



***Federal Transit Administration
Title VI Program***

Advance Transit, Inc.

August 17, 2023 - Plan Approval

(Plan expires 3 years from date approved by the board)

Title VI Plan Table of Contents


The **Advance Transit, Inc.** Title VI plan includes the following elements:

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Section 1: Title VI Plan Approval & Compliance Requirements

Title VI Plan
Adopted on: August 17, 2023

Adopted by: Advance Transit Board of Directors

Signature(s):  Adams Carroll, Executive Director,
Assistant Secretary of the Board of Directors

Approval:

Board of Directors Meeting Minutes

August 17, 2023 • 6:30pm • Virtual Meeting

Meeting Attendees

<i>Committee Members</i>		<i>Staff</i>	<i>Guests</i>
Bethany Fleishman	Matt Osborn	Adams Carroll	Mark Heyman
Nathan Miller	James L. Taylor	Jason Bilby	Ross McDonald
Kathie Nolet	Devin Wilkie	Ashley Manning	
Patrick O'Neill		Trish Palao	

I. Call to Order

At 6:31 pm on August 17, 2023, President Matt Osborn convened a meeting of the Board of Directors of Advance Transit, Inc., held online via Microsoft Teams.

II. Introduction of AT's new controller – Jason Bilby

Adams Carroll introduced Jason Bilby, AT's new controller.

III. Adoption of the Consent Agenda

The following documents were distributed for the board's review and approval in advance of the meeting:

- Minutes of the June 15, 2023 Board Meeting
- May 2023 Financial Statements
- Executive Director's Report

Patrick O'Neill motioned to approve the consent agenda. Devin Wilkie seconded. Motion carried.

IV. Approval of Updated Title VI Plan

Carroll presented changes to the Title VI plan, which requires an update every three years. Carroll explained the different issues covered by Title VI.

The most significant changes were the update of names (for example, updating info on AT's Executive Director) and of demographic information. The plan provides guidelines for more closely considering community members that AT serves and working towards effectively meeting their needs. This plan offers the most up-to-date data for AT to work with.

Nathan Miller motioned to adopt the Title VI plan as presented. Patrick O'Neill seconded. Motion carried.

V. EEO Plan – Presentation of Annual Statistical Analysis

AT now has over 50 employees, which means that it is required to submit demographic workforce data, including data by race/ethnicity, sex, and job categories.

Mark Heyman explained that AT has updated their EEO plan to incorporate a closer review of hiring practice and demographic data, as well as a greater commitment to statistical analysis.

AT is required to track, assess, and report by level of position, applications, hires, promotions, disciplinary action, and termination. To this end, AT has asked people to self-identify gender and race, using the standard protected categories. AT has refined the current method used to collect data to ensure that it is gathering the appropriate data needed for analysis.

AT has submitted this updated plan to the states of New Hampshire and Vermont. AT's submitted data includes information from the last 18 months. Moving forward, data will be organized by calendar year, beginning January 2024.

AT will take the following steps moving forward:

- Share information with outlets that reach a broader and more diverse population, such as Vermont Works for Women and Vermont Professionals of Color
- Collect data on an annual basis and review information every six months

Carroll shared that in order to effectively meet the objectives of AT's EEO and Title VI plans, it is necessary to have someone who is not involved in the hiring process or the day-to-day operations review data and procedures, as well. AT has named Trish Palao as EEO and Title VI officer, because her role works closely with the Operations and HR teams, but does not report to them, allowing for a more neutral perspective and assessment.

VI. Staff Reports

a. Audit update

On Monday and Tuesday (August 14-15), AT went through the field work phase of its annuals single audit process. The organization is waiting for the final approval from the auditor to close AT's books for FY23.

b. Expanded Service update

Ashley Manning reported on the Operations aspects of service expansion:

- AT has made great progress towards service expansion planning.
- Recently finalized the new drivers' bid, which has fewer split shifts and more straight shifts available; the drivers are very happy with this.
- Time trials were conducted three weeks ago, during which drivers ran the Saturday routes. The trials went well. Some minor changes were made to the schedules, which have now been finalized.
- Training for Saturday drivers is scheduled for the weekend before Saturday service begins (September 9).
- Bekka Cadwell has been prepping for the start of overtime.
- There have been destination sign changes and new bus stop signage installation.
- Manning and Carroll are in communication with Quail Hollow and Sachem Village to ensure all parties are aware of the upcoming service change.
- AT is partnering with Norwich Farmers Market on a Saturday-only bust stop.
- Paratransit Saturday shifts are on a volunteer basis; these are booked with drivers through December.

Trish Palao reported on the Marketing and Communications aspects of service expansion:

- Press release was distributed earlier in the month.
- Service expansion has received coverage from *Valley News* and Vermont Public.
- Other marketing efforts include: a direct mail campaign; radio advertisements; a potential appearance in a regional podcast; print advertisements; digital advertisements; handouts to be distributed to riders on board buses; flyers at key community locations.
- Outreach at local community events include a regular spot at the Lebanon Farmers Market and participation at the Upper Valley Electric Vehicle Expo in Lebanon at the end of September.
- Production is wrapping up on rider videos developed with Junction Arts and Media; filming to begin on a second series of videos highlighting stops on AT routes.
- The CDC recognizes that access to public transit is a social determinant of health, and has awarded AT a grant that will support public education, outreach, and awareness efforts and communications connected to service expansion.

VII. Other Business

Electric Vehicles: AT received a grant years ago for electric vehicles, which included the purchase of two large buses and three smaller vehicles. Because of supply issues, AT will revise the plan and possibly purchase one large bus instead of the three smaller vehicles.

Tri-State Transit Conference: Manning and Palao will be presenting at this regional transit conference in early September.

VIII. Adjourn

The meeting adjourned at 7:12 pm.

Respectfully submitted,

Rebecca Owens

Secretary

Annual Certifications and Assurances

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances. Primary recipients will collect Title VI assurances from sub-recipients prior to passing through FTA funds.

Advance Transit, Inc. will remain in compliance with this requirement by annual submission of certifications and assurances as required by NHDOT and VTrans.

The date of last submission of these certifications and assurances (at the time of this Plan's approval) is: January 31, 2023

Title VI Plan Revision Log

Date Month/day/year	Section Revised	Summary of Revisions
11/19/2020	Demographic Profile Data	Updated data using ACS data.
6/1/2023	Demographic Profile Data	Updated ACS data; Updated format

Section 2: Title VI Policy Statement

Policy Statement

Advance Transit, operating as a fixed route and demand response transit provider, as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the New Hampshire Department of Transportation (NHDOT), or Vermont Agency of Transportation (VTrans) will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the U.S. Department of Transportation implementing regulations, FTA Circular 4702.1B, and NHDOT Public Transportation requirements as specified in Master Grant Agreement, and State Management Plan. **Advance Transit** operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

Section 3: Notice to the Public

Title VI Notice to the Public

The **Advance Transit**'s Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

Advance Transit

- Advance Transit, Inc. 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 she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Advance Transit, Inc.
- For more information on Advance Transit's civil rights program, the procedures to file a complaint, or to file a complaint, please contact **Trish Palao, Director of Marketing** at **802-295-1824 x 204, (TTY 711)** email Tpalao@advancetransit.com; or visit our administrative office at **120 Billings Farm Rd. White River Jct., VT 05001**. For more information, visit www.advancetransit.com
- For transportation-related Title VI matters, a complaint may also be filed directly with the:

New Hampshire Department of Transportation, Attn: Shannon Aiton, Title VI Coordinator, PO Box 483, 7 Hazen Drive Concord, NH 03302-0483; 603-271-2467; TTY: 800-735-2964; titlevi@dot.nh.gov

Or

Vermont Agency of Transportation, Office of Civil Rights & Labor Compliance, 219 North Main St. Barre, VT 05641; 802-595-6959

Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

- If information is needed in another language, contact 802-295-1824

Advance Transit's Notice to the Public is posted in the public areas of the office and inside the transit vehicles.

1. Cabinet behind Driver in buses
2. Front Office Entryway
3. Labor Bulletin board

Section 4: Title VI Complaint Procedure

Advance Transit's Title VI Complaint Procedure is made available in the following locations:

- Agency website, if available: **www.advancetransit.com**
 - Hard copy in the central office
 - Agency Title VI Plan
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Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color, or national origin by **Advance Transit** may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

Any individual having filed a complaint or participated in the investigation of a complaint shall not be subjected to any form of intimidation or retaliation. Individuals who have cause to think that they have been subjected to intimidation or retaliation can file a complaint of retaliation following the same procedure for filing a discrimination complaint.

A complaint must be filed with **Advance Transit** no later than 180 days after the following:

1. The date of the alleged act of discrimination; or
2. The date when the person(s) became aware of the alleged discrimination; or
3. Where there has been a continuing course of conduct, the date on which that conduct was discontinued of the latest instance of the conduct.

Once the complaint is received, **Advance Transit** will review it to determine if our office has jurisdiction. A copy of each Title VI complaint received will be forwarded to the New Hampshire Department of Transportation or Vermont Agency of Transportation within ten (10) calendar days of receipt. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

Advance Transit has 45 days to investigate the complaint. If more information is needed to resolve the case, **Advance Transit** may contact the complainant requesting further information. The complainant has **30** business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within **30** business days, **Advance Transit** can administratively close the case.

After the investigator reviews the complaint, the agency will issue one of two (2) letters to the complainant: a closure letter or a letter of finding (LOF).

- ✓ A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- ✓ A letter of finding (LOF) summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant wishes to appeal the decision it must direct the appeal to the agency initially. The complainant has **10** days after the date of the closure letter or the letter of finding to do so. If there is outstanding concern, the appeal may be directed to the state DOT or FTA. The appeal process information will be included in the letter.

A person may also file a complaint directly with the: New Hampshire Department of Transportation, Attn: Shannon Aiton, Title VI Coordinator, PO Box 483, 7 Hazen Drive Concord, NH 03302-0483; 603-271-2467; TTY: 800-735-2964; titlevi@dot.nh.gov

Or

Vermont Agency of Transportation, Office of Civil Rights & Labor Compliance, 219 North Main St. Barre, VT 05641; 802-595-6959

Or

Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language, then contact **802-295-1824**.

Section 5: Title VI Complaint Form

The **Advance Transit's** Title VI Complaint Procedure is made available in the following locations:

- Agency website, if available: **www.advancetransit.com**
- Hard copy in the central office
- Agency Title VI Plan

Advance Transit Title VI Complaint Form

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
E-Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party:				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
Section III:				

I believe the discrimination I experienced was based on (check all that apply):

Title VI: Race Color National Origin

Other (specify): _____

Date of Alleged Discrimination (Month, Day, Year): _____

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.

Section IV

Have you previously filed a Civil Rights related complaint with this agency?	Yes	No
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Section V

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

Yes No

If yes, check all that apply:

Federal Agency: _____

Federal Court _____ State Agency _____

State Court _____ Local Agency _____

If marked Yes in Section V, please provide information about a contact person at the agency/court where the complaint was filed.

Name:

Title:

Agency:

Address:

Telephone:

Section VI

Name of agency complaint is against:
Contact person:
Title:
Telephone number:

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below

Signature

Date

Please submit this form in person at the address below, or mail this form to:

**Advance Transit
Trish Palao
120 Billings Farm Rd.
White River Jct. VT 05001
802-295-1824
ADA.manager@advancetransit.com**

Section 6: List of Transit Related Title VI Investigations, Complaints and Lawsuits

The **Advance Transit** maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit-related activities.

Check One:

 X There have been **no** investigations, complaint and/or lawsuits filed against us since the last plan submission.

 There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

Section 7: Public Participation Plan

Strategies and Desired Outcomes

To promote inclusive public participation, **Advance Transit** will employ the following strategies, as appropriate (make these determinations based on a demographic analysis of the population(s) affected, type of plan, program and/or service under consideration, and the resources available):

- ✓ Provide for early, frequent and continuous engagement by the public
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Use social media in addition to other resources as a way to gain public involvement
- ✓ Use radio, television or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.
- ✓ Expand traditional outreach methods by visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, local festivals, etc.

Public Outreach Activities

The public outreach and involvement activities conducted by **Advance Transit** since the last Title VI Program submission are summarized in the table below.

Specific Public Participation activities are listed in the table below:

Event Date	Advance Transit Staffer(s) or Department	Activity	Communication Method (Public notice, posters, social media)	Notes
	Trish Palao	Legal Notices / Hiring Ads	Newspaper	Service Changes Hiring Events
	Trish Palao	Post information about services	Website	Changes to Routes Notices Schedules and changes
5/16/2023	Trish Palao	Town Hall Meeting	Public Meetings	Meeting was to discuss new service options.
		Service Alerts	Social Media	Day to day changes (i.e Delays, re-routes)

Demographic Profile

Overall, the AT service area is overwhelmingly Caucasian and native born, with the exception of the census tracts in Hanover dominated by Dartmouth College and the adjacent tracts in Lebanon (see Table 1). Overall, 14.0% of residents are either Hispanic or of some race other than White, but in the tracts mentioned above, the figures are range between 17.1% and 31.5%, likely due to the presence of international students. Similarly, some 92% of residents overall were born in the United States, but in those four tracts, there were over 2,500 foreign-born individuals. People in poverty are somewhat less prevalent, with 7.4% of residents having incomes below the federal poverty line, reflecting the prosperity

of the Upper Valley region. Cells highlighted in red in Table 1 indicate that the percentage in that census tract is above the service area average, reflecting a “concentration” of individuals in that category.

Table 1: Demographic Characteristics of AT Service Area

County	Tract	Town	Total Pop.	Non-White or Hispanic Population	Pct.	Foreign Born	Pct.	Below Poverty Line	Pct.
Windsor, VT	9650	Norwich	3,584	286	8.0%	130	3.6%	198	5.5%
Windsor, VT	9655.01	South Hartford	3,516	299	8.5%	74	2.1%	286	8.1%
Windsor, VT	9655.02	North Hartford	2,655	255	9.6%	306	11.5%	306	11.5%
Windsor, VT	9656	White Riv. Jct./Wilder	4,433	403	9.1%	264	6.0%	284	6.4%
Grafton, NH	9614	Canaan	3,806	288	7.6%	74	1.9%	335	8.8%
Grafton, NH	9615	Enfield	4,496	90	2.0%	180	4.0%	548	12.2%
Grafton, NH	9616.01	Hanover East	2,799	397	14.2%	177	6.3%	51	1.8%
Grafton, NH	9616.03	Hanover N. Campus	5,801	1,826	31.5%	1,100	19.0%	187	3.2%
Grafton, NH	9616.04	Hanover Downtown	3,012	826	27.4%	418	13.9%	303	10.1%
Grafton, NH	9617.01	Lebanon North	4,660	798	17.1%	605	13.0%	240	5.2%
Grafton, NH	9617.02	Lebanon Downtown	3,451	757	21.9%	389	11.3%	276	8.0%
Grafton, NH	9618.01	Lebanon South including Plazas	2,585	112	4.3%	45	1.7%	177	6.8%
Grafton, NH	9618.02	West Lebanon	3,620	445	12.3%	110	3.0%	410	11.3%
TOTALS			48,418	6,782	14.0%	3,872	8.0%	3,601	7.4%

Only two tracts, the downtown portions of Hanover and Lebanon, have concentrations in all three measures. The three tracts that make up the Town of Hanover have concentrations of non-white individuals and the two that contain Dartmouth College have concentrations of foreign-born individuals. Wilder has the highest concentration of poverty outside of Lebanon.

As AT carries out public involvement activities, the figures in Table 1 will inform staff about where additional outreach is needed to encourage minorities and low-income individuals to participate in the process.

Section 8: Language Assistance Plan

Plan Components

As a recipient of federal US DOT funding, **Advance Transit** is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

Limited English Proficient (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. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

Advance Transit's Language Assistance Plan includes the following elements:

Item #1: The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.

Item #2: A description of how language assistance services are provided by language

Item #3: A description of how LEP persons are informed of the availability of language assistance service

Item #4: A description of how the language assistance plan is monitored and updated

Item #5: A description of how employees are trained to provide language assistance to LEP persons

Four Factor Analysis Methodology

To determine if an individual is entitled to language assistance and what specific services are appropriate, **Advance Transit** has conducted a *Four Factor Analysis* of the following areas: 1) Limited-English Proficient (LEP) Speaker Demography, 2) Contact Frequency, 3) Importance of Service, and 4) Resources and Costs.

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient. In addition to the number or proportion of LEP persons served, **Advance Transit** will identify:

- (a) How LEP persons interact with the recipient's agency;
- (b) Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language;
- (c) The literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice; and
- (d) Whether LEP persons are underserved by the recipient due to language barriers.

Factor 2: The frequency with which LEP persons come into contact with the program: Identifies and assesses the frequency **Advance Transit** staff comes into contact with LEP persons. Examples of contact could include:

- (a) Use of bus service;
- (b) Purchase of tickets through vending machines, outlets, websites, and over the phone;
- (c) Participation in public meetings;
- (d) Customer service interactions;
- (e) Ridership surveys;
- (f) Operator surveys.

Factor 3: The nature and importance of the program, activity, or service provided by the program to people’s lives. Generally speaking, the more important the program, the more frequent the contact and the likelihood that language services will be needed.

Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach. Resource and cost issues can often be reduced by technological advances, reasonable business practices, and the sharing of language assistance materials and services among and between recipients, advocacy groups, LEP populations and Federal agencies. Large entities and those entities serving a significant number of LEP persons should ensure that their resource limitations are well substantiated before using this factor as a reason to limit language assistance.

Item #1 –Results of the Four Factor Analysis (including a description of the LEP population(s) served)

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered.

According to the 2017-2021 American Community Survey, of the 46,431 residents in **Advance Transit’s** service area, 800 residents describe themselves as speaking English less than “very well,” (linguistic isolates) representing 1.72% of the total. The largest language group among these residents is Other Indo-European Languages, followed by Chinese and Korean. The largest number of linguistic isolates in any tract speaking a single language consists of Chinese speakers in the downtown area of Hanover.

Table 2 below shows the number of people who speak English less than very well by language group by census tract. The greatest numbers of linguistic isolates are in the downtown portions of Hanover and Lebanon, along with the areas just north of each downtown. Languages with fewer than 10 speakers are not shown.

Table 2: People Who Speak English Less than Very Well by Language and Tract

Tract	Towns	Total Population 5+	Spanish	French	German	Other Indo-European	Korean	Chinese	Other Asian and Pacific Island	Arabic	Other	Total Linguistic Isolates
9650	Norwich	3,313	0	0	0	0	0	0	0	0	12	12
9655.01	South Hartford	3,402	0	0	0	0	0	0	28	0	0	28
9655.02	North Hartford	2,560	0	0	0	0	0	0	0	0	0	0
9656	White River Junction/Wilder	4,257	0	0	0	37	0	13	34	0	0	84
9614	Canaan	3,733	0	0	25	18	0	0	0	0	0	43
9615	Enfield	4,244	1	0	0	16	0	0	0	0	0	17
9616.01	Hanover East	2,770	0	6	0	0	0	6	52	0	0	64
9616.03	Hanover North Campus	5,704	8	8	0	13	40	0	33	4	7	113
9616.04	Hanover Downtown	2,917	0	0	0	0	0	103	0	0	0	103
9617.01	Lebanon North	4,578	57	0	0	82	15	0	1	0	9	164
9617.02	Lebanon Downtown	3,356	0	0	0	0	48	19	0	84	0	157
9618.01	Lebanon South including Plazas	2,151	0	0	0	0	0	0	0	0	0	0
9618.02	West Lebanon	3,446	0	15	0	0	0	0	0	0	0	15
		46,431	66	29	25	166	103	141	148	88	28	800

Table 3 shows the percentage of residents who speak English less than very well by language and tract. Those tracts where there is a “concentration” of linguistic isolates, meaning a percentage higher than the area average of 1.72%, are highlighted in red.

The highest percentages in the table are for Chinese speakers in downtown Hanover and Arabic speakers in downtown Lebanon. Outreach activities in these areas should take these concentrations into account.

Table 3: Percent of Linguistic Isolates by Language and Tract

Tract	Towns	Spanish	French	German	Other Indo-European	Korean	Chinese	Other Asian and Pacific Island	Arabic	Other	Total Linguistic Isolates
9650	Norwich									0.4%	0.4%
9655.01	South Hartford							0.8%			0.8%
9655.02	North Hartford										0.0%
9656	White River Junction/Wilder				0.9%		0.3%	0.8%			2.0%
9614	Canaan			0.7%	0.5%						1.2%
9615	Enfield	0.0%			0.4%						0.4%
9616.01	Hanover East		0.2%				0.2%	1.9%			2.3%
9616.03	Hanover North Campus	0.1%	0.1%		0.2%	0.7%		0.6%	0.1%	0.1%	2.0%
9616.04	Hanover Downtown						3.5%				3.5%
9617.01	Lebanon North	1.2%			1.8%	0.3%		0.0%		0.2%	3.6%
9617.02	Lebanon Downtown					1.4%	0.6%		2.5%		4.7%
9618.01	Lebanon South including Plazas										0.0%
9618.02	West Lebanon		0.4%								0.4%

Factor 2: The frequency with which LEP persons come into contact with the program.

Advance Transit assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. Advance Transit provides approximately 360,000 passenger trips per year. If an individual has speech limitations, the dispatcher or driver will work with the New Hampshire Department of Transportation, if needed, to ensure the individual receives access to the transit services.

Factor 3: The nature and importance of the program, activity, or service provided by the program to people’s lives.

Access to the service provided by Advance Transit is critical to the lives of many in the service area. Many depend on Advance Transit’s services for access to jobs and for access to essential community services like schools, shopping and medical appointments. Riders eligible for service under the American’s with Disabilities Act (ADA) require service for the same reasons. 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.

All of Advance Transit’s programs are important; however, those related to safety, public transit, nondiscrimination and public involvement are among the most important. Advance Transit is committed to providing meaningful access and will provide written translation for any of its documents, when reasonable, effective and with the available resources. In other cases, Advance Transit will strive to provide alternative but meaningful accessibility. Moreover, Advance Transit continually evaluates its programs, services, and activities to ensure that persons who may be LEP are always provided with meaningful access. The Title VI policy, complaint form, and LEP policy are available in insert languages(s) upon request.

Factor 4: The resources available for LEP outreach, as well as the costs associated with that outreach.

Advance Transit makes every effort to make its programs, services, and activities, accessible to LEP individuals. Advance Transit will use available resources, both internal and external to accommodate reasonable requests for translations.

Advance Transit has committed resources to improving access to its services and programs for LEP persons. We have contracted with a telephone interpretive service. We will provide translation services into the languages identified in our LEP analysis. We also actively ask if a certain document needs to be translated, and we have an audio version of our ADA Rider’s Guide.

Today, only English Language documents are distributed in an extensive number of mediums including the following:

- ◆ A website
- ◆ A complete system timetable.
- ◆ A complete Rider’s Guide to demand response services (ADA paratransit)
- ◆ Outreach materials (seat drops and service change alerts)
- ◆ Representation at public meetings
- ◆ Customer service representatives
- ◆ Demand Response reservation agents

Item # 2 – Description of how Language Assistance Services are Provided, by Language
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The Advance Transit has identified, developed, and uses the following:

- a) Individuals who have contact with the public are provided with “I Speak” language cards to identify language needs in order to match them with available services
- b) The Advance Transit has developed partnerships with local agencies, organizations, law enforcement, colleges/universities, local school districts and social service agencies that are available to assist with its LEP responsibilities.

Item # 3 – Description of how LEP Persons are Informed of the Availability of Language Assistance Service

In order to ensure that LEP individuals are aware of Advance Transit’s language assistance measures, Advance Transit provides the following:

- Title VI Program including the Language Assistance Plan is made available on website, if applicable, and hard copy in central office.
- Drivers and dispatchers are provided “I Speak” language cards to identify language needs in order to match them with available services.

Item # 4 – Description of how the Language Assistance Plan is Monitored and Updated

Advance Transit will continue to update the LEP plan as required by U.S. DOT. At a minimum, the Title VI Plan will continue to be reviewed and updated every three (3) years in conjunction with the Title VI submission and use data from the U.S. Decennial Census or the American Community Survey as available, or when it is clear that the concentrations of LEP individuals are present in the Advance Transit’s service area.

Updates will continue to include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether Advance Transit’s financial resources are sufficient to fund language assistance resources needed.
- Determine whether Advance Transit has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning Advance Transit’s failure to meet the needs of LEP individuals.

Item # 5 - Description of how Employees are Trained to Provide Language Assistance to LEP Persons

The following training will continue to be provided to Advance Transit staff:

- Information on Advance Transit’s Title VI Procedures and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of “I Speak” language cards (used to identify language preference).
- Documentation of language assistance requests.
- Use of web-based interpreter services (over the phone interpretation provider).
- How to handle a potential Title VI / LEP complaint.

Limited English Proficient (LEP) Resource Materials:

LEP Policy

Advance Transit shall provide for communication for limited English proficient riders to ensure them equal opportunity to benefit from services. Family members or friends of limited English proficient riders will not be used as translators unless specifically requested by that individual. Arrangements have been made with Propio Language Services to obtain translators. The agency will also utilize web-based translator programs if available.

If you need help with English, please call 802-295-1824.

"I Speak" Language Identification Card

Note: For additional languages visit the US Census Bureau website <http://www.lep.gov/ISpeakCards2004.pdf>

Mark this Box if you speak...	Language Identification Chart	Language
	Mark this box if you read or speak English	English
	Marque esta casilla si lee o habla español	Spanish
	Kos lub voj no yog koj paub twm thiab hais lus Hmoob	Hmong
	如果说中国在方框内打勾	Chinese
	Xin ñaùnh daáu vaø oâ naøy neáu quyù vò bieát ñoïc vaø noùi ñöôic Vieät Ngöô.	Vietnamese
	당신이한국어말할경우이 상자를표시	Korean
	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	Tagalog
	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen	German
	Отметить этот флажок, если вы говорите по-русски	Russian
	Означите ову кућицу ако говорите српски	Serbian
	आप हिंदी बोलते हैं तो इस बक्से को चिह्नित करें	Hindi
	پر نشان لگائیں تو اس باکس بولتے ہیں اگر آپ	Urdu

Log of LEP Encounters

Date	Time	Language Spoken By Individual <i>(if available)</i>	Name and Phone Number of Individual <i>(if available)</i>	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes

Section 9: Minority Representation Information

Recipients that have **transit-related**, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

***Guidance:** Elected transit-related board, committee, or council, do not need to complete the table below, and write in section B that there are no non-elected transit-related boards, committees, or councils.

A. Minority Representation Table

Table Depicting Membership of Board, Committees, Councils, Broken Down by Race

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
Not applicable.						

Note: insert the number of people and % of total board membership

B. Efforts to Encourage Minority Participation

Advance Transit has no non-elected transit-related boards, committees, or councils.

To encourage participation on its boards, committees, and councils, Advance Transit will make every effort to encourage minority participation on the boards.

Section 10: Providing Assistance to and Monitoring Subrecipients

1. Does agency provide funding to subrecipients?

No, the agency does not have subrecipients.

Yes. If yes, list the subrecipient names: (list other agency names here)

Section 11: Title VI Equity Analysis for Facility Acquisition

Title 49 CFR, Appendix C, Section (3)(iv) requires “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. Has the agency built a facility? (check a response below)

No, the agency has not built a facility.

Yes, the agency has built a facility and completed a Title VI equity analysis to compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site. (Include at the end of the Title VI plan a copy of the Title VI equity analysis.)

Section 12: Fixed Route Transit Providers Service Standards and Policies

FTA Circular 4702.1B, Chapter III, Paragraph 10: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.

Advance Transit:

is a fixed route transit provider

is **not** a fixed route transit provider.

V. Service Standards and Policies

Advance Transit has developed a set of quantifiable service standards and policies. These service standards were updated in 2020 through a public participation process, approved by Advance Transit's Board of Directors and with the input of Advance Transit riders. These service standards and policies include:

- ◆ Vehicle Load
- ◆ Headways (Frequencies)
- ◆ On-time Performance (Schedule Adherence)
- ◆ Service Availability
- ◆ Vehicle Assignment Policy
- ◆ Transit Amenity Policy

Following the internal updating of these policies and standards, Advance Transit will advertise and provide the opportunity for a public information session to receive comments on the proposed standards. During the session, Advance Transit staff will present an overview of the components of Advance Transit’s public participation process as well as the various policies and standards. A copy of the presentation will be available by contacting Advance Transit.

Vehicle Load

Vehicle load is expressed as the ratio of passengers to the total number of seats on a vehicle.

Vehicle Type	Seated Capacity	Preferred Load Factor	Allowed Peak Load Factor
Small Cutaways	9	1.0	1.0
Van Style	13	1.0	1.0
Medium Duty	28	1.0	1.1
Heavy Duty	34	1.0	1.25

Vehicle Headway

Vehicle headway is the amount of time between two buses traveling in the same direction on a given route. Advance Transit buses are scheduled with a variety of frequencies based generally on demand. Routes are scheduled with 30 to 60-minute headways, with some increase in frequency during peak time with heavy rider volume. Advance Transit will also consider more frequent 15- to 30-minute service headways where ridership levels warrant and funding levels permit, and less frequent services where demand dictates.

Service	Peak Headway	Off Peak
Blue-Canaan & Enfield Commuter to DHMC	60 to 110	No service
Blue- Lebanon to DHMC	15	15
Blue-DHMC to Hanover	15	15
Blue – Hanover to DHMC	15	15
Red-Lebanon to West Lebanon	30	30
Red- West Lebanon to Route 12A Plazas	30	30
Red- Rte 12A Plazas to West Lebanon	30	30
Red- West Lebanon to Lebanon	30	30
Orange-West Lebanon to Hanover	60	60
Orange-Hanover to West Lebanon	60	60
Orange-West Lebanon to White River & VA Hospital	60	60
Orange- VA Hospital & White River to West Lebanon	60	60
Green-West Lebanon via Wilder to Hanover	60	60
Green- Hanover via Hartford Village to West Lebanon	60 to 150	150
Green-West Lebanon via Hartford Village to Hanover	60	125
Green-Hanover via Wilder to West Lebanon	60	60
Brown- Norwich via Hanover to Kendall	40	60
Brown- Kendall via Hanover to Norwich	40	60
Dartmouth-Hanover Downtown Shuttle	10	30
DHMC Parking Shuttle- Lot 20	6	6

On-Time Performance

Among the most important service standard for riders is on-time performance or adherence to published schedules.

- A vehicle is considered on time if it departs a scheduled time point no more than 5 minutes late.
- Advance Transit's on-time performance objective is **90%** or greater.

Service Availability – Access to the Bus

Advance Transit currently provides transit service so that 90% of our residents are within our service and are less than $\frac{3}{4}$ of a mile walk to our bus service. Consideration is given to new markets as demand warrants and as resources become available.

Vehicle Assignment Policy

With several practical considerations, Advance Transit assigns buses to service so that average age of the buses serving each route does not exceed the average age of the fleet. Bus assignments take into account the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route. Advance Transit has only one bus facility.

Transit Amenity Policy

Advance Transit has over 197 stops in the service area.

Stops, shelters and benches will be placed according to industry standards (TCRP Report 19) with consideration of and permitting for local and special needs. The installation of new bus amenities can be requested through the customer service office, or at public meetings.

When the annual cost of repairs to any amenity (beyond the cost of normal cleaning) is greater than the cost of the structure, Advance Transit reserves the right to permanently remove the amenity.