



# Beaver County Transit Authority (BCTA)

## Title VI Plan

**June 1, 2019**

**Revision: January, 2020**

**Beaver County Transit Authority (BCTA)**  
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Rochester, PA 15074  
(724) 728-4255

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# INTRODUCTION

## BCTA's Commitment to Civil Rights

This update of Beaver County Transit Authority's (BCTA) Title VI Program has been prepared to ensure that the level and quality of BCTA's fixed route and demand response services are provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to BCTA's riders and other community members.

"No person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance."

-Civil Rights Act of 1964

Under the Civil Rights Act of 1964, and as a recipient of federal funding under the programs of the Federal Transit Administration (FTA) of the U.S. Department of Transportation (US DOT), BCTA has an obligation to ensure that:

- The benefits of its bus services are shared equitably throughout the service area;
- The level and quality of bus services are sufficient to provide equal access to all riders in its service area;
- No one is precluded from participating in BCTA's service planning and development process;
- Decisions regarding service changes or facility locations are made without regard to race, color or national origin and that development and urban renewal benefitting a community as a whole not be unjustifiably purchased through the disproportionate allocation of its adverse environmental and health burdens on the community's minority population; and
- A program is in place for correcting any discrimination, whether intentional or unintentional.

This program contains all of the elements required of a transit provider operating in an urbanized area of 200,000 or more in population and operating less than fifty vehicles in peak service. It is effective as of July 1, 2019. It has been prepared using data from the most recent (Year 2010) U.S. Census. **The content of the program including the service standards was approved and adopted by the Board at a meeting on May 21, 2019.**

# GENERAL REQUIREMENTS

## Notice to the Public

To make BCTA's riders aware of its commitment to Title VI compliance, and of their right to file a civil rights complaint, BCTA has presented the following language on its website [bcta.com](http://bcta.com), on posters, and at its bus facilities:

### Your Civil Rights

Beaver County Transit Authority (BCTA) operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI may file a complaint with BCTA. For more information on BCTA's civil rights program and the procedures to file a complaint, please contact 724-728-4255; email [TitleVI@bcta.com](mailto:TitleVI@bcta.com) or visit our administrative office at 200 W. Washington Street, Rochester, PA 15074 from 5:30 a.m. to 7:30 p.m. Monday through Friday. For more information about BCTA programs and services, visit [www.bcta.com](http://www.bcta.com). If information is needed in another language, please contact 724-728-4255.

Complainants may also file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE. Washington, DC 20590

Beaver County Transit Authority (BCTA) grants all citizens equal access to all its transportation services. It is further the intent of BCTA that all citizens are aware of their rights to such access. This site is designed to serve as an educational tool for citizens so that they may understand one of the civil rights laws that protect their benefit of BCTA programs and services, specifically, as it relates to Title VI of the Civil Rights Act of 1964.

## What is Title VI?

Title VI is a section of the Civil Rights Act of 1964 requiring the "No person in the United States shall on the grounds of race, color or national origin, be excluded from participating in, be denied the benefits of, or be subjected to discrimination under any programs or activity receiving federal financial assistance." Note that Title VI does not address gender discrimination. It only covers race, color and national origin. Other Civil Rights laws prohibit gender discrimination.

BCTA operates its programs without regard to race, color, or national origin.

## **Discrimination Complaint Procedures**

BCTA has established a process for riders to file a complaint under Title VI. Any person who believes that she or he has been discriminated against on the basis of race, color, or national origin by BCTA may file a Title VI complaint by completing and submitting the agency's Title VI Complaint available at our administrative offices or on our website [TitleVI@bcta.com](mailto:TitleVI@bcta.com).

## **BCTA's Complaint and Investigation Procedures**

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990, for alleged discrimination in any program or activity administered by BCTA.

These procedures do not deny the right of the complainant to file formal complaints with other State or Federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of information mediation meeting(s) between the affected parties and BCTA may be utilized for resolution. Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited under Title VI and related statutes may file a complaint.

The following measures will be taken to resolve Title VI complaints:

1. A formal complaint must be filed within 180 days of the alleged occurrence. Complaints shall be in writing and signed by the individual or his/her representative, and will include the complainant's name, address and telephone number; name of alleged discriminating official, basis of complaint (race, color, national origin, sex, disability, age, limited English), and the date of alleged act(s). A statement detailing the facts and circumstances of the alleged discrimination must accompany all complaints.

BCTA strongly encourages the use of BCTA's "Title VI Complaint Form" when filing official complaints.

The preferred method is to file your complaint in writing using the Title VI Complaint Form, and sending it to:

Title VI Coordinator  
BCTA  
200 W. Washington Street  
Rochester, PA 15074

2. *In the case where a complainant is unable or incapable of providing a written statement*, a verbal complaint of discrimination may be made to the BCTA Title VI Coordinator. Under these circumstances, the complainant will be interviewed, and the BCTA Title VI Coordinator will assist the Complainant in converting the verbal allegations to writing.
3. When a complaint is received, the Title VI Coordinator will provide written acknowledgment to the Complainant, within ten (10) days by registered mail.
4. If a complaint is deemed incomplete, additional information will be requested, and the Complainant will be provided 60 business days to submit the required information. Failure to do so may be considered good cause for a determination of no investigative merit.
5. Within 15 business days from receipt of a complete complaint, BCTA will determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant investigation. Within five (5) days of this decision, the General Manager or his/her authorized designee will notify the Complainant and Respondent, by registered mail, informing them of the disposition.
  - a. If the decision is not to investigate the complaint, the notification shall specifically state the reason for the decision.
  - b. If the complaint is to be investigated, the notification shall state the grounds of BCTA's jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting the investigator.
6. When BCTA does not have sufficient jurisdiction, the General Manager or his/her authorized designee will refer the complaint to the appropriate State or Federal agency holding such jurisdiction.
7. If the complaint has investigative merit, the General Manager or his/her authorized designee will instruct the Title VI Coordinator to fully investigate the complaint. A complete investigation will be conducted, and an investigative report will be submitted to the General Manager within 60 days from receipt of the complaint. The report will include a narrative description of the incident, summaries of all persons interviewed, and a finding with recommendations and conciliatory measures where appropriate. If the investigation is delayed for any reason, the Title VI Coordinator will notify the appropriate authorities, and an extension will be requested.
8. The General Manager or his/her authorized designee will issue letters of finding to the Complainant and Respondent within 90 days from receipt of the complaint.
9. If the Complainant is dissatisfied with BCTA's resolution of the complaint, he/she has the right to file a complaint with the Federal Transit Administration Office of

Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE. Washington, DC 20590

10. For more information on the BCTA civil rights program, and the procedures to file a complaint, contact (724) 728-4255, visit [www@bcta.com](http://www@bcta.com), email [TitleVI@bcta.com](mailto:TitleVI@bcta.com) or visit our administrative office at 200 West Washington Street, Rochester, PA 15074

# Complaint Form

## Complaint Form

Instructions: If you would like to submit a Title VI complaint to the Beaver County Transit Authority (BCTA), please fill out the form below and send it to: BCTA, Attn: Title VI Coordinator, 200 W. Washington Street, Rochester, PA 15074. For questions or a full copy of BCTA's Title VI policy and complaint procedures call 724-728-4255, visit [www.bcta.com](http://www.bcta.com) or email [TitleVI@bcta.com](mailto:TitleVI@bcta.com).

1. Name (Complainant):
2. Phone:
3. Home Address (Street No., City, State, Zip):
4. If applicable, name of person(s) who allegedly discriminated against you:
5. Location and position of person(s) if known:
6. Date of Incident:
7. Discrimination because of:
<input type="checkbox"/> Race
<input type="checkbox"/> National Origin
<input type="checkbox"/> Color
8. Explain as briefly and clearly as possible what happened and how you believe you were discriminated against. Indicate who was involved. Be sure to include how you feel other persons were treated differently than you. Also, attach any written material pertaining to your case.

9. Why do you believe these events occurred?
10. What other information do you think is relevant to the investigation?
11. How can this/these issue(s) be resolved to your satisfaction?
12. Please list below any person(s) we may contact for additional information to support or clarify your complaint (witness):
Name:
Address:
Phone Number:
13. 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
<input type="checkbox"/> Federal Agency
<input type="checkbox"/> Local Agency
<input type="checkbox"/> Federal Court
<input type="checkbox"/> State Agency
<input type="checkbox"/> State Court
If filed at an agency and/or court, please provide information about a contact person at the agency/court where the complaint was filed.
Agency / Court:
Contact's Name:
Address:
Phone Number:
A customer may also choose to file a complaint directly with the Federal Transit Administration Office of Civil Rights at the following address and phone number: East Building 5 <sup>th</sup> Floor – TCR 1200 New Jersey Avenue., SE. Washington, DC 20590 Phone: (888) 446-4511 for assistance.
Signature (Complainant):

## **ACTIVE LAWSUITS, COMPLAINTS, OR INQUIRIES ALLEGING DISCRIMINATION**

As of the writing of this program, there have not been any Title VI complaints since the last BCTA Title VI update in 2016.

# **BCTA'S PUBLIC PARTICIPATION PLAN**

## **Key Principles**

BCTA's Public Participation Plan (PPP) has been prepared to ensure that no one is precluded from participating in BCTA's service planning and development process. It ensures that:

- Potentially affected community members will have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health;
- The public's contribution can influence BCTA's decision making;
- The concerns of all participants involved will be considered in the decision-making process; and
- BCTA will seek out and facilitate the involvement of those potentially affected.

Through an open public process, BCTA has developed a public participation plan to encourage and guide public involvement efforts and enhance access to BCTA's transportation decision-making process by minority and Limited English Proficient (LEP) populations. The public participation plan describes the overall goals, guiding principles and outreach methods that BCTA uses to reach its riders.

## **Limited English Proficient (LEP)**

LEP refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

## **Early, Continuous and Meaningful**

The steps outlined in the public participation plan offer early (in the planning process), continuous and meaningful opportunities for the public to be involved in the identification of social, economic and environmental impacts of proposed transportation decisions at BCTA. It is a guide for how BCTA engages its diverse community. BCTA may continue to improve its public participation methods over time based on feedback from all of its riders and community members including low-income, minority and LEP populations as well as customer and community-based organizations.

## Goals of the Public Participation Plan

The overarching goals of BCTA's Public Participation Plan include:

- **Clarity in Potential for Influence** – The process clearly identifies and communicates where and how participants can have influence and direct impact on decision making.
- **Consistent Commitment** – BCTA communicates regularly, develops trust with riders and our community and builds community capacity to provide public input.
- **Diversity** – Participants represent a range of socioeconomic, ethnic and cultural perspectives, with representative participants including residents from low income neighborhoods, ethnic communities and residents from Limited English Proficiency.
- **Accessibility** – Every reasonable effort is made to ensure that opportunities to participate are physically, geographically, temporally, linguistically, and culturally accessible.
- **Relevance** – Issues are framed in such a way that the significance and potential effect is understood by participants.
- **Participant Satisfaction** – People who take the time to participate feel it is worth the effort to join the discussion and provide feedback.
- **Partnerships** – BCTA develops and maintains partnerships with communities through the methods described in its public participation plan.
- **Quality Input and Participation** – That comments received by BCTA are useful, relevant and constructive, contributing to better plans, projects, strategies and decisions.

## Objectives of the Public Participation Plan

BCTA's Public Participation Plan is based on the following principles:

- **Flexibility** – The engagement process will accommodate participation in a variety of ways and be adjusted as needed.
- **Inclusiveness** – BCTA will proactively reach out to and engage low income, minority and LEP populations from the BCTA service area.
- **Respect** – All feedback will be given careful and respectful consideration.
- **Proactive and Timeliness** – Participation methods will allow for early involvement and be ongoing.
- **Clear, Focused and Understandable** – Participation methods will allow for early involvement and be ongoing.
- **Honest and Transparent** – Information provided will be accurate, trustworthy and complete.
- **Responsiveness** – BCTA will respond and incorporate appropriate public comments into transportation decisions.
- **Accessibility** – Meetings will be held in locations which are fully accessible and welcoming to all area residents, including, but not limited to, low-income and minority members of the public and in locations relevant to the topics being presented and discussed.

BCTA will use its public participation plan when considering fare changes, modifications to routes and major schedule changes, and new transit facility projects when:

- BCTA consistently updates its “stakeholder” list of human service agencies and other organizations affected by fare increases and service changes. BCTA maintains a stakeholder list on the 2019 fixed route service reorganization plan and a shared ride fare increase.
- Any system-wide service reduction or service enhancement of more than 25% of both revenue hours and revenue miles of BCTA's total fixed route system.

## **BCTA's Public Participation Process**

### **Selection of Meeting Locations**

At a minimum, BCTA will hold public participation meetings, including public hearings, at the Rochester Transportation Center. This location is accessible to both fixed route and shared ride bus riders throughout the Beaver County area.

### **Addressing Comments**

#### **The Incorporation of Public Comments into Decisions**

All comments received through the public participation plan on fare changes or major service changes are given full consideration. There are a number of different ways riders or members of the community can comment (mail, email, public meetings and others). All ways will be considered by BCTA.

### **Identification of Stakeholders**

#### **Our Community Partners**

Stakeholders are those who are either directly or indirectly affected by a plan, or the recommendations of that plan. Those who may be adversely affected, or who may be denied benefit of a plan's recommendation(s), are of particular interest in the identification of specific stakeholders. Stakeholders can come from a number of groups including general citizens/residents, minority and low-income persons, public agencies, and private organizations and businesses. While stakeholders may vary based on the plan or program being considered, BCTA has assembled a listing of stakeholders with whom we regularly communicate through email and direct mail. A complete list of BCTA's community stakeholders was recently updated for the proposed fixed route service change and shared ride fare increase. Public hearings were held in 2017 for fare increases for fixed route and DART service and termination of the Midland Flex Route. The hearings followed an opportunity to comment in writing for consideration in any decision making.

#### **Stakeholder List**

Any community organization or person can be added to BCTA's stakeholder list and receive regular communications regarding service changes by contacting the BCTA administrative office at (724) 728-4255. Local organizations and businesses can also request that a speaker from BCTA attend their regular meeting at the same number or through the BCTA website [TitleVI@bcta.com](mailto:TitleVI@bcta.com).

This stakeholder list is quite comprehensive and includes agencies that serve low income and minority populations. However, please note that there is a lack of any social service, professional, or leadership organization within the Beaver County area that focuses on outreach or membership of LEP individuals.

BCTA utilized the stakeholder list for involvement in public hearings for BCTA's DART and fixed route fare increases and the Midland Flex Route termination. There were no requests for language assistance for the hearings.

## **LANGUAGE ASSISTANCE PLAN**

### **Improving Access for People with Limited English Proficiency**

In order to ensure meaningful access to programs and activities, BCTA used the information obtained in a Four Factor Analysis to determine the specific language services that are appropriate. This analysis helps BCTA to determine if it communicates effectively with LEP persons and informs language access planning.

The **Four Factor Analysis** is a local assessment that considers:

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

#### **Factor 1 – Number of LEP Persons in Service Region**

The first step in determining the appropriate components of a Language Assistance Plan is understanding the proportion of LEP persons who may encounter BCTA's services, their literacy skills in English and their native language, the location of their communities and neighborhoods and, more importantly, if any are underserved as a result of a language barrier.

To do this, BCTA evaluated the level of English literacy and to what degree people in its service area speak a language other than English and what those languages are. Data for this review is derived from the United States Census Bureau from 2010.

### **Beaver County Overview**

BCTA’s service system encompasses a 444 square mile area of Beaver County, Pennsylvania. BCTA evaluated the 2007-2011 American Community Survey 5-year estimates of “Language Spoken at Home by Ability to Speak English for the Population Five Years and Over” to determine the most populous groups of non-English speaking residents.

### **Speak English Less than Well (County)**

This data reveals that at the county level, there are no significant non-English speaking populations which report speaking English less than well. Refer to the table below:

<b>Speak English “Less than Very Well”</b>	<b>Population</b>	<b>Total</b>
Spanish or Spanish Creole	2005	0.2%
Italian	1095	0.2%
Greek	499	0.1%
Serbo-Croatian	432	0.1%
Chinese	261	0.1%

### **Factor 2 – Frequency of LEP Use**

BCTA’s Route Surveyor conducts NTD surveys and notes any LEP issues on the surveys. During the three-year period, the surveys have not depicted any LEP issues. They would be noted directly on the Survey form.

### **Factor 3 – The Importance of BCTA Service to People’s Lives**

Access to the services provided by BCTA, both fixed route and demand response are critical to the lives of many in the region. Many depend on BCTA’s fixed route services for access to jobs and for access to essential community services like schools, shopping and medical appointments. Because of the essential nature of the services and the importance of these programs in the lives of many of the region’s residents, there is a need to ensure that language is not a barrier to access.

However, we should note that there are no large geographic concentration of any one type of LEP individuals in the BCTA service area. The overwhelming majority of the population, 95.9% or 155,482, speak only English.

## **Factor 4 – Resources and Costs for LEP Outreach**

BCTA assessed its available resources that could be used for providing LEP assistance. This included identifying how much a professional interpreter and translation service would cost on an as needed basis, which documents would be the most valuable to be translated if and when the populations supports, taking an inventory of available organizations that BCTA could partner with for outreach and translation efforts, and what level of staff training is needed. After analyzing the four factors, BCTA developed the plan outlined in the following section for assisting persons of limited English proficiency.

## **LIMITED ENGLISH PROFICIENCY PLAN OUTLINE**

### **How to Identify an LEP Person who Needs Language Assistance**

Below are tools to help identify persons who may need language assistance:

- Examine records requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings;
- When BCTA sponsored workshops or conferences are held, set up a sign-in sheet table, have a staff member greet and briefly speak to each attendee. To informally gage the attendee's ability to speak and understand English, ask a question that requires a full sentence reply.
- Have the Census Bureau's "I Speak Cards" at the workshop or conference sign-in sheet table. While staff may not be able to provide translation assistance at this meeting, the cards are an excellent tool to identify language needs for future meetings. Also, have the cards available at the BCTA Transit Center Customer Service Area; and
- Conduct periodic surveys of bus riders on all fixed routes to determine the need for LEP assistance.

### **Language Assistance Measures**

The BCTA has or will implement the following LEP procedures. The creation of these steps are based on the very low percentage of persons speaking other languages or not speaking English at least "well", and the lack of resources available in the BCTA service area:

- Census Bureau's "I Speak Cards" are to be located at the Customer Service window in the Transit Center at all times.

- The computer(s) located at the Customer Service window in the Transit Center have Google Translate added to the favorites listing for easy access via Microsoft Internet Explorer for the translations of blocks of texts. This will aid the BCTA staff in the interpretation of services on a one-on-one basis for LEP individuals visiting the BCTA Transit Center.
- When an interpreter is needed, in person or on the telephone, and the BCTA staff has exhausted the above options, staff will first attempt to determine what language is required. Staff shall use the telephone interpreter service – Language Line Services at <http://www.language.com>. On the Language Line home page, the staff will select the Need an Interpreter Now link and follow the directions to receive and access code.

## **BCTA Staff Training**

All BCTA Customer Service staff and their supervisor will be provided with the LEP Plan and will be educated on procedures to follow. This information will also be part of the BCTA staff orientation process for new hires in that department. Training topics are listed below:

- Understanding the Title VI policy and LEP responsibilities;
- What language assistance services the BCTA offers;
- Use of LEP “I Speak Cards”;
- How to access Google Translate via the Customer Service computer(s) in the BCTA Transit Center;
- How to use the Language Line interpretation and translation services;
- Documentation of language assistance requests;
- How to handle a Title VI and/or LEP complaint.

## **Outreach Techniques**

Here are a few options that the BCTA will incorporate when and/or if the need arises for LEP outreach:

- If staff knows that they will be presenting a topic that could be of potential importance to an LEP person or if staff will be hosting a meeting or a workshop in a geographic location with a greater concentration of LEP persons, meeting notices, fliers, advertisements, and agendas will be printed in an alternative language, based on known LEP population in the area.

- When running a general public meeting notice, staff will insert the clause, based on the LEP population and when relevant, that translates into “A (insert alternative Language) translator will be available”. For example: “Un traductor del idioma espanol estara disponible”. This means “A Spanish translator will be available”.
- Key print materials, including but limited to schedules and maps, will be translated and made available at the BCTA Transit Center, on board vehicles and in communities if a specific and concentrated LEP population is identified.

### **Monitoring and Updating the LEP Plan**

This plan is designed to be flexible and is one that can be easily updated. At a minimum, BCTA will follow the Title VI Program update schedule for the LEP Plan. Major updates most likely will not occur until the next Census unless BCTA finds it necessary and crucial for an update before such time.

Each update should examine all plan components such as:

- How many LEP persons were encountered
- Were their needs met;
- What is the current LEP population in BCTA service area;
- Has there been a change in the types of languages where translation services are needed;
- Is there still a need for continued language assistance for previously identified BCTA programs? Are there other programs that should be included
- Have BCTA’s available resources, such as technology, staff, and financial costs changed;
- Has BCTA fulfilled the goals of the LEP Plan and
- Were any complaints received?

### **Dissemination of the BCTA Limited English Proficiency Plan**

BCTA includes the LEP plan (and the entire Title VI plan) on the BCTA website ([www.bcta.com](http://www.bcta.com)) together with its Title VI Policy and Complaint Procedures. The BCTA’s Notice of Rights under Title VI to the public posted in the BCTA Transit Center,

on all BCTA vehicles, and in selected printed materials also refers to the LEP Plan's availability.

Any person, including social service, non-profit, and law enforcement agencies and other community partners with internet access will be able to access the plan.

Copies of the LEP Plan will be provided, on request, to any person(s) requesting the document via phone, in person, by mail or email. LEP persons may obtain copies/translations of the plan upon request.

Any questions or comments regarding this plan should be directed to the BCTA Title VI Coordinator.

BCTA Title VI Coordinator  
BCTA  
200 W. Washington St.  
Rochester, PA 15074  
Phone: 724-728-4255  
Fax: 724-728-8333  
Email: [TitleVI@bcta.com](mailto:TitleVI@bcta.com)

## DECISION MAKING BODIES

### BCTA Non-Elected Committees and Councils – June 2016

BCTA does not have any transit-related non-elected planning or advisory boards. BCTA finds its *Complaint Procedure* to be more effective and far-reaching than creating a formal meeting group that would enable only select group members to repeatedly attend meetings. For many years now, BCTA has continued to make a variety of system improvements that come as a result of information received directly from our passengers. BCTA's *Complaint Procedure* enables all passengers to provide feedback to and have interaction with BCTA staff at any time, on an ongoing basis, via any possible method of contact. Methods of contact that passengers most often choose to employ are telephone, in person at Rochester's Customer Information Center, email, and mailed letters. In these ways, BCTA's door is always open to all passenger groups.

## SERVICE STANDARDS AND POLICIES

BCTA developed a number of service standards and policies related to Title VI. Standards include Vehicle Load, Vehicle Headway, On Time Performance, and Service Availability. Policies include Transit Amenities and Vehicle Assignments. **These standards and policies were approved by BCTA's Board on May 20, 2019 and are discussed below.**

- **Vehicle Load Factor**
  - BCTA's vehicle load factor standard consists of the following:
    - **BCTA maintains a load factor standard of 1 seat for every 1 ½ passengers (1:1.5).** However, if a certain trip consistently has standees (load factor of over 1:1), BCTA will typically begin to evaluate the feasibility of 1) redistributing ridership with schedule changes and/or 2) shortening the headway in order to correct the problem.

BCTA's average peak vehicle load factors within both minority and non-minority communities adhere to the above standard of 1 seat for every 1.5 passengers. This is based on BCTA's procedure of requiring all operators to report standees on buses at any time during a vehicle's revenue service. BCTA discourages standees anywhere throughout the system based on its exceptional safety protocol as well as transit planning considerations. BCTA's average peak vehicle load is less than 1:1. It follows then that BCTA's average peak vehicle load is also significantly below the standard of 1:1.5.

**BCTA's Operations Supervisor is responsible for reporting and monitoring standees on all fixed routes.** Express service adjustments have been made including increasing headways and adjusting times. There are minor standee issues from time to time on local routes, however BCTA within its established

standard. Service changes implemented on May 6, 2019 will be closely monitored for standee issues. Additional changes may be implemented September 3, 2019.

- **Vehicle Headway**

- BCTA's headway standards consist of the following:
  - A minimum headway of no greater than 1 hour and 15 minutes for all fixed routes in the central urban core of the County. This standard is adequate to accommodate demand within the urban core, or centrally located riverbed communities, without vehicle overcrowding pursuant to BCTA's Load Factor standard.
  - For express commuter services, headways vary based on ridership and service is only available at peak hours.
  - For Route 1 commuter service, the headway varies from approximately 30 minutes at peak to 1 hour non-peak. There is a modest gap in mid-day service that extends into Pittsburgh due to lower ridership.
  - The Midland Flex Route was terminated May 1, 2017 due to limited ridership; however, shared ride service remains an option for riders.

Below is a summary of planned headways by routes to be effective September 3, 2019.

- **Route 1 (local, long-haul commuter route):** 30 minutes peak, approximate 1 hour off-peak, mid-day less frequent.
- **Route 2 (local, short-haul route):** approximate 1 hour
- **Route 3 (express, long-haul commuter route):** two (2) - a.m. peak hour trips and two (2) - p.m. peak hour trips.
- **Route 4 (express, long-haul commuter route):** five (5) a.m. peak hour trips and five (5) p.m. peak hour trips.
- **Route 11 (local, short-haul route):** approximate 1 hour

With the exception of Route 4, all BCTA routes serve communities with concentrations of minorities. It is clear that headways are consistent in both groups.

Note: BCTA expanded its span of service hours in July, 2009 for local, in-county service which currently includes Routes 1 and 2. This does not affect the headways of each route. However, an expanded span of service provides transportation for more diverse work – and school – shifts, including entry level employment. This increase includes both minority and non-minority/low income municipalities. The greatest fixed route service levels are non-express to disadvantaged groups.

- **On Time Performance**

BCTA’s definition of “on-time” is no greater than five (5) minutes “late” and one minute “early” no less than 90% of the time. BCTA’s on-time standard applies at the route and run level and to certain bus stops. The standard of 90% is applied less on-time issues associated with inclement weather, highway construction and/or the need for alternative routing.

PADOT will be purchasing a new CAD-AVL system for BCTA which will include automated passenger counters and real time information for customers on its fixed route service. BCTA will be better positioned to monitor on-time performance.

The primary BCTA personnel responsible for monitoring on-time performance, passenger loads, and other operations measures is the Operations Supervisor and the team of dispatchers.

All employees in these positions will be fully trained on the new AVL system and can fully utilize the system to gauge on time performance. The new system installation will occur in July, 2019 and the project will be completed around December, 2019.

- **Service Availability**

The availability of service includes consideration of the following factors: ridership productivity relative to other BCTA routes, transit/pedestrian friendly streets, density of transit-dependent population, relationship to the Regional (SPC) Transportation Plan, relationship to major transportation developments, land use connectivity, and transportation demand management.

- BCTA service standard for accessibility is ¼ mile or less from a bus route, and/or 4 miles or less from a park and ride lot.
- These two standards apply to all communities including those with concentrations of minorities.
- Access to park and ride lots from minority communities within the BCTA service area is addressed below.
- Each minority community within the BCTA service area has access to at least one BCTA transit route.

Aliquippa:	Route 2
Ambridge	Routes 1 and 2
Beaver Falls	Route 1
New Brighton	Route 1
Rochester	Routes 1, 2, 3, and 11
White Township	Route 1

BCTA's analysis of the entire service system relative to these policies and standards is discussed below.

- **Vehicle Assignment**

- **BCTA's vehicle assignment standards consist of the following:**
  - **Size** is the most important factor, as certain vehicles are purchased for specific routes. 40 foot transit buses and 45-foot coaches are reserved for commuter trips. 35 foot low transit vehicles are utilized for non-commuter services. Smaller transit buses are used for shared ride services to accommodate the smaller level of demand and enhance maneuverability along narrow local streets. BCTA replaced two-thirds of its fixed route fleet and one half of its shared ride fleet over the last two + years.
  - Once the appropriate vehicle size has been determined, the **age** of the vehicle is also considered. All other things being equal, older vehicles are reserved for backup and emergency use.
  - When assigning a vehicle, BCTA also considers the **maintenance** needs of each bus. Periodically, even the newest transit vehicle will need to be pulled from service for preventative maintenance, state inspection, or accident repair. In these instances, older backup vehicles are used until newer vehicle can be placed back into service.
- The vehicles assigned to transit service in minority/low income communities are consistent with the above standards. The buses are rotated throughout the system to ensure even mileage and access to newer equipment.
  - **Routes 1, 3, and 4:** 45-foot coaches, three Route 1 buses were replaced with 3- 40 foot low floor transit buses in Fall, 2017. Most Route 1 buses are newer.
  - **Routes 2 and 11:** 35-foot low-floor vehicle or small accessible transit – all newer buses and serving lower income communities.
- As 4 of the 5 BCTA routes each serve a variety of both non-minority and minority communities, there is no discrepancy in vehicle assignment offered between the two groups.

- **Distribution of Transit Amenities**

- **Bus Stop Shelters:** BCTA's standard is that at least 20 passengers per day must board at the bus stop. Eight new customer shelters were installed in in 2017. Five of the eight shelters are located in minority communities.
- **Park and Ride Lots:** BCTA's standard is to provide an accessible park and ride location to at least 75% of municipalities within the BCTA service area, pursuant to the 4-mile BCTA accessibility standard. Based on this standard, all urban core communities (100%) meet this standard.
- **Transportation Centers:** BCTA's standard is to provide a transportation center within at least one minority community and at least one non-minority community within the BCTA service area. One minority community (Rochester) hosts a BCTA transportation center.
- **Ticket Sales Outlets:** BCTA's standard is that at least 40% of minority communities within BCTA's service area have at least one ticket outlet. Three minority communities in BCTA's service area have at least one ticket outlet. Currently three communities have outlets: Aliquippa, Baden, and Rochester. BCTA recently lost an outlet in Beaver Falls and we are looking for a replacement. Thus far, we have unsuccessfully located an outlet in the community of Beaver Falls; however, BCTA meets the 40% standard.

## **Title VI Equity Analysis**

When BCTA plans to construct or expand a facility, including a vehicle storage facility, maintenance facility, transit hub or operation center, the agency will include a copy of the Title VI Equity Analysis conducted during the planning stage with regard to the location of the facility. The following principles will be applied in the analysis:

1. To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations;
2. To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process; and
3. To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

BCTA will follow federal guidance provided in FTA Circular 4703.1 (August 2012) and any updates thereafter.

## **PROGRAM SPECIFIC REQUIREMENTS**

### **Title VI Monitoring**

Mary Jo Morandini, General Manager

### **Sub Recipient Compliance**

During this report period, BCTA did not engage with any sub recipients.

### **Equity Analysis for Facility**

During the past three years, BCTA has not constructed a vehicle storage, operations center or maintenance facility.

### **Demographic Service Profile**

Because BCTA operates fewer than 50 buses in peak service, a demographic service profile was not prepared for this plan update.

## **CONTACT**

For additional information on the Beaver County Transit Authority's Title VI Plan, or its efforts to comply with the Civil Rights Act of 1964 or Executive Order 13166 Improving Access to Services for Persons with Limited English Proficiency, please contact:

Mary Jo Morandini  
General Manager  
Beaver County Transit Authority  
200 W. Washington Street  
Rochester, PA 15074  
Tel: (724) 728-4255  
Email: maryjom@bcta.com

### **Board Adoption of Policy**

The BCTA Board of Directors unanimously adopted the updated Title VI plan at their regular monthly meeting on May 21, 2019.

- **Title VI Plan Approval**

Ms. Morandini presented a Power Point summarizing BCTA's draft Title 6 Plan for period July 2019 – June 2021. The Title VI Policy Statement, Activities, and Standards were reviewed with the Board.

**MOTION: IT WAS MOVED BY MRS. RUBINO AND SECONDED BY MR. THOMPSON-GRAVES TO ADOPT THE TITLE 6 PLAN DATED JULY 1, 2019 AS PRESENTED BY THE GENERAL MANAGER. THE MOTION CARRIED UNANIMOUSLY.**

- **Finance Committee**
- **Capital Improvements Committee – No Report**
- **Service Committee – No Report**
- **Risk Management Committee – No Report**

8. **Staff Reports**

a. **Planning and Administration**

- **Duquesne Light Right-of-Way Request**

Mr. Woodske reported that Duquesne Light sent BCTA a Right-of-Way Agreement dated May 21, 2019. He stated that the agreement has already been seen by Mr. Ober and Mr. Morley. Mr. Woodske stated that it is a standard form, requiring Mr. Ober's signature.

**MOTION: IT WAS MOVED BY MRS. RUBINO AND SECONDED BY MR. MORLEY TO APPROVE THE DUQUESNE LIGHT RIGHT OF WAY AGREEMENT DATED MAY 21, 2019 AND AUTHORIZING THE CHAIRMAN TO SIGN SAME. THE MOTION CARRIED UNANIMOUSLY.**

**Meeting of the Board of Directors  
June 25, 2019  
4:00 p.m.  
BEAVER COUNTY TRANSIT AUTHORITY**

*BCTA Transportation Center  
200 W. Washington Street  
Rochester, PA 15074*

**1. Roll Call**

Present were: Chairman Richard Ober, Gerard Gloekler, Jerry Hodge, Jacqueline Evans, Larry Morley, and Scott Thompson-Graves

Absent were: Laura Rubino and James Sampson

Staff present were: Mary Jo Morandini, Kathy Clark, Diane Frye, Rose Sutter, Steve Vardzel, and Chari Rae.

Also present was Bruce Woodske, Solicitor

**2. Approval of the Amended Agenda**

**MOTION: IT WAS MOVED BY MR. HODGE AND SECONDED BY MR. MORLEY TO APPROVE THE REVISED AGENDA. THE MOTION CARRIED UNANIMOUSLY.**

**3. Approval of the Minutes**

**MOTION: IT WAS MOVED BY MR. GLOEKLER AND SECONDED BY MR. MORLEY TO APPROVE THE MINUTES OF THE MAY 21, 2019 MEETING. THE MOTION CARRIED UNANIMOUSLY.**

**4. Report of the Treasurer**

Mr. Gloekler presented the Treasurer's Report for the month ending May 2019.

**MOTION: IT WAS MOVED BY MR. THOMPSON-GRAVES AND SECONDED BY MR. HODGE TO APPROVE THE TREASURER'S REPORT FOR THE MONTH OF MAY, 2019. THE MOTION CARRIED UNANIMOUSLY.**