



Title VI Program

Adopted: October 2017

Updated: June 2021

**Allied Coordinated Transportation Services, Inc. (ACTS)
701 N. Mercer Street
New Castle, PA 16101**

TITLE VI POLICY AND COMPLAINT PROCESS

Allied Coordinated Transportation Services, Inc. (ACTS) grants equal access to its programs and services to all citizens. This document serves to make citizens aware of their rights to such access and serves to educate citizens so that they may understand the civil rights laws that protect their receipt and benefit of such services as defined by 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 that "No person in the United States shall on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program 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.

ACTS'S TITLE VI COMPLAINT AND INVESTIGATION PROCEDURES

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964 for alleged discrimination in any program or activity administered by Allied Coordinated Transportation Services, Inc. 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 informal mediation meeting(s) between the affected parties and ACTS 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 separate 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), and the date of alleged occurrence. A statement detailing the facts and circumstances of the alleged discrimination must accompany all complaints. An ACTS Title VI Complaint Form can be obtained from the ACTS office. ACTS encourages individuals to submit Title VI complaints in writing using this form and mailing it to:

Title VI Coordinator

Allied Coordinated Transportation Services, Inc. (ACTS)

701 N. Mercer Street

New Castle, PA 16101

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 Title VI Coordinator. Under these circumstances, the complainant will be interviewed, and the Title VI Coordinator will assist the complainant in completing a written statement.
3. When a complaint is received, the Title VI Coordinator will provide written acknowledgment to the Complainant, within ten (10) business days by registered mail or hand delivery.
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, ACTS 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 Chief Executive Officer or his/her authorized designee will notify the Complainant and Respondent, by registered mail or hand delivery 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 ACTS jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting the investigator.
6. When ACTS does not have sufficient jurisdiction, the Chief Executive Officer 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 Chief Executive Officer 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 Chief Executive Officer within 60 days from receipt of the complaint. The report will include a description of the incident, summaries of all persons interviewed, and a finding with recommendations and proposed resolution 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 Chief Executive Officer 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 the ACTS resolution of the complaint, he/she has the right to file a complaint in the time allotted by law with:

Federal Transit Administration Region 3
1760 Market Street Suite 500
Philadelphia, PA 19103-4124
(215) 656-7100 (telephone)
(215) 656-7260 (fax)

POSTING OF PUBLIC NOTICE

Public notice of Title VI Policy and Complaint Procedures is posted in each vehicle and at the ACTS Transportation Facility located at 701 N. Mercer Street, New Castle, Pennsylvania 16101.

The Public Notice is as follows:



NOTIFYING THE PUBLIC OF RIGHTS UNDER TITLE VI

ALLIED COORDINATED TRANSPORTATION SERVICES, INC. (ACTS)

ACTS 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 he or she has been subjected to discrimination on the basis of race, color, or national origin may file a complaint with ACTS.

For more information on ACTS's civil rights program and the procedures to file a complaint, contact ACTS at 724-652-5588; or visit our Transportation Facility located at 701 N. Mercer Street, New Castle, PA 16101.

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



Title VI Complaint Form

Title VI of the 1964 Civil Rights Act 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.” If you feel you have been discriminated against in transit services, please provide the following information to assist us in processing your complaint:

Please print CLEARLY:

Section I:	
Name:	
Address:	
City, State, Zip Code:	
Telephone Number: (home)	(cell)
Accessible Format Requirements? Large Print TDD Audio Tape	
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 you have obtained the permission of the aggrieved party if you are filing on behalf of a third party:

Section III:
I believe the discrimination I experienced was based on (check all that apply):
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin
What was the date of the alleged discrimination (Month, Day, and 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 Title VI complaint with this agency?

Section V:
Have you filed a Title VI 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 Court: _____
State Agency: _____
Local Agency: _____
Please provide information about a contact person at the agency/court where the complaint was filed.
Name: _____
Title: _____
Agency: _____
Address: _____
Phone: _____

Section VI:
Name of agency complaint is against: _____
Contact person: _____
Title: _____
Phone: _____

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

Signature and date required below:

Your Signature Date

Print your name

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

**Title VI Coordinator
Allied Coordinated Transportation Services, Inc. (ACTS)
701 N. Mercer Street
New Castle, PA 16101**

Public Participation Plan

ACTS strives to sustain the delivery of quality transportation service to the residents of Lawrence County.

The ACTS Advisory Council Committee meets annually, and more often if relevant, to review the status of the ACTS service and to determine if acceptable service standards are being met. The Committee also makes recommendations for improvements.

In addition, when significant service changes and/or fare increases are proposed, ACTS collects and evaluates input from the Advisory Council and the ridership to aid in the decision-making process.

Any Lawrence County residents may serve on the ACTS Advisory Council Committee. ACTS does not appoint its members. Participation is on a volunteer basis. All Advisory Council Meetings are advertised in the local community newspaper and are open to the public. Any new member attending their first meeting is automatically added to the committee listing and invited to all subsequent meetings.

The committee strives to maintain a broad-based mix of members from the public and private sectors. Membership is encouraged from consumers as well as agencies and organizations serving the elderly, disabled, and low-income populations.

Limited English Proficiency Policy – Language Assistance Plan

The purpose of this limited English proficiency policy guidance is to clarify the responsibilities of recipients of federal financial assistance from the U.S. Department of Transportation (DOT) and assist them in fulfilling their responsibilities to limited English proficient (LEP) persons, pursuant to Title VI of the Civil Rights Act of 1964 and implementing regulations. It was prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance, and;

Executive Order 13166

Executive Order 13166 "Improving Access to Services for Persons with proficiency," reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled "Enforcement of Title VI of the Civil Rights Act of 1964-National Origin Discrimination against Persons with Limited English Proficiency." (See 65 FR 50123, August 16, 2000 DOJ's General LEP Guidance). Different treatment based upon a person's inability to speak, read, write, or understand English may be a type of national origin discrimination. Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies such as Allied Coordinated Transportation Services, Inc. (ACTS) and governments, private and non-profit entities, and sub recipients.

Plan Summary

ACTS has developed this Language Assistance Plan to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to ACTS services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English. This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available, and information for future plan updates. In developing the plan while determining ACTS's extent of obligation to provide LEP services, ACTS conducted a U.S. Department of Transportation four factor LEP analysis which considers the following: 1) The number or proportion of LEP persons eligible in the ACTS service area who may be served or likely to encounter an ACTS program, activity, or service; 2) the frequency with which LEP individuals come in contact with ACTS services; 3) the nature and importance of the program, activity or service provided by ACTS to the LEP population; and 4) the resources available to the ACTS and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

Four Factor Analyses

1. The number or proportion of LEP persons eligible in the ACTS service area who may be served or likely to encounter an ACTS program, activity, or service.

ACTS examined the 2019 data reported by the US Census Bureau to determine that approximately 95.7% of people within ACTS's service area, age 5 and older, speak English as the primary or only language. Approximately 4.3%, or 3,482 individuals, speak a language other than English in their home.

Since 2018, Lawrence County has seen an increase in the number of Spanish-only speaking families in our community. After a natural disaster in Puerto Rico, approximately sixty (60) families relocated to Lawrence County.

2. The frequency with which LEP individuals encounter an ACTS program, activity, or service.

ACTS assesses the frequency at which staff and drivers have or could possibly have contact with LEP persons and adjusts our plan accordingly. ACTS personnel, using our client and trip tracking software, indicate each passenger's primary language in the client's profile setup as well as enter a driver note in the system alerting our office staff and vehicle operators that a passenger does not speak English. Currently, Spanish is the only language encountered by ACTS personnel, but continued monitoring and tracking will assist ACTS in determining if our LEP plan should encompass other languages.

Based on the influx of Spanish-only speaking families in the ACTS service area, ACTS has translated all print materials and consumer applications into Spanish. The company website also can be automatically translated into other languages, including Spanish, with the tap of one button. ACTS, as part of the Lawrence County Community Action Partnership, participates in outreach and community-based activities in order to educate these families on the services available to them through ACTS. ACTS also shares a bi-lingual staff person with other LCCAP departments who is available to provide in-person, live interpreter services, when needed. ACTS continues to utilize the Language Line Interpreter Service when the staff interpreter is unavailable. Currently, ACTS has enrolled fifteen (15) Spanish-only speaking individuals. ACTS will continue participating in outreach activities to attract a greater number of LEP individuals.

3. The nature and importance of the program, activity, or service provided by ACTS to the LEP community.

The overwhelming majority of the population, 95.7% of residents speaks English as their primary language. Therefore, for the most part, LEP individuals do not use ACTS's services.

For the concentration of Spanish-only speaking families living in two subsidized housing apartment complexes within the City of New Castle, both apartment complexes are along the New Castle Area Transit's fixed-routes. ACTS provides service to these locations during all operating hours, including Saturday service. As these LEP individuals settle into our community, ACTS expects that the number of LEP individuals served will continue to grow.

4. The resources available to ACTS and overall associated costs.

ACTS assessed its available resources that could be used for providing LEP assistance and the costs associated with: the subscription to the Language Line service; the cost of additional translation services, such as a professional interpreter; translation of documents that would be the most valuable to be translated if and when the population supports; taking an inventory of available organizations that ACTS could partner with for outreach and translation efforts; and the level of staff training needed to provide services for the LEP population. After analyzing these factors, ACTS developed a cost-effective plan to serve persons with Limited English Proficiency, which is outlined in the following section of this document, in order to assist persons with limited English proficiency.

Language Assistance Plan Outline

How to Identify a LEP Person Who Needs Language Assistance

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

- Examine requests for language assistance from past meetings and events to anticipate the need for language assistance at upcoming meetings.
- When ACTS sponsored meetings are held, a staff person is assigned to the sign-in table to briefly speak to each attendee. By asking each attendee an open-ended question which would require a full sentence reply, the attendee's ability to speak and understand English can be informally gauged.
- At the beginning of each fiscal year, survey drivers and other frontline staff to determine whether they had any direct or indirect contact with LEP individuals in the preceding year.
- Identify trends concerning LEP individuals. ACTS tracks each passenger's primary language in their scheduling software so that office personnel and vehicle operators can identify LEP individuals and communicate with them appropriately.

Language Assistance Measures

Based on the limited number of LEP individuals residing in Lawrence County, the following LEP procedures have been developed to best assist them when accessing ACTS's services:

- ACTS's website allows viewers to tap one button in order to view the website in an alternative language.
- Upon a LEP individual's arrival to the ACTS office, the reception staff will provide an "I Speak" flyer to the individual to determine which language is being communicated.
- After the language spoken by individual is identified, the staff person will utilize the Language Line Service via telephone. If the LEP individual speaks Spanish, the bilingual staff person will be called to assist. For in-person meetings, a mobile translator application may also be used.
- LEP individuals, regardless of age or disability status, are authorized to take along a free escort to act as an interpreter with them during their trips. For LEP passengers who are under the age of 18 years old, and whose parent is LEP, a second escort, acting as the interpreter for the parent and child, is authorized to ride at no charge to the LEP individual.

ACTS Staff Training

For existing staff, the LEP Plan has been presented, and a hard copy provided, to all ACTS personnel. Updates to the LEP Plan is covered during annual staff trainings. For new hires, this information is part of the staff orientation process. The staff training topics are:

- Understanding the Title VI Policy and LEP Plan
- Documentation of language assistance requests
- How to handle a Title VI and/or LEP Complaint

Outreach Techniques

ACTS participates in local outreach techniques aimed at educating LEP individuals about ACTS services. During the outreach activity, the following will be considered:

- 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 known 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.
- Key print materials have been translated and are available at the ACTS Transportation Facility and in communities when a specific and concentrated LEP population is identified.
- Staff members conducting Community Outreach bring along the "I Speak" flyer as well as the Language Line Service instructions so that interpretation services can be accessed while in the community.
- For outreach activities in the apartment complexes known to have a concentrated number of LEP families, ACTS strives to schedule at least one interpreter to facilitate the event.

Monitoring and Updating the Language Assistance Plan

This plan is designed to be flexible and is one that can be easily updated. At a minimum, ACTS will follow the Title VI Program update schedule for the Plan.

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 the ACTS 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 ACTS programs? Are there other programs that should be included?
- Have ACTS's available resources; such as, technology, staff, and financial costs changed?
- Has ACTS fulfilled the goals of the Language Assistance Plan?
- Were any Title VI complaints received?

As part of the monitoring and update plan, ACTS tracks the activity of usage of its services by LEP persons and requests for assistance from Customer Service and Operations staff using the system's client and trip software. As part of conducting Customer Satisfaction Surveys, copies will be made available in the preferred language of the LEP consumers to elicit feedback from LEP consumers. ACTS will also maintain communication with municipalities and other community-focused service providers in its service area to identify LEP individuals who may have moved into a part of ACTS's service area and may require assistance. These municipalities and community-focuses service providers will also be instructed to contact ACTS with any requests that they may receive for language assistance.

Dissemination of the ACTS Language Assistance Plan

ACTS includes the Language Assistance Plan on the agency website (www.lccap.org/ACTS) together with its Title VI Policy and Complaint Procedures. ACTS's Notice of Rights under Title VI to the public is available in the lobby area of the ACTS Transportation Facility and posted on all buses.

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

Copies of the Language Assistance Plan will be provided upon request. LEP persons may obtain copies/translations of the plan upon request.

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

Title VI Coordinator

Allied Coordinated Transportation Services, Inc.

701 N. Mercer Street

New Castle, PA 16101

Phone : 724-652-5588

Fax : 724-546-5160

Non-Elected Committees and Councils

ACTS does not appoint the Board of Directors or have a specified number of members. Anyone interested in joining the Board must be nominated and approved for membership by the current standing Board of Directors.

ACTS holds a minimum of two Advisory Council Meetings per year, with additional meetings scheduled as needed. The Advisory Council, also listed under our Public Participation Plan contained in this document, is reflective of our County demographic. The Council Members represent the various passenger groups who ACTS primarily serves by either being part of the demographic themselves or working for an agency who advocates for the passenger demographic. Any person in the public may attend these open, public meetings. Once attending their first meeting, the attendee is automatically added to our invitation list for all subsequent meetings until they request to be removed from our mailing list.

The following chart depicts the ACTS Board of Director’s and ACTS Advisory Council’s membership as well as their race and their represented demographic:

Member of:	Population Represented	Race
Advisory Council	Adults and Youth with Intellectual and Physical Disabilities	White
Advisory Council	Adults with Disabilities	White
Advisory Council	Adults with Disabilities	White
Advisory Council	Adults with Intellectual and Physical Disabilities	White
Advisory Council	Adults with Intellectual and Physical Disabilities	White
Advisory Council	Adults with Intellectual and Physical Disabilities	White
Advisory Council	Dialysis Patients	White
Advisory Council	Disabled Individuals (All Ages)	White
Advisory Council	Domestic Violence Survivors and Children	White
Advisory Council	Low-income	African American
Advisory Council	Low-income	White
Advisory Council	Low-income / Homeless Families / Veterans	White
Advisory Council	Low-income / Mental Health & Substance Abuse	White
Advisory Council	Low-income / Mental Health & Substance Abuse	White
Advisory Council	Low-income / Mental Health & Substance Abuse	White
Advisory Council	Low-income / Senior Citizens / Disabled Individuals	White
Advisory Council	Low-income / Senior Citizens / Disabled Individuals	White
Advisory Council	Low-income / Senior Citizens / Disabled Individuals	White
Advisory Council	Low-income / Senior Citizens / Disabled Individuals	White
Advisory Council	Low-income and Adults/Youth with Disabilities	African American
Advisory Council	Low-income and Adults/Youth with Disabilities	White
Advisory Council	Low-income and Adults/Youth with Disabilities	White
Advisory Council	Low-income and Senior Citizens	White
Advisory Council	Low-income and Senior Citizens	White
Advisory Council	Low-income and Senior Citizens	White
Advisory Council	Low-income and Spanish-Only Speaking Families	Other
Advisory Council	Low-income Families	African American
Advisory Council	Low-income families	White
Advisory Council	Senior Citizens	White
Advisory Council	Senior Citizens	White
ACTS Board Member	Community Representative	White
ACTS Board Member	Community Representative	White
ACTS Board Member	Community Representative / Senior Citizens	White
ACTS Board Member	Legal Representative / Senior Citizens	White
ACTS Board Member	Low-Income Representative	White

Equity Analysis Statement

ACTS has not completed a major construction project since the inception of this Title VI Plan. For future qualifying projects, an equity analysis will be performed.

ACTS - Title VI Equity Analysis Procedures for Compliancy with FTA C 4702. 1B.

ACTS'S TITLE VI - DETERMINATION OF SITE OR LOCATION OF FACILITIES

Title 49 CFR Section 21.9(b)(3) states, "In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part."

Title 49 CFR part 21, Appendix C, Section (3)(iv) provides, "The location of projects requiring land acquisition and the displacement of persons from their residences and businesses 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 these are transit amenities and are covered in Chapter IV, nor does it include transit stations, power substations, etc., as those are evaluated during project development and the NEPA process. Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc.

In order to comply with the regulations:

- a) ACTS shall complete a Title VI equity analysis during the planning stage regarding where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. ACTS will engage in outreach to persons potentially impacted by the siting of facilities. The Title VI equity analysis will compare the equity impacts of various siting alternatives, and the analysis will occur before the selection of the preferred site.
- b) When evaluating locations of facilities, ACTS will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis will be done at the Census tract or block group where appropriate to ensure that proper perspective is given to localized impacts.
- c) If ACTS determines that the location of a project will result in a disparate impact on the basis of race, color, or national origin, ACTS will only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. ACTS will show how both tests are met. ACTS realizes that in order to make this showing, ACTS must consider and analyze alternatives to determine whether those alternatives would have less (Chap. III-12 FTA C 4702.1B) of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

Definitions – According to the Federal Transit Administration

Minority: The FTA defines a minority person as one who self-identifies as American Indian/Alaska Native, Asian, Black or African American, Hispanic or Latino, and/or Native Hawaiian/Pacific Islander. Minority values in the ACTS Study Area are monitored through census studies and zoning maps.

Low Income: The FTA defines a low-income individual as one whose household income is at or below the poverty guidelines set by the Department of Health and Human Services (DHHS). DHHS poverty thresholds are based on household size and income and are nearly identical to the guidelines used to define poverty in the 2011

U.S. Census and American Community Survey (ACS), which form the basis of this review. Low-income values in the ACTS study area are monitored through census studies and zoning maps.

Disparate Impact: The defines “disparate impacts” as neutral policies or practices that have the effect of disproportionately excluding or adversely affecting members of a group protected under Title VI, and the recipient’s policy or practice lacks a substantial legitimate justification. If the results of the analysis indicate a potential for disparate impacts, further investigation is performed. This investigation uses qualitative assessments and/or the “four-fifths rule” to determine whether disparate impacts exist. In this analysis, if the quantitative results indicate that the Concept Plan service changes provide benefits to minority/low-income groups at a rate less than 80 percent of the benefits provided to non-minority/non-low-income groups, there could be evidence of disparate impacts and mitigation measures should be identified

List of Title VI Investigations/Complaints/Lawsuits

FY 2017-18: Not Applicable
FY 2018-19: Zero
FY 2019-20: Zero
FY 2020-21: TBD

Title VI Service Standards

It is the intent of Allied Coordinated Transportation Services, Inc. (ACTS) to ensure full compliance with Title VI Regulations. The information below has been reviewed and adopted as policy by the ACTS Board of Directors at a regularly scheduled meeting on October 26, 2017. As part of the required Annual Title VI Plan Update, the Service Standards section will be updated.

Vehicle Load Standard:

ACTS will maintain a vehicle load standard of 1.0 for each vehicle operating in shared-ride transportation service. The following vehicle capacity exists for the current ACTS fleet not indicated as spare vehicles:

FLEET NUMBER	MAKE	YEAR	MAX AMBULATORY SEATING CAPACITY	MAX MOBILITY DEVICE CAPACITY	MAX VEHICLE PASSENGER LOAD
104	Ford	2016	16	4	18
105	Ford	2016	16	4	18
106	Ford	2016	16	4	18
107	Ford	2016	12	2	14
108	Ford	2016	12	2	14
109	Ford	2016	12	2	14
110	Ford	2016	12	2	14
111	Ford	2016	12	2	14
112	Ford	2016	12	2	14
113	Ford	2017	12	3	14
114	Ford	2017	12	3	14
115	Ford	2017	12	3	14
116	Ford	2018	12	3	14
117	Ford	2018	12	3	14
118	Ford	2018	12	3	14
119	Ford	2018	12	3	14
120	Ford	2018	12	3	14
121	Ford	2018	12	3	14
122	Ford	2018	12	3	14
123	Ford	2018	12	3	14
124	Ford	2018	12	3	14
125	Ford	2018	14	3	14
126	Chevy	2020	15	4	16
127	Chevy	2020	15	4	16
128	Chevy	2020	15	4	16

Passenger Ride Time:

ACTS strives to ensure that the shared-ride passenger's ride time is not more than double the time that same trip would take someone, plus load and unload time, in a personal car at the same time of day. ACTS has set a standard of 90% of trips having a satisfactory passenger ride time.

There are several exceptions to this standard:

1. Actual passenger ride times that are less than thirty (30) minutes, regardless of ideal ride time, will be excluded from this standard based on required coordination of trips.
2. Cross-county trips may exceed this standard due to grouping of the passengers onto one bus to cross into the neighboring County. To lessen out-of-county ride times, ACTS will utilize several vehicles to pick-up the passengers in various parts of Lawrence County and will then transfer all passengers onto one bus that will leave the county.
3. Group runs, such as our local adult day programs, require that passengers are routed together based on residence location and program's location. Consumers living in rural areas that are grouped together based on the program in which they attend, may ride longer than the standard.

On-time performance:

For appointment trips, a trip is determined to be "on time" if the passenger arrives to their appointment between thirty (30) minutes to zero (0) minutes prior to their scheduled drop-off time. For return trips where the pickup time is scheduled, the trip is determined to be "on time" if the passenger is picked up between zero (0) minutes to thirty (30) minutes after their scheduled pickup time. For "will call" return trips that are reserved without a scheduled return pickup time, ACTS will consider the return pickup to be "on time" if the vehicle arrives between five (5) minutes before and forty-five (45) minutes after the scheduled return time. On-time performance will be analyzed monthly using the ACTS software system's reports. ACTS strives to maintain an "on time" performance measure of 75% for all trip types.

Service Availability:

ACTS serves the entire Lawrence County population with service to outer-lying, rural areas limited to designated days of the week and times of the day. ACTS identifies the days and times that service will be provided to these outer-lying, rural areas on subscription trips that either originate or terminate in these areas. ACTS will add an additional day or time to service an outer-lying, rural area if a new subscription trip is requested.

ACTS will evaluate and update the service days and times to these outer-lying, rural areas on an ongoing basis.

Review of Service Standards

ACTS will analyze and review the service standards annually. The results of the review will be presented at a publicly advertised ACTS Advisory Council Committee Meeting. During this same meeting, any proposed or new standards will be presented to the Committee.

Record of Annual Updates to Title VI and LEP Plan

2018 Annual Update- Presented to:

- ACTS Advisory Council - October 17, 2018
- ACTS Board of Directors - November 2018

2019 Annual Update- Presented to:

- ACTS Advisory Council – November 13, 2019
- ACTS Board of Directors – November 2019

2020 Annual Update- Presented to:

- ACTS Advisory Council – January 2021
- ACTS Board of Directors – January 2021

Attachment “1”

Annual Plan Review and Service-Standard Analysis

I. Service Period – October 1, 2019 – September 30, 2020

- A. LEP Plan- Updated to reflect that ACTS has enrolled two (2) more Spanish-only speaking passengers into our programs, bringing the total Spanish-only speaking passenger count to fifteen (15) passengers as compared to thirteen (13) in the 2019 update.
- B. Service Standards:
1. **Vehicle Standards:** Details the ACTS fleet and each vehicle’s capacity.
 - a. ACTS will not load a vehicle past its capacity - *Standard Met*
 - b. ACTS fleet will remain in satisfactory condition – *Standard Met as the Average age of fleet is 2.3 years old. As of September 30, 2020, ACTS has 25 vehicles in regular service plus spares. ACTS placed three (3) new revenue buses into service in August 2020.*
 2. **Passenger Ride Time:** Describes the acceptable amount of time that a passenger will ride on an ACTS vehicle.
 - a. ACTS set this standard at least 90% of passenger trips’ duration would be less than “double the time the same trip would take, on the same date and time, in a private automobile, plus the load and unload time”. Out-of-County and Group Trips are exempt from this standard based on the type of service. – *Standard Met at 92.4% of Passenger Trips for 2020 update as compared to 93% for the 2018 and 2019 Annual Updates.*
 3. **On-time Performance:** Describes the pickup and drop off window in which a trip is “on time”.
 - a. ACTS strives to maintain a minimum of 75% “on time” standard for all trip types: scheduled drop-offs/appointments and scheduled pick-ups/return trips. – *Standard Met with Appointment Trips being 84% on-time, which is up from the 2019 report of 83% on-time. For Return Trips, 99% of these trips were on-time, which is up from the 2019 report of 98% on-time. Total On-Time Performance is 92% for the 2020 Update.*
 4. **Service Availability:** Describes the service to outer-lying, rural areas of Lawrence County.
 - a. Due to the need to coordinate trips to rural areas, dates and times are determined by passengers’ reoccurring trips to and from these areas.
 - b. ACTS continually evaluates the days and times that service is provided to outer-lying, rural areas and will add more service as warranted by trip demand. – *Standard Met as new subscription trips allow for increased service to outer-lying areas of the County. During the 2020 reporting period, ACTS increased service availability into New Wilmington, a township located in northern Lawrence County due to increased trip demand for students working at the college located in the township.*