method of engagement is largely determined by the scope of the project and the intended outcome. The choice of method is also determined by the extent of the affected population and the demographic composition of the population. Good public engagement requires considerable staff resources, so it is important that engagement methods properly match the project scope. The following guidelines help choose the appropriate method of engagement:

- Is SRTA **fact-finding**, or learning about topic before developing plans? If so, appropriate engagement methods may be:
  - Customer surveys, online and in-person
  - Ad-hoc meetings with groups representing the affected population
  - An open forum
  - A public meeting
- Is SRTA presenting **service or fare change proposals**? If so, appropriate engagement methods may be:
  - Customer surveys on affected routes and at affected stops
  - Ad-hoc meetings
  - A public meeting in the affected area
  - A demand-response consumer advisory meeting
- Is SRTA making a final **decision on service or fare change**? If so, appropriate engagement methods may be:
  - A public hearing

Public participation needs vary by project and should match a project's scope and scale. Service changes that only affect a small area or population require less engagement than projects that affect several routes or larger portions of the service area population. Affected population demographics also guide engagement method selection. If the people being engaged fall under LEP Plan guidance, engagement methods should include translation of materials and having interpreters present during the meeting.

### **Step 4: Choose an appropriate time and location for public participation events**

The time and location of meetings are important to ensuring the public can participate. Meetings are held as close to the affected area as possible to reduce the

travel burden for the affected population, and are located on a SRTA fixed route that is in service before and after the meeting. Meeting places are accessible for people with disabilities, have enough space for the anticipated number of attendees, are well lit, and have reasonable acoustics so attendees can clearly hear any presentation or dialogue. SRTA will accommodate the hearing impaired by providing assistive listening devices, if requested. Requests for assistive listening devices need to be acknowledged by SRTA seven days in advance of the event, to provide time for devices to be procured for the meeting.

Meeting days and times are scheduled to accommodate community needs and are typically scheduled during weekday late afternoon or early evening hours. Times are chosen to allow participation by people that work during the day. Sometimes, public outreach is conducted on weekends; the type of outreach most commonly done on weekends is passenger surveying. Open forums are typically scheduled for the busiest times in the SRTA terminals, to include as many customers as possible.

### **Step 5: Advertise the public participation event**

Once public engagement methods have been chosen, locations identified, and times selected, the public must be made aware of the opportunity to participate. SRTA posts notices of public participation no later than two weeks in advance of the event date. These postings include the date, time, and location of the meeting, with directions to the location. The postings include information about the event purpose, any proposals, and a reminder that the public is encouraged to participate. All notices include information in English, Portuguese, Spanish, and Haitian Creole, and are posted on all SRTA fixed-route buses (and demand-response vehicles, if demand-response riders are likely to be affected) and in SRTA terminals. SRTA also uses social media to promote events.

In the case of customer surveys, notices explain when and where surveyors will conduct the survey and generally include a link to an online version of the survey.

### **Step 6: Hold the event**

The event is held at the location and the time advertised. Participants are asked to provide basic personal information upon entry (e.g., name, place of residence, phone number, e-mail address). The space is arranged according to the purpose:

- **Open Forums:** Tables are set up in the direct line of sight of people in the terminal. Visualizations are large format and generally interactive. Staff are available to speak with customers. No sign-in is requested.

- **Public Meetings:** Visualizations (e.g., posters) are set up in stations to allow for one-on-one conversation between SRTA staff and participants. Seating is available in the meeting space, and is oriented towards the podium and presentation screen, if a presentation is planned. Upon entry, attendees are asked to provide basic personal information and are given any print materials relevant to the topic of discussion; print materials are prepared in English, Portuguese, Spanish, and Haitian Creole.
- **Public Hearing:** The room is set up with seating facing the front of the room. A table and chairs are placed at the front of the room for SRTA staff to sit at while receiving testimony. A space is provided for attendees to stand and address SRTA. The attendees that provide testimony are asked to give their name and place of residence. Any visualizations or printed material is given to attendees when they enter. The hearing is opened by SRTA with a description of the change for which comment is sought.

### **Step 7: Summary Report**

At the conclusion of the public input event and after the written comment period closes, a summary report is prepared to document public participation. The summary report describes the event that was held, the process followed (steps 1 through 6), and comments received. The report is placed on file with the project and is included as an appendix to the final project report. If a decision is made to implement the proposed change, the summary report is used as a reference document in the decision. All public participation efforts are reported to the advisory board and recorded in board meeting minutes.

## **3.4 PLAN TO ENGAGE MINORITY AND LIMITED-ENGLISH PROFICIENT POPULATIONS**

The events and outreach described in SRTA's PPP are applicable to all people living in SRTA's service area, including low-income, minority, and LEP populations. In addition to this inclusive outreach, SRTA has specific plans for engaging minority and LEP populations, per FTA guidance. Some of the methods SRTA uses to ensure high-quality engagement with minority and LEP people are:

- Planning events for times and at locations that are accessible to minorities and LEP people.

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- Ensuring vital documents, visualizations, presentations, and other engagement materials are translated into languages spoken in the community that is being engaged with.
- Engaging with community-based organizations (CBOs) to ensure SRTA is reaching minority and LEP populations with outreach and, if needed, conduct more targeted outreach based on input from these CBOs.

## 3.5 SUMMARY OF PUBLIC OUTREACH ACTIVITIES

SRTA has conducted many public outreach activities since submission of its last Title VI Program. Figure 8 summarizes these events.

Figure 8 SRTA Public Outreach Activities

Outreach Activity	Dates
Open Forum	<ul style="list-style-type: none"> <li>▪ October 28, 2019</li> <li>▪ October 29, 2019</li> </ul>
Public Meeting	<ul style="list-style-type: none"> <li>▪ July 10, 2019: Tripp Towers Shoppers Shuttle Meeting</li> </ul>
Public Hearing	<ul style="list-style-type: none"> <li>▪ September 17, 2020: Route Change Public Hearing</li> <li>▪ June 17, 2021: Route Change Public Hearing</li> </ul>
Advisory Board Meetings	<ul style="list-style-type: none"> <li>▪ March 28, 2019</li> <li>▪ May 23, 2019</li> <li>▪ September 26, 2019</li> <li>▪ October 21, 2019</li> <li>▪ November 21, 2019</li> <li>▪ January 16, 2020</li> <li>▪ February 27, 2020</li> <li>▪ April 22, 2020</li> <li>▪ May 28, 2020</li> <li>▪ December 16, 2020</li> <li>▪ February 25, 2021</li> <li>▪ March 31, 2021</li> <li>▪ April 29, 2021</li> <li>▪ May 27, 2021</li> <li>▪ June 14, 2021</li> </ul>
Customer Survey	<ul style="list-style-type: none"> <li>▪ Fare Equity Analysis Customer Survey</li> <li>▪ Comprehensive Regional Transit Plan Customer Survey</li> <li>▪ New Bedford Industrial Park Customer Survey</li> </ul>
Demand-Response Consumer Advisory Meetings	<ul style="list-style-type: none"> <li>▪ September 5, 2019</li> <li>▪ March 3, 2020: <i>Scheduled but cancelled due to COVID-19</i></li> <li>▪ October 29, 2020</li> <li>▪ May 20, 2021: <i>Held in-person with dial-in option</i></li> <li>▪ November 10, 2021</li> </ul>
Non-SRTA Events (SRTA was invited to share information)	<ul style="list-style-type: none"> <li>▪ June 15, 2019: NB Resilient Plan Public Meeting</li> <li>▪ July 1, 2019: New Bedford School District Kindergarten Registration Event</li> <li>▪ August 4, 2021: New Bedford School District Kindergarten Registration Event</li> </ul>

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Outreach Activity	Dates
Ad Hoc Meetings with Social Service Agencies and Business Groups (listed by group as meeting dates are numerous)	<ul style="list-style-type: none"> <li>▪ Atlantis Charter School</li> <li>▪ Blount Fine Foods</li> <li>▪ City of New Bedford Mobility Planning Committee</li> <li>▪ Coastal Foodshed</li> <li>▪ Fall River Amazon Fulfillment Center</li> <li>▪ Fall River Public Housing Authority</li> <li>▪ Fall River Public Schools</li> <li>▪ Freetown Stop &amp; Shop Distribution Center</li> <li>▪ Millstone Medical</li> <li>▪ New Bedford Feast of the Blessed Sacrament</li> <li>▪ New Bedford Public Schools</li> <li>▪ Old Bedford Village Community Meeting</li> <li>▪ US Census Bureau</li> </ul>
Social Media and Online Engagement	<ul style="list-style-type: none"> <li>▪ 2019: 50+ social media posts with more than 24,000 views</li> <li>▪ 2020: 50+ social media posts with more than 52,000 views</li> <li>▪ 2021: 60+ social media posts with more than 42,000 views</li> </ul>

## 4 LANGUAGE ASSISTANCE PLAN

As established by Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency”,<sup>4</sup> the SRTA Language Assistance Plan (LEP Plan) describes how SRTA will address the language needs of limited-English proficient (LEP) people the agency serves, to ensure LEP people have meaningful access to benefits, services, information, and other important portions of SRTA programs and activities. The Language Assistance Plan has two sections:

- The **Four-Factor Analysis** determines what language services are appropriate for SRTA to provide. This analysis informs the Implementation Plan.
- The **Implementation Plan** establishes the framework by which SRTA ensures language assistance is available to LEP people.

### 4.1 FOUR-FACTOR ANALYSIS

The FTA’s Title VI guidance requires use of the Four-Factor Analysis to help determine the specific language services that are appropriate for the recipient to provide. The Four-Factor Analysis is an individualized assessment that balances the following factors:

1. The number or proportion of LEP people eligible to be served or likely to be encountered by SRTA.
2. The frequency with which LEP persons come in to contact with the programs or activities provided by SRTA.
3. The nature and importance of the program, activity, or services provided by SRTA to people’s lives.
4. The resources available to SRTA for LEP outreach, as well as the costs associated with that outreach.

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<sup>4</sup> 65 FR 50121, Aug. 11, 2000

## **Factor 1: The number and proportion of LEP people served**

### **LEP People Presence in SRTA Service Area**

To document the presence of LEP people in the service area, SRTA uses American Community Survey (ACS) data that estimate the percent of a given population that speaks a different language at home and the percent of the population considered LEP.<sup>5</sup> The ACS data used in this analysis are from 2015 five-year estimates and are analyzed at the census tract level (shown in Figure 9). Data from 2015 are used because this is the last year that this table was made available at the tract level.

Figure 9 through Figure 11 map the distribution of LEP people in SRTA's service area, showing that LEP people live most densely in Fall River and New Bedford.

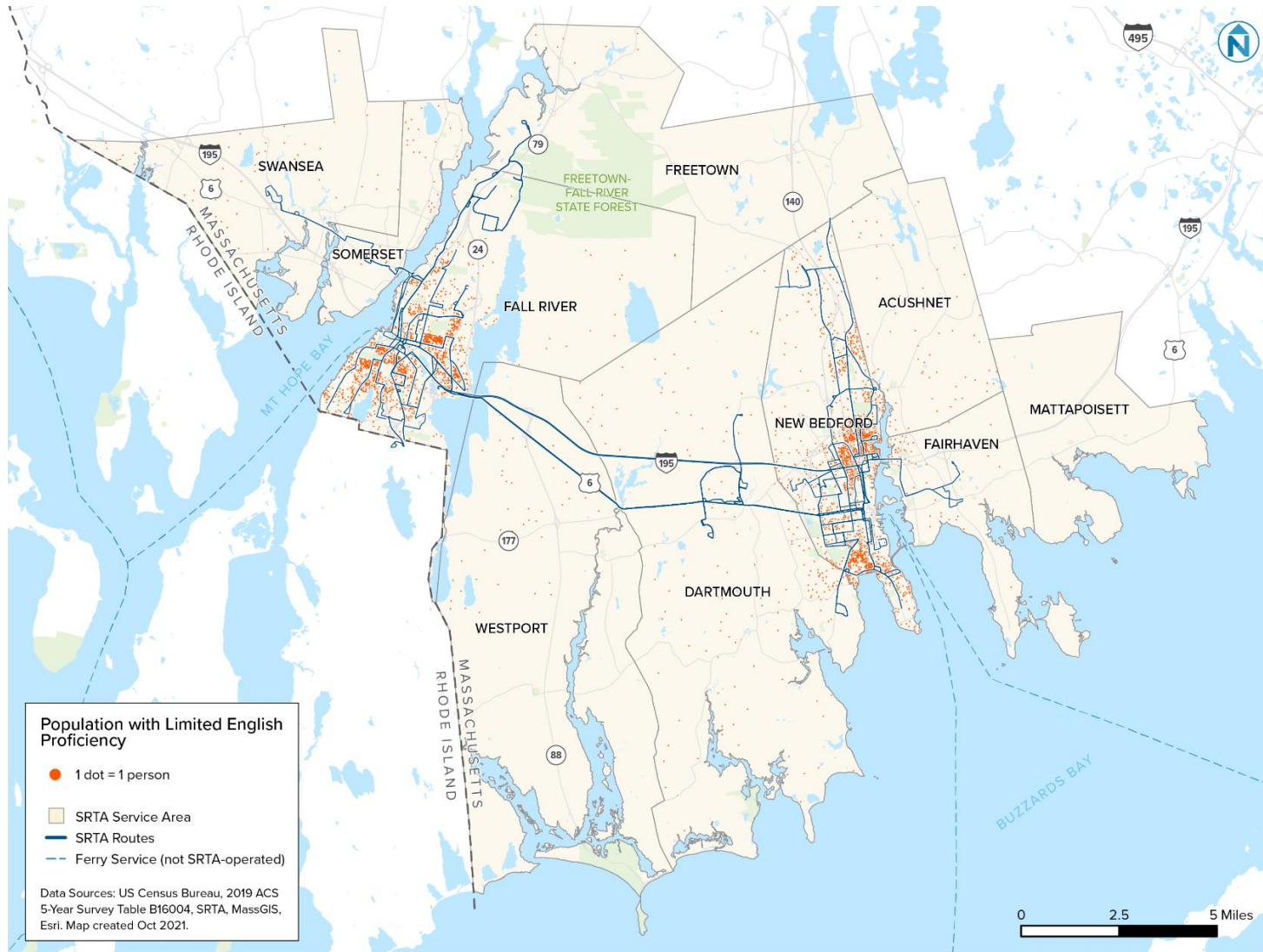
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<sup>5</sup> LEP people are defined in ACS data as those that "speak English less than very well".



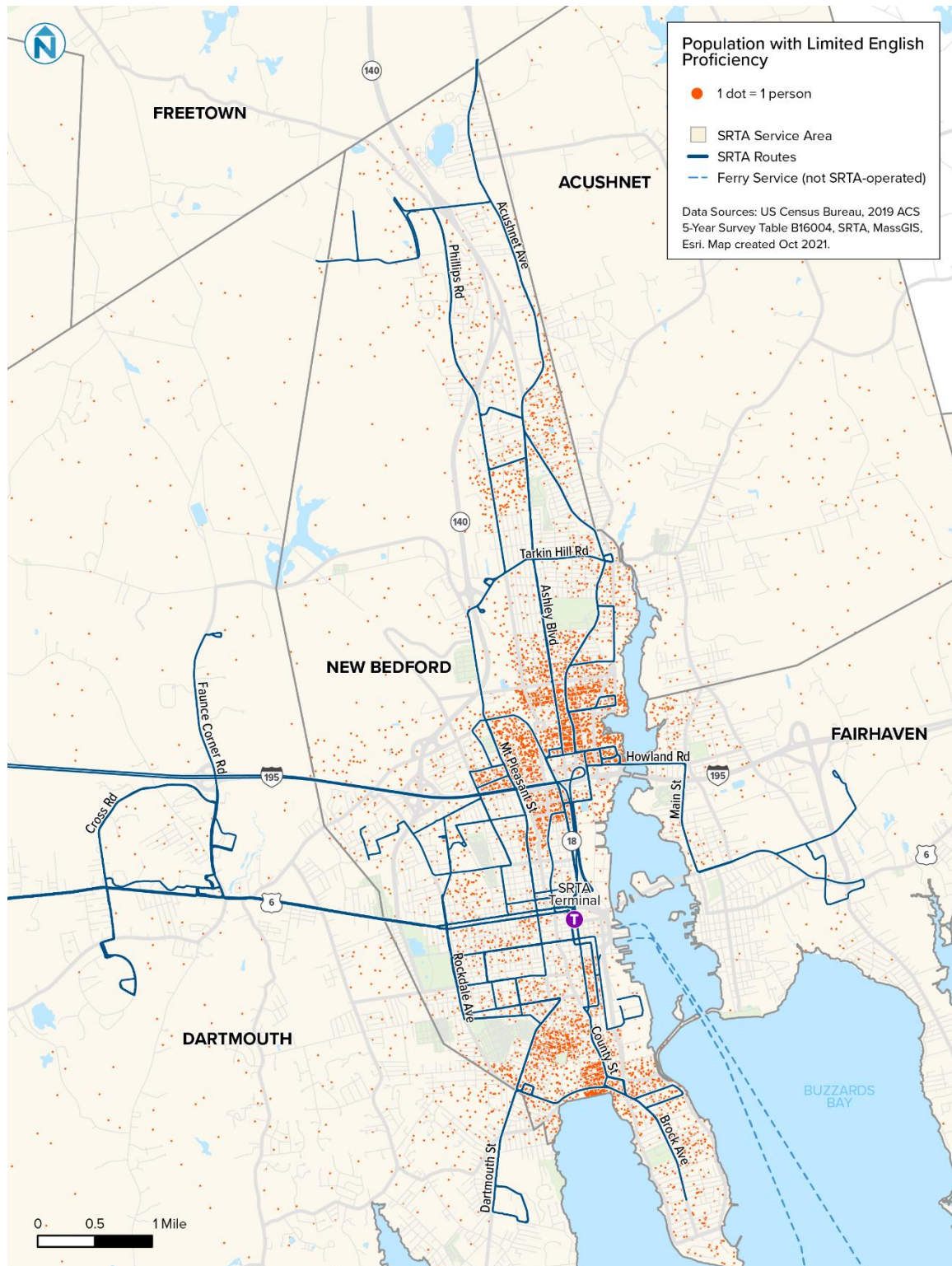
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Figure 9 Map Showing the Distribution of LEP People in the SRTA Service Area



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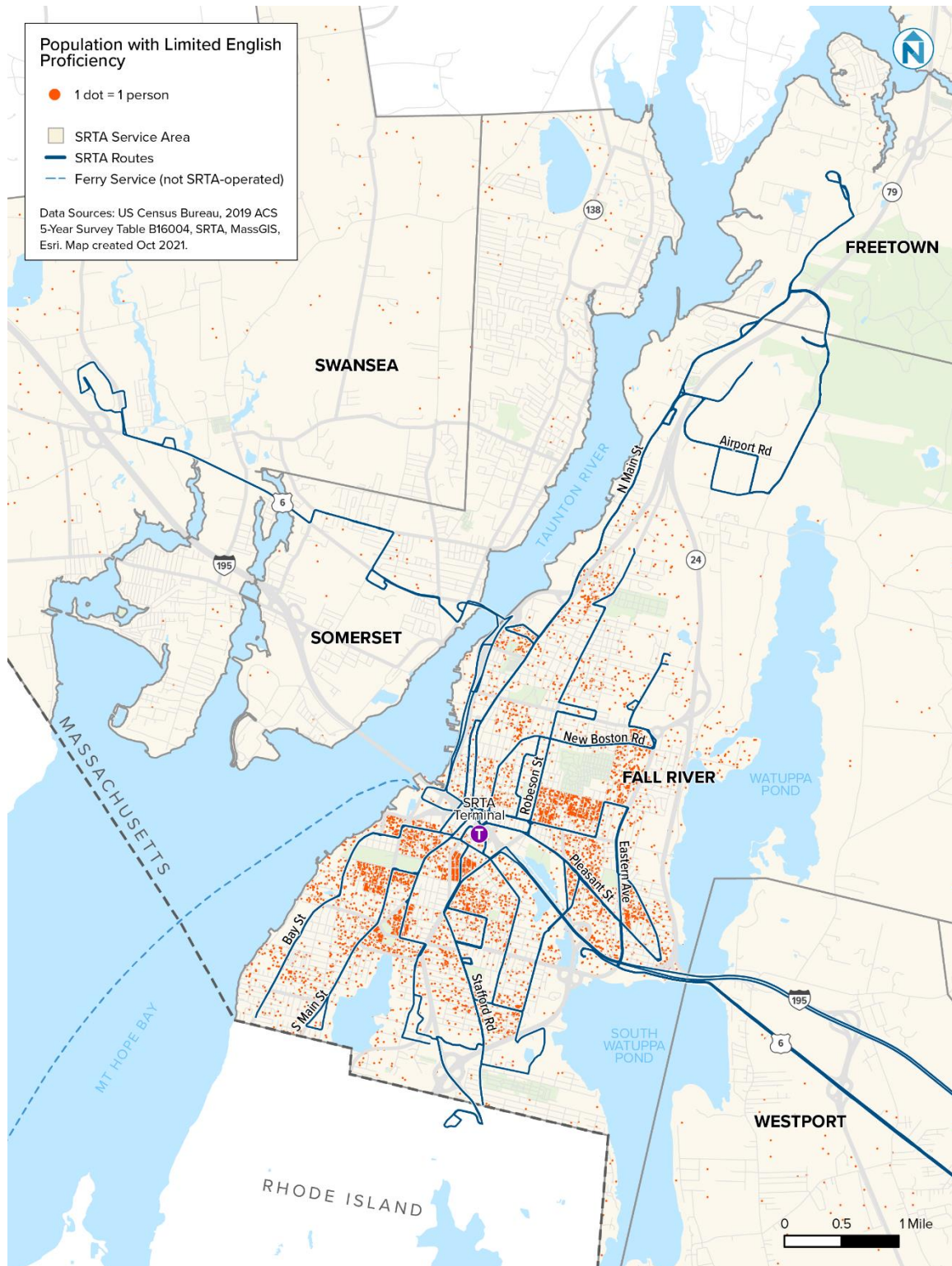
Figure 10 Map Showing the Distribution of LEP People in New Bedford





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Figure 11 Map Showing the Distribution of LEP People in Fall River



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SRTA has identified 26 distinct languages spoken by LEP residents within the agency's service area (Figure 12). The range in the number of people speaking each language varies dramatically, from about 19,000 people speaking Portuguese to approximately seven people speaking Laotian.

To assist transit agencies in determining which languages should be considered for translation or interpretation, the USDOT has adopted the DOJ Safe Harbor Provision. This provision requires written translation of vital documents for each eligible LEP language group that constitutes 5% or 1,000 people—whichever is less—of the total population. The three languages spoken in SRTA's service area that qualify as 'Safe Harbor' languages are bolded in Figure 12.

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Figure 12 Estimated Number of LEP Residents in SRTA Service Area by Language Spoken at Home

Language	LEP Residents Speaking Language	Percent of Total Population
<b>Portuguese or Portuguese Creole</b>	<b>19,451</b>	<b>6.61%</b>
<b>Spanish or Spanish Creole</b>	<b>8,461</b>	<b>2.88%</b>
<b>French Creole</b>	<b>1,237</b>	<b>0.42%</b>
Chinese	710	0.24%
Mon-Khmer, Cambodian	626	0.21%
French (incl. Patois, Cajun)	441	0.15%
Vietnamese	303	0.10%
Arabic	191	0.06%
Greek	180	0.06%
Polish	149	0.05%
Other Asian languages	104	0.04%
Korean	96	0.03%
Persian	95	0.03%
Other Indo-European languages	87	0.03%
Russian	74	0.03%
Urdu	70	0.02%
Other and unspecified languages	32	0.01%
Gujarati	31	0.01%
Other Indic languages	29	0.01%
Tagalog	29	0.01%
African languages	28	0.01%
Italian	19	0.01%
Japanese	12	0.00%
German	8	0.00%
Hindi	8	0.00%
Laotian	7	0.00%
<i>Total LEP Population</i>	<i>32,478</i>	<i>11%</i>
<i>Total Population</i>	<i>291,276</i>	<i>100%</i>

Source: ACS 2015 five-year estimates. Table B16001.

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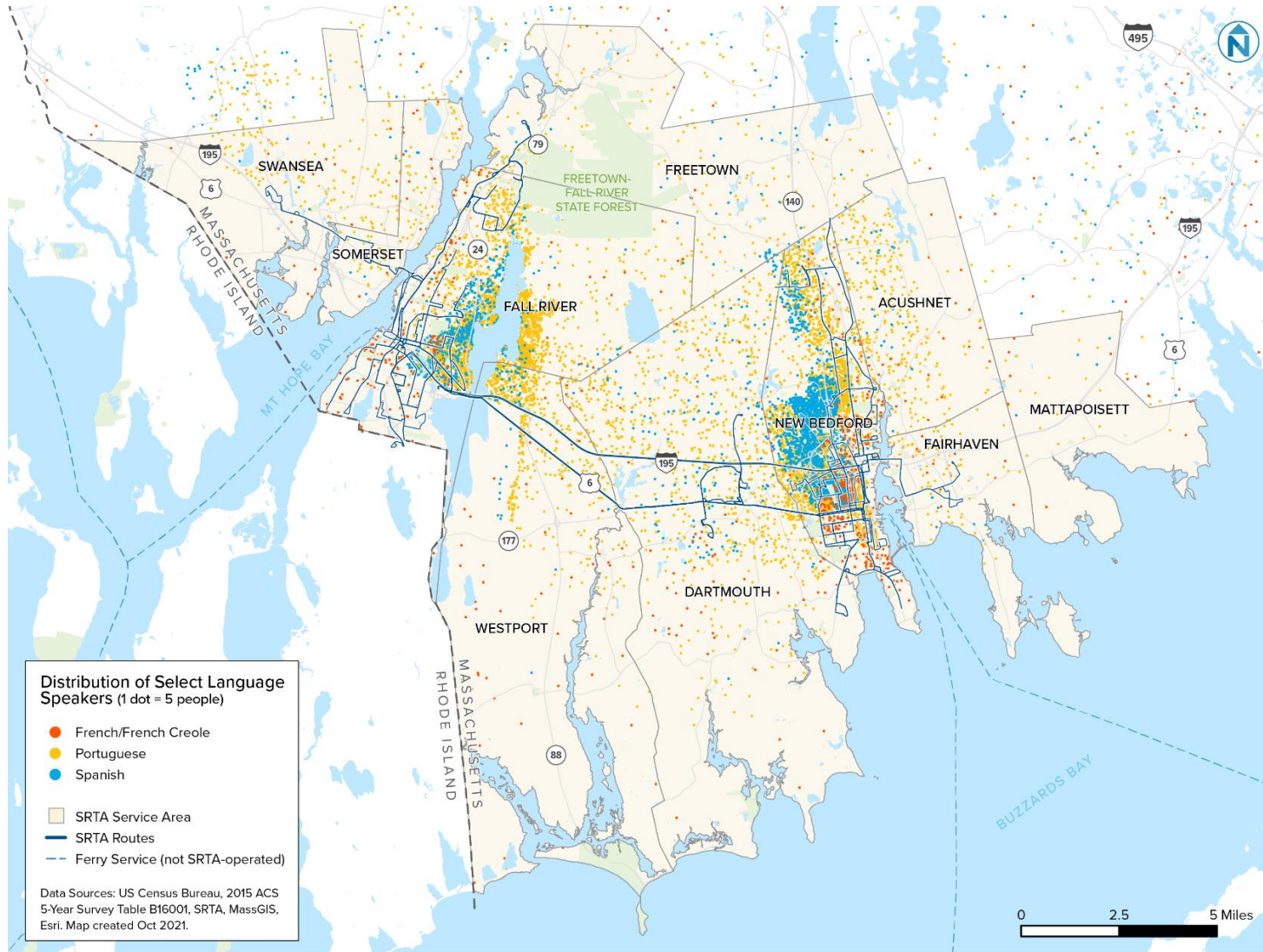
These Safe Harbor languages are unchanged from the previous Title VI Program (2019), which also identified Portuguese, Spanish, and French Creole.

The presence of Portuguese- and Spanish-speaking people is well-understood by SRTA, as communities speaking these languages have a long history in SRTA's service area. French Creole became a Safe Harbor language during the last Title VI program update, and SRTA continues to work to better understand the French Creole-speaking community in the service area.

More information on the relationship between SRTA and Safe Harbor language-speaking residents of SRTA's service area is below, as well as maps showing where these people live (Figure 13 through Figure 15).

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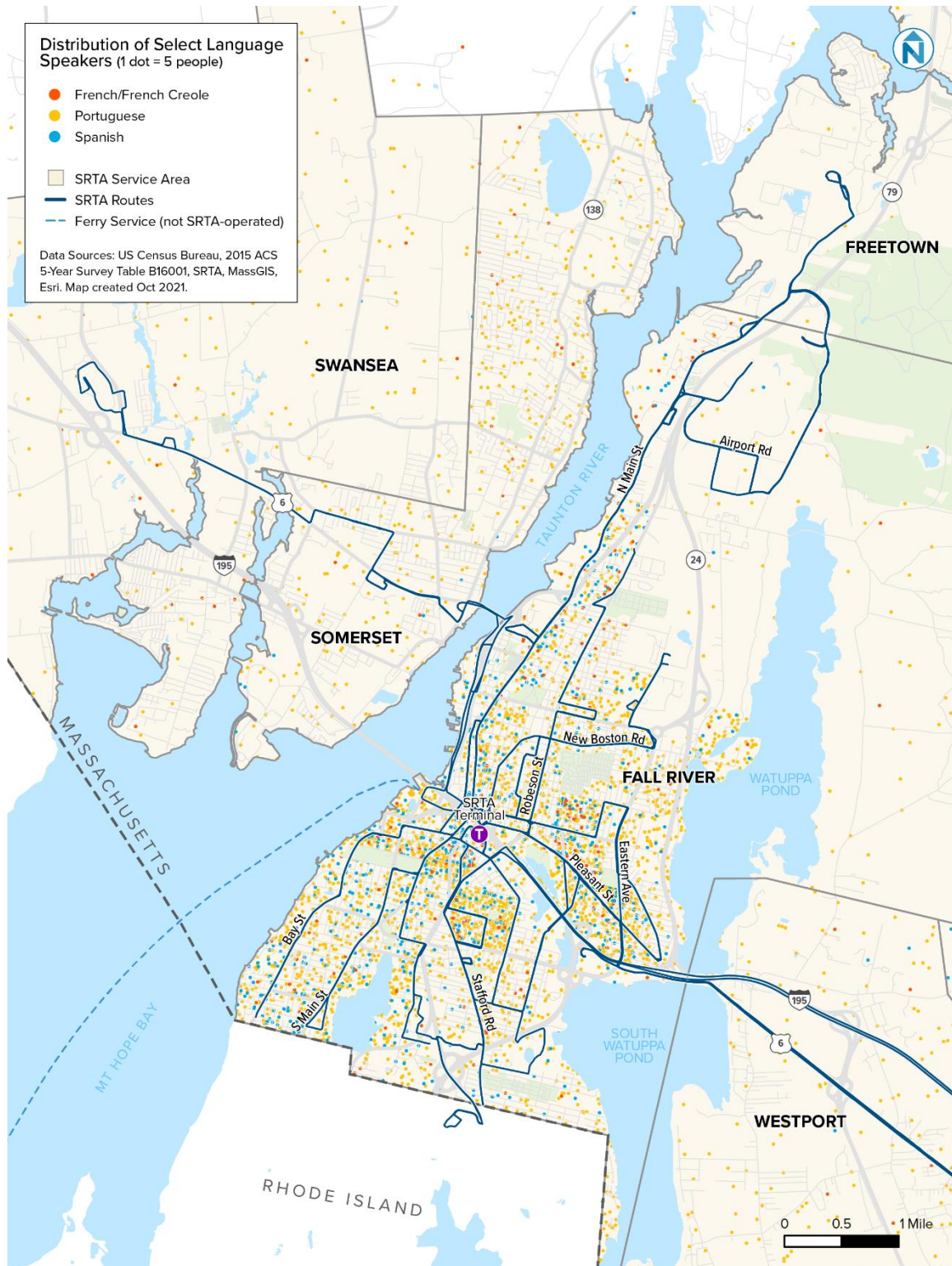
Figure 13 Map of Portuguese-, Spanish-, and French-Speaking Residents in SRTA Service Area





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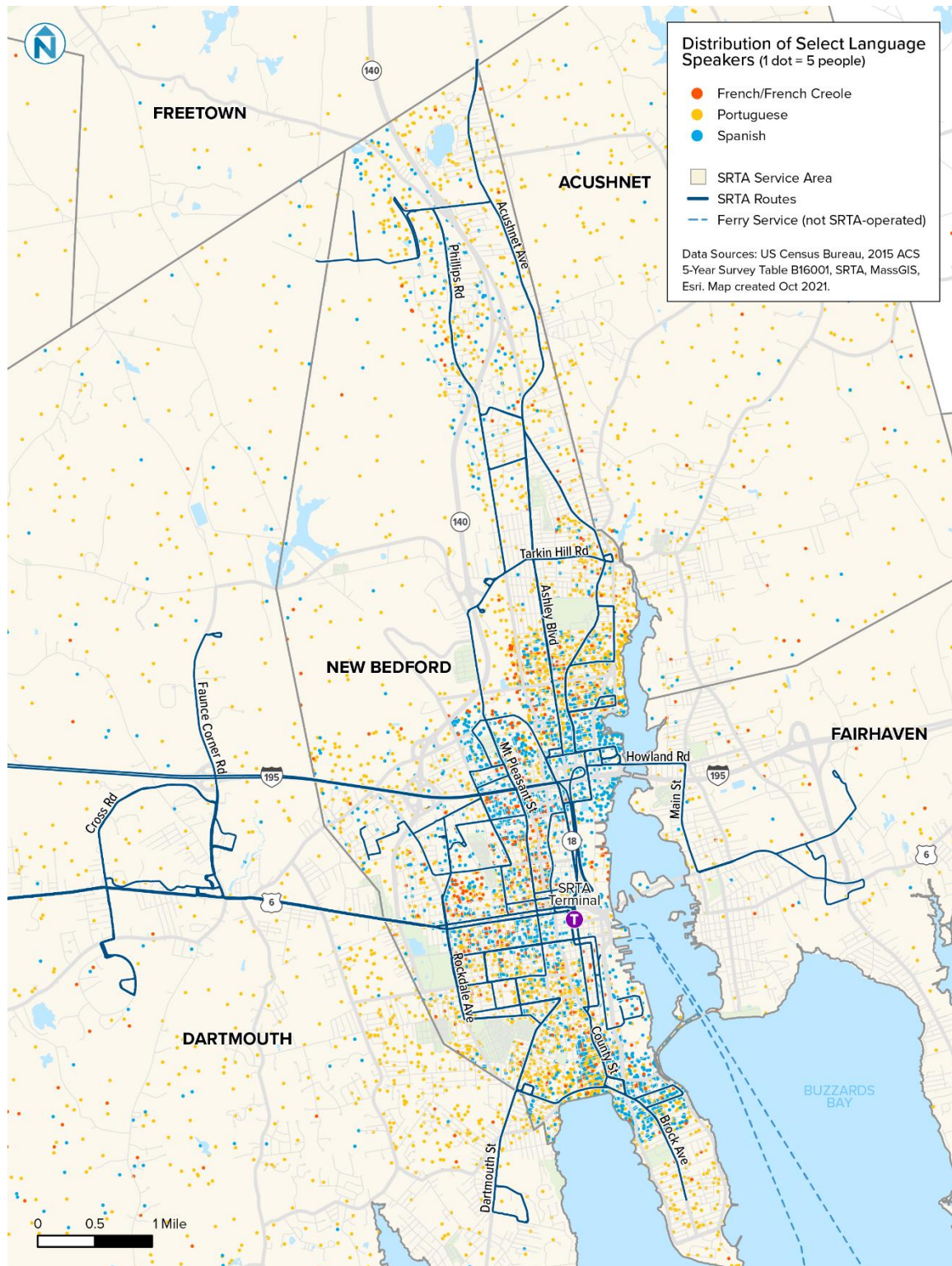
Figure 14 Map of Portuguese-, Spanish-, and French-Speaking Residents in Fall River





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Figure 15 Map of Portuguese-, Spanish-, and French-Speaking Residents in New Bedford



## **French**

It is estimated that most French-speaking residents of SRTA's service area are Haitian and Haitian-American people that speak Haitian Creole. Based on ACS data, it appears French-speaking people are most densely concentrated in New Bedford and in parts of Fall River near downtown.

During development of SRTA's previous Title VI Program, outreach was conducted in the Haitian community, but little evidence was collected about Haitian Creole-speaking people's use of SRTA services, so it is assumed this community does not interact with SRTA services as commonly as other Safe Harbor language-speaking people. The French Creole-speaking community's literacy skills and transit service status are not well understood, due to challenges reaching the population.

## **Portuguese**

Portuguese-speaking residents of SRTA's area have a long history in the region and their relationship to public transit is well understood. Portuguese speakers often ride SRTA services and literacy among this population is estimated to be widespread. SRTA does not believe Portuguese-speaking residents of the agency's service area are underserved.

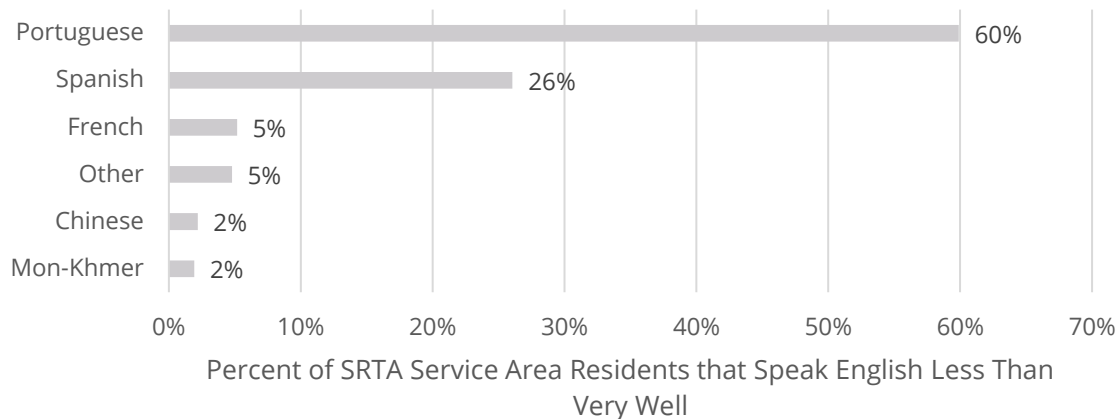
## **Spanish**

Spanish-speaking residents of SRTA's area have a long history in the region and their relationship to public transit is well understood. Spanish speakers often ride SRTA services and literacy among this population is estimated to be widespread. SRTA does not believe Spanish-speaking residents of the agency's service area are underserved.

## Common Languages Among LEP People

Of people living in the SRTA service area that speak English less than very well, Portuguese is by far the most common language spoken, followed by Spanish (Figure 16). This highlights the importance of providing language assistance for Spanish and Portuguese speakers engaging with SRTA service.

Figure 16 SRTA Service Area Residents' Languages Spoken at Home for Residents that Speak English Less Than Very Well



Source: 2015 ACS five-year estimates, Table B16001.

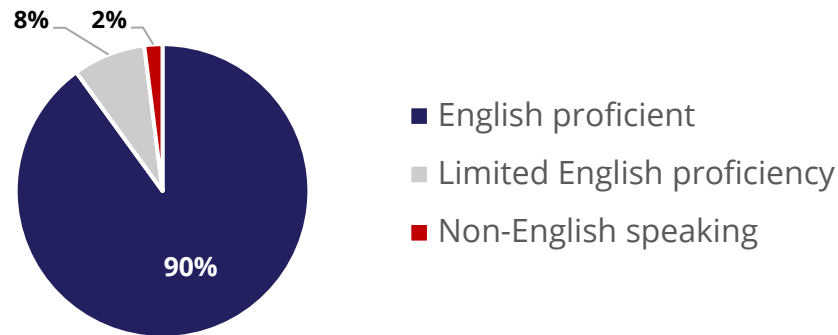
## LEP People's Use of SRTA Service

The demographics of SRTA riders are different from the demographics of people that live in SRTA's service area. In June 2018, the Southeastern Regional Planning Economic and Development District (SRPEDD) conducted an on-board passenger survey to develop a demographic profile of SRTA riders; language proficiency was included as a question on the survey. Surveys were distributed in English, Portuguese, and Spanish. There were two questions about language, one of which asked the respondent to indicate their proficiency in English, and the other to indicate their language spoken at home.

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Most SRTA riders can speak some English; 90% of respondents that answered the English proficiency question indicated they speak English well, 8% indicated they speak English not well, and 2% indicated they do not speak English (Figure 17).

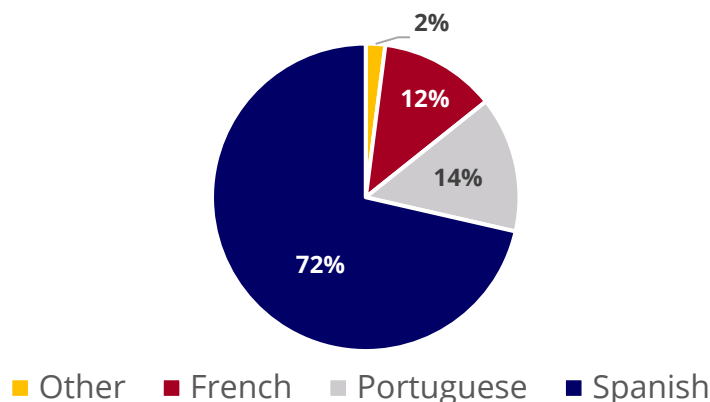
Figure 17 SRTA Riders' English Proficiency Status



Source: 2018 SPREDD onboard survey.

Among limited-English proficient SRTA riders, Spanish is the dominant language spoken, at 72% (Figure 18). Other LEP riders primarily speak French and Portuguese languages.

Figure 18 Percent of Riders That Reported Speaking English Less Than Well by Language Spoken



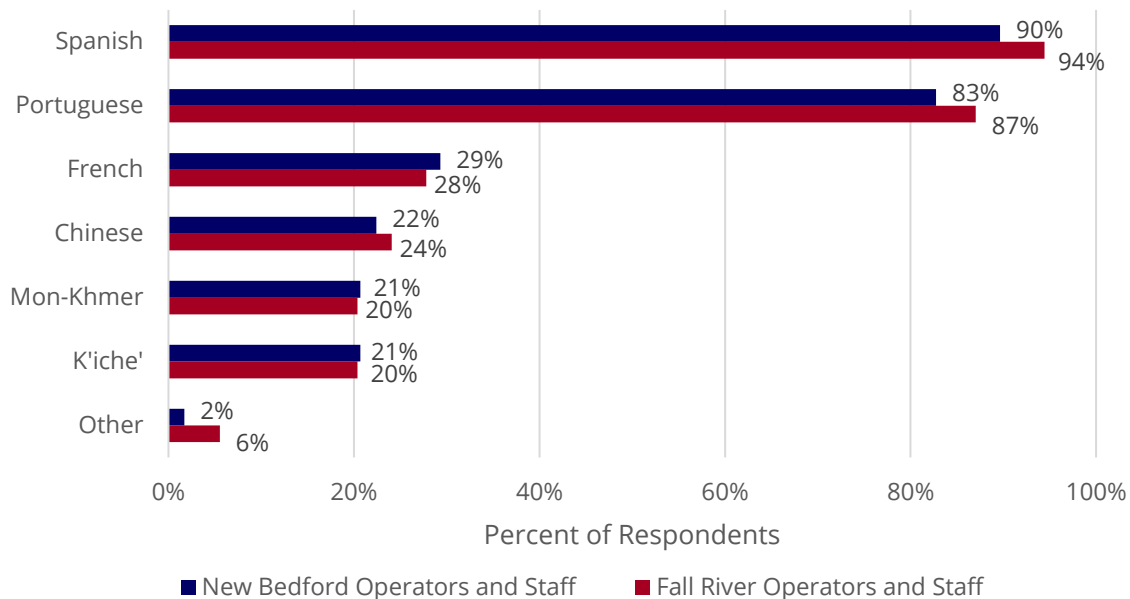
Source: 2018 SPREDD Rider Survey

In addition to the 2018 SPREDD onboard survey, SRTA conducted a Title VI Program LEP employee survey during development of this Title VI Program (more detail regarding this survey is in the Factor 2 section of this chapter). Results from this survey show Spanish and Portuguese are by far the most common language that LEP populations interacting with SCTM employees speak (Figure 19). These data also

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show that Fall River-based employees are somewhat more likely to encounter Spanish- and Portuguese-speaking LEP people than New Bedford-based employees.

Figure 19 Languages Encountered by SRTA Employees When Working with LEP People, by SRTA Base



Source: 2021 SRTA Title VI Employee Survey

About 20% of SCTM employees also reported encountering K'iche' speakers. Although the ACS does not collect data on K'iche', there is a documented presence of people speaking the language in New Bedford, where the public school district translates some documents into K'iche'.

## Factor 2: The frequency with which LEP people come in contact with the program

To assess the frequency with which LEP people come into contact with SRTA's service, an employee survey was conducted during development of this Title VI Program.<sup>6</sup> Overall, 85% of SCTM employee respondents reported encountering LEP people at least once each week, and 39% of respondents reported encountering LEP people at least once every day (Figure 20). New Bedford-based employees were more likely to report encountering LEP people than Fall River-based employees.

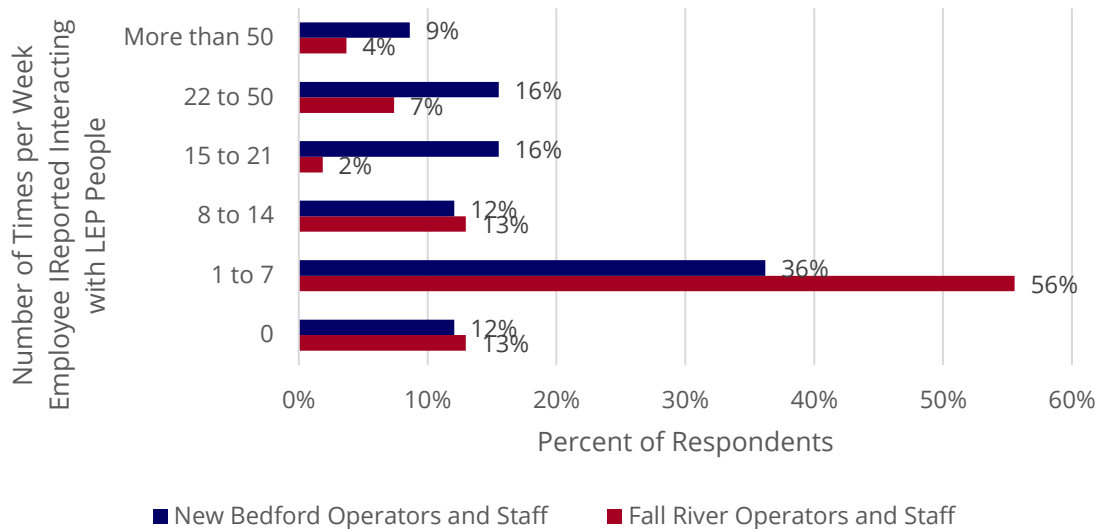
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<sup>6</sup> The survey was distributed on paper to operators and staff from October 18 through October 22, 2021. There was a total of 112 respondents.

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New Bedford-based employees were also more likely to report encountering LEP people on a more frequent basis. This suggests SRTA may benefit from greater language assistance in New Bedford than in Fall River.

Figure 20 Number of Times per Week SRTA Employees Interact with LEP People



Source: 2021 SRTA Title VI Employee Survey

There are five primary ways LEP people encounter SRTA service and programming:

- **Riding SRTA buses:** This is the most common way LEP people encounter SRTA service.
- **Ticket purchases:** Tickets for fixed-route service can be purchased in person, and demand-response tickets can be purchased in person and by telephone. Fixed-route ticket sales occur at both SRTA terminals at the sales windows and ticket vending machines (TVMs). SCTM employs ticket agents and supervisors that are fluent in Portuguese and Spanish, and TVMs provide both language options. Eligible customers can schedule demand-response trips by telephone. Demand-response call centers are staffed with Spanish- and Portuguese-speakers that book trips.
- **Main office interactions:** SRTA riders interact with main office staff when filing complaints in person, applying for demand-response service, and applying for discounted fare cards. Some SRTA office staff are fluent in Spanish. If Portuguese translation is necessary, SCTM can provide a fluent staff person on short notice.



- **Onboard surveys:** SRTA and its partners periodically conduct onboard surveys during planning and other outreach efforts. These surveys are translated into Spanish and Portuguese.
- **Public outreach events:** SRTA and its partners periodically hold outreach events to inform and solicit input from the public. When these events are in person or via videoconference, Spanish and Portuguese interpreters are included. Materials shared at these events are also translated into Spanish and Portuguese.

## **Factor 3: Nature and importance of the program**

Fixed-route and demand-response public transit plays a vital role in the lives of SRTA riders. For many riders, public transit is their only option for local travel and provides their transportation for work, learning, medical needs, shopping, and social visits. Because SRTA's services are so important to riders, it is critical that the language needs of riders are accommodated to the fullest extent possible.

### **Fixed-Route Bus**

Fixed-route bus is the most widely used SRTA service, providing more than 2.6 million passenger trips per year.<sup>7</sup> Ticket vending machines for fixed-route bus service offer Spanish and Portuguese options, and terminal staff are fluent in both languages. Several operators are fluent in either Spanish or Portuguese, and all vehicles are equipped with two-way radios so operators and dispatchers can communicate about rider language assistance needs.

SRTA has recently implemented technology that makes audio announcements on all fixed-route vehicles and provides real-time information signs in the terminals. This technology makes announcements in both English and Spanish. SRTA has also implemented a web-based application that provides customers real-time arrival information in a web browser or smart phone. This mobile application offers translation in Spanish and Portuguese.

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<sup>7</sup> Federal Transit Administration. Southeastern Regional Transit Authority 2019 Annual Agency Profile. <[https://www7.fta.dot.gov/sites/fta.dot.gov/files/transit\\_agency\\_profile\\_doc/2019/10006.pdf](https://www7.fta.dot.gov/sites/fta.dot.gov/files/transit_agency_profile_doc/2019/10006.pdf)>



## **Demand-Response Bus**

Demand-response bus is SRTA's curb-to-curb service for eligible riders, providing over 80,000 passenger trips each year.<sup>8</sup> Once approved for the service, customers can call one day before a needed trip and schedule a ride. The demand-response call center is staffed with Spanish and Portuguese speakers.

## **Filing Complaints**

Customer complaints are an important way to identify needed customer service improvements. Customer complaints are typically received by SRTA administrative staff and addressed by SCTM. Complaints are classified as a civil rights discrimination, disability discrimination, or general customer service complaint. Customer service complaints are generally submitted by telephone, however civil rights and disability discrimination complaints are generally submitted via complaint form. The civil rights and disability discrimination complaint forms are translated in all Safe Harbor languages, with additional translation available upon request. If language assistance is needed for a telephone complaint, the caller is connected with a staff person fluent in either Spanish or Portuguese.

## **Public Outreach**

SRTA periodically conducts service planning initiatives to better align service with customer needs. Effective planning includes the public during the decision-making process, maintains transparency, and is responsive to input. Language access is integral to this inclusive planning. All planning-event advertisements are provided in English, Spanish, and Portuguese, and posted at bus terminals and on buses in the community or communities affected by planning process. All advertisements indicate translation services are available upon request, and all public meetings include staff that speak either Spanish or Portuguese.

## **Factor 4: Resources available for LEP outreach**

SRTA provides translation and interpretive services to the fullest extent possible, given available language assistance resources. Although these resources are limited, SRTA incorporates language assistance in its operating budget without undue burden on other essential transit activities.

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<sup>8</sup> Ibid.

## **Multi-Lingual Staff**

SRTA has found that the most effective and cost-efficient way to provide language assistance is hiring multilingual staff. Nearly 90% of non-English speakers in the SRTA service area speak Portuguese and/or Spanish,<sup>9</sup> and both SCTM and SRTA employ staff fluent in both languages. These staff are available to speak with riders if language assistance is needed. In partnership with the regional planning agency, SRPEDD, SRTA translates demand-response applications, customer complaint forms, and public notices into Portuguese and Spanish.

## **Translation at Public Meetings**

SRTA staff fluent in Portuguese and Spanish are available at all public meetings.

## **Translation Technology**

SRTA uses technology to provide language assistance where feasible and cost-effective. The SRTA website uses a translator application that allows much of the site content to be translated into dozens of languages. The translation application uses Google translation, which is less accurate than translation provided by a human, but allows SRTA to provide basic language assistance in almost any language likely to be encountered. Fixed-route vehicles and terminals have a technology system that makes audio announcements in Spanish, the language spoken by most non-English speaking customers.

## **Additional Resources**

Language assistance for languages other than Portuguese or Spanish is infrequently requested, although SRTA has the budgetary capacity to address requests on an as-needed basis.

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<sup>9</sup> Source: 2015 ACS five-year estimates, Table B16001.

## Determination of Language Services Needed

Based on the Four-Factor Analysis results described above, SRTA has determined that several language services should be provided to LEP people that interact with SRTA programs and services. Figure 21 describes the services needed and the following Implementation Plan describes how these services are provided.

Figure 21 Summary of Language Services Needed by Language

Language	Language Services Needed
French	<ul style="list-style-type: none"><li>▪ This is a relatively new Safe Harbor language for SRTA. SCTM employees report that most French-speaking SRTA riders speak Haitian Creole. SRTA will translate vital documents into Haitian Creole and, when resources allow, provide translation services in Haitian Creole.</li></ul>
Portuguese	<ul style="list-style-type: none"><li>▪ This is the second-most common language spoken by LEP people interacting with SRTA. SRTA will continue to translate vital documents into Portuguese and provide Portuguese translation. SRTA will also encourage SCTM to hire qualified workers that speak Portuguese fluently.</li></ul>
Spanish	<ul style="list-style-type: none"><li>▪ This is the most common language spoken by LEP people interacting with SRTA. SRTA will continue to translate vital documents into Spanish and provide Spanish translation. SRTA will also encourage SCTM to hire qualified workers that speak Spanish fluently.</li></ul>
Other languages	<ul style="list-style-type: none"><li>▪ Although other languages and language groups (such as K'iche', Chinese, and Mon-Khmer) in the SRTA service area are not considered Safe Harbor languages, SRTA strives to provide the most accessible service possible for people speaking all languages. To achieve this goal, SRTA will provide translation services on an as-needed basis to people speaking non-Safe Harbor languages, as resources allow.</li></ul>

## 4.2 IMPLEMENTATION PLAN

The Four-Factor Analysis established the languages and extent to which assistance should be provided in Safe Harbor languages. Implementing the assistance and monitoring the implementation is how SRTA ensures language assistance is provided in a meaningful and effective manner. This Implementation Plan is a working document and reference that is formally updated every three years, as part of the Title VI Program.

### Provision of Language Services by Language

Language services are provided for SRTA Safe Harbor languages, as well as for some non-Safe Harbor languages, when resources allow. The language services provided, by language, are shown in Figure 22.

Figure 22 Summary of SRTA Language Services Provided by Language

Language Service Provided	French	Portuguese	Spanish	Other Languages
Employees fluent in language		✓	✓	When available
Public outreach translation		✓	✓	When available
Survey translation		✓	✓	When available
Translation of vital documents	✓	✓	✓	Upon request
TVM translation		✓	✓	
Website translation	✓	✓	✓	✓

### Translation of Vital Documents

Vital documents are key written notices that allow people to understand essential aspects of SRTA's service and programs. These documents, which are translated into SRTA's three Safe Harbor languages, are listed below.

- Demand-response informational brochure
- Demand-response application
- Public hearing notices
- SRTA/American with Disabilities Act (ADA)/Title VI Complaint Form
- Title VI Complaint Instructions and Procedure
- Title VI Notice to the Public

## **Provision of Notice of Language Assistance Availability**

If LEP riders are not aware language assistance is available, these services may go unused. To ensure LEP riders are aware of language assistance services, a statement indicating that language assistance is available is included in the Title VI Notice to the Public, which is displayed in SRTA's public spaces, including in terminals, on fixed-route buses, in demand-response vehicles, and in the reception area of the SRTA administrative office.

In addition, notices posted for service changes or public meetings are prepared in English, Portuguese, Spanish, and Haitian Creole, and posted in public spaces pertinent to the meeting being held. The notices are posted in conspicuous locations and prepared in a size and font that are easy to read.

## **Monitoring, Evaluating, and Updating LEP Plan**

The SRTA LEP Plan is monitored, evaluated, and updated triennially as part of the Title VI Program.

### **Monitoring**

LEP Plan performance is monitored in several ways:

- Collecting demographic data and conducting surveys to document the presence of LEP people likely to be served by SRTA.
- Maintaining records that indicate where language assistance beyond what is normally provided was requested by and/or provided to customers.
- Reviewing language assistance policies.
- Reviewing staff training procedures.
- Checking vehicles and terminals for language assistance notices and ensuring these locations have the latest English and non-English version of these notices.

Informal LEP Plan monitoring occurs on an ongoing basis, as SRTA staff observe SCTM operations to ensure compliance with LEP Plan policies.

## **Evaluating**

Evaluation of SRTA's LEP Plan includes:

- Analyzing demographic data and comparing against historic data to identify changes in the presence of LEP people in the SRTA service area.
- Understanding how LEP populations are changing.
- Analyzing survey data to identify how the LEP customer base is changing.
- Evaluating the frequency of contact with LEP people and the nature of that contact.

## **Updating**

The results of LEP Plan monitoring and evaluation are used to develop and update the LEP Plan, policies, and procedures. The LEP Plan is updated triennially with the Title VI Program. LEP Plan policies and procedures are updated if the results of a complaint investigation identify a deficiency. Since the last LEP Plan update, neither SRTA or SCTM have had complaint investigations result in modification to LEP Plan policies or procedures.

## **Training Staff to Provide Language Assistance**

Training staff to properly address the needs of LEP riders is an ongoing effort that begins with new hires and continues through the entirety of an employee's tenure with SRTA and with SCTM. All new hires receive LEP training to ensure they understand SRTA's LEP policies. Tenured employees receive LEP training when LEP policies change. Employees also receive training when a valid complaint regarding LEP-related issues is submitted by a customer.

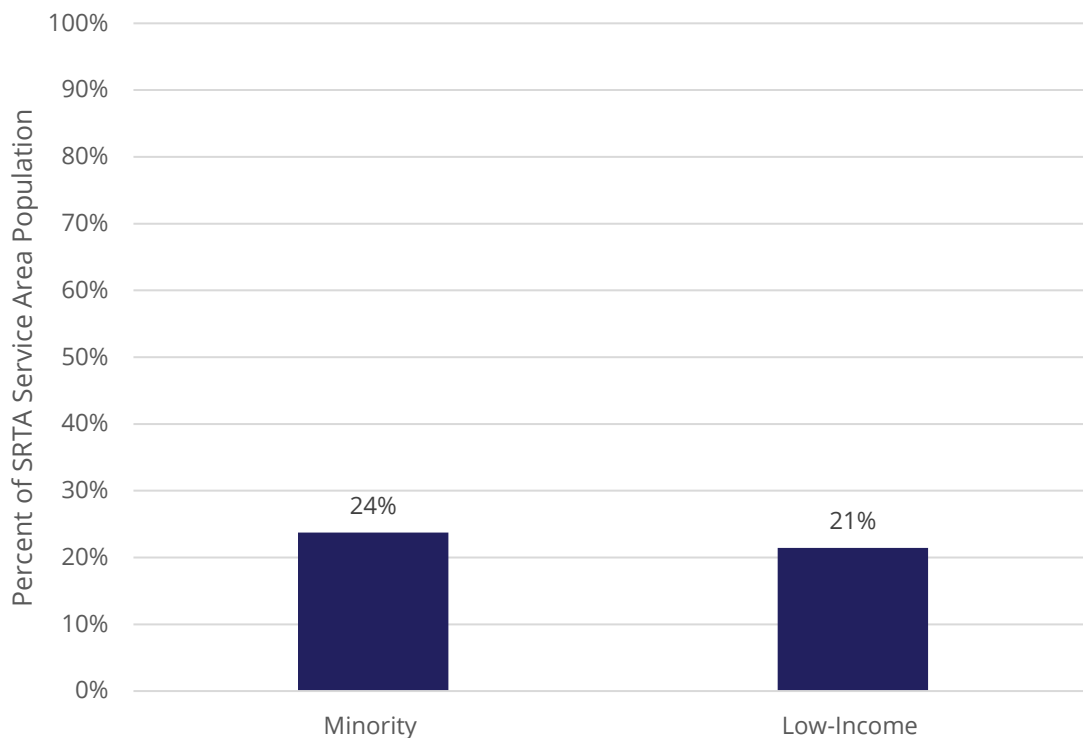
Special training is provided to dispatchers and employees fielding calls from the public, since staff coordinating demand-response service typically have the most language skill-dependent interactions with riders.

## 5 DEMOGRAPHIC DATA AND MAPS

### 5.1 SERVICE AREA DEMOGRAPHIC PROFILE

According to the 2020 U.S. Census, 322,845 people live in the SRTA service area. This population is concentrated in the cities of Fall River and New Bedford.<sup>10</sup> Of these residents, 76,632 (24%) identify as minorities and 69,221 (22%) are considered low-income (Figure 23).

Figure 23 Percent of SRTA Service Area Population that is Minority or Low-Income



Sources: 2020 U.S. Census Table P1 (minority data), 2019 ACS five-year estimates Table DP05 (income data).

<sup>10</sup> Source: 2020 U.S. Census. Table P1.



## Minority and Low-Income Classification

SRTA follows guidance from FTA C 4702.1B to define low-income and minority people, geographies, and fixed transit routes. These definitions and analytical methods are described in Figure 24.

Figure 24 Low-Income and Minority Definitions and Methods

Demographic Group	Category	Definition	Guidance Source
Low-Income	Person	A person is considered low-income if their median household income is at or below the US Department of Health and Human Services (DHHS). The 2021 DHHS poverty guideline for a four-person household is \$26,500. Additional household size poverty guidelines are in Appendix D. <sup>11</sup>	FTA C 4702.1B, Chap. I-3
	Census block group	A block group is considered low-income if the low-income population of the block group is greater than SRTA's service area average.	FTA C 4702.1B, Chap. IV-8
Minority	Person	A person is considered minority if they identify as any race/ethnicity other than white, or as Hispanic or Latino.	FTA C 4702.1B, Chap. I-4
	Census block group	A block group is considered a minority block group if the minority population of the block group is greater than SRTA's service area average.	FTA C 4702.1B, Chap. IV-9
	Fixed transit route	A transit route is considered a minority transit route if at least 1/3 of its total revenue mileage occurs in a minority census block group or groups.	FTA C 4702.1B, Chap. I-4

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<sup>11</sup> U.S. DHHS. 2021 Poverty Guidelines. <<https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines/prior-hhs-poverty-guidelines-federal-register-references/2021-poverty-guidelines#guidelines>>

In accordance with federal guidance referenced in Figure 25, SRTA identifies census block groups in its service area that are considered low-income and minority block groups. Based on the latest U.S. Census and ACS data, block groups are considered minority block groups if more than 23.7% of residents identify as minority and are considered low-income block groups if more than 21.4% of residents are considered low-income. Nearly half of all 251 block groups in the SRTA service area are either low-income or minority block groups, and one-third of block groups are both low-income and minority (Figure 25).

Figure 25 Block Groups in SRTA Service Area that Meet Demographic Criteria

Demographic Criteria	Number of Census Block Groups Meeting Criterion	Percent of Census Block Groups Meeting Criterion
Low-Income	106	42%
Minority	121	48%
Low-Income and Minority	83	33%

Sources: 2019 ACS five-year estimates, Table DP05.

## 5.2 DEMOGRAPHIC MAPS

Figure 26 through Figure 29 show the location of low-income and minority block groups in the SRTA service area, along with SRTA facilities and routes.

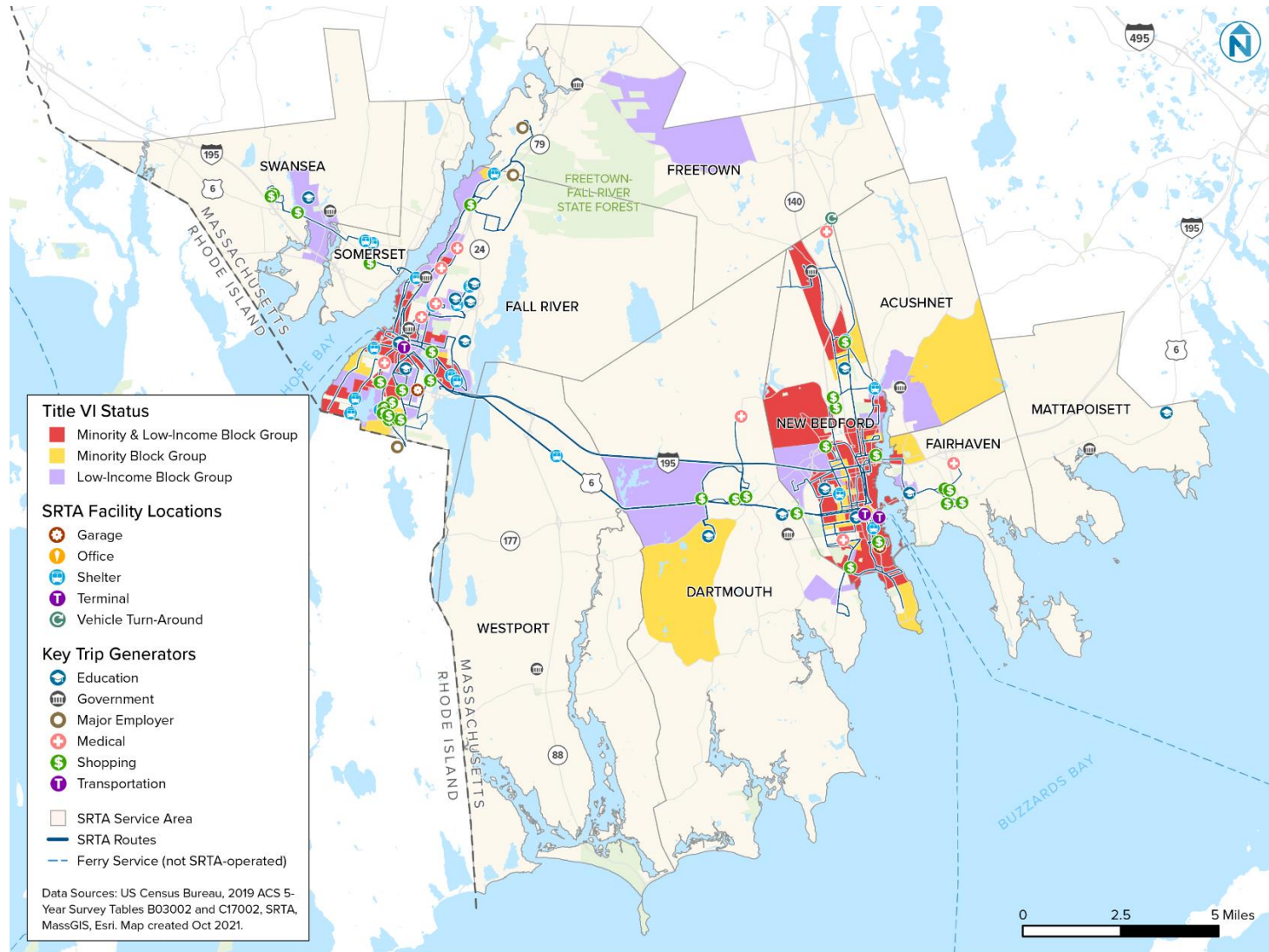
Minority populations are concentrated in New Bedford and Fall River. In New Bedford, minority populations are primarily concentrated in the more urbanized parts of the city. In Fall River, minority populations are concentrated downtown, as well as in the southwestern part of the city. Smaller concentrations of minority populations live in Dartmouth, Fairhaven, and Acushnet.

Low-income people are concentrated in the urban areas of New Bedford and central Fall River. Other concentrations of low-income populations live in northern Freetown, western Dartmouth, southern Acushnet, and parts of Swansea.

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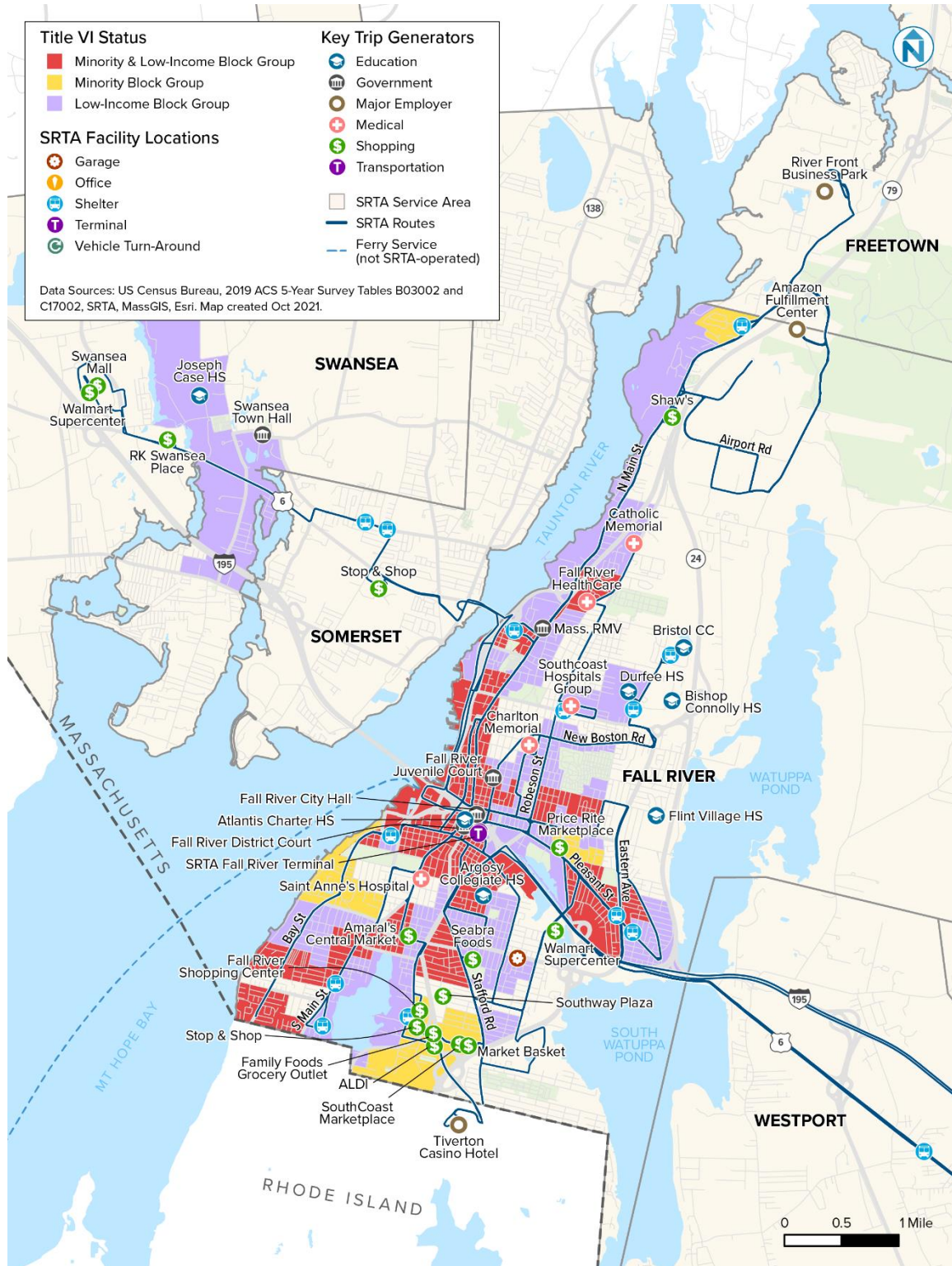
### Southeastern Regional Transit Authority

Figure 26 Map Showing Minority and Low-Income Block Groups in the SRTA Service Area



# 2022 Title VI Program Southeastern Regional Transit Authority

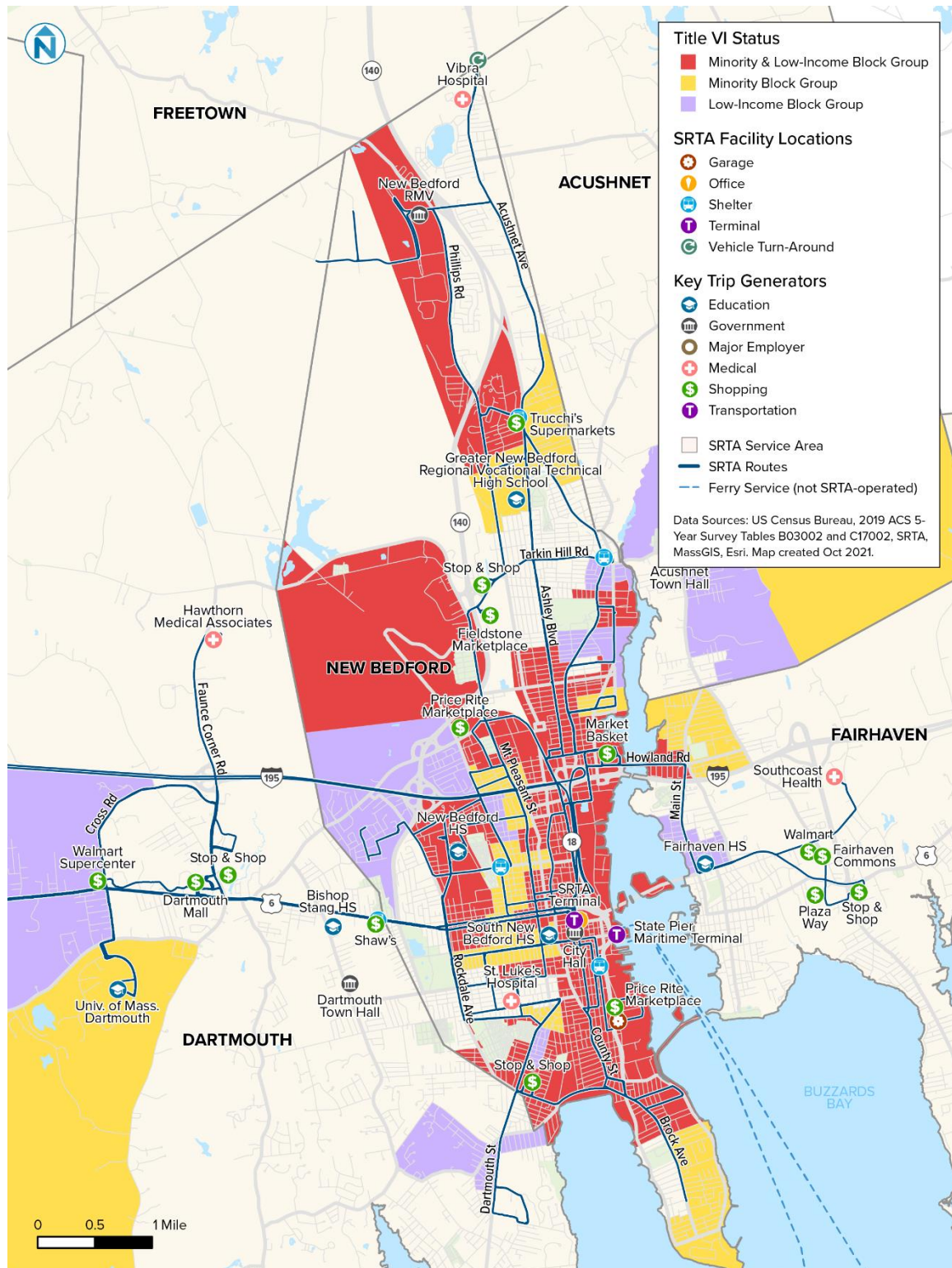
Figure 27 Map Showing Minority and Low-Income Block Groups in Fall River





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**Figure 28 Map Showing Minority and Low-Income Block Groups in New Bedford**

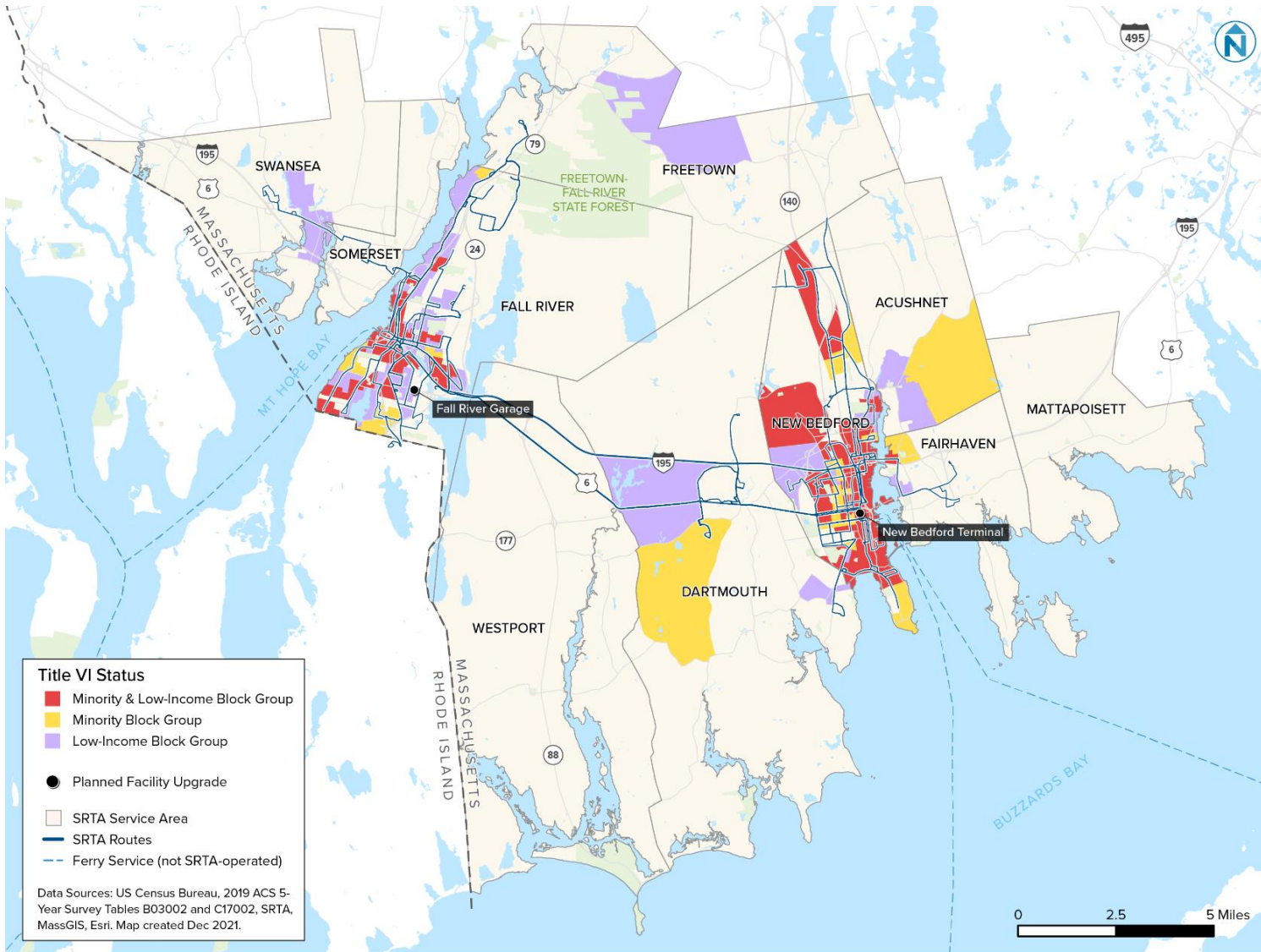


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SRTA plans to upgrade its Fall River garage/maintenance facility and New Bedford Terminal in the coming years, although funding has not been identified for these projects. A map showing these facilities' locations, with minority and low-income demographic data, is in Figure 29.

Figure 29 Map Showing Planned Facility Upgrade Locations with Low-Income and Minority Census Block Groups



## 5.3 ROUTE CLASSIFICATION

Based on the FTA C 4702.1B definition above, SRTA has identified 'minority routes' (Figure 30). These routes are also classified as either urban or suburban, where urban routes operate most of their revenue miles within either the City of Fall River or New Bedford, and suburban routes do not.

Figure 30 SRTA Route Classification

Route Name	Minority Status	Route Type
<b>New Bedford Routes</b>		
NB1 – Fort Rodman	Minority Route	Urban
NB2 – Lund's Corner	Minority Route	Urban
NB3 – Dartmouth St.	Minority Route	Urban
NB4 – Ashley Blvd.	Minority Route	Urban
NB5 – South Central	Minority Route	Urban
NB6 – Shawmut	Minority Route	Urban
NB8 – Mt. Pleasant	Minority Route	Suburban
NB9 – Fall River-New Bedford	Non-Minority Route	Suburban
NB9X – Fall River-New Bedford Express	Minority Route	Suburban
NB10 – Dartmouth Mall	Non-Minority Route	Suburban
NB11 – Fairhaven	Minority Route	Suburban
North End Shuttle	Non-Minority Route	Urban
<b>New Bedford School Routes</b>		
Roosevelt Middle School	Minority Route	Urban
Keith Middle School	Minority Route	Urban
New Bedford High School	Minority Route	Urban
<b>Fall River Routes</b>		
FR1 – South Main	Minority Route	Urban
FR2 – North Main	Minority Route	Urban
FR3 – Laurel	Minority Route	Urban
FR4 – Robeson St.	Minority Route	Urban
FR5 – Stafford Rd.	Minority Route	Urban
FR6 – Pleasant St.	Minority Route	Urban
FR7 – Bay St.	Minority Route	Urban
FR8 – BCC/Durfee	Minority Route	Urban
FR9 – Bedford	Minority Route	Urban
FR10 – Rodman St./Walmart	Minority Route	Urban
FR14 – Swansea Mall	Non-Minority Route	Suburban



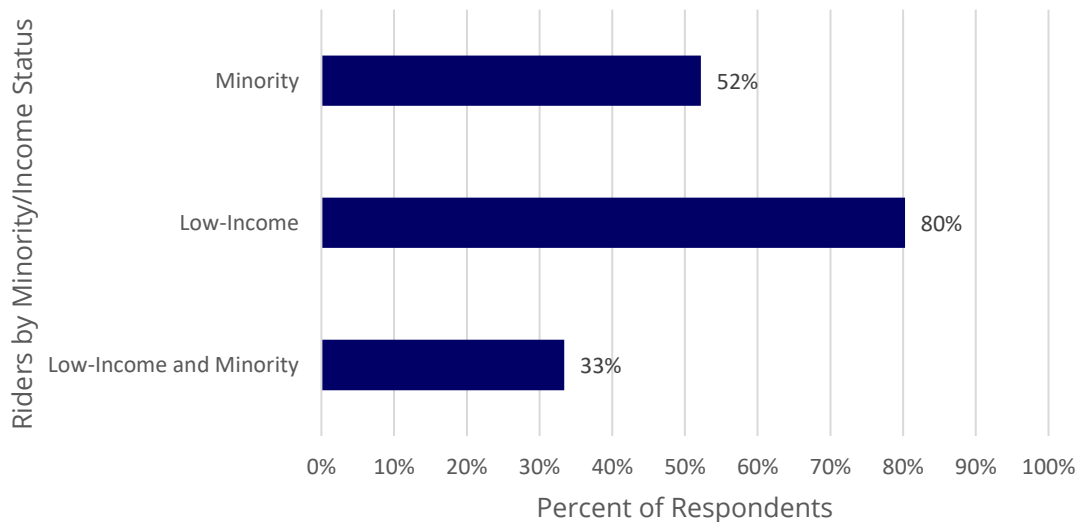
## 5.4 DEMOGRAPHIC PROFILE OF CUSTOMERS

In addition to analyzing service area demographic data from the U.S. Census and ACS, SRTA collects demographic information on SRTA riders, and uses this information to develop a demographic profile to analyze the minority and low-income status of riders. These data are important because SRTA rider demographics do not always reflect the demographics of the service area; this information provides valuable information for analyzing potential service and fare changes.

The most recent customer data were collected in a survey conducted by the Southeastern Regional Planning and Economic Development District (SRPEDD) on-board SRTA buses as part of a 2019 fare equity analysis. The survey was conducted over the course of several days in 2019 and produced a statistically significant sample of SRTA customers, providing a 95% confidence interval with a 4.8% margin of error. The survey was distributed and collected on all SRTA routes and resulted in a sample representing all routes, times of the day, and schedule types. Surveys were provided in English, Portuguese, and Spanish.

The results of the survey indicated that 52% of passengers identify as minorities and 80% identified as low-income (Figure 31 and Figure 32). This shows that SRTA's ridership consists of proportionally more minority and low-income people than the service area.

Figure 31 SRTA Riders' Minority and Low-Income Status



Source: 2019 SPREDD Fare Equity Survey

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Figure 32 SRTA Riders' Minority and Low-Income Status

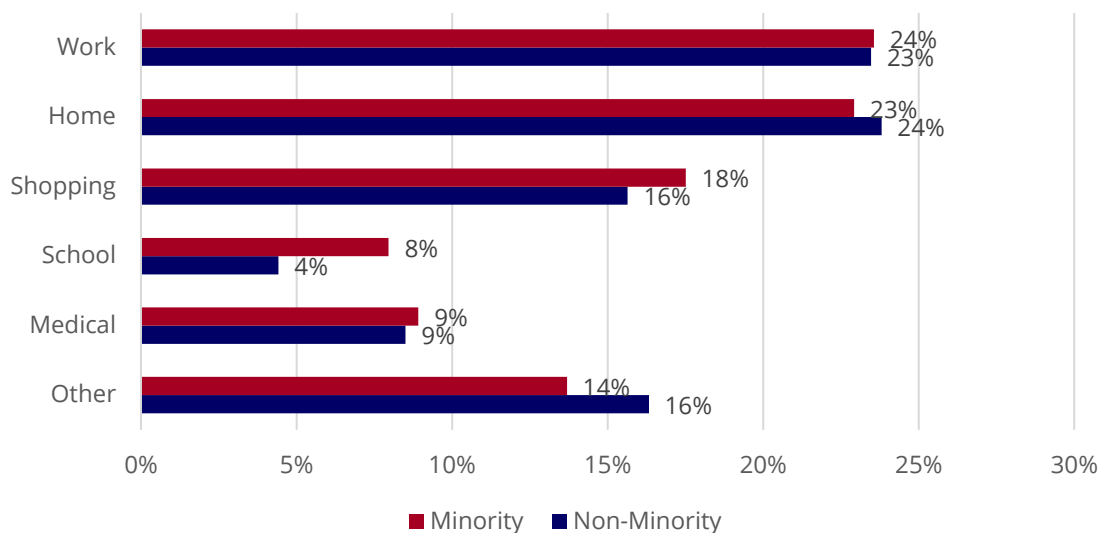
Minority and Low-Income Status	Responses	Percent
Minority	250	52%
Low-Income	321	80%
Minority and Low-Income	160	33%

Source: 2019 SPREDD Fare Equity Survey

In addition to understanding the demographic profile of riders, it is important to understand how and why SRTA riders use SRTA's fixed-route system. To understand this, SRTA uses information collected from a 2018 rider survey. The SRTA rider survey was conducted by SPREDD at the New Bedford Terminal from June 12, 2018, until June 16, 2018; and at the Fall River Terminal from June 19, 2018, until June 23, 2018. The survey was available in English, Portuguese, and Spanish. 623 surveys responses were collected, providing a 95% confidence interval with a 4% margin of error.

Results from this survey show that minority and non-minority trip purposes on SRTA's fixed-route services are relatively similar, but minority riders are twice as likely to use SRTA service for school trips than non-minority riders (Figure 33 and Figure 34).

Figure 33 SRTA Riders' Trip Purpose by Minority Status



Source: 2018 SPREDD Rider Survey

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Figure 34 SRTA Riders' Trip Purpose as a Percent of All Trips, by Minority Status

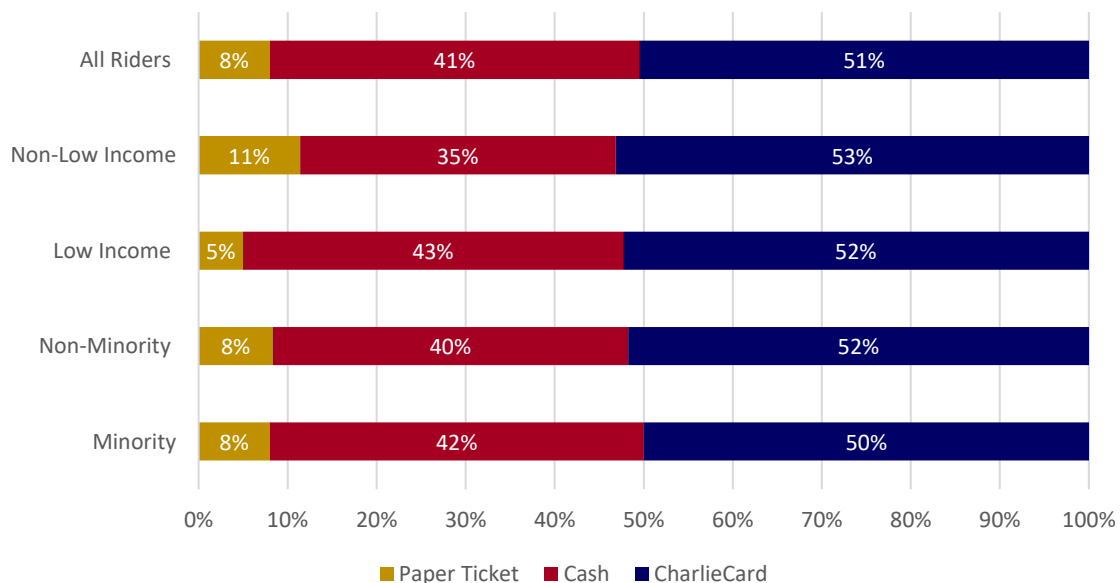
Trip Purpose	Minority	Non-Minority
Work	24%	23%
Home	23%	24%
Shopping	18%	16%
School	8%	4%
Medical	9%	9%
Other	14%	16%

Source: 2018 SPREDD Rider Survey

It is also important to understand how fare payment may differ among low-income and minority riders, relative to non-low-income and non-minority riders. To understand this, SRTA uses data from the 2019 SPREDD fare equity survey.

Figure 35 and Figure 36 show how low-income and minority riders pay their fares on SRTA fixed routes. Although all demographic groups are similarly likely to use CharlieCards, non-low-income riders are more likely than low-income riders to use paper tickets, and low-income riders are considerably more likely to pay fares with cash. There is little difference between fare media use of non-minority and minority riders. A complete analysis of the 2019 Fare Equity survey is provided in Appendix E.

Figure 35 Fare Media Used Most Frequently by SRTA Riders, by Income and Minority Status



Source: 2019 SPREDD Fare Equity Survey

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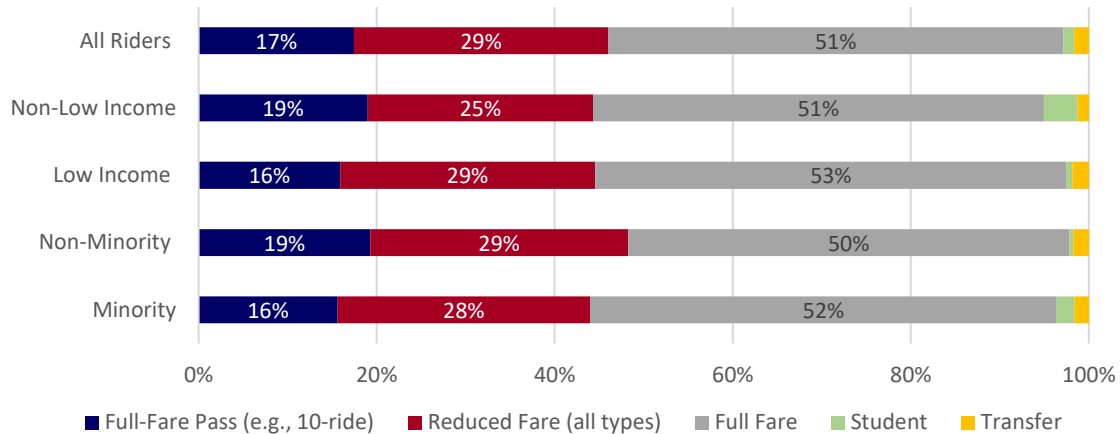
Figure 36 Fare Media Used Most Frequently by SRTA Riders, by Income and Minority Status

Fare Media	All Riders	Minority	Non-Minority	Low-Income	Non- Low Income
Paper Tickets	8%	8%	8%	5%	11%
Cash	41%	42%	40%	43%	35%
CharlieCard	51%	50%	52%	52%	53%

Source: 2019 SPREDD Fare Equity Survey

Figure 37 and Figure 38 show how the fare type that SRTA riders most commonly use varies by income and minority status. Although all demographic groups are roughly equally as likely to pay full fare, low-income riders are more likely to pay with a reduced fare. Non-low-income riders are also more likely than low-income riders to pay with a student pass.

Figure 37 Fare Type Used Most Frequently by SRTA Riders, by Income and Minority Status



Source: 2019 SPREDD Fare Equity Survey

Figure 38 Fare Type Used Most Frequently by SRTA Riders, by Income and Minority Status

Fare Type	All Riders	Minority	Non-Minority	Low-Income	Non- Low Income
Pass (e.g., 10-ride)	17%	16%	19%	16%	19%
Reduced Fare (all types)	29%	28%	29%	29%	25%
Full Fare	51%	52%	50%	53%	51%
Student	1%	2%	0%	1%	4%
Transfer	2%	2%	2%	2%	1%

Source: 2019 SPREDD Fare Equity Survey

## 6 SYSTEMWIDE SERVICE STANDARDS AND POLICIES

SRTA maintains service standards and service policies that guide the agency's levels and quality of service for fixed-route bus service. These standards and policies are used by SRTA to monitor transit service, in compliance with the agency's Title VI obligations.

### 6.1 SERVICE STANDARDS

SRTA's fixed-route service standards are summarized here and described in more detail below:

- **Vehicle load:** A route's average maximum passenger load should not exceed 150% of a vehicle's seated capacity, where the maximum passenger load is measured at the trip level. This standard applies to both peak and off-peak trips.
- **Vehicle headway:** A route's headways should be no greater than 60 minutes.
- **On-time performance:** A route's on-time performance should be 85% or greater, where on-time performance is measured as the percent of departures from trip origins that are on time. Departures are considered on time if they occur less than one minute earlier or less than five minutes later than the scheduled departure time.
- **Service availability:** 90% of households in the SRTA service area that don't have access to a vehicle should be within ½-mile of a fixed-route bus stop.

## Vehicle Load

SRTA maintains a fixed-route vehicle load standard to ensure vehicles are not overcrowded. Vehicle load is the number of passengers on board a vehicle, and vehicle load ratio is the ratio of vehicle load to seated capacity of the vehicle. The vehicle load ratio is recorded at each stop, after all passengers on board are counted.

SRTA considers a vehicle's maximum passenger capacity to be 150% of the number of seats, which represents a very crowded condition, with many passengers forced to stand. The seated and maximum passenger capacities for the three vehicle types SRTA operates are in Figure 39.

Figure 39 SRTA Fixed-Route Passenger Seated and Maximum Capacity by Vehicle Size

Vehicle Type	Seated Capacity	Maximum Capacity
30-Foot Bus	30	45
35-Foot Bus	35	53
40-Foot Bus	38	57

SRTA's vehicle load service standard is for a route's average maximum vehicle load ratio to not exceed the maximum capacity ratio (i.e., 150%), where the vehicle load ratio is measured at the trip level.<sup>12</sup> This standard applies to both peak and off-peak trips.

## Vehicle Headway

SRTA maintains vehicle headway standards to ensure service is provided at a reasonable frequency throughout the service area. Vehicle headway is measured at the route level and is the time between bus departures at the same stop, on the same route. Vehicle headways on a route can vary, depending on the time of day.

SRTA's vehicle headway standard sets maximum headways by route type, day type, and time of day. Figure 40 shows SRTA's vehicle headway standards, where the standard is the maximum headway that should be operated. For example, an urban route in the a.m. peak period should not operate with headways greater than every

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<sup>12</sup> For example, if Route X makes three trips where the maximum vehicle load ratios are 175%, 150%, and 100%, the average maximum vehicle load ratio for Route X is 142%  $([175\%+150\%+100\%]/3)$ . This does not exceed SRTA's standard.

60 minutes. For example, headways of every 40 or 35 minutes would meet the standard.

Figure 40 SRTA Fixed-Route Vehicle Headway Standards

Day Type	Peak Period Standard	Off-Peak Period Standard
Weekday	60 mins.	60 mins.
Saturday	60 mins.	60 mins.

## On-Time Performance

SRTA maintains a fixed-route on-time performance standard to ensure service is reliable for riders. On-time performance is the percentage of departures from trip origins that are on time, where departures are considered on time if they occur less than one minute earlier or less than five minutes later than the scheduled departure time. For example, a bus that leaves a trip origin two minutes early is not on-time; likewise, if that bus were to leave the trip origin six minutes late, it would not be on time.

SRTA's standard is for a route to have 85% or greater on-time performance.

## Service Availability

SRTA maintains a fixed-route service availability standard to ensure service is provided to as many service area residents as is reasonably possible.

SRTA's service availability standard is for 90% of households in the SRTA service area that do not have access to a vehicle to be within a half-mile walking distance of a SRTA bus stop.



## 6.2 SERVICE POLICIES

### Distribution of Transit Amenities

SRTA maintains transit amenity provision standards to guide its capital investments at transit stops and facilities. These standards are described below and shown in Figure 41.

Figure 41 SRTA Fixed-Route Distribution of Transit Amenities Policy Guidelines

Transit Amenity	Provision Policy
Elevators	N/A
Escalators	N/A
Printed route schedules	Available on request at Fall River Terminal, New Bedford Terminal, and SRTA offices.
Seating	Prioritized at stops with higher numbers of average daily boardings and with higher numbers of riders that cannot comfortably stand for long periods of time (e.g., stops at senior living facilities).
Shelter	Prioritized at stops where average daily boardings exceed 20 and/or where transfers are possible among different routes.
Waste receptacles	Prioritized at stops with higher numbers of average daily boardings and/or with high numbers of complaints about littering.

### Elevators and Escalators

There are SRTA-owned and -operated elevators at the Fall River Terminal and New Bedford Terminal, and a third-party operated elevator at SRTA offices. SRTA does not plan to add elevators at any transit facilities in the future, and the current SRTA-owned elevators are not used to access transit (only to access the SRTA-owned parking garage). SRTA does not own or operate any escalators and does not plan to add escalators at any transit facilities in the future. Because of this, SRTA does not have a provision policy for elevators or escalators.

### Printed Route Schedules

SRTA provides printed route schedules for each route, on request, at the Fall River and New Bedford terminals, and at SRTA's offices.

## **Seating and Shelter**

SRTA provides seating at the Fall River and New Bedford terminals but does not plan to provide seating at any other locations, due to resource limitations. If resources are made available in the future, SRTA will prioritize stops with higher numbers of average daily boardings and with higher numbers of riders that cannot comfortably stand for long periods of time.

SRTA maintains 20 bus shelters, 11 of which are in either a minority or low-income census tract. No new shelters have been installed by SRTA since the agency's last Title VI Program was updated in 2019. Shelters are considered for stops that exceed 20 boardings per day or where multiple routes intersect and transfers among the routes are possible. SRTA has limited jurisdiction to install shelters without the approval of the property owner that controls the site (site control can generally be defined as private or government ownership) and is subject to municipal review and approval. SRTA prefers to site shelters in publicly controlled right-of-way to ensure the shelter will remain in place for the entirety of its useable life. SRTA encourages private property owners to install and maintain shelters.

## **Waste Receptacles**

SRTA provides waste receptacles at the Fall River and New Bedford terminals but does not plan to provide receptacles at any other locations. If resources are made available in the future, SRTA will prioritize stops with higher numbers of average daily boardings and/or with high numbers of complaints about littering.

## **Vehicle Assignment**

SRTA assigns vehicles to routes based on the route's geometry and anticipated passenger volumes. Current fixed-route bus fleet vehicles are comparably equipped with technology and comfort features, and all vehicles are accessible by people with disabilities. Vehicles are kept in a state of good repair and are only used in service if all equipment is functioning properly.

SRTA's vehicle assignment policy is for the average age of fixed-route vehicles at the Fall River Garage and New Bedford Garage to be within two years of one another. Because vehicles are assigned to garages, and not specific routes, SRTA considers this a reasonable approach to ensuring the quality of vehicles is roughly equivalent throughout the network.

## 7 SERVICE MONITORING PROGRAM AND RESULTS

### 7.1 MONITORING PROGRAM SUMMARY

SRTA's systemwide service standards and policies establish minimum thresholds for system performance. This chapter of the Title VI Program documents how SRTA's current service compares to those standards, as well as how minority routes perform relative to non-minority routes on these standards.

The data used to monitor system performance were collected between June 1, 2021 and October 30, 2021. These data were from fixed-route automatic passenger counters (APCs) and automatic vehicle location (AVL) systems, which are installed on all SRTA fixed-route vehicles. Software used to assess these data were Ridecheck Plus Version 8.1, Tableau Desktop 2020.4.10, and Microsoft Excel.

Overall monitoring results show that SRTA meets its standards and policies in all categories except for on-time performance. There are no discrepancies between minority and non-minority outcomes. A summary table of the monitoring program results is in Figure 42.

Figure 42 Summary Table of Monitoring Program Results

Standard or Policy	Is Standard or Policy Met Systemwide?	Discrepancy between Minority and Non-Minority Standard or Policy Performance?
Vehicle load	Yes	Standard Met for All Routes
Vehicle headway	Yes	Standard Met for All Routes
On-time performance	No	No Discrepancy
Distribution of transit amenities	N/A	No Discrepancy
Vehicle assignment	Yes	N/A
Service availability	Yes	N/A

The SRTA board was made aware of these monitoring results and approved of the changes when approving this Title VI Program. Minutes showing the board's approval of the monitoring results are in Appendix F.

## **7.2 VEHICLE LOAD**

Vehicle load is the number of passengers on board a vehicle, and a vehicle load ratio is the ratio of passengers on board a vehicle to the seated capacity of the vehicle.

SRTA's vehicle load service standard is for a route's average maximum vehicle load ratio to not exceed the maximum capacity ratio of 150%, where the maximum vehicle load ratio is measured at the trip level (i.e., the maximum number of passengers onboard a vehicle at any time during a trip is the 'maximum vehicle load' for that trip).

Although SRTA's standard allows for standees on some trips, this is likely to only occur during periods of peak demand, on some trips, on some routes. Most of the time, SRTA riders should expect to find a seat upon boarding. In the monitoring data used for this analysis, standing-room-only trips did not occur.

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Figure 43 shows the average maximum vehicle load ratio recorded during the 2021 data collection period. The average maximum ratio did not exceed the standard for any routes, with non-minority routes showing a higher average maximum vehicle load (and therefore more crowding) than minority routes. Likewise, the systemwide average maximum vehicle load ratio did not exceed the standard. These results do not suggest a disparate impact in terms of vehicle load.

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Figure 43 Average Route Maximum Vehicle Load Ratio, by Minority Status and Time Period

Minority Status	Route	Off-Peak	Peak	Meets Standard?
Minority	FR1 – South Main	0.33	0.31	Yes
	FR2 – North Main	0.32	0.40	Yes
	FR3 – Laurel	0.42	0.33	Yes
	FR4 – Robeson St.	0.31	0.30	Yes
	FR5 – Stafford Rd.	0.36	0.33	Yes
	FR6 – Pleasant St.	0.32	0.23	Yes
	FR7 – Bay St.	0.30	0.25	Yes
	FR8 – BCC/Durfee	0.32	0.33	Yes
	FR9 – Bedford	0.30	0.25	Yes
	FR10 – Rodman St./Walmart	0.35	0.26	Yes
	NB1 – Fort Rodman	0.51	0.52	Yes
	NB2 – Lund's Corner	0.49	0.47	Yes
	NB3 – Dartmouth St.	0.35	0.33	Yes
	NB4 – Ashley Blvd.	0.34	0.30	Yes
	NB5 – South Central	0.17	0.15	Yes
	NB6 – Shawmut	0.21	0.19	Yes
	NB8 – Mt. Pleasant	0.41	0.36	Yes
	NB9X – Fall River-New Bedford Express	0.33	0.34	Yes
	NB11 – Fairhaven	0.42	0.36	Yes
	New Bedford School Trips	0.55	0.41	Yes
	<i>Minority Route Average</i>	<i>0.37</i>	<i>0.34</i>	<i>Yes</i>
Non-minority	FR14 – Swansea Mall	0.25	0.28	Yes
	NB9 – Fall River-New Bedford	0.62	0.55	Yes
	NB10 – Dartmouth Mall	0.42	0.39	Yes
	North End Shuttle	0.26	0.31	Yes
	<i>Non-Minority Route Average</i>	<i>0.43</i>	<i>0.42</i>	<i>Yes</i>
Systemwide Average		0.37	0.34	Yes
<b>SRTA Standard</b>		<b>1.5</b>	<b>1.5</b>	-

Source: SRTA APC data from between June 1, 2021 and October 30, 2021.

## **7.3 VEHICLE HEADWAY**

Vehicle headway is the time between bus departures at the same stop, on the same route; it measures the frequency of vehicle arrivals. SRTA headways are set based on route length, service demand, and available resources, and vary by service schedule.<sup>13</sup> Because school ridership increases demand for service, several routes have additional service in the a.m. and p.m. when school is in session, to provide additional capacity during peak periods.

SRTA's vehicle headway standard is to operate all fixed-route service with headways no greater than 60 minutes on weekdays and Saturdays. All routes in the SRTA system meet SRTA's service standard for Weekday and Saturday service, so there is no disparate impact (Figure 44).

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<sup>13</sup> SRTA operates two service schedules: weekday and Saturday. Holiday service operates on a Saturday schedule.



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Figure 44 SRTA Route Headways

Route Name	Minority Status	Route Type	Weekday Headway	Saturday Headway	Meets Standard?
<b>New Bedford Routes</b>					
NB1 – Fort Rodman	Minority Route	Urban	20-30 mins.	30 mins.	Yes
NB2 – Lund's Corner	Minority Route	Urban	20-30 mins.	30 mins.	Yes
NB3 – Dartmouth St.	Minority Route	Urban	30 mins.	60 mins.	Yes
NB4 – Ashley Blvd.	Minority Route	Urban	25-45 mins.	30 mins.	Yes
NB5 – South Central	Minority Route	Urban	60 mins.	60 mins.	Yes
NB6 – Shawmut	Minority Route	Urban	60 mins.	60 mins.	Yes
NB8 – Mt. Pleasant	Minority Route	Suburban	40 mins.	40 mins.	Yes
NB9 – Fall River-New Bedford	Non-Minority Route	Suburban	30-60 mins.	60 mins.	Yes
NB9X – Fall River-New Bedford Express	Minority Route	Suburban	60 mins.	60 mins.	Yes
NB10 – Dartmouth Mall	Non-Minority Route	Suburban	60 mins.	60 mins.	Yes
NB11 – Fairhaven	Minority Route	Suburban	30 mins.	30 mins.	Yes
North End Shuttle	Non-Minority Route	Urban	40 mins.	40 mins.	Yes
<b>New Bedford School Routes</b>					
Roosevelt Middle School	Minority Route	Urban	N/A		
Keith Middle School	Minority Route	Urban			
New Bedford High School	Minority Route	Urban			
<b>Fall River Routes</b>					
FR1 – South Main	Minority Route	Urban	15-30 mins.	30-35 mins.	Yes
FR2 – North Main	Minority Route	Urban	25-30 mins.	30 mins.	Yes
FR3 – Laurel	Minority Route	Urban	25-30 mins.	30-40 mins.	Yes
FR4 – Robeson St.	Minority Route	Urban	30 mins.	60 mins.	Yes
FR5 – Stafford Rd.	Minority Route	Urban	5-30mins.	30 mins.	Yes
FR6 – Pleasant St.	Minority Route	Urban	10-60 mins.	60 mins.	Yes
FR7 – Bay St.	Minority Route	Urban	25-60 mins.	60 mins.	Yes
FR8 – BCC/Durfee	Minority Route	Urban	10-30 mins.	60 mins.	Yes
FR9 – Bedford	Minority Route	Urban	5-30mins.	60 mins.	Yes
FR10 – Rodman St./Walmart	Minority Route	Urban	10-60 mins.	60 mins.	Yes
FR14 – Swansea Mall	Non-Minority Route	Suburban	60 mins.	60 mins.	Yes

## **7.4 ON-TIME PERFORMANCE**

On-time performance is the percent of departures from trip origins that are on time, where departures are considered on time if they occur less than one minute earlier or less than five minutes later than the schedule departure time. SRTA's standard is for a route to have 85% or greater on-time performance.

Using AVL data from the program monitoring period, it was determined that systemwide on-time performance was 83%, which does not meet SRTA's standard. Among trip departures, 3% were early and 14% were late. SRTA plans to address on-time performance issues by reviewing AVL calibration to ensure stop times are being recorded accurately, and by adjusting schedules to ensure schedule stop times match realistic running times for routes. Operators that regularly depart prior to the scheduled departure time will also be identified for additional training.

Using the same AVL data, minority routes achieved an 83% on-time performance and non-minority routes achieved an 80% on-time performance, indicating very little discrepancy (there was a 5% difference, in favor of minority routes) in route on-time performance by minority status (Figure 45). Likewise, 47% of all minority routes did not meet OTP standards, while 50% of non-minority routes did not meet OTP standards. This is not considered a minority status-based discrepancy (there was a 6% difference, in favor of minority routes) or disparate impact.

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Figure 45 On-Time Performance by Route

Route	Minority Status	Early	Late	On-Time	Standard	Meets Standard?
FR1 – South Main	Minority	1%	9%	90%	85%	Yes
FR2 – North Main	Minority	2%	15%	83%	85%	No
FR3 – Laurel	Minority	3%	23%	75%	85%	No
FR4 – Robeson St.	Minority	0%	13%	87%	85%	Yes
FR5 – Stafford Rd.	Minority	7%	13%	80%	85%	No
FR7 – Bay St.	Minority	1%	17%	82%	85%	No
FR8 – BCC/Durfee	Minority	1%	14%	85%	85%	Yes
FR9 – Bedford	Minority	8%	25%	67%	85%	No
FR10 – Rodman St./Walmart	Minority	3%	31%	66%	85%	No
NB1 – Fort Rodman	Minority	4%	14%	83%	85%	No
NB2 – Lund's Corner	Minority	2%	16%	82%	85%	No
NB3 – Dartmouth St.	Minority	3%	7%	90%	85%	Yes
NB4 – Ashley Blvd.	Minority	4%	6%	90%	85%	Yes
NB5 – South Central	Minority	2%	11%	87%	85%	Yes
NB6 – Shawmut	Minority	9%	7%	84%	85%	No
NB8 – Mt. Pleasant	Minority	5%	9%	86%	85%	Yes
NB9X – FR-NB Express	Minority	3%	3%	94%	85%	Yes
NB11 – Fairhaven	Minority	2%	11%	86%	85%	Yes
New Bedford School Trips	Minority	13%	34%	52%	85%	No
<i>Minority Route Total</i>		3%	13%	83%	85%	No
FR14 – Swansea Mall	Non-Minority	8%	6%	86%	85%	Yes
NB9 – Fall River-New Bedford	Non-Minority	1%	21%	78%	85%	No
NB10 – Dartmouth Mall	Non-Minority	9%	17%	74%	85%	No
North End Shuttle	Non-Minority	3%	5%	92%	85%	Yes
<i>Non-Minority Route Total</i>		5%	16%	80%	85%	No
<b>Systemwide Total</b>		<b>3%</b>	<b>14%</b>	<b>83%</b>	<b>85%</b>	<b>No</b>

Source: SRTA AVL data from between June 1, 2021 and October 30, 2021.

Note: FR6 was not completely in service at the time these data were collected, so is excluded from this table.

## 7.5 SERVICE AVAILABILITY

Service availability measures the population that has access to the transit system. SRTA's current standard is for 90% of households in the SRTA service area without access to a vehicle to be within ½-mile walking distance of a SRTA fixed-route bus stop.

SRTA staff conducted a GIS analysis to assess the agency's performance against this standard. The analysis created a ½-mile walking distance buffer from each SRTA fixed-route bus stop to establish a service area. To estimate the number of households in the service area, the area of the buffer was multiplied by the ratio of households to area for the census tracts intersected by the buffer. The results produced an estimate of the number of households, which was then multiplied by the proportion of households without an available vehicle in the intersecting census tracts.

According to the latest ACS data, there are 125,145 households in SRTA's service area, 17,674 (14%) of which have zero vehicles available.<sup>14</sup> The results of the analysis described above estimate that 79,850 (64%) of service area households are within a half-mile of the fixed-route system, and 16,071 of those households (20%) do not have an available vehicle. Based on these results, 91% of households without an available vehicle live within ½-mile walking distance of a SRTA fixed-route bus stop, meeting SRTA's standard. This information is displayed in Figure 46.

Figure 46 SRTA Household Service Availability

Geography	Total Households	Households w/o Vehicle Available	Percent of Households w/o Vehicle Available
SRTA service area	125,145	17,674	14%
½-mile walking distance of SRTA fixed-route bus stop	79,850	16,071	20%
Percent withing ½-mile walking distance of SRTA fixed-route bus stop	64%	91%	-

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<sup>14</sup> 2019 ACS five-year estimate, Table B08203.

## **7.6 DISTRIBUTION OF TRANSIT AMENITIES**

SRTA's policies for distribution of transit amenities are largely prioritization-based, as SRTA does not systemically provide seating, shelters, and waste receptacles. Monitoring results related to SRTA's current policies are discussed below.

### **Elevators and Escalators**

SRTA does not plan to provide elevators outside of its parking garages, and so does not have a standard for provision of this amenity. SRTA has no plans to provide escalators.

### **Printed Route Schedules**

SRTA's policy is for route schedules to be available at its Fall River Terminal, New Bedford Terminal, and New Bedford offices. Schedules are available at these locations, so SRTA is meeting its policy for provision of this amenity.

### **Seating and Shelters**

SRTA does not provide seating outside of its transit facilities, and so does not have a policy for provision of this amenity.

Eleven of 20 (55%) SRTA shelters are in minority census tracts and nine (45%) are located in non-minority tracts; this is 10% more shelters in minority tracts than non-minority tracts, and which does not represent a discrepancy in amenity provision based on race/ethnicity, under SRTA's disparate impact policy.

### **Waste Receptacles**

SRTA does not plan to provide waste receptacles outside of its transit facilities, and so does not have a policy for provision of this amenity.

## **7.7 VEHICLE ASSIGNMENT**

SRTA's standard to ensure vehicles are of roughly equivalent quality throughout the network is for the average fixed-route vehicle age at each garage to be within two years of one another. Meeting this standard requires fleet balancing, as New Bedford vehicles typically accrue more mileage per year than Fall River vehicles, and SRTA's current Fall River Garage does not have space to store many 40-foot vehicles.

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The current difference in average age between the Fall River Garage and New Bedford Garage fleets is 1.05 years, which meets SRTA's standard. SRTA constantly rebalances vehicles across garages to maintain a roughly equivalent average age, working within garage capacity and other operational limitations.

Figure 47 Average Vehicle Age at SRTA Garages

SRTA Garage	Average Vehicle Age (years)
Fall River	7.9
New Bedford	6.9
<b>Difference</b>	<b>1.05</b>

Source: SRTA fleet roster as of December 23, 2021.

## 8 SERVICE AND FARE CHANGES

Per FTA C 4702.1B, SRTA conducts equity analyses for all permanent fare changes and service changes that exceed the major service change threshold. This chapter of the Title VI Program describes the major service change policy, adverse effects, and the disparate impact and disproportionate burden policies. This chapter also includes summaries and findings from service and fare equity analyses conducted by SRTA since submission of the last Title VI Program.

### 8.1 MAJOR SERVICE CHANGE POLICY

A major service change is defined as one in which **an individual fixed route's or the full fixed-route system's daily revenue mileage is permanently increased or decreased by more than 25%, or in which a demand-response service area's size or daily<sup>15</sup> span of service is permanently increased or decreased by more than 25%**. A permanent change is considered one that lasts for longer than 12 months or is made with the intention of being in place for more than 12 months, or until the next regularly scheduled service change.

In the case of a major service change that is intended to be permanent, SRTA will conduct a service equity analysis prior to the change occurring. In the case of a major service change that is initially meant to be temporary but becomes permanent by lasting more than 12 months, SRTA will conduct a service equity analysis immediately after determining the service change is permanent.

In conducting a service or fare equity analysis, SRTA will use the best available data, including but not limited to: ACS estimates, U.S. Census data, SRTA ridership data, or SRTA survey data.

It is SRTA policy to engage the public during development of a major service change, conduct a service equity analysis, and address potential adverse disparate impacts or disproportionate burdens caused by those changes.

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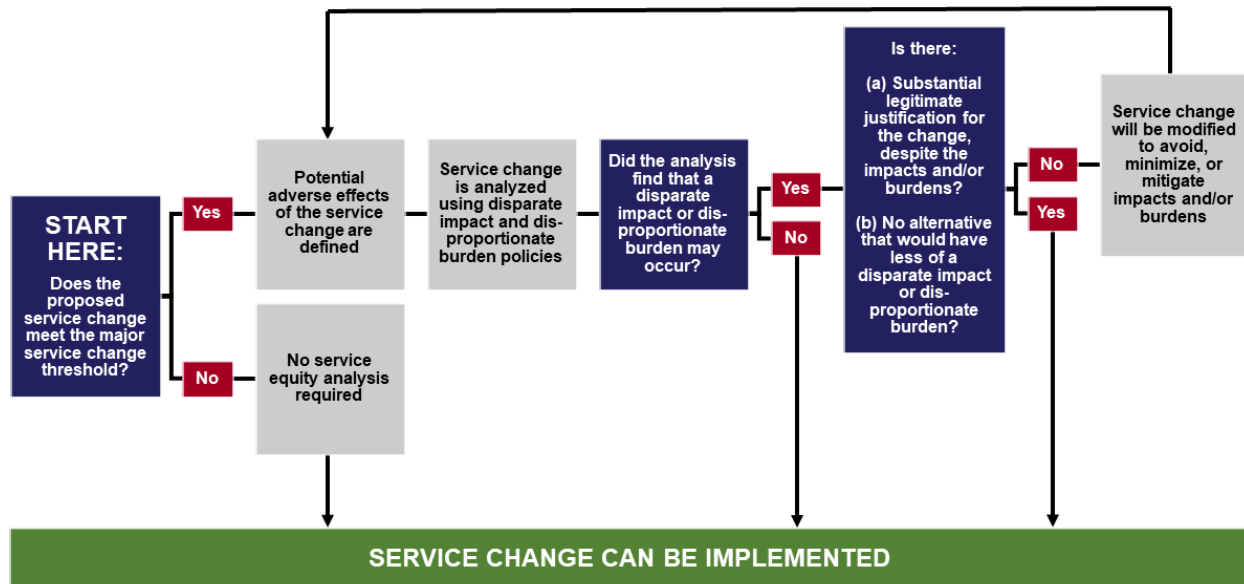
<sup>15</sup> For any day (i.e., weekday or weekend).



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Service changes that have potential for adverse effects include route elimination, shortlining, rerouting, headway changes, or span of service changes. Prior to making a service change, SRTA conducts the following steps, which allow agency staff to determine if a service equity analysis is necessary and, if a service equity analysis is required, what analysis results will allow the agency to implement the service change.

Figure 48 SRTA Service Change and Title VI Service Equity Analysis Flowchart



The major service change policy described in this document was revised from SRTA's previous Title VI Program to be clearer, but substantial changes were not made. To ensure the public was aware of these changes and had an opportunity to provide input, SRTA held one Title VI open forum at the Fall River Terminal and another at the New Bedford Terminal in January 2022. For three weeks following these open forums, the public was able to comment on the proposed changes. The SRTA board was made aware of these proposed changes at their January 27, 2022 board meeting and approved of the changes when approving this Title VI Program. Minutes showing the board's approval of the major service change policy are in Appendix F.

## 8.2 ADVERSE EFFECTS

Because major service changes can either increase or decrease the amount of transit service available, it must be determined if they have adverse effects. SRTA considers the degree of adverse effects in its service equity analyses. Adverse effects include:

- **Loss of access to transit** (i.e., a route no longer operates in a certain place)
- **Loss of frequency** (i.e., a route comes less often)
- **Loss of span of service** (i.e., a route doesn't come as early or late in the day)

## 8.3 DISPARATE IMPACT POLICY

A disparate impact occurs when a proposed fare or major service change produces adverse effects on a population that is 60% or more minority.<sup>16</sup> The definition of the population impacted may vary, depending on the type of change or result being examined. In some cases the population may be the riders affected and in other cases the population may be *potential* riders affected (i.e., the service area population). Staff conducting the equity analysis will use their best judgement when determining the population. Examples of how this policy may be used are:

- **A route is proposed to be eliminated**, reducing access to transit in a neighborhood of 6,000 people. All these people would lose access to transit in this proposal, so they are considered the 'population' for the analysis. This population consists of 5,000 minorities and 1,000 non-minorities, which is 83% minority and 17% non-minority. This population is more than 60% minority, so there is a disparate impact in this example.
- **Cash fares are proposed to be increased** systemwide, increasing the cost of transit for riders paying with cash. In this example, the 'population' bearing the adverse effects is riders paying cash. Survey data show that 55% of cash riders are minorities and 45% of cash riders are non-minorities. Because less than 60% of the affected population is minority, there is no disparate impact in this example.

The disparate impact policy can also be applied to SRTA's service monitoring results. In the case of examining a population of minority routes and non-minority routes, the disparate impact threshold is when minority routes experience adverse effects at a rate that is 20 percentage points higher than non-minority routes. An example of this is:

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<sup>16</sup> 60% or more minority is the percentage at which the population is 20 percentage points more minority than non-minority. The prior SRTA Title VI Program used a 20% threshold in its disparate impact and disproportionate burden policies; this threshold is an evolution of that method.

- **There is a discrepancy in on-time performance** on minority and non-minority routes. Non-minority routes have an on-time performance of 90% and minority routes have an on-time performance of 80%. This means that minority routes have 10 percentage-point worse on-time performance than non-minority routes, which does not meet the 20 percentage-point disparate impact threshold. There is no disparate impact in this example.

It is the goal of SRTA to avoid, minimize, or mitigate adverse effects of service changes. Changes may proceed with a documented disparate impact if a substantial legitimate justification is demonstrated and there are no comparably effective alternative practices that would result in a lesser disparate impact.

The disparate impact policy described in this document was revised from SRTA's previous Title VI Program to clearly indicate that the disparate impact policy was 20 percentage points and not a 20 percent difference. To ensure the public was aware of these changes and had an opportunity to provide input, SRTA held one Title VI open forum at the Fall River Terminal and another at the New Bedford Terminal in January 2022. For three weeks following these open forums, the public was able to comment on the proposed changes. The SRTA board was made aware of these proposed changes at their January 27, 2022 board meeting and approved of the changes when approving this Title VI Program. Minutes showing the board's approval of the disparate impact policy are in Appendix F.

## **8.4 DISPROPORTIONATE BURDEN POLICY**

A disproportionate burden occurs when a proposed fare or major service change produces adverse effects on a population that is 60% or more low-income.<sup>17</sup> The definition of the population impacted may vary, depending on the type of change or result being examined. In some cases the population may be the riders affected and in other cases the population may be potential riders affected (i.e., the service area population). Staff conducting the equity analysis will use their best judgement when determining the population. Examples of how this policy may be used are:

- **A route is proposed to be eliminated**, reducing access to transit in a neighborhood of 6,000 people. All these people would lose access to transit in this proposal, so they are considered the 'population' for the analysis. This population consists of 5,000 low-income people and 1,000 non-low-income people, which is

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<sup>17</sup> 60% or more low-income is the percentage at which the population is 20 percentage points more low-income than non-low-income. The prior SRTA Title VI Program used a 20% threshold in its disparate impact and disproportionate burden policies; this threshold is an evolution of that method.

83% low-income and 17% non-low-income. This population is more than 60% low-income, so there is a disproportionate burden in this example.

- **Cash fares are proposed to be increased** systemwide, increasing the cost of transit for riders paying with cash. In this example, the ‘population’ bearing the adverse effects is riders paying cash. Survey data show that 55% of cash riders are low-income and 45% of cash riders are non-low-income. Because less than 60% of the affected population is low-income, there is no disproportionate burden in this example.

It is the goal of SRTA to avoid, minimize, or mitigate adverse effects of service changes. Changes may proceed with a documented disproportionate burden if a substantial legitimate justification is demonstrated and there are no comparably effective alternative practices that would result in a lesser disproportionate burden.

The disproportionate burden policy described in this document was revised from SRTA’s previous Title VI Program to clearly indicate that the disproportionate burden policy was 20 percentage points and not a 20 percent difference. To ensure the public was aware of these changes and had an opportunity to provide input, SRTA held one Title VI open forum at the Fall River Terminal and another at the New Bedford Terminal in January 2022. For three weeks following these open forums, the public was able to comment on the proposed changes. The SRTA board was made aware of these proposed changes at their January 27, 2022 board meeting and approved of the changes when approving this Title VI Program. Minutes showing the board’s approval of the disproportionate burden policy are in Appendix F.

## **8.5 FINDINGS OF SERVICE EQUITY ANALYSES**

Since the submission of SRTA’s previous Title VI Program, SRTA has not implemented any service changes that required an equity analysis.

## **8.6 FINDINGS OF FARE EQUITY ANALYSES**

Since the submission of SRTA’s previous Title VI Program, SRTA implemented one fare change that required a fare equity analysis. A description of the change and the results of the analysis are below, and the full fare equity analysis is included as Appendix G of this document.

### **January 2020 Fare Equity Analysis**

This fare equity analysis was conducted to assess the potential impacts of a systemwide SRTA fare increase. The fare equity analysis, which is in Appendix G, analyzed the potential

impacts of four fare change scenarios to low-income and minority SRTA riders, finding that none of the scenarios would produce a disparate impact or disproportionate burden on minority or low-income riders, respectively.

## **September 2021 Fare Equity Analysis**

This fare equity analysis was conducted to assess the potential impacts of reduction in CharlieCard and pass fares. These fare reductions were proposed as a tool to help restore ridership that was lost due to the COVID-19 pandemic. The analysis, which is in Appendix H, found that there would be no disparate impact or disproportionate burden due to these fare changes.

The proposed fare changes were put into effect October 1, 2021.

This equity analysis was presented to SRTA's Advisory Board on September 30, 2021. Meeting notes showing the Board's consideration of the analysis are in Appendix I.

# **APPENDIX**

## **A.TITLE VI CIRCULAR COMPLIANCE CHECKLIST**

## 2022 Title VI Program Appendix

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Report Chapter	Provision	FTA C 4702.1B Reference	Reporting Requirements
Chapter 2	Notify Beneficiaries of Protection under Title VI	III.5	A notice that includes (1) a statement that the agency operates programs without regard to race, color, or national origin; (2) description of the procedures that members of the public should follow in order to request additional information on the recipient's Title VI obligations; (3) a description of the procedures that members of the public shall follow in order to file a Title VI discrimination complaint against the recipient.
Chapter 2	Develop Title VI Complaint Procedures and Complaint Form	III.6	(1) Instructions to the public regarding how to file a Title VI discrimination complaint; (2) a copy of the recipient's complaint form.
Chapter 2	Record and report transit-related Title VI investigations, complaints, and lawsuits	III.7	Prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: (1) active investigations conducted by entities other than FTA; (2) lawsuits; (3) complaints naming the recipient. This list shall include: (1) the date that the investigation, lawsuit, or complaint was filed; (2) a summary of the allegation(s); (3) the status of the investigation, lawsuit, or complaint; (4) actions taken by the recipient in response, or final findings related to, the investigation, lawsuit, or complaint.
Chapter 3	Promoting Inclusive Public Participation	III.8	(1) A copy of the public participation plan that includes an outreach plan to engage minority and limited English proficient populations; (2) a summary of efforts made since the last Title VI submission.
Chapter 4	Provide meaningful access to LEP Persons	III.9	A copy of the recipient's Language Access Plan which shall, at a minimum (1) include the results of the Four Factor Analysis; (2) describe how the recipient provides language assistance service by language; (3) describe how the recipient provides notice to LEP persons about the availability of language assistance; (4) describe how the recipient monitors, evaluates, and updates the language access plan; (5) describe how the recipient trains employees to provide timely and reasonable language assistance to LEP populations.
N/A	Minority representation on planning and advisory boards	III.10	(1) A table depicting the racial breakdown of membership of those committees; (2) a description of efforts made to encourage the participation of minorities on such committees.
N/A	Provide assistance to subrecipients	III.11	Provide (1) sample Notice to Beneficiaries of Protection under Title VI; (2) sample procedures for tracking and investigating Title VI complaints; (3) demographic information on the race and English proficiency of residents served by subrecipient.
N/A	Monitoring Subrecipients	III.12	(1) Document process for ensuring that all subrecipients are complying with general reporting requirements; (2) collect Title VI programs from subrecipients and review for compliance; (3) request that subrecipients who provide transportation services verify that their level and quality of service is provided on an equitable basis.
Chapter 5	Determination of site or location of facilities	III.13	Copy of Title VI analysis of the located constructed facilities.



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Chapter 6	Set System-wide service standards	IV.4.a	Develop quantitative standards for: (1) vehicle load; (2) vehicle headway; (3) on-time performance; and (4) service availability.
Chapter 6	Set System-wide service policies	IV.4.b	Develop a policy for the following service indicators: (1) distribution of transit amenities; (2) vehicle assignments for each mode.
Chapter 5	Collect and Report Demographic Data	IV.5.a	Prepare (1) a base map of the transit provider's service area that overlays Census tract with transit facilities - including transit routes, transit stops, depots, maintenance and garage facilities, administrative buildings, as well as major activity centers and transit trip generators, and major streets and highways; (2) demographic map that plots information listed above in (1) and also shades those Census tracts where the percentage of minority population residing in these areas exceeds the average percentage of minority populations for the service area as a whole; (3) maps that depict those Census tracts where the percentage of total low-income population residing in these areas exceeds the service area population as a whole.
Chapter 5	Collect and Report Ridership and Travel Patterns	IV.5.b	Passenger demographic collected through surveys that (1) compare minority and non-minority riders, trips taken by minority riders and non-minority riders; and (2) a summary in tabular form of information collected on the race, color, national origin, English proficiency, language spoken at home, household income, travel patterns, usage by fare type.
Chapter 7	Monitor Transit Service	IV.6	(1) An assessment of the performance of transit performance of each minority and non-minority routes for each of the transit provider's service standards and service policies; (2) comparison of the transit service observed in the assessment to the transit provider's established service policies and standards (3) an application of a policy or procedure to determine whether disparate impacts exist on the basis of race, color, or national origin; (3) documentation that the results have been submitted to the administrator for consideration, awareness, and approval of the monitoring results.
Chapter 8	Evaluate Service Changes	IV.7.a	(1) Documentation of major service change policy; (2) definition and analysis of adverse effects related to major service changes; (3) documentation of a policy for measuring disparate impacts and disproportionate burdens that establish thresholds for determining when adverse effects of service change are borne disproportionately by minority and/or low-income populations presented as a statistical percentage and applied uniformly; (4) documentation that the service provider engaged the public in the decision making process to develop the major service change policy, the disparate impact policy, and the disproportionate burden policy; (5) a description of the dataset and technologies used in the analysis; (6) an evaluation of the impacts of proposed service changes.

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Chapter 8	Evaluate Fare Changes	IV.7.b	(1) description of the datasets, technologies, and techniques used to collect data and determine the number and percent of users for each fare media being changed and an analysis of minority and low-income riders use of fare media; (2) an assessment of the impacts the proposed fare change will have on minority and low-income populations; (3) documentation of minority disparate impact and low-income disproportionate burden policies which establish thresholds and analysis whether minority and/or low-income riders are bearing a disproportionate impact of the changes between the existing cost and the proposed cost presented as a statistical percentage and applied uniformly across all fare media; (4) documentation that the transit provider engaged the public in the decision making process to develop the disparate impact/disproportionate burden policies.
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Source: FTA Title VI Circular Requirements

## **B. TRANSLATED VERSIONS OF TITLE VI NOTICE TO THE PUBLIC**



# TIT VI AVI POU PIBLIK LA

## Konsènan Tit VI

Southeastern Regional Transit Authority (SRTA) fè piblik la konnen li konfòme yo ak Tit VI Lwa sou Dwa Sivil 1964 la ak tout lwa ki gen rapò ak yo.

Tit VI prevwa ke "pa gen okenn moun Ozetazini, pou rezon ras, koulè, oswa orijin nasyonal, yo pa dwe eskli nan patisipasyon nan, yo pa resevwa benefis yo nan, oswa yo dwe sibi diskriminasyon nan nenpòt pwogram oswa aktivite k ap resevwa finansye federal. asistans." SRTA opere pwogram ak sèvis li yo san konsiderasyon ras, koulè, ak orijin nasyonal dapre Tit VI.

Pou plis enfòmasyon sou Pwogram Tit VI SRTA a, obligasyon, pwosedi ak/oswa pou depoze yon plent, tanpri rele (508) 997-6767 epi mande Kowòdonatè Tit VI a. Ou ka aprann plis tou sou sitwèb SRTA a:

[www.srtabus.com](http://www.srtabus.com).

## Kijan pou depoze yon plent Tit VI

Pwosedi pou plent Tit VI ak fòm yo disponib sou sitwèb SRTA a, [www.srtabus.com](http://www.srtabus.com). Pou depoze yon plent, ranpli fòm plent lan epi poste fòm nan nan:

*Shayne Trimbell, Title VI Coordinator  
Southeastern Regional Transit Authority  
700 Pleasant Street, Suite 530  
New Bedford, MA 02740*

Ou ka depoze yon plent tou lè w vizite biwo SRTA yo, ki sitiye nan adrès ki ekri pi wo a, oswa lè w voye yon fòm plent ranpli yon imèl bay [info@srtabus.com](mailto:info@srtabus.com).

Ou ka depoze yon plent tou dirèkteman nan Federal Transit Administration lè w kontakte:

*Federal Transit Administration Office of Civil Rights, Region 1  
Attention: Title VI Program Coordinator  
55 Broadway, Suite 920  
Cambridge, MA 02142*

## Asistans nan lang

If information is needed in another language, please call (508) 997-6767.

Si se necesita información en otro idioma, por favor llame al (508) 997-6767.

Se a informação for necessária em outra língua, por favor ligue para (508) 997-6767.

Si enfòmasyon nesesè nan yon lòt lang, tanpri rele (508) 997-6767.

# TÍTULO VI AVISO AO PÚBLICO



## Sobre o Título VI

A Autoridade de Trânsito Regional do Sudeste (SRTA) informa publicamente que está em conformidade com o Título VI da Lei dos Direitos Civis de 1964 e todos os estatutos relacionados.

O Título VI estabelece que "nenhuma pessoa nos Estados Unidos deve, por motivo de raça, cor ou origem nacional, ser excluída da participação, ter seus benefícios negados ou ser submetida a discriminação sob qualquer programa ou atividade que receba financiamento federal assistência." A SRTA opera seus programas e serviços independentemente de raça, cor e nacionalidade de acordo com o Título VI.

Para mais informações sobre o Programa Title VI da SRTA, obrigações, procedimentos e/ou para registrar uma reclamação, ligue para (508) 997-6767 e pergunte pelo Coordenador do Title VI. Você também pode saber mais no site da SRTA: [www.srtabus.com](http://www.srtabus.com).

## Como registrar uma reclamação do Título VI

Os procedimentos e formulários de reclamação do Título VI estão disponíveis no site da SRTA, [www.srtabus.com](http://www.srtabus.com). Para registrar uma reclamação, preencha o formulário de reclamação e envie o formulário para:

*Shayne Trimbell, Title VI Coordinator  
Southeastern Regional Transit Authority  
700 Pleasant Street, Suite 530  
New Bedford, MA 02740*

Você também pode registrar uma reclamação visitando os escritórios da SRTA, localizados na morada escrita acima, ou enviando um formulário de reclamação preenchido por e-mail para [info@srtabus.com](mailto:info@srtabus.com).

Uma reclamação também pode ser apresentada diretamente à Administração Federal de Trânsito, contactando:

*Federal Transit Administration Office of Civil Rights, Region 1  
Attention: Title VI Program Coordinator  
55 Broadway, Suite 920  
Cambridge, MA 02142*

## Assistência linguística

If information is needed in another language, please call (508) 997—6767.

Si se necesita información en otro idioma, por favor llame al (508) 997-6767.

Se a informação for necessária em outra língua, por favor ligue para (508) 997-6767.

Si enfòmasyon nesesè nan yon lòt lang, tanpri rele (508) 997-6767.

Southeastern Regional Transit Authority  
(508) 999-5211  
[info@srtabus.com](mailto:info@srtabus.com)

# TÍTULO VI AVISO AL PÚBLICO



## Acerca del Título VI

La Autoridad de Tránsito Regional del Sudeste (SRTA) notifica públicamente que cumple con el Título VI de la Ley de Derechos Civiles de 1964 y todos los estatutos relacionados.

El Título VI establece que "ninguna persona en los Estados Unidos será excluida de participar, se le negaran beneficios, o será discriminada por motivos de su raza, color o nacionalidad de origen en cualquiera de los programas o actividades que reciben asistencia de Fondos Federales. "SRTA opera sus programas y servicios sin distinción de raza, color y nacionalidad de origen de acuerdo con el Título VI.

Para obtener más información sobre el Programa del Título VI de SRTA, sus deberes, los procedimientos y/o para presentar una reclamación, llame al (508) 997-6767 y pregunte por el Coordinador del Título VI. También puede obtener más información en el sitio web de SRTA: [www.srtabus.com](http://www.srtabus.com).

## Cómo presentar una reclamación del Título VI

Los procedimientos y formularios de quejas del Título VI están disponibles en el sitio web de SRTA, [www.srtabus.com](http://www.srtabus.com). Para presentar su reclamación o denuncia, complete el formulario de reclamo y envíelo por correo a:

*Shayne Trimbell, Title VI Coordinator  
Southeastern Regional Transit Authority  
700 Pleasant Street, Suite 530  
New Bedford, MA 02740*

También puede presentar una reclamación visitando las oficinas de SRTA, que se encuentran en la dirección que se indica arriba, o enviando por correo electrónico el formulario de reclamación debidamente completado a [info@srtabus.com](mailto:info@srtabus.com).

También se puede presentar una queja directamente ante la Administración Federal de Tránsito comunicándose con:

*Federal Transit Administration Office of Civil Rights, Region 1  
Attention: Title VI Program Coordinator  
55 Broadway, Suite 920  
Cambridge, MA 02142*

## Asistencia en otros idiomas

If information is needed in another language, please call (508) 997-6767.

Si se necesita información en otro idioma, por favor llame al (508) 997-6767.

Se a informação for necessária em outra língua, por favor ligue para (508) 997-6767.

Si enfòmasyon nesesè nan yon lòt lang, tanpri rele (508) 997-6767.

## **C. TRANSLATED VERSIONS OF TITLE VI COMPLAINT INSTRUCTIONS AND FORM**



# ENSTRIKSYON AK PWOSEDI POU PLENT TIT VI



## Konsènan plent Tit VI

Nenpòt moun ki kwè ke yo te fè diskriminasyon sou baz ras, koulè, oswa orijin nasyonal pa Southeastern Regional Transit Authority (SRTA) kapab depoze yon plent Tit VI lè yo ranpli epi soumèt fòmilè plent Tit VI SRTA a. Fòm plent yo dwe depoze pa pita pase 180 jou kalandriye apre dat ensidan an nan kesyon an.

## Kijan pou depoze yon plent Tit VI

Metòd pi pito a se pou depoze yon plent alekri lè w ranpli Fòm Plent Tit VI SRTA a, ki disponib sou sitwèb SRTA a, [www.srtabus.com](http://www.srtabus.com). Si w pa sèvi ak Fòm Plent Tit VI SRTA a, plent ou a dwe siyen epi—omwen—gen sa ki annapre yo:

- Enfòmasyon sou kontak ki gen ladan non, adrès postal, nimewo telefòn, ak imel
- Yon deskripsyon ki jan, ki lè, ki kote, ak poukisa ou kwè yo te fè diskriminasyon kont ou, tankou kote, non, ak enfòmasyon kontak nenpòt temwen.
- Lòt enfòmasyon ou panse ki enpòtan

## Soumèt yon plent Tit VI ba SRTA

Gen twa fason pou soumèt yon plent Tit VI: pa lapòs, pa imel, oswa an pèsòn.

### Depoze yon plent pa lapòs:

Ou ka depoze yon plent alekri epi voye yo pa lapòs nan adrès sa a:

*Shayne Trimbell, Title VI Coordinator  
Southeastern Regional Transit Authority  
700 Pleasant Street, Suite 530  
New Bedford, MA 02740*

### Depoze yon plent pa imel:

Ou ka depoze yon plent lè w voye yon fòm plent ranpli yon imèl bay [info@srtabus.com](mailto:info@srtabus.com).

### Depoze yon plent an pèsòn:

Ou ka depoze yon plent an pèsòn nan biwo SRTA: 700 Pleasant St., Suite 530, nan New Bedford.

## **Asistans nan lang**

If information is needed in another language, please call (508) 997-6767.

Si se necesita información en otro idioma, por favor llame al (508) 997-6767.

Se a informação for necessária em outra língua, por favor ligue para (508) 997-6767.

Si enfòmasyon nesesè nan yon lòt lang, tanpri rele (508) 997-6767.

# TÍTULO VI INSTRUÇÕES E PROCEDIMENTO DE RECLAMAÇÃO



## Sobre as reclamações do Título VI

Qualquer pessoa que acredite ter sido discriminada com base em raça, cor ou origem nacional pela Autoridade de Trânsito Regional do Sudeste (SRTA) pode registrar uma reclamação de Título VI preenchendo e enviando o formulário de reclamação de Título VI da SRTA. Os formulários de reclamação devem ser apresentados o mais tardar 180 dias corridos após a data do incidente em questão.

## Como registrar uma reclamação do Título VI

O método preferido é apresentar uma reclamação por escrito, preenchendo o Formulário de Reclamação Título VI da SRTA, que está disponível no site da SRTA, [www.srtabus.com](http://www.srtabus.com). Se você não usar o Formulário de Reclamação do Título VI da SRTA, sua reclamação por escrito deve ser assinada e, no mínimo, conter o seguinte:

- Informações de contato, incluindo nome, endereço para correspondência, número de telefone e e-mail
- Uma descrição de como, quando, onde e por que você acredita ter sido discriminado, incluindo localização, nomes e informações de contato de quaisquer testemunhas
- Outras informações que você considera importante

## Como enviar uma reclamação do Título VI à SRTA

Existem três maneiras de enviar uma reclamação do Título VI: por correio, por e-mail ou pessoalmente.

### Apresentar uma reclamação por correio:

A reclamação pode ser apresentada por escrito e enviada para o seguinte endereço:

*Shayne Trimbell, Title VI Coordinator  
Southeastern Regional Transit Authority  
700 Pleasant Street, Suite 530  
New Bedford, MA 02740*

### Denúncia por e-mail:

Uma reclamação pode ser feita enviando um e-mail com um formulário de reclamação preenchido para [info@srtabus.com](mailto:info@srtabus.com).

### Denunciar pessoalmente:

A reclamação pode ser apresentada pessoalmente no escritório da SRTA: 700 Pleasant St., Suíte 530, em New Bedford.

## **Assistência linguística**

If information is needed in another language, please call (508) 997-6767.

Si se necesita información en otro idioma, por favor llame al (508) 997-6767.

Se a informação for necessária em outra língua, por favor ligue para (508) 997-6767.

Si enfòmasyon nesesè nan yon lòt lang, tanpri rele (508) 997-6767.

# TITULO VI INSTRUCCIONES Y PROCEDIMIENTO PARA DENUNCIAS



## Acerca de las denuncias del Título VI

Cualquier persona que crea que ha sido discriminada por motivos de raza, color, o nacionalidad de origen, por la Autoridad de Tránsito Regional del Sureste (SRTA) podrá presentar su reclamo del Título VI completando y presentando el formulario de queja del Título VI de SRTA. Las hojas de reclamación deberán presentarse a mas tardar 180 días contados a partir de la fecha del incidente en cuestión.

## Cómo presentar un reclamo del Título VI

El método preferido es presentar su reclamo por escrito completando el Formulario de Queja del Título VI de SRTA, que está disponible en el sitio web de SRTA, [www.srtabus.com](http://www.srtabus.com). Si no utiliza el Formulario de Queja del Título VI de SRTA, su reclamacion por escrito debera estar firmada y, como mínimo, contener lo siguiente:

- Información de contacto, incluido el nombre, la dirección postal, el número de teléfono y el correo electrónico
- Una descripción de cómo, cuándo, dónde y por qué cree que fue discriminado, incluida la ubicación, los nombres y la información de contacto de cualquier testigo.
- Información adicional que usted considere importante.

## Como someter una reclamacion del Título VI a SRTA

Hay tres formas de someter su reclamo escrito del Título VI: por correo, por correo electrónico o en persona.

### Presentación de una reclamo por correo:

Un reclamo puede presentarse por escrito y enviarse por correo a la siguiente dirección:

*Shayne Trimbell, Title VI Coordinator  
Southeastern Regional Transit Authority  
700 Pleasant Street, Suite 530  
New Bedford, MA 02740*

### Presentación de un reclamo por correo electrónico:

El reclamo puede ser enviando por correo electrónico un formulario de queja completo a [info@srtabus.com](mailto:info@srtabus.com).

### Presentación de una queja en persona:

Una reclamo se puede presentar en persona en la oficina de SRTA: 700 Pleasant St., Suite 530, en New Bedford, MA 02740

## **Asistencia en otros idiomas**

If information is needed in another language, please call (508) 997-6767.

Si se necesita información en otro idioma, por favor llame al (508) 997-6767.

Se a informação for necessária em outra língua, por favor ligue para (508) 997-6767.

Si enfòmasyon nesesè nan yon lòt lang, tanpri rele (508) 997-6767.

## **D. 2021 DEPARTMENT OF HEALTH AND HUMAN SERVICES POVERTY GUIDELINES**



# 2021 Poverty Guidelines

ASPE Topics Poverty & Economic Mobility Poverty Guidelines  
Prior HHS Poverty Guidelines and Federal Register References 2021 Poverty Guidelines

## U.S. Federal Poverty Guidelines Used to Determine Financial Eligibility for Certain Federal Programs

[\[Federal Register Notice, February 1, 2021 - Full text\]](#)

[\[Computations for the 2021 Poverty Guidelines\]](#)

There are two slightly different versions of the federal poverty measure:

- The [poverty thresholds](#), and
- The [poverty guidelines](#).

The [poverty thresholds](#) are the original version of the federal poverty measure. They are updated each year by the **Census Bureau**. The thresholds are used mainly for **statistical** purpose — for instance, preparing estimates of the number of Americans in poverty each year. (In other words, all official poverty population figures are calculated using the poverty thresholds, not the guidelines.) [Poverty thresholds since 1973 \(and for selected earlier years\)](#) and [weighted average poverty thresholds since 1959](#) are available on the Census Bureau's Web site. For an example of how the Census Bureau applies the thresholds to a family's income to determine its poverty status, see "[How the Census Bureau Measures Poverty](#)" on the Census Bureau's web site.

The [poverty guidelines](#) are the other version of the federal poverty measure. They are issued each year in the *Federal Register* by the **Department of Health and Human Services** (HHS). The

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2021 Poverty Guidelines | ASPE

guidelines are a simplification of the poverty thresholds for use for **administrative** purposes — for instance, determining financial eligibility for certain federal programs.

The poverty guidelines are sometimes loosely referred to as the “federal poverty level” (FPL), but that phrase is ambiguous and should be avoided, especially in situations (e.g., legislative or administrative) where precision is important.

Key differences between poverty thresholds and poverty guidelines are outlined in a table under [Frequently Asked Questions](#) (FAQs). See also the [discussion of this topic](#) on the Institute for Research on Poverty’s web site.

The following figures are the 2021 HHS poverty guidelines which will be published in the Federal Register

### 2021 POVERTY GUIDELINES FOR THE 48 CONTIGUOUS STATES AND THE DISTRICT OF COLUMBIA

Persons in family/household	Poverty guideline
1	\$12,880
2	\$17,420
3	\$21,960
4	\$26,500
5	\$31,040
6	\$35,580
7	\$40,120
8	\$44,660
For families/households with more than 8 persons, add \$4,540 for each additional person.	

### 2021 POVERTY GUIDELINES FOR ALASKA

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2021 Poverty Guidelines | ASPE

Persons in family/household	Poverty guideline
1	\$16,090
2	\$21,770
3	\$27,450
4	\$33,130
5	\$38,810
6	\$44,490
7	\$50,170
8	\$55,850
For families/households with more than 8 persons, add \$5,680 for each additional person.	

### 2020 POVERTY GUIDELINES FOR HAWAII

2021 POVERTY GUIDELINES FOR HAWAII	
Persons in family/household	Poverty guideline
1	\$14,820
2	\$20,040
3	\$25,260
4	\$30,480
5	\$35,700
For families/households with more than 8 persons, add \$5,220 for each additional person	

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2021 Poverty Guidelines | ASPE

<b>2021 POVERTY GUIDELINES FOR HAWAII</b>	
<b>Persons in family/household</b>	<b>Poverty guideline</b>
6	\$40,920
7	\$46,140
8	\$51,360
For families/households with more than 8 persons, add \$5,220 for each additional person	

The separate poverty guidelines for Alaska and Hawaii reflect Office of Economic Opportunity administrative practice beginning in the 1966-1970 period. Note that the poverty thresholds — the original version of the poverty measure — have never had separate figures for Alaska and Hawaii. The poverty guidelines are not defined for Puerto Rico, the U.S. Virgin Islands, American Samoa, Guam, the Republic of the Marshall Islands, the Federated States of Micronesia, the Commonwealth of the Northern Mariana Islands, and Palau. In cases in which a Federal program using the poverty guidelines serves any of those jurisdictions, the Federal office which administers the program is responsible for deciding whether to use the contiguous-states-and-D.C. guidelines for those jurisdictions or to follow some other procedure.

The poverty guidelines apply to both aged and non-aged units. The guidelines have never had an aged/non-aged distinction; only the Census Bureau (statistical) poverty thresholds have separate figures for aged and non-aged one-person and two-person units.

Programs using the guidelines (or percentage multiples of the guidelines — for instance, 125 percent or 185 percent of the guidelines) in determining eligibility include Head Start, the Supplemental Nutrition Assistance Program (SNAP), the National School Lunch Program, the Low-Income Home Energy Assistance Program, and the Children's Health Insurance Program. Note that in general, cash public assistance programs (Temporary Assistance for Needy Families and Supplemental Security Income) do NOT use the poverty guidelines in determining eligibility. The Earned Income Tax Credit program also does NOT use the poverty guidelines to determine eligibility. For a more detailed list of programs that do and don't use the guidelines, see the [Frequently Asked Questions](#)(FAQs).

The poverty guidelines (unlike the poverty thresholds) are designated by the year in which they are issued. For instance, the guidelines issued in January 2021 are designated the 2021 poverty guidelines. However, the 2021 HHS poverty guidelines only reflect price changes through calendar

## **E. 2019 SRTA FARE EQUITY SURVEY RESULTS**

## **F. SRTA BOARD MEETING MINUTES SHOWING APPROVAL OF THE MAJOR SERVICE CHANGE AND DISPARATE IMPACT POLICIES**

## **G. JANUARY 29, 2020 FARE EQUITY ANALYSIS**



## **H. SRTA BOARD MEETING MINUTES SHOWING CONSIDERATION OF THE JANUARY 2020 FARE EQUITY ANALYSIS**

## **I. SEPTEMBER 29, 2021 FARE EQUITY ANALYSIS**

## **J. SRTA BOARD MEETING MINUTES SHOWING CONSIDERATION OF THE SEPTEMBER 2021 FARE EQUITY ANALYSIS**

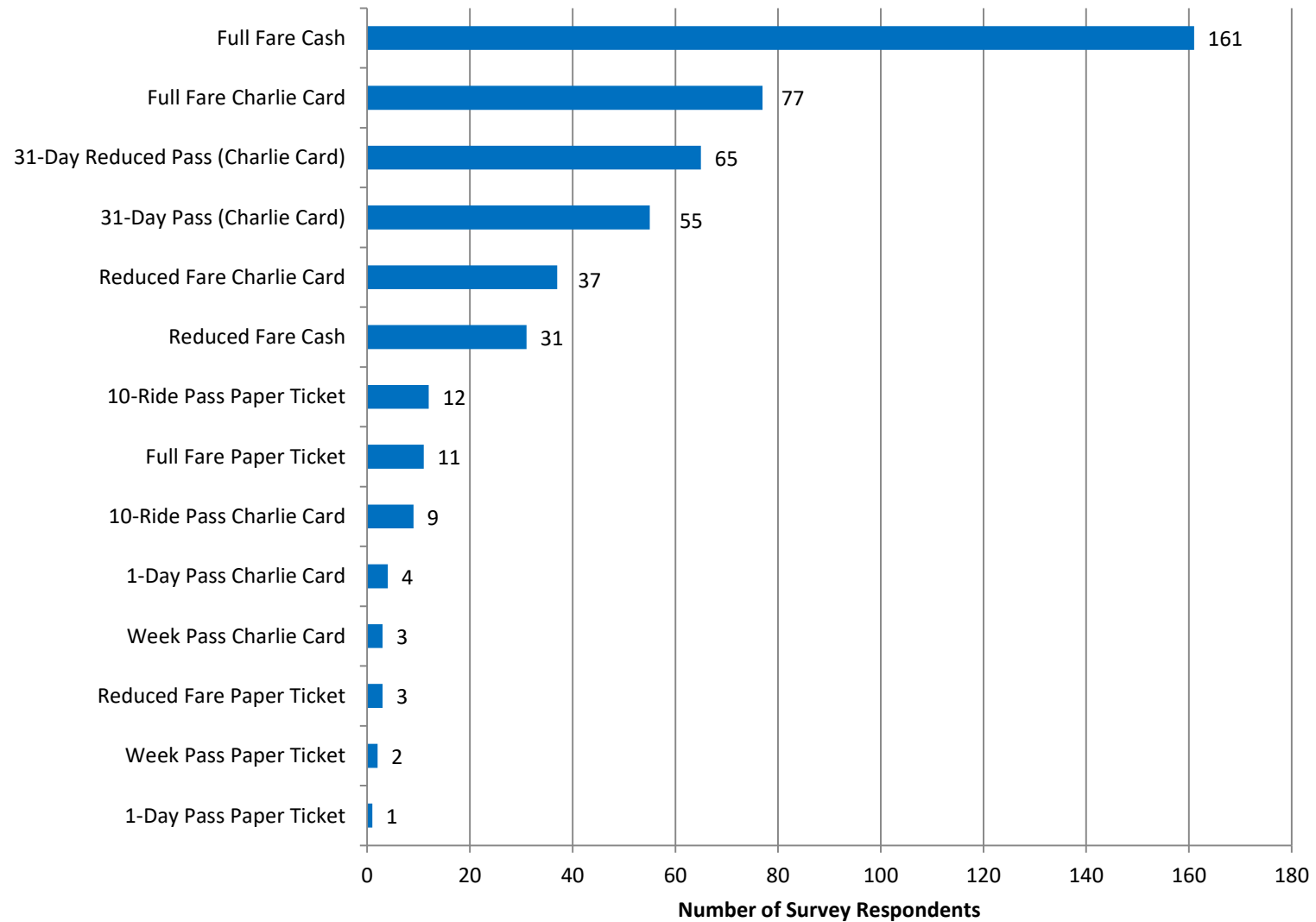
On behalf of SRTA, the Southeastern Regional Planning and Economic Development District (SRPEDD) conducted on-board passenger surveys on SRTA fixed routes in June of 2019. Surveys were administered by SRPEDD staff on SRTA fixed route buses for Fall River and New Bedford to garner demographic and fare usage information.

The sample size was determined based on the SRTA Fiscal Year 2018 ridership for the fixed route system and yielded results at the 95% confidence interval with a 4.8% margin of error. To obtain a representative sample of the SRTA riding population, the minimum number of completed responses were collected based on the proportion of boardings for each route during each time period of the service day (proportionally split between weekdays and Saturdays). The service day was divided into four time periods, typically these are: morning (5:00 – 11:00), mid-day (11:00-14:00), afternoon (14:00-18:00), and night (18:00-22:00).

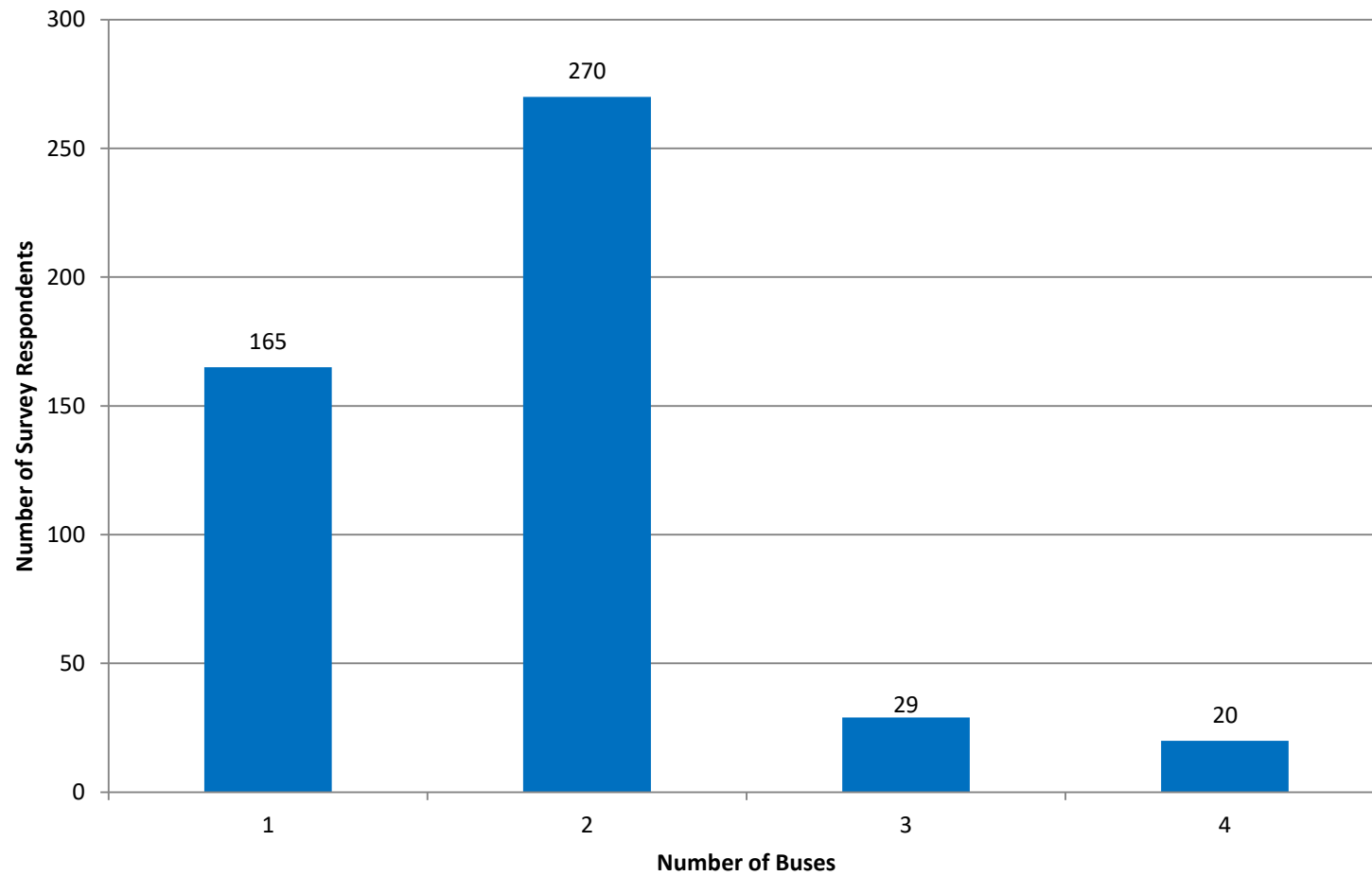
Surveys were administered on a randomly selected service day, with trip assignments selected at random from all available trips during the corresponding service period. A staff administered survey was conducted with passengers boarding at every stop until the required completed survey count was achieved for each route during each time period. If the required number of surveys were not completed during the trip, additional trips were selected using the same randomized method.

A total of 489 surveys were collected. Below are the survey results.

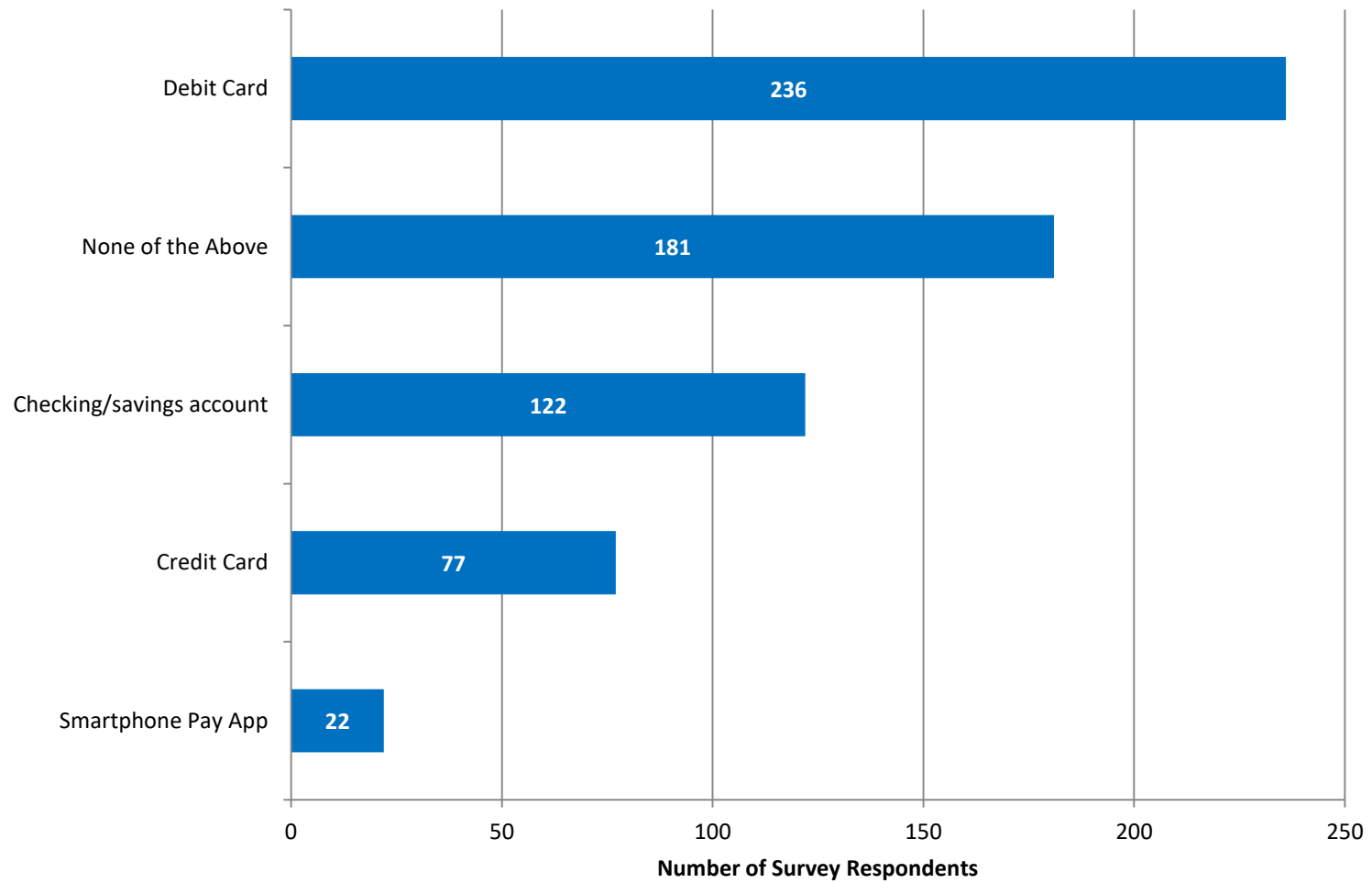
Question 1: How did you pay for this trip?



Question 2: How many SRTA routes do you have to take to get to your destination?

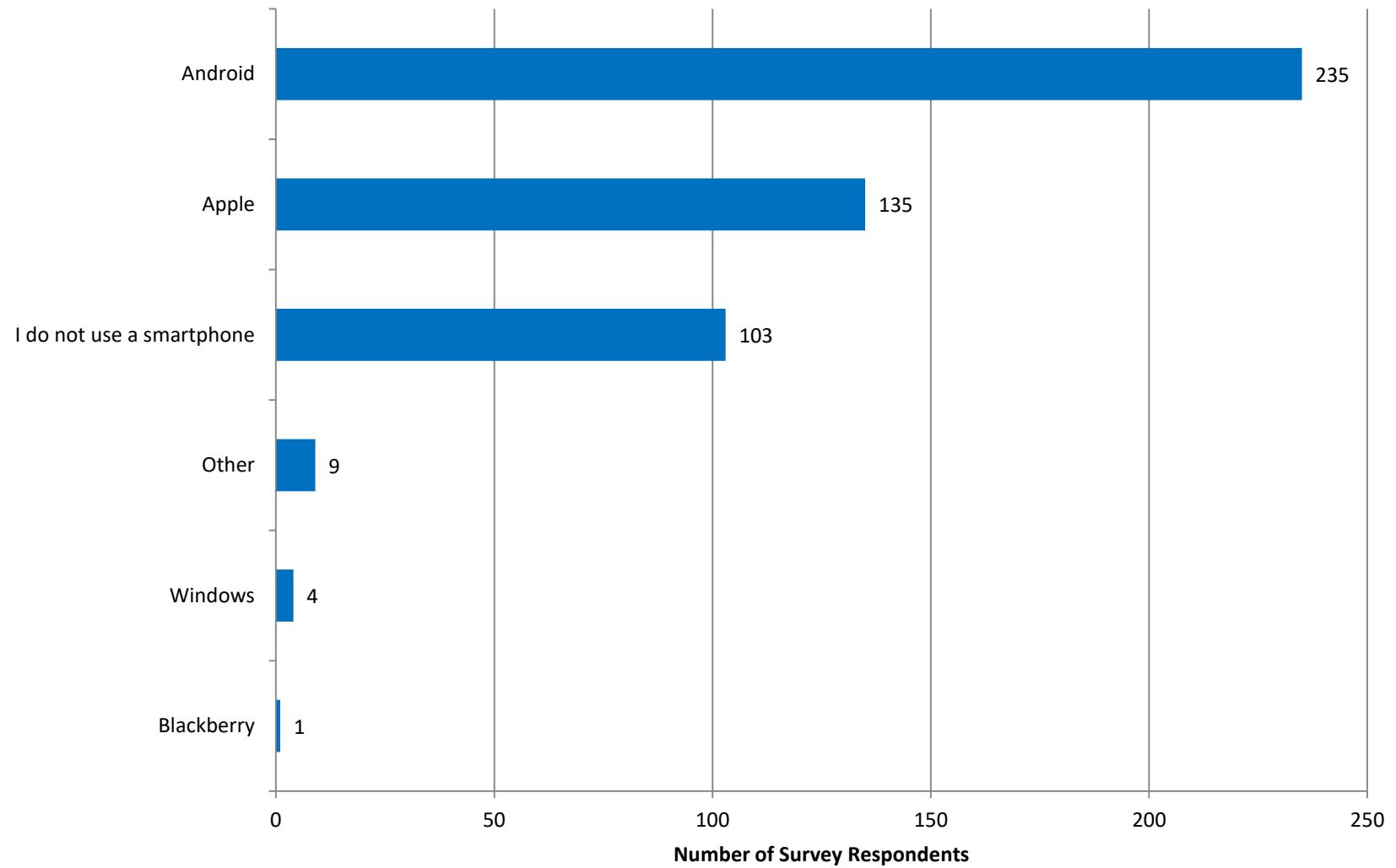


Question 3: I use the following on a regular basis

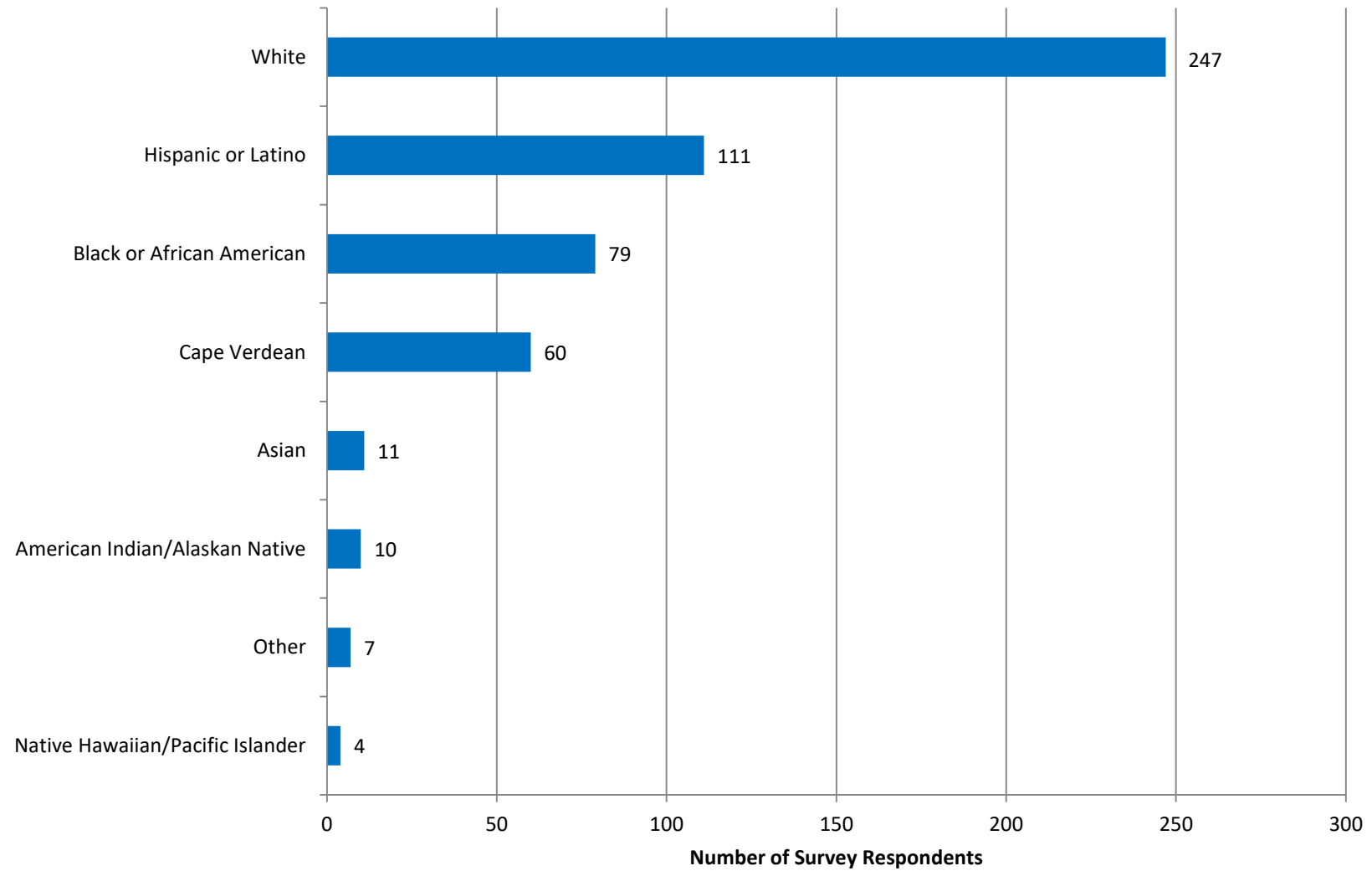




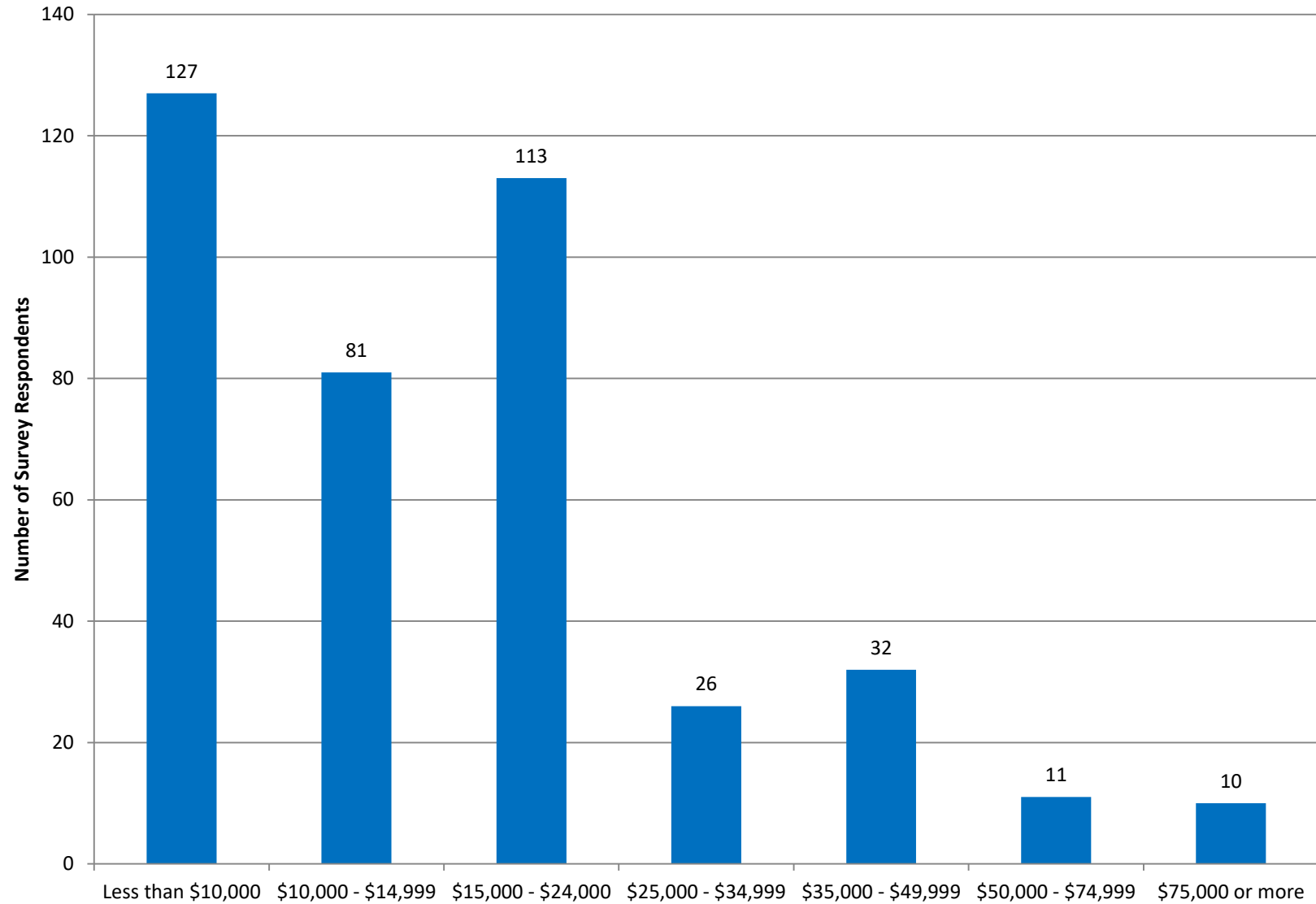
Question 4: I use a \_\_\_\_\_ smartphone



Question 5: Please check all that apply to you



Question 6: What was your total household income last year?



# SRTA Survey June 2019

1. How did you pay for this trip?

	CASH	PAPER TICKET	CHARLIE CARD
Full Fare (\$1.50)			
Reduced Fare (\$0.75)			
Free Transfer / Origin Trip Payment			
1-Day Pass	-----		
Week Pass	-----		
10-Ride Pass	-----		
Student Pass	-----		
31-Day Pass	-----	-----	
31-Day Pass Student, Senior, Disabled	-----	-----	

2. How many SRTA routes do you have to take to get to your destination (circle one)?

1

2

3

4

3. I use the following on a regular basis

- Checking/savings account
- Debit card
- Credit card
- Smartphone Pay App (Apple Pay, Google Pay, Paypal, Venmo, etc.)
- None of the above

4. I use a \_\_\_\_\_ smartphone

- Apple
- Android
- Windows
- Blackberry
- Other \_\_\_\_\_
- I do not use a smartphone

5. Please check all that apply to you

- |  |   |
|--|---|
| <input type="checkbox"/> White                     | <input type="checkbox"/> Asian                            |
| <input type="checkbox"/> Cape Verdean              | <input type="checkbox"/> American Indian/Alaskan Native   |
| <input type="checkbox"/> Hispanic or Latino        | <input type="checkbox"/> Native Hawaiian/Pacific Islander |
| <input type="checkbox"/> Black or African American | <input type="checkbox"/> Other: _____                     |

6. What was your total household income last year?

- |   |  |
|---|--|
| <input type="checkbox"/> Less than \$10,000 | <input type="checkbox"/> \$10,000-14,999   |
| <input type="checkbox"/> \$15,000-\$24,999  | <input type="checkbox"/> \$25,000-\$34,999 |
| <input type="checkbox"/> \$35,000-\$49,999  | <input type="checkbox"/> \$50,000-\$74,999 |
| <input type="checkbox"/> \$75,000 or more   | <input type="checkbox"/> Not Sure          |

## Encuesta de SRTA Junio 2019

1. ¿Cómo le hizo para (o va) pagar por este viaje?

	Dinero	Boleto de papel	Tarjeta de Charlie (Plástica)
Tarifa completa			
Tarifa reducida			
Transferir /Pago de viaje de origen			
Pase de un día			
Pase de un semana	-----		
Pase de 10 viajes	-----		
Pase estudiantil	-----		
Pase de 31 días	-----		
Pase de 31 días de mayores de edad/deshabilitado	-----	-----	

2. ¿Cuántas rutas SRTA tiene que tomar para llegar a su destino (un círculo)?

1                  2                  3                  4

3. Frecuentemente mi forma de pago es:

- Cuenta de cheques / ahorro
- Tarjeta de débito
- Tarjeta de crédito
- Cellular pay app (Apple Pay, Google Pay, etc.)
- Ninguna de las anteriores

4. Yo uso un \_\_\_\_\_ smartphone

- Apple
- Android
- Windows
- Blackberry
- Other \_\_\_\_\_
- No uso celular

5. ¿Con qué grupo étnico o racial se identifica usted? (Puede elegir más de uno)

- ☐ Blanco  
☐ Caboverdiano  
☐ Hispano o Latino  
☐ Negro o Afroamericano  
☐ Indio Americano/Nativos de Alaska  
☐ Nativo Hawaiano/Isleño del Pacífico  
☐ Asiático  
☐ Otro: \_\_\_\_\_

6. ¿Cuál fue su ingreso familiar total el año pasado?

- |  |  |
|--|--|
| <input type="checkbox"/> Menos de \$10,000 | <input type="checkbox"/> \$10,000-14,999   |
| <input type="checkbox"/> \$15,000-\$24,999 | <input type="checkbox"/> \$25,000-\$34,999 |
| <input type="checkbox"/> \$35,000-\$49,999 | <input type="checkbox"/> \$50,000-\$74,999 |
| <input type="checkbox"/> \$75,000 or more  | <input type="checkbox"/> No estoy seguro   |

## Encuesta de SRTA Junio 2019

1. Como pagou (ou vai pagar) por esta viagem?

	Dinero	Boleto de papel	Tarjeta de Charlie (Plástica)
Tarifa inteira			
Tarifa reduzida			
Transferir/ Pagamento de viagem de origem			
Passe de 1 dia			
Passe Semanal	-----		
Passe para 10 viagens	-----		
Passe de aluno	-----		
Passe de 31 dias	-----		
Passe de 31 dias de idoso/ incapacitado	-----	-----	

2. Quantos ônibus você tem que levar para chegar a sua desintegração (um círculo)?

1                  2                  3                  4

3. Eu uso isso com regularmente

- Conta corrente / poupança
- Cartão de débito
- Cartão de crédito
- Cellular Pay app (Apple Pay, Google Pay, etc.)
- Nenhuma das acima

4. Eu uso um \_\_\_\_\_ smartphone

- Apple
- Android
- Windows
- Blackberry
- Other \_\_\_\_\_
- Eu não uso celular

5. Com que grupo racial ou étnico é que se identifica? (Pode escolher mais do que um)

- ☐ Branco  
☐ Cabo-Verdiano  
☐ Hispano ou Latino  
☐ Preto ou Afro-Americano  
☐ Indio Americano/Nativos do Alaska  
☐ Natural do Havai/ Ilhéu do Pacífico  
☐ Asiático  
☐ Outro: \_\_\_\_\_

6. Qual foi a sua renda familia anual no ano passado?

- |  |  |
|--|--|
| <input type="checkbox"/> Menos de \$10,000 | <input type="checkbox"/> \$10,000-14,999   |
| <input type="checkbox"/> \$15,000-\$24,999 | <input type="checkbox"/> \$25,000-\$34,999 |
| <input type="checkbox"/> \$35,000-\$49,999 | <input type="checkbox"/> \$50,000-\$74,999 |
| <input type="checkbox"/> \$75,000 or more  | <input type="checkbox"/> No estoy seguro   |

## **F. SRTA BOARD MEETING MINUTES SHOWING APPROVAL OF THE MAJOR SERVICE CHANGE AND DISPARATE IMPACT POLICIES**



## **Southeastern Regional Transit Authority (SRTA) Advisory Board Meeting**

**Date:** Thursday, February 24, 2022

**Location:** Virtual Meeting via SRTA Cisco WebEx (2:00 PM)

Call in Number: 1-408-418-9388; Access Code: 2631 163 7853; Password 69875884

**Purpose:** SRTA Advisory Board Meeting

### (1) Call to Order

**The Advisory Board Chair called the meeting to order at 2:07 PM EST.**

### (2) Roll Call

**Present:**

City of New Bedford (Jennifer Clarke)

City of Fall River (John Perry)

Town of Fairhaven (Bob Espinola)

Town of Mattapoisett (Michael Lourenco)

Riders Representative (Dan Robillard)

Town of Westport (Richard Brewer)

**Absent:**

Town of Acushnet

Town of Swansea

Town of Freetown

Town of Dartmouth

Town of Somerset

ADA Representative

**Additional Attendees:**

Erik Rousseau, SRTA

Arthur Frank, General Counsel (SRTA)

Maritza Aquino, SRTA

Lilia Cabral-Bernard, SRPEDD

John LeBert, SRTA

Amber Allen, SRTA

Shayne Trimbell, SRTA

Paul Foley, Town of Fairhaven

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(3) Approval of Minutes

**Motion:** The motion was made (Riders' Representative) and seconded (City of Fall River) to approve the minutes from the January 27, 2022 SRTA Advisory Board Meeting.

**Discussion:** N/A

**Vote:**

**For:** Town of Fairhaven, City of Fall River, City of New Bedford, Town of Mattapoisett, Town of Westport, and Riders' Representative

**Status:** Motion Passes

(4) Citizen's Participation

No Citizen's Participation.

(5) Civil Rights Update

*Title VI:*

The SRTA's current Title VI Plan has been submitted and is under FTA review and awaiting concurrence.

The SRTA's subsequent Title VI Plan is in progress, and updates will be provided to the Board as part of this process.

*Equal Employment Opportunity (EEO):*

The EEO Plan for South Coast Transit Management (SCTM) has been submitted and is under FTA review and awaiting concurrence.

*Disadvantaged Business Enterprise (DBE):*

The SRTA's current DBE Goal Plan has been submitted and is under FTA review and awaiting concurrence.

The most recent semi-annual report was submitted on December 1 and is under FTA review. The next semi-annual report is due June 1.

The SRTA's current DBE Program Plan received FTA concurrence in September 2017.

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*Environmental Justice:*

Environmental justice is a requirement that the SRTA must engage the public whenever there is a major project or route change. The SRTA is constantly working to increase public participation, and if any public input is needed, it will be conveyed to the Board as part of this report.

(6) Old Business

*COVID-19 Response (<http://www.srtabus.com/covid19>):*

Mr. Rousseau stated that the TSA, or Transit Security Administration's current mask mandate is due to expire on March 18, 2022. This mandate has not yet been extended. Mr. Rousseau expressed that he will update the Board accordingly should there be any new information.

Question: Have any new air filters been installed in conjunction with what is already in place?

Mr. Rousseau answered: We have piloted five systems that have a UV light component. They have not proven to provide additional benefit. The air filters we utilize currently are the MERV-13. These have shown to be very effective. We are also exploring other manufacturers to provide more options if applicable. We want to ensure the health and safety of our passengers.

(7) New Business

*Title VI Plan Update:*

Mr. Shayne Trimbell introduced the final policy updates via PowerPoint presentation before it is sent to FTA to await review and concurrence. The following are synopses of each policy and/or service change.

Within the Safe Harbor language policy, a new language was added, French Haitian (Creole). This was determined by collecting data from the American Community Survey. This initiative is for those that reside within our service area that speak this language (over 1,000 people). Mr. Trimbell states that the documents to be updated with this addition are the ADA Paratransit application/guide, any notice(s) for service changes, and any future public hearings.

Next, the Disparate Impact/Disproportionate Burden policy was discussed. Mr. Trimbell states this occurs when a proposed fare or major service change produces an adverse effect on a population that is 60% or more minority/low-income based. The main objective here was to amend the policy for easier reading and more likely understood by our passengers.

Then, Mr. Trimbell described the Major Service Change policy. Here, the Demand Response service was included with how we dictate service area and span of service. The span of service, for example, could be time of day expansion or a reduction in those times of service.

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The Headway policy was spoken about as a complete revamp. The old system split routes and times based on either urban or suburban areas of operation. This did not specify reflect how many of our passengers resided in these areas. The 2022 policy simplifies this endeavor by weekday and Saturday “flat standards.” All routes and times of operation are given a 60 minute threshold (peak and off-peak).

Mr. Trimbell moved onward to explain the On-Time Performance and the Monitoring Program results

The On-Time Performance measures the departures from a particular trip’s origin. These departures are considered on time if they occur less than 1 minute earlier or 5 minutes after the scheduled departure times. This differs from the previous 2019 policy, where there was a split between on-time performance and headway times.

In order to meet all standards mentioned within the areas of policy, each needed to be monitored for quality and control. All standards were met except for On-Time Performance. The target observation for all routes inbound was 85% to meet the 6 minute window of departures with inbound and outbound trips. We were very close with an 83% result in this area. Findings show that this happens mostly with early departures in the inbound trips. SRTA/SCTM will continue to look at this area in service to meet the standard.

Question: Is there a list of appendices to this policy update?

Mr. Trimbell answered: The following are the appendices mentioned in our policy: A is a checklist of requests, B provides a translation of notices to the public, C is the Title VI version of a complaint form, D is the Department of Health guidelines, E is the 2019 SRTA Fair Equity Analysis results, F is the meeting minutes of this current meeting, G pertains to the SRTA Fair Equity analysis, H includes the meeting minutes from which the Fair Equity analysis was presented, I is the 2021 SRTA Fair Equity analysis, and the last appendix is J, where the meeting minutes from the 2021 Fair Equity analysis are.

Question: Why in the Disparate Impact/Disproportionate Burden policy does it say 60% and not 51%?

Mr. Trimbell answered: When our consulting firm, Nelson/Nygaard took a look at the analysis of census tracks, they found the 20% difference occurred whenever the population exceeded 60%. So the new percentage is to reflect this trend.

**Motion: To adopt new Title VI Program policy and its updates made by Riders’ Representative and seconded by the City of Fall River.**

**Discussion: N/A**

**Vote:**

**For: Town of Fairhaven, City of Fall River, City of New Bedford, Town of Mattapoisett, Town of Westport, and Riders’ Representative**

**Status: Motion Passes**

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*PTASP Update:*

Mr. Rousseau expressed information for the PTASP (Public Transportation Agency Safety Plan) update. This is just a preview stating there will be updates to the metrics of this plan. It is due in July of 2022 but they have extended the deadline. This will be the 3<sup>rd</sup> update, and it is done annually.

(8) Logistics for the Next Advisory Board Meeting

As indicated on the agenda, the next Advisory Board Meeting for the Southeastern Regional Transit Authority will be held on Thursday, March 31st at 2:00 PM.

(9) Adjournment

**The Advisory Board Chair called the meeting to adjournment at 2:50PM EST.**

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## **G. JANUARY 29, 2020 FARE EQUITY ANALYSIS**

# **Fare Equity Analysis**

## Southeastern Regional Transit Authority

January 29, 2020

Prepared by  
Southeastern Regional Planning and Economic Development District

## Southeastern Regional Planning and Economic Development District

### SRPEDD Administration:

Jeffrey Walker, Executive Director

Paul Mission, Transportation Planning Manager



### Staff Contributors:

Jennifer Chaves, Principal Transportation Planner

Angela Constantino, Mobility Manager

Charles Mills, Transportation Planner

### Federal Disclaimer, Title VI and Nondiscrimination Notice of Rights of Beneficiaries

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The Southeastern Massachusetts Metropolitan Planning Organization (SMMPO) through the Southeastern Regional Planning and Economic Development District (SRPEDD) operates its programs, services, and activities in compliance with federal nondiscrimination laws including Title VI of the Civil Rights Act of 1964 (Title VI), the Civil Rights Restoration Act of 1987, and related statutes and regulations. Title VI prohibits discrimination in federally assisted programs and requires that no person in the United States of America shall, on the grounds of **race, color, or national origin** (including **limited English proficiency**), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal assistance. Related federal nondiscrimination laws administered by the Federal Highway Administration, the Federal Transit Administration, or both prohibit discrimination on the basis of **age, sex, and disability**. These protected categories are contemplated within SRPEDD's Title VI Programs consistent with federal interpretation and administration. Additionally, SRPEDD provides meaningful access to its programs, services, and activities to individuals with limited English proficiency, in compliance with US Department of Transportation policy and guidance on federal Executive Order 13166.

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Lilia Cabral-Bernard  
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Massachusetts Public Accommodation Law (M.G.L. c 272 §§92a, 98, 98a) and Executive Order 526 section 4 also prohibit discrimination in public accommodations based on religion, creed,

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class, race, color, denomination, sex, sexual orientation, nationality, disability, gender identity and expression, and veteran's status, and SRPEDD and the SMMPO assures compliance with these laws. Public Accommodation Law concerns can be brought to SRPEDD's Title VI/Nondiscrimination Coordinator or to file a complaint alleging a violation of the state's Public Accommodation Law,

contact the Massachusetts Commission Against Discrimination within 300 days of the alleged discriminatory conduct.

The SMMPO is equally committed to implementing federal Executive Order 12898, entitled "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations." In this capacity, the SMMPO identifies and addresses disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations. The SMMPO carries out this responsibility by involving minority and low income individuals in the transportation process and considering their transportation needs in the development and review of the SMMPO's transportation plans, programs and projects.

English: If this information is needed in another language, please contact SRPEDD's Title VI Coordinator by phone at (508) 824-1367.

Portuguese: Caso esta informação seja necessária em outra idioma, favor contar o coordenador em Título VI do SRPEDD pelo telephone (508) 824-1367.

Spanish: Si necesita esta información en otro idioma, por favor contacte al coordinador de SRPEDD del Título VI al (508) 824-1367.

Haitian Creole: Si yo bezwen enfòmasyon sa a nan yon lòt lang, tanpri kontakte Koòdonatè Tit VI SRPEDD a pa telefòn nan (508) 824-1367.



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**Appendix A: Demographic Profile of SRTA Riders, November 2018**

**Appendix B: SRTA Fare Equity Analysis Survey Results, June 2019**

# 1. Introduction

## 1.1 Background

Established in 1974, the Southeastern Regional Transit Authority (SRTA) provides fixed route as well as demand response service to ten communities in Southeastern Massachusetts: Acushnet, Dartmouth, Fairhaven, Fall River, Freetown, Mattapoisett, New Bedford, Somerset, Swansea, and Westport. SRTA has two terminals, one in Fall River and the other in New Bedford. These two terminals are connected via the Intercity Route. SRTA bus routes can make connections to the Greater Attleboro Regional Transit Authority (GATRA) in Wareham and to the Rhode Island Public Transit Authority (RIPTA) at the Fall River Terminal.

Historically, SRTA had a zone based fare structure, where a full fare cash cost \$1.25 per zone. In 2012, after a fare equity analysis and extended public outreach, SRTA abolished the zone based fare structure. As a result of this and several route alterations over the years, SRTA's ridership has significantly increased.

It is SRTA's mission to provide safe, convenient, and economical transportation opportunities for people that supports economic development and improved quality of life for South Coast residents.

## 1.2 Title VI Equity Analysis Requirements

Federal Transit Administration (FTA) regulation Circular 4702.1B requires that all transit providers operating 50 or more fixed route vehicles in peak service and serving an urbanized area exceeding a population of 200,000 conduct a Title VI equity analysis before a fare change and/or a major service change is enacted. In addition to the Title VI requirement to evaluate the impact on minority populations, the FTA requires transit providers to also evaluate the effects of low-income populations. These analyses require a disparate impact analysis for minority riders versus non-minority riders, and a disproportionate burden analysis for low-income riders versus non-low-income riders. The fare equity analysis requirement applies to all fare changes regardless of the amount of increase or decrease.

SRTA has addressed Title VI considerations in its Title VI Report, February 21, 2019. The purpose of the Title VI Report is to ensure that no person is excluded from participation in or denied the benefits of services on the basis of race, color, or national origin. This report also requires that the agency identify and address adverse effects, disparate impacts, and/or disproportionate burdens on minority and low-income populations

**Disproportionate Burden Definition:** 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. Per SRTA's Title VI Program, SRTA has

established a threshold of 20%, meaning that a disproportionate burden occurs when the fare or service change affects low-income population 20% more than a non-low-income population.

**Disparate Impact Definition:** 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.

Per SRTA's Title VI Program, SRTA has established a threshold of 20%, meaning that a disparate impact occurs when the fare or service change affects minority populations 20% more than non-minority populations.

**Low-Income Definition:** Low-income is defined as a person whose median household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines. The 2019 HHS poverty guidelines state that for a 2-person household the poverty guideline is \$16,910. For the purpose of this analysis, low-income includes any survey respondent who has a household income of \$25,000 or less. This was determined using data from SRTA's 2018 Demographic Profile (see Appendix A). The majority of survey respondents from the 2018 survey stated that they reside in a 2-person household. Per the 2010 census household income breakdown, the 2019 passenger survey's income bracket was \$15,000 - \$24,999. Therefore, any survey respondent who has a household income less than \$25,000 was considered low-income.

**Minority Definition:** A minority person includes the following: American Indian and Alaska Native, Asian, Black or African American, Hispanic or Latino, or Native Hawaiian or Other Pacific Islander.

For the purpose of this analysis, minority also included respondents who identified as Cape Verdean. The minority category comprised of all survey respondents who did not identify as white.

It is the goal of SRTA to avoid, minimize, or mitigate adverse effects of proposed service/fare changes. Changes may proceed if it is determined that a public need cannot be satisfied by an alternative.

## 2. Data and Methodology

### 2.1 On-Board Survey

On behalf of SRTA, the Southeastern Regional Planning and Economic Development District (SRPEDD) conducted on-board passenger surveys on SRTA fixed routes in June of 2019. Surveys were administered by SRPEDD staff on SRTA fixed route buses in Fall River and New Bedford to garner demographic and fare usage information. See Appendix B for full survey results.

The sample size was determined based on the SRTA Fiscal Year 2018 ridership for the fixed route system and yielded results at the 95% confidence interval with a 4.8% margin of error. To obtain a representative sample of the SRTA riding population, the minimum number of completed responses were collected based on the proportion of boardings for each route during each time period of the service day (proportionally split between weekdays and Saturdays). The service day was divided into four time periods, typically these are: morning (5:00 – 11:00), mid-day (11:00-14:00), afternoon (14:00-18:00), and night (18:00-22:00).

Surveys were administered on a randomly selected service day, with trip assignments selected at random from all available trips during the corresponding service period. A staff administered survey was conducted with passengers boarding at every stop until the required completed survey count was achieved for each route during each time period. If the required number of surveys were not completed during the trip, additional trips were selected using the same randomized method.

### 2.2 Analysis

Using the demographic and fare product data from the on-board passenger surveys, SRTA can determine the usage of fare products by minority and low-income populations. Comparing this data with the proposed fare changes, SRTA can then calculate the effects of fare changes on minority versus non-minority populations and on low-income versus non-low-income populations. SRTA's objective is for the percent increase in average fare for minority and low-income populations to be less than or equal that for non-minority and non-low-income populations. As stated above, SRTA established a threshold of 20%. A disparate impact or disproportionate burden may exist if the fare change affects minority and/or low-income populations 20% more than non-minority and/or non-low-income populations.

### 3. SRTA Fare Products

SRTA offers one-way fares as well as a variety of pass options where fare product determines the price per trip. To encourage customers to utilize the Charlie Card, SRTA a discount to those that utilize stored value on a Charlie Card to pay for their trip.

#### 3.1 SRTA Standard One-Way Fares

Table 3-1 shows SRTA's standard one-way fare product and prices.

Table 3-1 SRTA Standard One-Way Fares and Prices

Fare Product	Price
Full Fare Cash	\$1.50
Full Fare Charlie Card	\$1.40
Transfers	Free*
Children under 6 years old	Free
*One free transfer issued from an inbound trip that can be used on an outbound trip within 90 minutes.	

#### 3.2 SRTA Reduced One-Way Fares

SRTA offers reduced fares to older adults (age 60+), registered persons with a disability, Medicare recipients, and to children ages 6-11 years of age.

SRTA also provides a paratransit service for customers who have a temporary or permanent disability that prevents them from using the fixed route bus system. Paratransit is a shared ride which uses accessible vehicles to meet the needs of eligible riders.

Table 3-2 shows SRTA's reduced one-way fares.

Table 3-2 SRTA Reduced One-Way Fares and Prices

Fare Product	Price
Reduced Fare Cash	\$0.75
Reduced Fare Charlie Card	\$0.70

#### 3.3 SRTA Pass Options

SRTA offers a variety of pass options to its customers. In providing these pass options to its customers, SRTA provides a savings incentive.

Table 3-3 shows the variety of SRTA's pass options.

Table 3-3 SRTA Pass Options and Prices

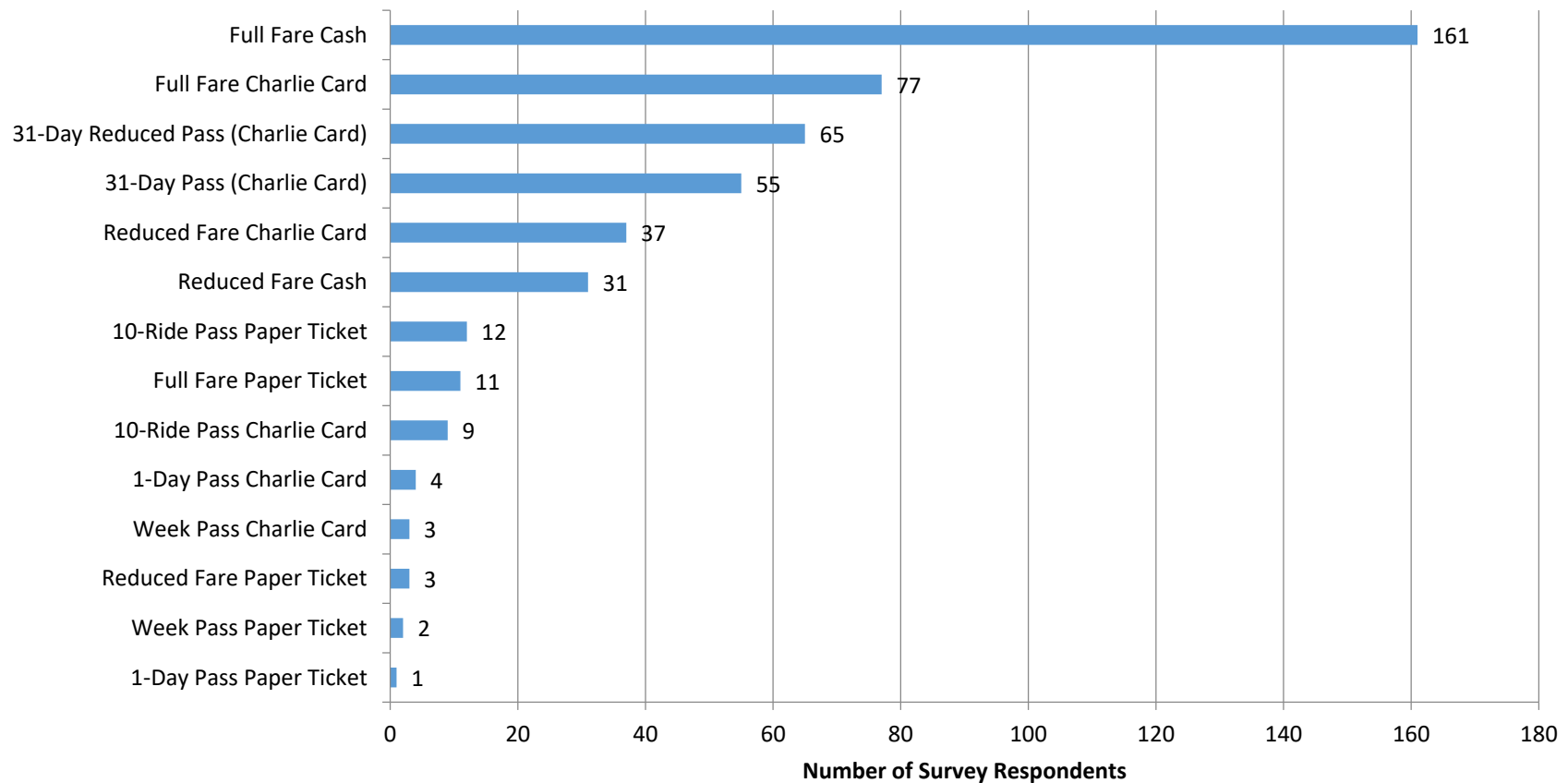
Fare Product	Price
One Day Pass	\$4.00
10-Ride Pass	\$14.00
One Week Pass	\$14.00
31-Day Pass	\$40.00
31-Day Reduced Pass	\$28.00



### 3.4 Survey Fare Payment Results

The 2019 survey asked passengers to indicate which type of fare product they used to complete their trip. Even with multiple fare product options, the majority of SRTA passengers choose to use full fare cash as their choice of fare product, with full fare Charlie Card coming in second. Figure 3-1 shows the complete results of fare payment by fare product.

Figure 3-1 SRTA Fare Payment by Fare Product



## 4. Analysis of Minority and Low-Income Riders

The 2019 survey includes 471 surveys where respondents answered the fare payment question as well as the race/ethnicity question. These were used to determine minority and non-minority status. Of those surveys, 246 respondents identified as minority and 225 respondents identified as non-minority.

The 2019 survey includes 396 surveys where respondents answered the fare payment question as well as the annual household income question. These were used to determine low-income and non-low-income status. Of those surveys, an overwhelming majority of 320 respondents indicated a household income of less than \$25,000, categorizing those respondents as low-income. Seventy-six respondents indicated a household income greater than \$25,000.

Overall, the analysis shows there is about the same proportion of minority riders (52%) compared to non-minority riders (48%). In terms of income level, SRTA riders are far more likely to be low-income (81%) than non-low-income (19%).

Table 4-1 shows minority and low-income survey results by SRTA fare product.

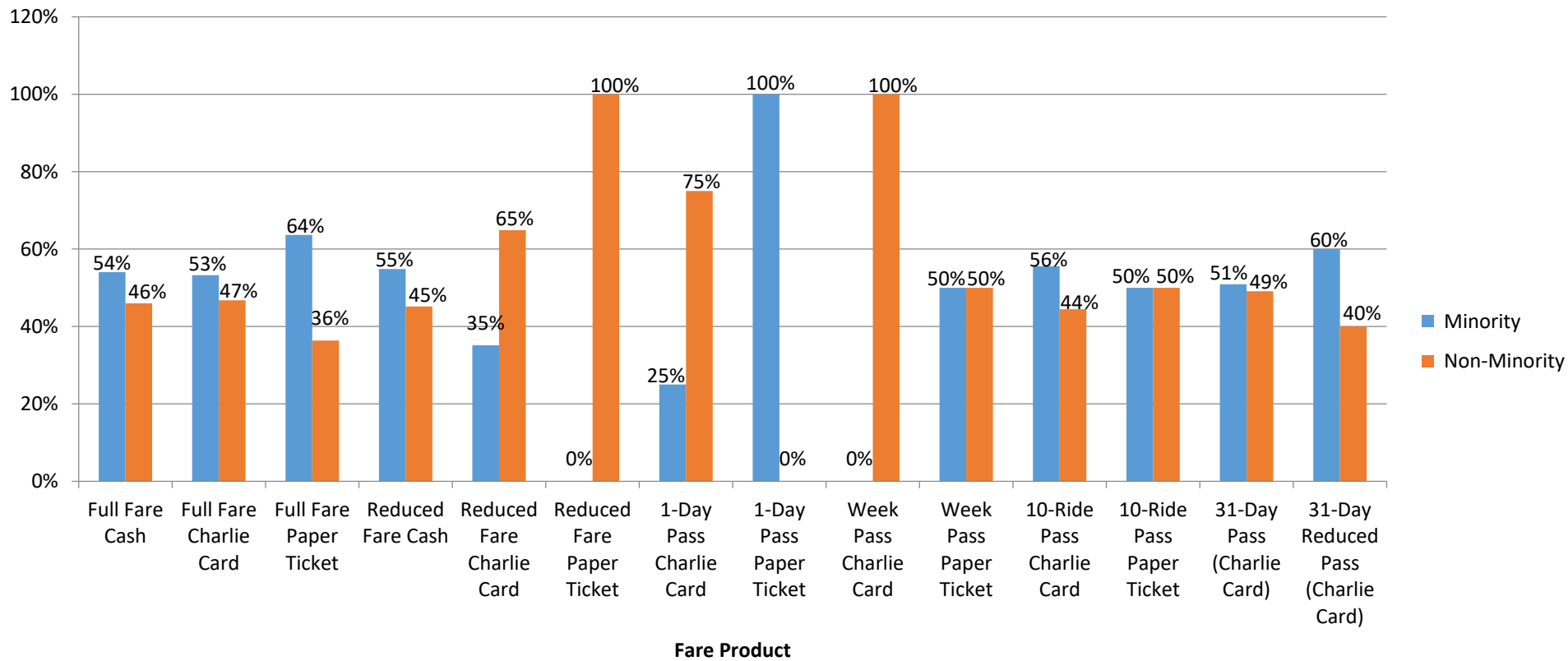
Table 4-1 Minority and Low-Income Survey Results by Fare Product

Proportion of Minority and Low-Income Riders										
Fare Product	Total Surveys	Minority	Percent Minority	Non-Minority	Percent Non-Minority	Total Surveys	Low Income	Percent Low-Income	Non-Low Income	Percent Non-Low Income
Full Fare Cash	161	87	54%	74	46%	137	114	83%	23	17%
Full Fare Charlie Card	77	41	53%	36	47%	70	56	80%	14	20%
Full Fare Paper Ticket	11	7	64%	4	36%	8	6	75%	2	25%
Reduced Fare Cash	31	17	55%	14	45%	25	23	92%	2	8%
Reduced Fare Charlie Card	37	13	35%	24	65%	32	26	81%	6	19%
Reduced Fare Paper Ticket	3	0	0%	3	100%	2	2	100%	0	0%
1-Day Pass Charlie Card	4	1	25%	3	75%	3	3	100%	0	0%
1-Day Pass Paper Ticket	1	1	100%	0	0%	1	0	0%	1	100%
Week Pass Charlie Card	3	0	0%	3	100%	4	1	25%	3	75%
Week Pass Paper Ticket	2	1	50%	1	50%	2	1	50%	1	50%
10-Ride Pass Charlie Card	9	5	56%	4	44%	5	3	60%	2	40%
10-Ride Pass Paper Ticket	12	6	50%	6	50%	7	4	57%	3	43%
31-Day Pass (Charlie Card)	55	28	51%	27	49%	49	41	84%	8	16%
31-Day Reduced Pass (Charlie Card)	65	39	60%	26	40%	51	40	78%	11	22%
<b>Total</b>	<b>471</b>	<b>246</b>	<b>52%</b>	<b>225</b>	<b>48%</b>	<b>396</b>	<b>320</b>	<b>81%</b>	<b>76</b>	<b>19%</b>

## 4.1 Minority Status Survey Results

In order to evaluate the effects of a fare change on minority populations, SRTA must evaluate the proportion of riders who identify as minority. Minority ridership is measured against non-minority ridership to calculate the effect a fare change would have. The minority category is comprised of all respondents who did not identify as white. Figure 4-1 outlines minority status by fare product.

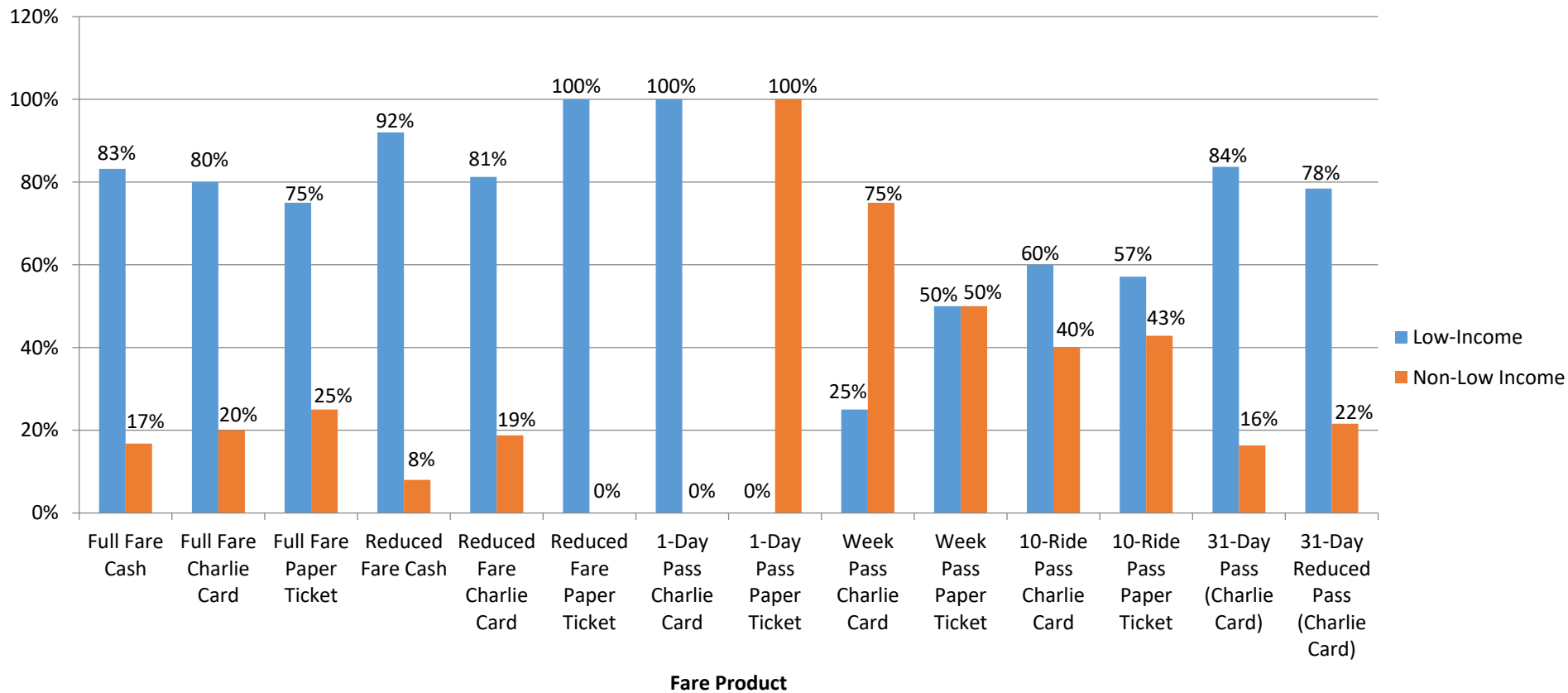
Figure 4-1 Minority Status by Fare Product



## 4.2 Low-Income Status Survey Results

Much like Minority status, in order to evaluate the effects of a fare change on low-income populations, SRTA must evaluate the proportion of riders who identify as low-income. Low-income ridership is measured against non-low-income ridership to calculate the effect a fare change would have. The low-income category is comprised of all respondents who had an annual household income of less than \$25,000. Figure 4-2 outlines low-income status by fare product.

Figure 4-2 Low-Income Status by Fare Product



## 5. SRTA Proposed Fare Change

To determine the appropriate fare rate for SRTA customers and to fully understand the economic impact of a fare increase or decrease, SRTA proposed four fare change scenarios (proposals A through D). Proposals A and B increase the current fare, Proposal C decreases the current fare, and Proposal D maintains all current fares and fare products with the exception of the full fare cash product. Table 5-1 lists SRTA's existing and proposed fares.

Table 5-1 SRTA Existing and Proposed Fares

Fare Product	Fare Price				
	Existing	Proposal A	Proposal B	Proposal C	Proposal D
Full Fare Cash	\$1.50	\$1.75	\$2.00	\$1.25	\$2.00
Full Fare Charlie Card	\$1.40	\$1.50	\$1.75	\$1.00	\$1.40
Full Fare Paper Ticket	\$1.50	\$1.75	\$2.00	\$1.25	\$1.50
Reduced Fare Cash	\$0.75	\$0.85	\$1.00	\$0.60	\$0.75
Reduced Fare Charlie Card	\$0.70	\$0.75	\$0.90	\$0.50	\$0.70
Reduced Fare Paper Ticket	\$0.75	\$0.85	\$1.00	\$0.60	\$0.75
1-Day Pass Charlie Card	\$4.00	\$5.00	\$6.00	\$3.00	\$4.00
1-Day Pass Paper Ticket	\$4.00	\$5.00	\$6.00	\$3.00	\$4.00
Week Pass Charlie Card	\$14.00	\$16.00	\$18.00	\$12.00	\$14.00
Week Pass Paper Ticket	\$14.00	\$16.00	\$18.00	\$12.00	\$14.00
10-Ride Pass Charlie Card	\$14.00	\$16.00	\$18.00	\$12.00	\$14.00
10-Ride Pass Paper Ticket	\$14.00	\$16.00	\$18.00	\$12.00	\$14.00
31-Day Pass (Charlie Card)	\$40.00	\$45.00	\$50.00	\$35.00	\$40.00
31-Day Reduced Pass (Charlie Card)	\$28.00	\$33.00	\$38.00	\$23.00	\$28.00

## 6. Proposal A

Proposal A increases the current full fare cash price from \$1.50 to \$1.75 with all fare media increasing consequently. The average increase for minority riders is \$1.59 versus non-minority riders at \$1.43; the average increase for low-income riders is \$1.45 versus non-low-income riders at \$1.61. Table 6-1 lists the fare product increase for Proposal A along with the average increase and percent increase for minority and low-income riders.

Table 6-1 Proposal A: Effects of Fare Change on SRTA Riders

	Fare Information				Average Fare Change			
Fare Product	Existing	Proposed	Fare Change	Percent Fare Change	Minority	Non-Minority	Low-Income	Non-Low-Income
Full Fare Cash	\$1.50	\$1.75	\$0.25	17%	\$21.75	\$18.50	\$28.50	\$5.75
Full Fare Charlie Card	\$1.40	\$1.50	\$0.10	7%	\$4.10	\$3.60	\$5.60	\$1.40
Full Fare Paper Ticket	\$1.50	\$1.75	\$0.25	17%	\$1.75	\$1.00	\$1.50	\$0.50
Reduced Fare Cash	\$0.75	\$0.85	\$0.10	13%	\$1.70	\$1.40	\$2.30	\$0.20
Reduced Fare Charlie Card	\$0.70	\$0.75	\$0.05	7%	\$0.65	\$1.20	\$1.30	\$0.30
Reduced Fare Paper Ticket	\$0.75	\$0.85	\$0.10	13%	\$0.00	\$0.30	\$0.20	\$0.00
1-Day Pass Charlie Card	\$4.00	\$5.00	\$1.00	25%	\$1.00	\$3.00	\$3.00	\$0.00
1-Day Pass Paper Ticket	\$4.00	\$5.00	\$1.00	25%	\$1.00	\$0.00	\$0.00	\$1.00
Week Pass Charlie Card	\$14.00	\$16.00	\$2.00	14%	\$0.00	\$6.00	\$2.00	\$6.00
Week Pass Paper Ticket	\$14.00	\$16.00	\$2.00	14%	\$2.00	\$2.00	\$2.00	\$2.00
10-Ride Pass Charlie Card	\$14.00	\$16.00	\$2.00	14%	\$10.00	\$8.00	\$6.00	\$4.00
10-Ride Pass Paper Ticket	\$14.00	\$16.00	\$2.00	14%	\$12.00	\$12.00	\$8.00	\$6.00
31-Day Pass (Charlie Card)	\$40.00	\$45.00	\$5.00	13%	\$140.00	\$135.00	\$205.00	\$40.00
31-Day Reduced Pass (Charlie Card)	\$28.00	\$33.00	\$5.00	18%	\$195.00	\$130.00	\$200.00	\$55.00
<b>Total</b>					<b>\$390.95</b>	<b>\$322.00</b>	<b>\$465.40</b>	<b>\$122.15</b>
<b>Average Fare Increase</b>					<b>\$1.59</b>	<b>\$1.43</b>	<b>\$1.45</b>	<b>\$1.61</b>
<b>Percent Increase</b>					<b>52.62%</b>	<b>47.38%</b>	<b>47.50%</b>	<b>52.50%</b>

The **average fare change** by fare product was calculated by multiplying the total number of minority or low-income respondents (see Table 4-1) in each fare product category by the fare change. For example, in Proposal A the fare change has an increase of \$0.25 for the full fare cash product and 87 minority respondents (see Table 4-1) paid full fare cash, therefore, the calculation would be  $87 \times 0.25 = \$21.75$  average fare change for minority full fare cash. This methodology was also used to calculate non-minority and non-low-income average fare change.

The **average fare increase** was calculated by summing the total average fare change of each fare product by Title VI category and dividing that sum by the total number of survey respondents for Title VI category (see Table 4-1). For Proposal A the calculation for Minority Average Fare Increase would be: \$390.95 (total minority average fare change) / 246 (minority respondents) = \$1.59 average fare increase.

The **percent increase** was calculated by adding the total of each minority status average fare increase (\$1.59+\$1.43 = \$3.02) and dividing the average fare increase by that sum (\$1.59 / \$3.02 = 52.62%). The same methodology was used to achieve the percent increase for each Title VI category.

## 6.1 Determination of Disparate Impact and/or Disproportionate Burden

In accordance with SRTA's 2019 Title VI Report, a disparate impact occurs when a proposed fare or major service change affects a minority population twenty percent more than a non-minority population and a disproportionate burden occurs when a proposed fare or major service change affects a low-income population twenty percent more than a non-low-income population.

The analysis for Proposal A shows a 52.62% average fare increase for minority riders and a 47.38% average fare increase for non-minority riders, resulting in a difference of 5.24%. It has been determined that Proposal A does not exceed SRTA's threshold of 20%. Therefore, there is no finding of a disparate impact to the minority population.

The analysis for Proposal A shows a 47.50% average fare increase for low-income riders and a 52.50% average fare increase for non-low-income riders, resulting in a difference of 4.99%. In this case, non-low-income riders would see a higher increase in average fare than low-income riders, therefore resulting in no finding of a disproportionate burden.

## 7. Proposal B

Proposal B increases the current full fare cash price from \$1.50 to \$2.00 with all fare products increasing consequently. The average increase for minority riders is \$3.21 versus non-minority riders at \$2.90; the average increase for low-income riders is \$2.95 versus non-low-income riders at \$3.25. Table 7-1 lists the fare product increase for Proposal B along with the average increase and percent increase for minority and low-income riders.



Table 7-1 Proposal B: Effects of Fare Change on SRTA Riders

	Fare Information				Average Fare Change			
Fare Product	Existing	Proposed	Fare Change	Percent Fare Change	Minority	Non-Minority	Low-Income	Non-Low-Income
Full Fare Cash	\$1.50	\$2.00	\$0.50	33%	\$43.50	\$37.00	\$57.00	\$11.50
Full Fare Charlie Card	\$1.40	\$1.75	\$0.35	25%	\$14.35	\$12.60	\$19.60	\$4.90
Full Fare Paper Ticket	\$1.50	\$2.00	\$0.50	33%	\$3.50	\$2.00	\$3.00	\$1.00
Reduced Fare Cash	\$0.75	\$1.00	\$0.25	33%	\$4.25	\$3.50	\$5.75	\$0.50
Reduced Fare Charlie Card	\$0.70	\$0.90	\$0.20	29%	\$2.60	\$4.80	\$5.20	\$1.20
Reduced Fare Paper Ticket	\$0.75	\$1.00	\$0.25	33%	\$0.00	\$0.75	\$0.50	\$0.00
1-Day Pass Charlie Card	\$4.00	\$6.00	\$2.00	50%	\$2.00	\$6.00	\$6.00	\$0.00
1-Day Pass Paper Ticket	\$4.00	\$6.00	\$2.00	50%	\$2.00	\$0.00	\$0.00	\$2.00
Week Pass Charlie Card	\$14.00	\$18.00	\$4.00	29%	\$0.00	\$12.00	\$4.00	\$12.00
Week Pass Paper Ticket	\$14.00	\$18.00	\$4.00	29%	\$4.00	\$4.00	\$4.00	\$4.00
10-Ride Pass Charlie Card	\$14.00	\$18.00	\$4.00	29%	\$20.00	\$16.00	\$12.00	\$8.00
10-Ride Pass Paper Ticket	\$14.00	\$18.00	\$4.00	29%	\$24.00	\$24.00	\$16.00	\$12.00
31-Day Pass (Charlie Card)	\$40.00	\$50.00	\$10.00	25%	\$280.00	\$270.00	\$410.00	\$80.00
31-Day Reduced Pass (Charlie Card)	\$28.00	\$38.00	\$10.00	36%	\$390.00	\$260.00	\$400.00	\$110.00
<b>Total</b>					<b>\$790.20</b>	<b>\$652.65</b>	<b>\$943.05</b>	<b>\$247.10</b>
<b>Average Fare Increase</b>					<b>\$3.21</b>	<b>\$2.90</b>	<b>\$2.95</b>	<b>\$3.25</b>
<b>Percent Increase</b>					<b>52.55%</b>	<b>47.45%</b>	<b>47.55%</b>	<b>52.45%</b>

The **average fare change** by fare product was calculated by multiplying the total number of minority or low-income respondents (see Table 4-1) in each fare product category by the fare change. For example, in Proposal B the fare change has an increase of \$0.50 for the full fare cash product and 87 minority respondents (see Table 4-1) paid full fare cash, therefore, the calculation would be  $87 \times 0.50 = \$43.50$  average fare change for minority full fare cash. This methodology was also used to calculate non-minority and non-low-income average fare change.

The **average fare increase** was calculated by summing the total average fare change of each fare product by Title VI category and dividing that sum by the total number of survey respondents for each Title VI category (see Table 4-1). For Proposal B the calculation for Minority Average Fare Increase would be: \$790.20 (total minority average fare change) / 246 (minority respondents) = \$3.21 average fare increase.

The **percent increase** was calculated by adding the total of each minority status average fare increase (\$3.21+\$2.90 = \$6.11) and dividing the average fare increase by that sum (\$3.21 / \$6.11 = 52.55%). The same methodology was used to achieve the percent increase for each Title VI category.

## 7.1 Determination of Disparate Impact and/or Disproportionate Burden

In accordance with SRTA's 2019 Title VI Report, a disparate impact occurs when a proposed fare or major service change affects a minority population twenty percent more than a non-minority population and a disproportionate burden occurs when a proposed fare or major service change affects a low-income population twenty percent more than a non-low-income population.

The analysis for Proposal B shows a 52.55% average fare increase for minority riders and a 47.45% average fare increase for non-minority riders, resulting in a difference of 5.10%. It has been determined that Proposal B does not exceed SRTA's threshold of 20%. Therefore, there is no finding of a disparate impact to the minority population.

The analysis for Proposal B shows a 47.55% average fare increase for low-income riders and a 52.45% average fare increase for non-low-income riders, resulting in a difference of 4.91%. In this case, non-low-income riders would see a higher increase in average fare than low-income riders, therefore resulting in no finding of a disproportionate burden.

## 8. Proposal C

Proposal C decreases the current full fare cash price from \$1.50 to \$1.25 with all fare products decreasing consequently. The average decrease for minority riders is \$1.65 versus non-minority riders at \$1.50; the average decrease for low-income riders is \$1.52 versus non-low-income riders at \$1.68. Table 8-1 lists the fare product decrease for Proposal C along with the average decrease and percent decrease for minority and low-income riders.

Table 8-1 Proposal C: Effects of Fare Change on SRTA Riders

	Fare Information				Average Fare Change			
Fare Product	Existing	Proposed	Fare Change	Percent Fare Change	Minority	Non-Minority	Low-Income	Non-Low-Income
Full Fare Cash	\$1.50	\$1.25	-\$0.25	-17%	-\$21.75	-\$18.50	-\$28.50	-\$5.75
Full Fare Charlie Card	\$1.40	\$1.00	-\$0.40	-29%	-\$16.40	-\$14.40	-\$22.40	-\$5.60
Full Fare Paper Ticket	\$1.50	\$1.25	-\$0.25	-17%	-\$1.75	-\$1.00	-\$1.50	-\$0.50
Reduced Fare Cash	\$0.75	\$0.60	-\$0.15	-20%	-\$2.55	-\$2.10	-\$3.45	-\$0.30
Reduced Fare Charlie Card	\$0.70	\$0.50	-\$0.20	-29%	-\$2.60	-\$4.80	-\$5.20	-\$1.20
Reduced Fare Paper Ticket	\$0.75	\$0.60	-\$0.15	-20%	\$0.00	-\$0.45	-\$0.30	\$0.00
1-Day Pass Charlie Card	\$4.00	\$3.00	-\$1.00	-25%	-\$1.00	-\$3.00	-\$3.00	\$0.00
1-Day Pass Paper Ticket	\$4.00	\$3.00	-\$1.00	-25%	-\$1.00	\$0.00	\$0.00	-\$1.00
Week Pass Charlie Card	\$14.00	\$12.00	-\$2.00	-14%	\$0.00	-\$6.00	-\$2.00	-\$6.00
Week Pass Paper Ticket	\$14.00	\$12.00	-\$2.00	-14%	-\$2.00	-\$2.00	-\$2.00	-\$2.00
10-Ride Pass Charlie Card	\$14.00	\$12.00	-\$2.00	-14%	-\$10.00	-\$8.00	-\$6.00	-\$4.00
10-Ride Pass Paper Ticket	\$14.00	\$12.00	-\$2.00	-14%	-\$12.00	-\$12.00	-\$8.00	-\$6.00
31-Day Pass (Charlie Card)	\$40.00	\$35.00	-\$5.00	-13%	-\$140.00	-\$135.00	-\$205.00	-\$40.00
31-Day Reduced Pass (Charlie Card)	\$28.00	\$23.00	-\$5.00	-18%	-\$195.00	-\$130.00	-\$200.00	-\$55.00
<b>Total</b>					<b>-\$406.05</b>	<b>-\$337.25</b>	<b>-\$487.35</b>	<b>-\$127.35</b>
<b>Average Fare Decrease</b>					<b>-\$1.65</b>	<b>-\$1.50</b>	<b>-\$1.52</b>	<b>-\$1.68</b>
<b>Percent Decrease</b>					<b>52.41%</b>	<b>47.59%</b>	<b>47.61%</b>	<b>52.39%</b>

The **average fare change** by fare product was calculated by multiplying the total number of minority or low-income respondents (see Table 4-1) in each fare product category by the fare change. For example, in Proposal C the fare change has a decrease of \$0.25 for the full fare cash product and 87 minority respondents (see Table 4-1) paid full fare cash, therefore, the calculation would be  $87 \times -\$0.25 = -\$21.75$  average fare change for minority full fare cash. This methodology was also used to calculate non-minority and non-low-income average fare change.

The **average fare decrease** was calculated by summing the total average fare change of each fare product by Title VI category and dividing that sum by the total number of survey respondents for Title VI category (see Table 4-1). For Proposal C the calculation for Minority Average Fare Decrease would be:  $-\$406.05$  (total minority average fare change) /  $246$  (minority respondents) =  $\$1.65$  average fare decrease.

The **percent decrease** was calculated by adding the total of each minority status average fare increase ( $-\$1.65 + -\$1.50 = -\$3.15$ ) and dividing the average fare increase by that sum ( $-\$1.65 / -\$3.15 = 52.41\%$ ). The same methodology was used to achieve the percent decrease for each Title VI category.

## 8.1 Determination of Disparate Impact and/or Disproportionate Burden

In accordance with SRTA's 2019 Title VI Report, a disparate impact occurs when a proposed fare or major service change affects a minority population twenty percent more than a non-minority population and a disproportionate burden occurs when a proposed fare or major service change affects a low-income population twenty percent more than a non-low-income population.

The analysis for Proposal C shows a 52.41% average fare decrease for minority riders and a 47.59% average fare decrease for non-minority riders, resulting in a difference of 4.82%. It has been determined that Proposal C does not exceed SRTA's threshold of 20%. Therefore, there is no finding of a disparate impact to the minority population.

The analysis for Proposal C shows a 47.61% average fare decrease for low-income riders and a 52.39% average fare decrease for non-low-income riders, resulting in a difference of 4.77%. It has been determined that Proposal C does not exceed SRTA's threshold of 20%. Therefore, there is no finding of a disproportionate burden to the low-income population.

## 9. Proposal D

Proposal D increases the current full fare cash price from \$1.50 to \$2.00 with all other fare products remaining constant. The average increase for minority riders is \$0.18 versus non-minority riders at \$0.16; the average increase for low-income riders is \$0.18 versus non-low-income riders at \$0.15. Table 9-1 lists the fare product increase for Proposal D along with the average increase and percent increase for minority and low-income riders.

Table 9-1 Proposal D: Effects of Fare Change on SRTA Riders

	Fare Information				Average Fare Change			
Fare Product	Existing	Proposed	Fare Change	Percent Fare Change	Minority	Non-Minority	Low-Income	Non-Low-Income
Full Fare Cash	\$1.50	\$2.00	\$0.50	33%	\$43.50	\$37.00	\$57.00	\$11.50
Full Fare Charlie Card	\$1.40	\$1.40	\$0.00	0%	\$0.00	\$0.00	\$0.00	\$0.00
Full Fare Paper Ticket	\$1.50	\$1.50	\$0.00	0%	\$0.00	\$0.00	\$0.00	\$0.00
Reduced Fare Cash	\$0.75	\$0.75	\$0.00	0%	\$0.00	\$0.00	\$0.00	\$0.00
Reduced Fare Charlie Card	\$0.70	\$0.70	\$0.00	0%	\$0.00	\$0.00	\$0.00	\$0.00
Reduced Fare Paper Ticket	\$0.75	\$0.75	\$0.00	0%	\$0.00	\$0.00	\$0.00	\$0.00
1-Day Pass Charlie Card	\$4.00	\$4.00	\$0.00	0%	\$0.00	\$0.00	\$0.00	\$0.00
1-Day Pass Paper Ticket	\$4.00	\$4.00	\$0.00	0%	\$0.00	\$0.00	\$0.00	\$0.00
Week Pass Charlie Card	\$14.00	\$14.00	\$0.00	0%	\$0.00	\$0.00	\$0.00	\$0.00
Week Pass Paper Ticket	\$14.00	\$14.00	\$0.00	0%	\$0.00	\$0.00	\$0.00	\$0.00
10-Ride Pass Charlie Card	\$14.00	\$14.00	\$0.00	0%	\$0.00	\$0.00	\$0.00	\$0.00
10-Ride Pass Paper Ticket	\$14.00	\$14.00	\$0.00	0%	\$0.00	\$0.00	\$0.00	\$0.00
31-Day Pass (Charlie Card)	\$40.00	\$40.00	\$0.00	0%	\$0.00	\$0.00	\$0.00	\$0.00
31-Day Reduced Pass (Charlie Card)	\$28.00	\$28.00	\$0.00	0%	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total</b>					<b>\$43.50</b>	<b>\$37.00</b>	<b>\$57.00</b>	<b>\$11.50</b>
<b>Average Fare Increase</b>					<b>\$0.18</b>	<b>\$0.16</b>	<b>\$0.18</b>	<b>\$0.15</b>
<b>Percent Increase</b>					<b>51.81%</b>	<b>48.19%</b>	<b>54.07%</b>	<b>45.93%</b>

The **average fare change** by fare product was calculated by multiplying the total number of minority or low-income respondents (see Table 4-1) in each fare product category by the fare change. For example, in Proposal D the fare change has an increase of \$0.50 for the full fare cash product only and 87 minority respondents (see Table 4-1) paid full fare cash, therefore, the calculation would be  $87 \times 0.50 = \$43.50$  average fare change for minority full fare cash. All other fare payments remained constant and therefore had \$0.00 average fare change.

The **average fare decrease** was calculated by summing the total average fare change of each fare product by Title VI category and dividing that sum by the total number of survey respondents for Title VI category (see Table 4-1). For Proposal D the calculation for Minority Average Fare Increase would be: \$43.50 (total minority average fare change) / 246 (minority respondents) = \$0.18 average fare decrease.

The **percent decrease** was calculated by adding the total of each minority status average fare increase (\$0.18 + \$0.16 = \$0.34) and dividing the average fare increase by that sum (\$0.18 / \$0.34 = 51.84%). The same methodology was used to achieve the percent increase for each Title VI category.

## 9.1 Determination of Disparate Impact and/or Disproportionate Burden

In accordance with SRTA's 2019 Title VI Report, a disparate impact occurs when a proposed fare or major service change affects a minority population twenty percent more than a non-minority population and a disproportionate burden occurs when a proposed fare or major service change affects a low-income population twenty percent more than a non-low-income population.

The analysis for Proposal D shows a 51.84% average fare increase for minority riders and a 48.19% average fare increase for non-minority riders, resulting in a difference of 3.63%. It has been determined that Proposal D does not exceed SRTA's threshold of 20%. Therefore, there is no finding of a disparate impact to the minority population.

The analysis for Proposal C shows a 54.07% average fare increase for low-income riders and a 45.93% average fare increase for non-low-income riders, resulting in a difference of 8.14%. It has been determined that Proposal C does not exceed SRTA's threshold of 20%. Therefore, there is no finding of a disproportionate burden to the low-income population.

It is important to note that while raising the full fare cash product to \$2.00 may not be the most economical method, none of the other fare options are being altered. SRTA riders are able to choose the convenience and potential savings associated with other fare products available.

## 10. Conclusion

The equity analysis concludes that the majority of SRTA's passengers come from low-income populations and a slight majority comes from minority populations. The majority of passengers prefer to use the full fare cash option as payment.

Under each fare proposal presented in this analysis, neither minority nor low-income riders experience a 20% increase over non-minority or non-low-income riders. There is therefore, no

disparate impact on minority populations and no disproportionate burden on low-income populations.

SRTA has not raised fares in several years, however, SRTA fares are in line with other Massachusetts Regional Transit Authority fares at \$1.50 per one-way trip.

# **Appendix A**



**Demographic Profile of  
Southeastern Regional Transit Authority Riders**



**Prepared by:  
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88 Broadway  
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November 2018**

## **Federal Disclaimer**

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## Title VI and Nondiscrimination Notice of Rights of Beneficiaries

The Southeastern Massachusetts Metropolitan Planning Organization (SMMPO) through the Southeastern Regional Planning and Economic Development District (SRPEDD) operates its programs, services, and activities in compliance with federal nondiscrimination laws including Title VI of the Civil Rights Act of 1964 (Title VI), the Civil Rights Restoration Act of 1987, and related statutes and regulations. Title VI prohibits discrimination in federally assisted programs and requires that no person in the United States of America shall, on the grounds of **race**, **color**, or **national origin** (including **limited English proficiency**), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal assistance. Related federal nondiscrimination laws administered by the Federal Highway Administration, the Federal Transit Administration, or both prohibit discrimination on the basis of **age**, **sex**, and **disability**. These protected categories are contemplated within SRPEDD's Title VI Programs consistent with federal interpretation and administration. Additionally, SRPEDD provides meaningful access to its programs, services, and activities to individuals with limited English proficiency, in compliance with US Department of Transportation policy and guidance on federal Executive Order 13166.

SRPEDD  
Lilia Cabral  
Title VI/Nondiscrimination Coordinator  
88 Broadway  
Taunton, MA 02780  
Phone: (508) 824-1367  
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[www.srpedd.org](http://www.srpedd.org)

Individuals seeking additional information or wishing to file a Title VI/Nondiscrimination complaint may contact the SRPEDD Title VI/Nondiscrimination Coordinator at the contact information here. All such complaints must be received, in writing, within 180 days of the alleged discriminatory occurrence. Assistance will be provided, upon request, to individuals unable to provide the complaint form in writing.

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Massachusetts Commission Against  
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One Ashburton Place, 6th Floor  
Boston, MA 02109  
617-994-6000  
TTY: 617-994-6196

class, race, color, denomination, sex, sexual orientation, nationality, disability, gender identity and expression, and veteran's status, and SRPEDD and the SMMPO assures compliance with these laws. Public Accommodation Law concerns can be brought to SRPEDD's Title VI/Nondiscrimination Coordinator or to

file a complaint alleging a violation of the state's Public Accommodation Law, contact the

Massachusetts Commission Against Discrimination within 300 days of the alleged discriminatory conduct.

The SMMPO is equally committed to implementing federal Executive Order 12898, entitled “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.” In this capacity, the SMMPO identifies and addresses disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations. The SMMPO carries out this responsibility by involving minority and low income individuals in the transportation process and considering their transportation needs in the development and review of the SMMPO’s transportation plans, programs and projects.

English: If this information is needed in another language, please contact Lilia Cabral, SRPEDD’s Title VI Coordinator by phone at (508) 824-1367.

Portuguese: Caso esta informação seja necessária em outra idioma, favor contar o coordenador em Título VI do SRPEDD pelo telephone (508) 824-1367.

Spanish: Si necesita esta información en otro idioma, por favor contacte al coordinador de SRPEDD del Título VI al (508) 824-1367.

## **Introduction:**

The Southeastern Regional Transit Authority (SRTA) as the recipient of Federal Transit Administration funds under Title 49 U.S.C. Chapter 53 is required to maintain a Title VI Program, and update the program every three years. As specified by FTA Circular 4701.1B dated October 1, 2012, “transit providers shall collect information on race, color, national origin, English proficiency, language spoken at home, household income, and travel patterns of their riders...” for the purpose of creating a demographic profile of ridership.

To satisfy this requirement, the Southeastern Regional Planning and Economic Development District (SRPEDD) conducted surveys of passengers, tabulated the completed surveys, and analyzed the results, which are presented in this report.

## **Survey Methods:**

SRPEDD conducted passenger surveys at the New Bedford Terminal from June 12, 2018 until June 16, 2018; and at the Fall River Terminal from June 19, 2018 until June 23, 2018. Passengers were provided a two-page survey and asked to either complete the survey on-site or return a completed survey to either terminal no later than June 16, 2018 for New Bedford and June 23, 2018 for Fall River. The survey was available in English, Portuguese, and Spanish.

A total of 623 surveys were returned which provides a 4% margin of error (at the 95% confidence interval). Of the 623 returned surveys, 294 were identified as Minority, which provides a 6% margin of error (at the 95% confidence interval) for Minority responses; 329 returned surveys were identified as Non-Minority, which provides a 5% margin of error (at the 95% confidence interval) for Non-Minority responses.

## **Results:**

### **Race and Ethnicity**

The majority of respondents identify their race as White (53%), the next largest ethnic group is Hispanic (23%), followed by Black or African American (13%), and Cape Verdean (4%). Asian, American Indian, and Other received less than 3% of total responses.

Row Labels	Percentage of Race/Ethnicity of SRTA Riders
n=623	
American Indian or Alaska Native	<0%
Asian	2%
Black or African American	13%
Cape Verdean	4%
Hispanic or Latino	23%
Native Hawaiian/Pacific Islander	1%
Other	3%
White (Non-Hispanic)	53%

For the purpose of this analysis, survey responses were grouped into two categories: Minority and Non-Minority. The Minority category comprised of all respondents that did not identify as White (the majority of responses). The 47% of respondents from racial and ethnic groups that form the Minority rider group far exceeds the 13% of racial and ethnic minorities that reside within the SRTA service area as identified by the 2010 U.S. Census.

Minority Status	
n=623	
Minority	Not Minority
47%	53%

## English Proficiency

English proficiency refers to a person's ability to read, write, speak, and understand English at a high degree of competence. More than 99% of the Non-Minority group respondents indicated that they speak English well as compared to 79% of Minority responses. The survey identified that 16% of Minority respondents do not speak English well and 5% do not speak English at all.

English Proficiency		
	Minority	Non-Minority
	n=261	n=289
Not at All	5%	<0%
Not Well	16%	0.69%
Well	79%	99%

## Language Spoken at Home

English proficiency provides insight into how well the riding population speaks English, however learning the language spoken at home by riders provides insight into the languages most likely to be encountered by SRTA. The responses varied greatly between Minority and Non-Minority respondents: English was the most predominant language, and is spoken by 96% of Non-Minorities; 58% of Minorities speak English at home. Spanish was the second most predominant language spoken at home by Minorities (34%); 8% indicated a language other than English or Spanish. Spanish and other languages received a much lower response rate among Non-Minorities with 0.4% and 3.6% respectively. Eleven different languages were identified by survey respondents.

Language Spoken at Home		
	Non-Minority	Minority
	n=236	n=230
English	96%	58%
Spanish	0.4%	34%
Other	3.6%	8%

## Annual Income

Response rates for annual income among Minority and Non-Minority groups were comparable across all income categories surveyed. The highest frequency of responses for both Minority (32%) and Non-Minorities (36%) indicated annual household income of less than \$10,000. The income category of \$10,000-14,999 garnered the next highest frequency of responses among Minorities (13%) and Non-Minorities (14%).

Of the respondents that indicated their annual household income, 99% of Minorities and 99% of Non-Minorities fall below the Household Income Average Median Value of \$48,409 within the SRTA Service Area.

Annual Household Income		
	Minority	Non-Minority
	n=259	n=207
<10K	32%	36%
10K-14,999K	13%	14%
15K-24,999K	21%	9%
25K-34,999K	3%	7%
35K-49,999K	6%	4%
50K-74,999K	3%	2%
75K<	1%	1%
Prefer not to Answer	21%	27%

### Minority Status by Bus Route

In order to evaluate service changes for impacts on minority populations, SRTA must evaluate the proportion of riders who identify as minority on all of its services. SRTA has fixed routes in New Bedford, also serving Fairhaven and Fall River, also serving Swansea. Using survey data, SRPEDD evaluated the number of minority and non-minority riders for each fixed route in New Bedford and Fall River. For the purpose of this analysis, survey responses were grouped into two categories: Minority and Non-Minority. The Minority category comprised of all respondents that did not identify as White.

In New Bedford, the breakdown between minority and non-minority riders varied greatly. Route 10 and Route 8 had the highest percentage of riders who identified as minority, 65% and 63% respectively. The Intercity route had the highest number of total respondents, with 81 people responding to the survey, of which 51% identified as minority and 49% identified as non-minority.

In Fall River, the breakdown between minority and non-minority was similar. Route 3 and Route 1 had the greatest percentage of riders who identified as minority, 67% and 48% respectively. Route 2 had the highest number of respondents with 33 people responding to the survey, of which 39% identified as minority and 61% identified as non-minority.

Overall, according to the survey, compared to Fall River, New Bedford had a much higher percentage of riders that identified as minority.



New Bedford Route	Number Minority	Percent Minority	Number Non-Minority	Percent Non-Minority
1	30	59%	21	41%
2	32	51%	31	49%
3	8	31%	18	69%
4	13	34%	25	66%
5	8	47%	9	53%
6	5	45%	6	55%
8	15	63%	9	38%
Intercity	41	51%	40	49%
10	22	65%	12	35%
11	10	43%	13	57%
NES	3	25%	9	75%

Fall River Route	Number Minority	Percent Minority	Number Non-Minority	Percent Non-Minority
1	11	48%	12	52%
2	13	39%	20	61%
3	12	67%	6	33%
4	5	29%	12	71%
5	7	41%	10	59%
6	10	31%	22	69%
7	6	33%	12	67%
8	14	47%	16	53%
9	5	29%	12	71%
10	4	25%	12	75%
14	7	41%	10	59%

## Low Income Riders

Low Income is defined by 49 U.S.C. 5302 as amended by MAP-21 as “an individual whose family income is at or below 150 percent of the poverty line.” The poverty line varies by household size and is identified by U.S. Department of Health and Human Services.

Survey respondents in both Minority (61%) and Non-Minority (58%) are identified as low-income individuals.

Low Income Riders		
	Minority	Non-Minority
	n=59	n=88
Low Income Riders	61%	58%
Non-Low Income Riders	39%	42%

## Travel Patterns

Travel patterns of both Minority and Non-Minority riders showed a similar pattern of ridership regarding trip origin and destination. The most frequent response for trip origin was Home (Minority 53%, Non-Minority 62%), Work (Minority 16%, Non-Minority 9%) was the second most frequent response, followed by School (Minority 6%, Non-Minority 3%). All other trip origins received a lower frequency of response.

Trip Origin		
	Minority	Non-Minority
	n=270	n=327
Home	53%	62%
School	6%	3%
Medical	4%	4%
Shopping	11%	6%
Work	16%	9%
Other	10%	16%

Trip destinations exhibit a varied distribution of response with Home being the most frequent response (Minority 24%, Non-Minority 26%). Work was the next most frequent response

(Minority 26%, Non-Minority 24%), followed by Shopping (Minority 19%, Non-Minority 17%), and Other (Minority 14%, Non-Minority 18%).

Destination		
	Minority	Non-Minority
	n=260	n=303
Home	24%	26%
School	8%	5%
Medical	9%	10%
Shopping	19%	17%
Work	26%	24%
Other	14%	18%

Trip frequencies received comparable frequencies in response among Minority and Non-Minority Riders. Both Minority (61%) and Non-Minority (54%) indicated that they ride daily, with the next highest frequency response of 2-3 times per week (Minority 26%, Non-Minority 36%). The responses suggest that SRTA is the primary mode of transportation among both Minority and Non-Minority riders.

Trip Frequency		
	Minority	Non-Minority
	n=266	n=319
Everyday	61%	54%
Once a Week	7%	5%
2-3/Week	26%	36%
2-3/Month	4%	4%
Less than Once a Month	3%	1%

SRTA offers one free transfer from an inbound bus to second outbound bus, which allows riders to extend the length of their trip without incurring an additional cost. The use of a transfer among Minority (53%) and Non-Minority (53%) riders was the same; slightly more than half of both groups took advantage of the free transfer.

Use of a Transfer		
	Minority	Non-Minority
	n=266	n=319
Yes	53%	53%
No	47%	47%

### Fare Usage by Fare Type

The base cash fare for a single trip (including a free transfer) is \$1.50 paid in cash upon boarding; the same trip paid for with a Stored Value Charlie Card costs \$1.40. Fare usage among riders was evaluated by Minority and Low-Income population. Cash fare is the most predominant method of payment among Minorities (45%) and Low-Income (45%) riders. The next most frequent response was for a Full-Fare Pass (Charlie Card) with 23% Minorities and 22% Low-Income riders. All other methods of fare payment received a lower frequency of responses.

When evaluating trip frequency, it was found that both Minority and Non-Minority riders use the SRTA system either daily, or several times per week. Regular riders benefit from the lower per trip cost of a multi-day pass, with the greatest value realized with the Full-Fare Pass (Charlie Card). Low-income riders benefit the most financially when using a multi-day pass due to the lower trip per cost. The low response of a multi-day pass shows the upfront cost presents a financial burden on Low-Income riders. Low-income riders likely choose the base cash fare due to the lower out of pocket expense despite the higher per trip cost.

Fare Usage by Fare Type				
	Minority	Non-Minority	Low-Income	Not Low Income
	n=247	n=326	n=83	n=64
Full Fare-Cash	45%	40%	45%	41%
Full Fare-Pass (Charlie Card)	23%	17%	22%	20%
Full Fare-Stored Value (Charlie Card)	10%	9%	10%	14%
Full Fare - Paper Ticket	<0%	3%	2%	0%
Reduced Fare Pass(Charlie Card)	6%	12%	7%	9%
Reduced Fare - Cash	8%	13%	8%	11%
Reduced Fare - Paper Ticket	<0%	1%	1%	2%
Reduced Fare - Stored Value (Charlie Card)	5%	5%	2%	3%
Other	1%	0%	2%	0%

## **Conclusion:**

The survey results indicate that SRTA riders identify as low-income individuals that ride frequently and pay cash for their trip. Riders that identify as “White” form the majority of riders, and predominantly speak English. The predominant language among Minority riders is English, however Spanish is also prevalent among this population. Riders of both Minority and Non-Minority status use SRTA for a variety of trips that include work, school, shopping, and medical and likely use more than one bus to reach their destination.

The frequency of trips taken by riders suggests a dependency upon SRTA as a mode of transportation; however, the low use of multi-day passes and stored value Charlie Cards raises concerns that the populations that would benefit most from the lower per trip costs are not realizing the benefits either due to a financial barrier or a lack of information about the Charlie Card and multi-day pass programs. Future surveys should explore this area to determine how to expand the use of the Charlie Card and multi-day pass programs.

## References:

Federal Transit Laws, Title 49, United States Code, Chapter 53 as amended by MAP-21.

U.S. Census; American Community Survey, 2005-2009 American Community Survey 5 Year Estimates, Table S1903.

U.S. Census; 2010 Census, Table PL94-171.

U.S. Department of Health and Human Services; 2014 Poverty Guidelines; [aspe.hhs.gov/2014-poverty-guidelines](https://aspe.hhs.gov/2014-poverty-guidelines); (September 17, 2015).

U.S. Department of Transportation – Federal Transit Administration; (2012). *Title VI Requirements and Guidelines for Federal Transit Administration Recipients* (FTA Circular 4702.1B). Washington, DC.

## **Appendix B**

On behalf of SRTA, the Southeastern Regional Planning and Economic Development District (SRPEDD) conducted on-board passenger surveys on SRTA fixed routes in June of 2019. Surveys were administered by SRPEDD staff on SRTA fixed route buses for Fall River and New Bedford to garner demographic and fare usage information.

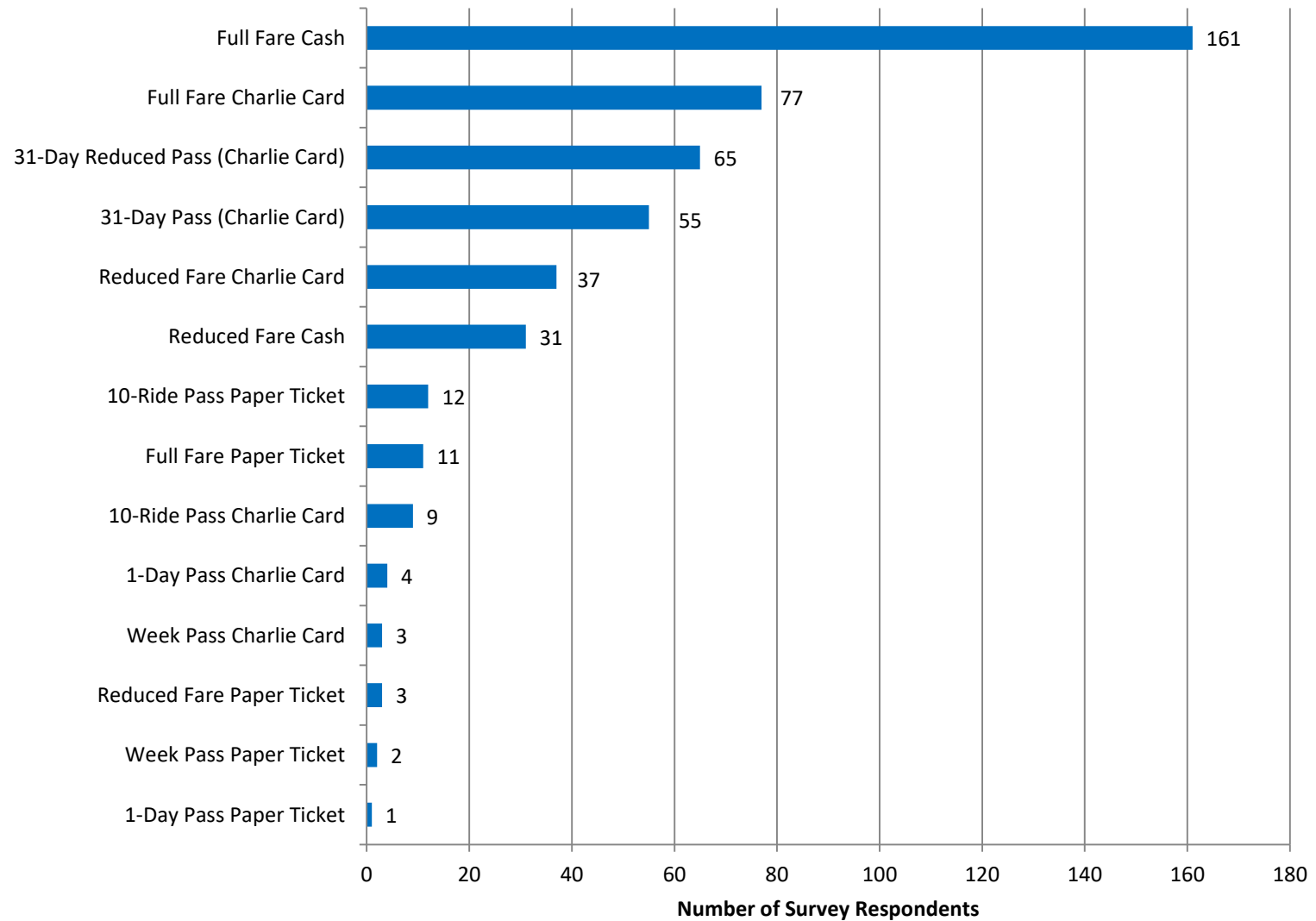
The sample size was determined based on the SRTA Fiscal Year 2018 ridership for the fixed route system and yielded results at the 95% confidence interval with a 4.8% margin of error. To obtain a representative sample of the SRTA riding population, the minimum number of completed responses were collected based on the proportion of boardings for each route during each time period of the service day (proportionally split between weekdays and Saturdays). The service day was divided into four time periods, typically these are: morning (5:00 – 11:00), mid-day (11:00-14:00), afternoon (14:00-18:00), and night (18:00-22:00).

Surveys were administered on a randomly selected service day, with trip assignments selected at random from all available trips during the corresponding service period. A staff administered survey was conducted with passengers boarding at every stop until the required completed survey count was achieved for each route during each time period. If the required number of surveys were not completed during the trip, additional trips were selected using the same randomized method.

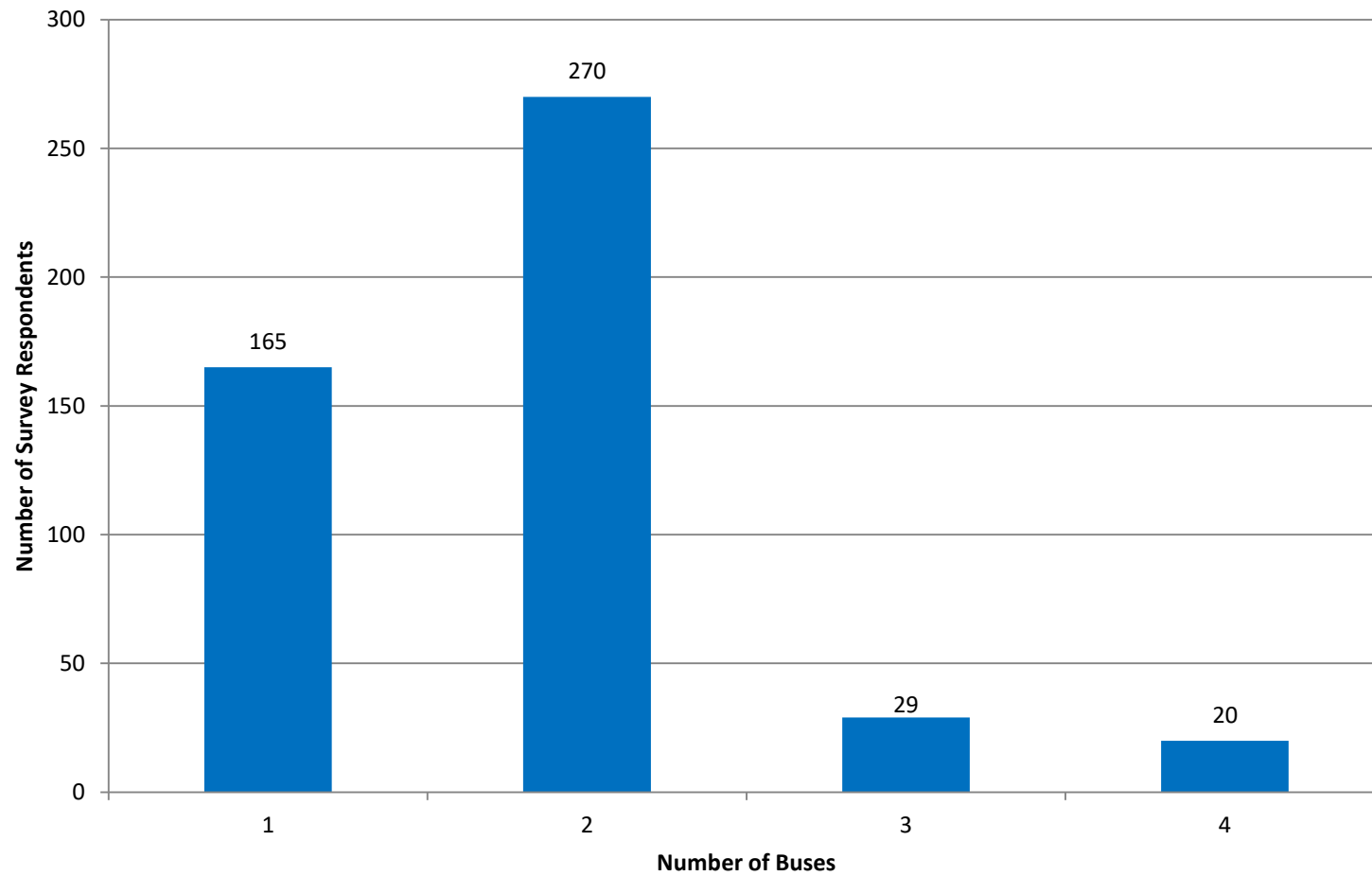
A total of 489 surveys were collected. Below are the survey results.



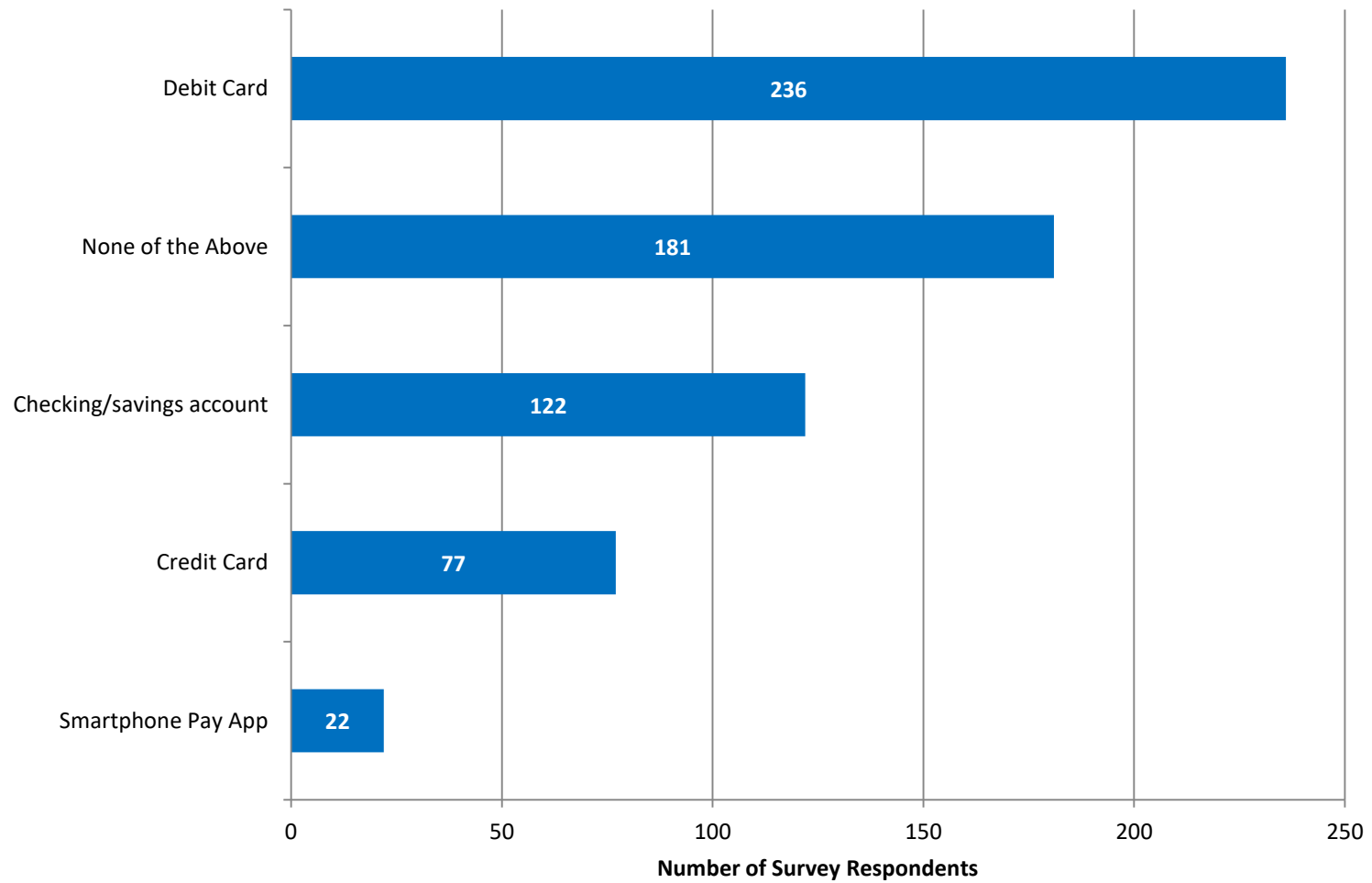
Question 1: How did you pay for this trip?



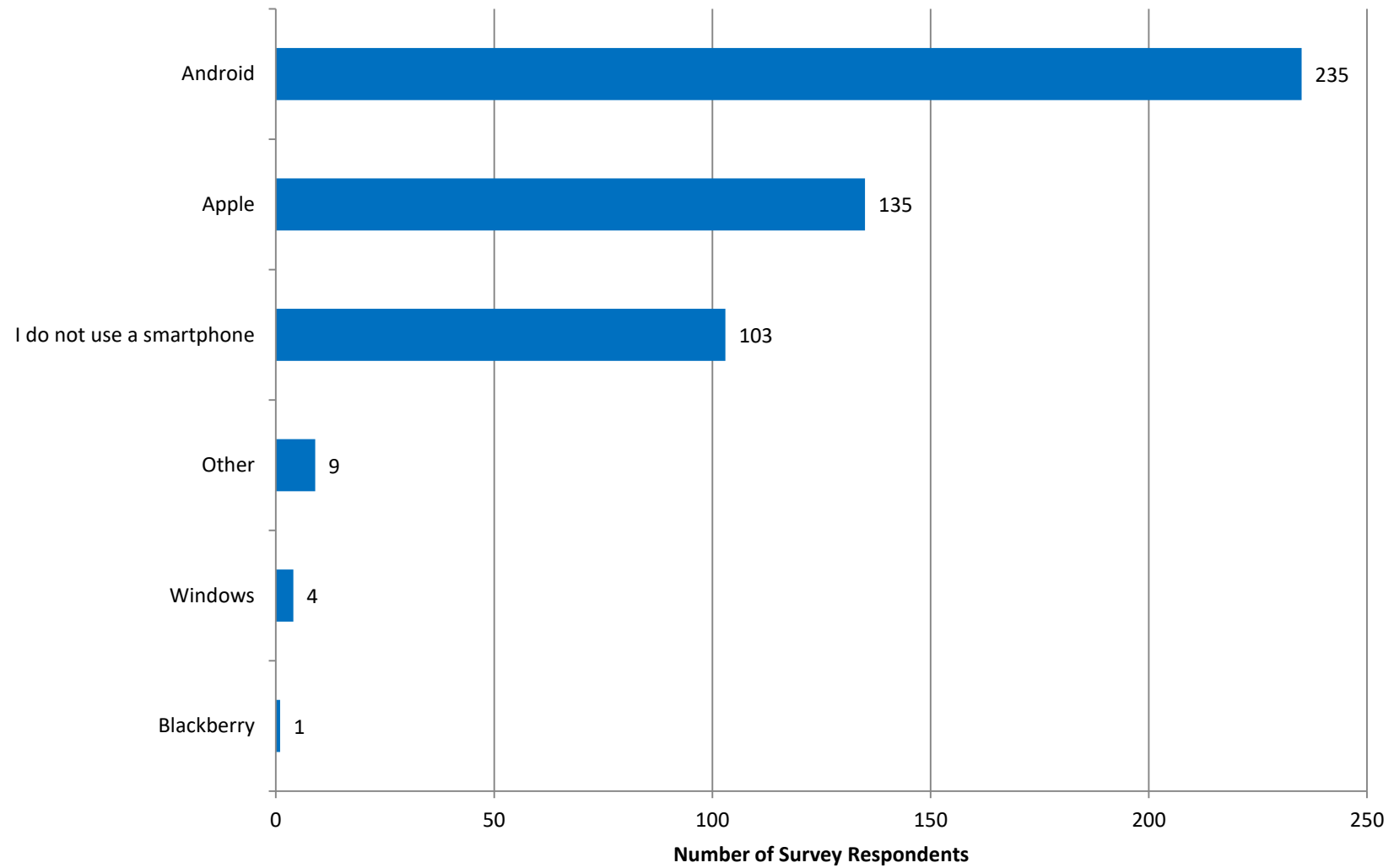
Question 2: How many SRTA routes do you have to take to get to your destination?



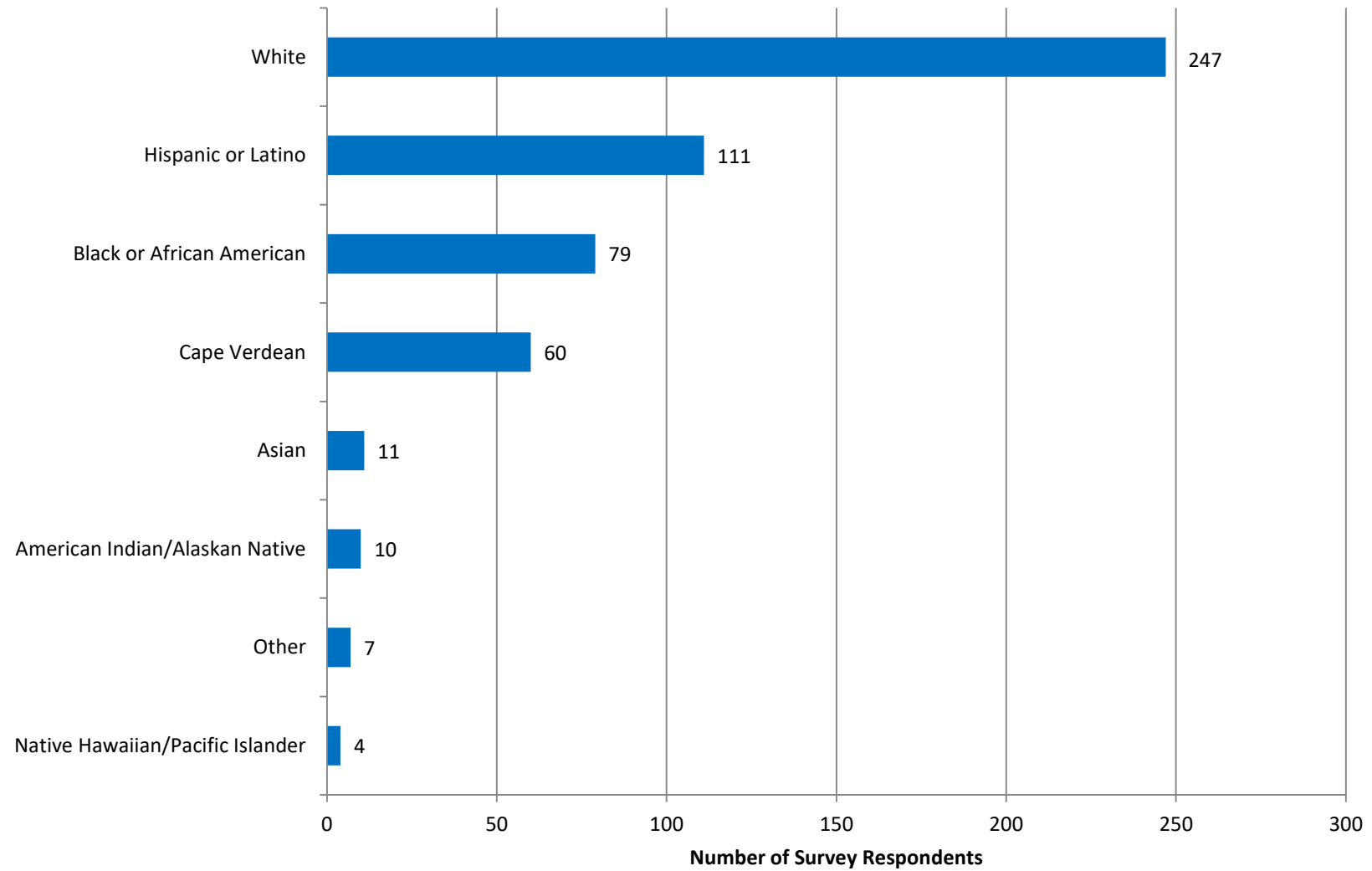
Question 3: I use the following on a regular basis



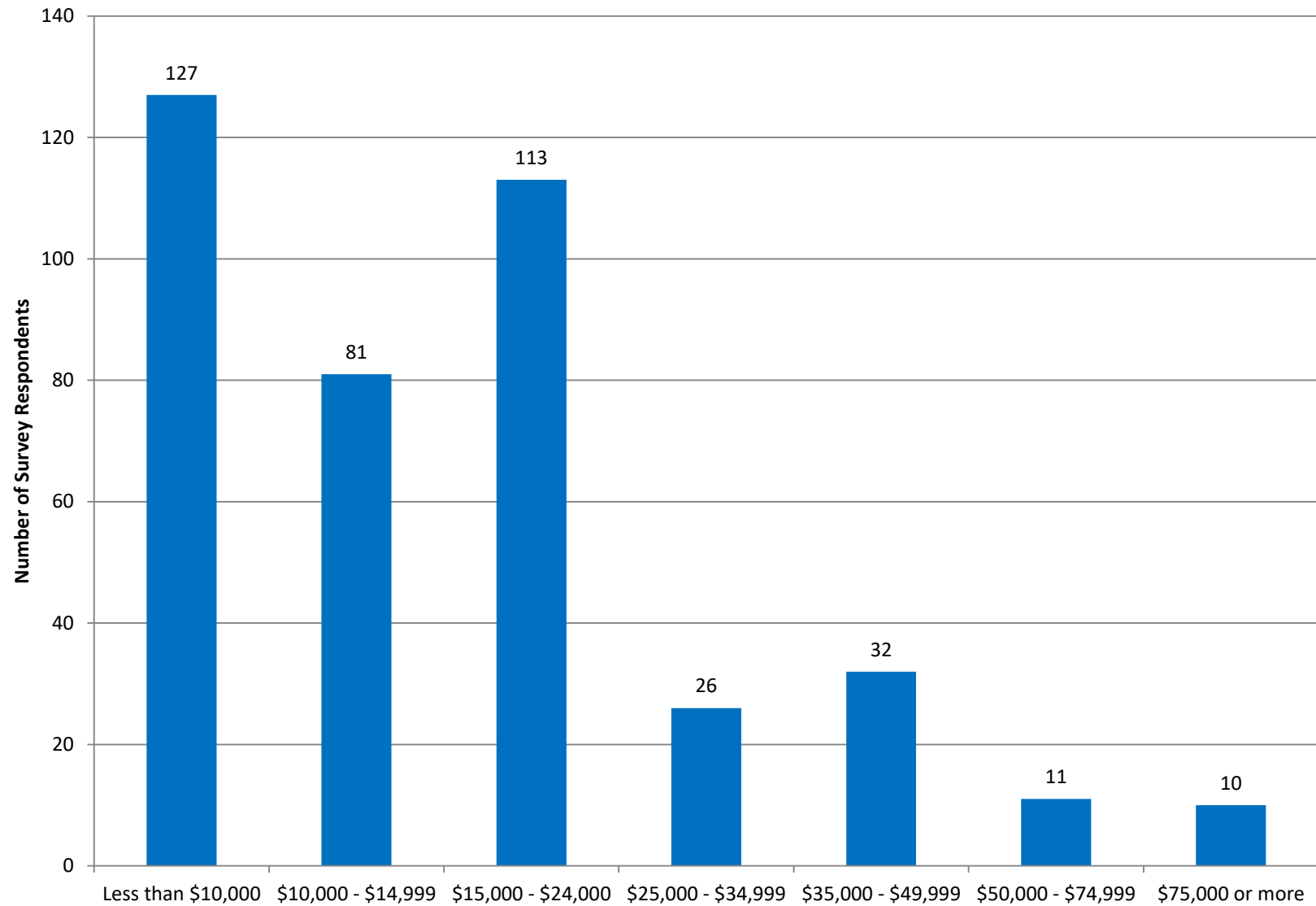
Question 4: I use a \_\_\_\_\_ smartphone



Question 5: Please check all that apply to you



Question 6: What was your total household income last year?



# SRTA Survey June 2019

1. How did you pay for this trip?

	CASH	PAPER TICKET	CHARLIE CARD
Full Fare (\$1.50)			
Reduced Fare (\$0.75)			
Free Transfer / Origin Trip Payment			
1-Day Pass	-----		
Week Pass	-----		
10-Ride Pass	-----		
Student Pass	-----		
31-Day Pass	-----	-----	
31-Day Pass Student, Senior, Disabled	-----	-----	

2. How many SRTA routes do you have to take to get to your destination (circle one)?

1

2

3

4

3. I use the following on a regular basis

- Checking/savings account
- Debit card
- Credit card
- Smartphone Pay App (Apple Pay, Google Pay, Paypal, Venmo, etc.)
- None of the above

4. I use a \_\_\_\_\_ smartphone

- Apple
- Android
- Windows
- Blackberry
- Other \_\_\_\_\_
- I do not use a smartphone

5. Please check all that apply to you

- |  |   |
|--|---|
| <input type="checkbox"/> White                     | <input type="checkbox"/> Asian                            |
| <input type="checkbox"/> Cape Verdean              | <input type="checkbox"/> American Indian/Alaskan Native   |
| <input type="checkbox"/> Hispanic or Latino        | <input type="checkbox"/> Native Hawaiian/Pacific Islander |
| <input type="checkbox"/> Black or African American | <input type="checkbox"/> Other: _____                     |

6. What was your total household income last year?

- |   |  |
|---|--|
| <input type="checkbox"/> Less than \$10,000 | <input type="checkbox"/> \$10,000-14,999   |
| <input type="checkbox"/> \$15,000-\$24,999  | <input type="checkbox"/> \$25,000-\$34,999 |
| <input type="checkbox"/> \$35,000-\$49,999  | <input type="checkbox"/> \$50,000-\$74,999 |
| <input type="checkbox"/> \$75,000 or more   | <input type="checkbox"/> Not Sure          |

## Encuesta de SRTA Junio 2019

1. ¿Cómo le hizo para (o va) pagar por este viaje?

	Dinero	Boleto de papel	Tarjeta de Charlie (Plástica)
Tarifa completa			
Tarifa reducida			
Transferir /Pago de viaje de origen			
Pase de un día			
Pase de un semana	-----		
Pase de 10 viajes	-----		
Pase estudiantil	-----		
Pase de 31 días	-----		
Pase de 31 días de mayores de edad/deshabilitado	-----	-----	

2. ¿Cuántas rutas SRTA tiene que tomar para llegar a su destino (un círculo)?

1                  2                  3                  4

3. Frecuentemente mi forma de pago es:

- Cuenta de cheques / ahorro
- Tarjeta de débito
- Tarjeta de crédito
- Cellular pay app (Apple Pay, Google Pay, etc.)
- Ninguna de las anteriores

4. Yo uso un \_\_\_\_\_ smartphone

- Apple
- Android
- Windows
- Blackberry
- Other \_\_\_\_\_
- No uso celular

5. ¿Con qué grupo étnico o racial se identifica usted? (Puede elegir más de uno)

- ☐ Blanco  
☐ Caboverdiano  
☐ Hispano o Latino  
☐ Negro o Afroamericano  
☐ Indio Americano/Nativos de Alaska  
☐ Nativo Hawaiano/Isleño del Pacífico  
☐ Asiático  
☐ Otro: \_\_\_\_\_

6. ¿Cuál fue su ingreso familiar total el año pasado?

- |  |  |
|--|--|
| <input type="checkbox"/> Menos de \$10,000 | <input type="checkbox"/> \$10,000-14,999   |
| <input type="checkbox"/> \$15,000-\$24,999 | <input type="checkbox"/> \$25,000-\$34,999 |
| <input type="checkbox"/> \$35,000-\$49,999 | <input type="checkbox"/> \$50,000-\$74,999 |
| <input type="checkbox"/> \$75,000 or more  | <input type="checkbox"/> No estoy seguro   |

## Encuesta de SRTA Junio 2019

1. Como pagou (ou vai pagar) por esta viagem?

	Dinero	Boleto de papel	Tarjeta de Charlie (Plástica)
Tarifa inteira			
Tarifa reduzida			
Transferir/ Pagamento de viagem de origem			
Passe de 1 dia			
Passe Semanal	-----		
Passe para 10 viagens	-----		
Passe de aluno	-----		
Passe de 31 dias	-----		
Passe de 31 dias de idoso/ incapacitado	-----	-----	

2. Quantos ônibus você tem que levar para chegar a sua desintegração (um círculo)?

1                  2                  3                  4

3. Eu uso isso com regularmente

- Conta corrente / poupança
- Cartão de débito
- Cartão de crédito
- Cellular Pay app (Apple Pay, Google Pay, etc.)
- Nenhuma das acima

4. Eu uso um \_\_\_\_\_ smartphone

- Apple
- Android
- Windows
- Blackberry
- Other \_\_\_\_\_
- Eu não uso celular

5. Com que grupo racial ou étnico é que se identifica? (Pode escolher mais do que um)

- ☐ Branco  
☐ Cabo-Verdiano  
☐ Hispano ou Latino  
☐ Preto ou Afro-Americano  
☐ Indio Americano/Nativos do Alaska  
☐ Natural do Havai/ Ilhéu do Pacífico  
☐ Asiático  
☐ Outro: \_\_\_\_\_

6. Qual foi a sua renda familia anual no ano passado?

- |  |  |
|--|--|
| <input type="checkbox"/> Menos de \$10,000 | <input type="checkbox"/> \$10,000-14,999   |
| <input type="checkbox"/> \$15,000-\$24,999 | <input type="checkbox"/> \$25,000-\$34,999 |
| <input type="checkbox"/> \$35,000-\$49,999 | <input type="checkbox"/> \$50,000-\$74,999 |
| <input type="checkbox"/> \$75,000 or more  | <input type="checkbox"/> No estoy seguro   |



## **H. SEPTEMBER 29, 2021 FARE EQUITY ANALYSIS**



Date: September 29, 2021

To: Erik Rousseau - Administrator

From: Shayne M. Trimbell, AICP – Director of Transit Planning

Re: Fare Rate Change Proposal – Title VI Disparate Impact/Disproportionate Burden Analysis

---

The Southeastern Regional Transit Authority (SRTA) has proposed a change to fare prices effective October 1, 2021. The change in fare prices is the second change in 2021 and is in response to the COVID-19 pandemic. In March 2020, SRTA suspended fare collection as an immediate response to the COVID-19 pandemic as a measure to protect drivers and minimize exposure to customers. During the fare suspension, passengers boarded at the rear door of buses on the two-door buses and continued to board at the front door on one-door buses.

On April 1, 2021, SRTA restored fare collection, but introduced a reduced fare price to mitigate the financial impact on customers after a year of fare suspension. The reduced price was a temporary measure which expires on September 30, 2021 with the reintroduction of the full fare pricing. The fare pricing has been changed from the pre-pandemic pricing as a measure to encourage customers to return to the SRTA system. The base cash fare will revert to the pre-pandemic price of \$1.50 with the reduced price at \$0.75. Pass products will be reduced in price.

In accordance with the SRTA Title VI Program dated February 21, 2019 a Fare Change Equity Analysis is required for any fare change to determine if the change represents a disparate impact on minority populations or a disproportionate burden on low-income populations if it affects either more than 20%. The proposed fare pricing was screened using customer survey data collected in 2018 to determine how the change in price affects minorities and low-income customers. The Table 1 shows the results of the analysis.

The fare change reduces most pass products but does not increase fare prices for any product. Based on the analysis, minority customers will experience 51% of the benefit from the fare change; low-income customers will experience 77% of the benefit from the fare change. These findings do not result in either a disproportionate impact on minorities or a disproportionate burden for low-income customers.

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Table 1: DIB Analysis for Oct. 1, 2021 Fare Change

Fare Product	Current Price	Proposed Price	Price Change	Percent Fare Change	Minority	Non-minority	Low-income	Non-Low-income
Full Fare	\$1.50	\$1.50	\$0.00	0%	\$0.00	\$0.00	\$0.00	\$0.00
Reduced Fare	\$0.75	\$0.75	\$0.00	0%	\$0.00	\$0.00	\$0.00	\$0.00
<b>Charlie Card Fare</b>								
Full Fare	\$1.40	\$1.25	-\$0.15	-11%	-\$5.40	-\$5.70	-\$7.95	-\$2.10
Reduced Fare	\$0.70	\$0.60	-\$0.10	-14%	-\$1.40	-\$2.40	-\$2.70	-\$0.60
<b>Passes</b>								
One Ride	\$1.50	\$1.50	\$0.00	0%	\$0.00	\$0.00	\$0.00	\$0.00
All Day	\$4.00	\$3.00	-\$1.00	-25%	-\$4.00	-\$3.00	-\$3.00	-\$1.00
Week Pass	\$14.00	\$11.00	-\$3.00	-21%	-\$3.00	-\$15.00	-\$6.00	-\$9.00
10 Ride	\$14.00	\$14.00	\$0.00	0%	\$0.00	\$0.00	\$0.00	\$0.00
10 Ride Student	\$7.50	\$7.50	\$0.00	0%	\$0.00	\$0.00	\$0.00	\$0.00
31 Day	\$40.00	\$30.00	-\$10.00	-25%	-\$280.00	-\$280.00	-\$410.00	-\$80.00
31 Day Senior, Disable and School Pass	\$28.00	\$20.00	-\$8.00	-29%	-\$280.00	-\$232.00	-\$320.00	-\$88.00
Total					-\$573.80	-\$538.10	-\$749.65	-\$180.70
Average Fare Increase					-\$2.44	-\$2.33	-\$1.95	-\$0.58
Percent Increase					<b>51%</b>	49%	<b>77%</b>	23%

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# **I. SRTA BOARD MEETING MINUTES SHOWING CONSIDERATION OF THE SEPTEMBER 2021 FARE EQUITY ANALYSIS**



## **Southeastern Regional Transit Authority (SRTA) Advisory Board Meeting**

**Date:** Thursday, September 30<sup>th</sup>, 2021

**Location:** Virtual Meeting via SRTA Cisco WebEx (2:00PM)

**Purpose:** FY21 SRTA Advisory Board

### (1) Call to Order

**The Advisory Board Chair called the meeting to order to at 2:10PM EST.**

### (2) Roll Call

Present:

City of New Bedford (Jennifer Clarke)  
Town of Dartmouth (Cody Haddad)  
Town of Mattapoisett (Michael Lorenzo)  
Rider Representative (Dan Robillard)

City of Fall River (Mayor Paul Coogan)  
City of Fall River (John Perry)  
Town of Westport (Richard Brewer)

Absent:

Town of Acushnet  
Town of Freetown  
Town of Somerset

ADA Representative  
Town of Swansea

Additional Attendees:

Erik Rousseau, SRTA  
Kristen Sniezek, SRTA  
Shayne Trimbell, SRTA  
Nancy Rezendes, SRTA

Maritza Aquino, SRTA  
Arthur Frank, General Counsel (SRTA)  
Amber Allen, SRTA

### (3) Approval of Minutes

**Motion: The motion was made (City of New Bedford) and seconded (Town of Westport) to prove the minutes from the previous June (06/14/21) SRTA Advisory Board Meeting.**

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**Discussion:** N/A

**Vote:**

**Westport, (Town of Mattapoisett dropped connectivity at this time), Riders' Representative**

**Status: Motion Passes**

**(3) Citizen's Participation**

No Citizen's Participation

**(4) Civil Rights Update**

*Title VI:* The SRTA's Title VI Plan has been submitted and is under FTA review and awaiting concurrence.

*Equal Employment Opportunity (EEO):*

The EEO Plan for South Coast Transit Management (SCTM) has been submitted and is under FTA review and awaiting concurrence.

*Disadvantaged Business Enterprise (DBE):*

The SRTA's DBE goals for FFY19-FFY21 has been submitted and is under FTA review and awaiting concurrence.

The SRTA's DBE Program Plan received concurrence in September 2017.

The June 1 semi-annual report was submitted and is under FTA review. The next semi-annual report is due December 1.

*Environmental Justice:*

Environmental justice is a requirement that the SRTA must engage the public whenever there is a major project or route change.

The SRTA is constantly working to increase public participation, and if any public input is needed, it will be conveyed to the Board as part of this report.

**6 Old Business**

*COVID-19 Response (<http://www.srtabus.com/covid19>):*

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Mr. Rousseau shared an update in this area. One of which is the FTA conducted a “spot check” on the CARES ACT funding. This funding has been utilized for the last 15 to 18 months. SRTA received a request for 3 of our drawdowns in the past year. Those were sampled by a team via the FTA to oversee the review. The report concurred no issues at this time but stated that the review was not a complete audit.

## (7) New Business

### FY20 Audit

Over the past month Hague, Sahady, & Co. has worked with SRTA to conduct the annual audit fieldwork. Hague, Sahady, & Co. reported that the Authority’s finance staff was well organized and made themselves available to provide assistance when requested. Hague, Sahady, & Co. has issued a clean opinion of both the FY20 financial statements, and the Single Audit, which is a separate audit of federal expenditures as required by Title 2 U.S. Code of Federal Regulations, Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance).

Total operating revenue decreased from \$2,073,848 in fiscal year 2020 to \$452,434 in fiscal year 2021 (a 78.2% decrease). The decrease is due to the economic effects of the COVID-19 pandemic. On March 17th, 2020, the Commonwealth of Massachusetts issued a stay at home order, which effected the 4th quarter fiscal year 2020 ridership for both fixed route and paratransit. The COVID-19 pandemic continued to effect FY21, as once the stay at home order was lifted, the Authority did not collect farebox revenues until the 4<sup>th</sup> quarter of FY21.

The total operating expenses have increased 3.7% over FY20

The operating assistance from the Commonwealth increased \$542,595 over FY20, which includes one-time discretionary awards for pilot programs.

The federal operating assistance increased by nearly \$2 million. During FY20 and FY21, the Authority received Federal CARES Act operating assistance under 49 USC Section 5307 direct funding. The Federal CARES Act funding expended by the Authority during fiscal year 2021 totaled \$10,312,803. Total funding awarded was \$21,043,483.

Capital assistance from the Commonwealth increased \$1,448,399 during FY21 and Federal capital assistance decreased \$1,317,046 during FY21 versus FY20.

Total Revenues (mostly farebox) ended the year \$50K better than projections.

Total Expenses (mostly related to fixed-route) ended the year \$12k more than projected but was covered by the modest outperformance on fares.

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### Questions:

Was there a management comment letter issued?

- Mr. Rousseau expressed that management comment letters are typically not used in public transit. In the event that errors are found, corrective measures are taken.

Could you go over why ridership has not rebounded to pre-COVID numbers?

- According to the National Transit Database, Mr. Rousseau stated that SRTA is currently ranked in the top 50 in ridership recovery. SRTA has specifically come back to about 78% of pre-pandemic levels. Mr. Rousseau went on to depict the culture of riders' habits and how they have diversified. This includes clusters of patrons riding transit during different parts of the day and evening. October will be the first true assessment of how SRTA has recovered from the pandemic as full fares resume. Additionally, October is customarily a high ridership month for SRTA.

What is the breakdown of the \$10 million in federal recovery funds utilized in FY20?

- Mr. Rousseau explained the \$10,312,803 was primarily allocated to SRTA's operating budget. Specifically, it covers shortfalls after state contract assistance, local assessments and auxiliary revenues are applied.

-

**Motion: The motion was made (Riders Representative) and seconded (Town of Westport) to adopt the FY 2020 Audit.**

**Discussion: N/A**

**Vote:**

**For: Town of Dartmouth, City of Fall River, Town of Mattapoisett, City of New Bedford, town of Westport, Riders Representative**

**Status: Motion Passes**

### Fare Update

Mr. Rousseau described the fare landscape. In March of 2021, the Board voted on a "step-up" fares that changed from \$1.50 to \$1.00 for all cash boardings and discounts for other pass products. This was to ease passengers into paying fares again and to start changing some of riders' habits. At the time of this vote, we were moving into pre-pandemic levels. For October 1<sup>st</sup>, when using the Charlie Cards, the full fare will now be a \$1.25 and there will be a change in the transfer policy for Charlie Card users. Passengers will have a 2 hour window to use the transfer and can board any bus, including making a round trip.

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There are also several discounts, up to 25% with the other passes, including the All Day Pass, the One Week Pass, the Regular 31 Day Charlie Card, and reduced fare passes. SRTA is diligently working to shift patrons away from cash as it is cumbersome. Cash payments slow boarding times and with the implementation of these discounts, SRTA's goal is to reduce the interaction time between the drivers and their passengers. In conjunction, the hope is that SRTA will also continue to regrow ridership.

Question:

What percentage of passengers pay cash for boarding?

- Mr. Rousseau responded that a large percentile of our customers pay cash. The average is about 40 to 45%.

**Motion: The motion was made (Riders Representative) and seconded (Town of Mattapoisett) to adopt the updated Fare Policy as presented.**

**Discussion: N/A**

**Vote:**

**Town of Dartmouth, City of Fall River, Town of Mattapoisett, City of New Bedford, Town of Westport, Riders Representative**

**Status: Motion Passes**

(8) Logistics for the Next Advisory Board Meeting

The next Advisory Board Meeting for the Southeastern Regional Transit Authority is anticipated to be held Thursday, October 21, 2021 at 2:00PM via Cisco WebEx – with any interim updates being circulated via email distribution. The virtual meetings shall continue through March of 2022.

(9) Adjournment

**The Advisory Board Chair called the meeting to adjournment at 2:38PM EST.**

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