

BOROUGH OF POTTSTOWN

POTTSTOWN AREA RAPID TRANSIT



TITLE VI PROGRAM

Revised June 13, 2023- KLH

The Borough of Pottstown and Pottstown Area Rapid Transit, (PART) operates in compliance with Federal Transit Administration, (FTA) program requirements and ensures that transit services are made available and equitably distributed, and provides equal access and mobility to any person without regard to race, color, or national origin.

Title VI of the Civil Rights Act of 1964; Civil Rights Restoration Act of 1987; FTA Circular 4702.1B, "Title VI and Title VI Dependent Guidelines for Federal Transit Administration Recipients."

The Borough of Pottstown/PART does not have subrecipients or pass FTA funds through to subrecipients.

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I.

Federal Transit Administration

Civil Rights Assurance

Borough of Pottstown

The Borough of Pottstown hereby certifies that, as a condition of receiving Federal financial assistance under the Urban Mass Transportation Act of 1964, as amended it will ensure that:

1. No person on the basis of race, color, national origin (Title VI of the Civil Rights Act of 1964), will be subjected to discrimination in the level and quality of transportation services and transit related benefits.
2. The Borough of Pottstown will compile, maintain, and submit in a timely manner Title VI information required by **FTA Circular 4702.1B and in compliance with Department of Transportation's Title VI Regulation 49 CFR 21.**
3. The Borough of Pottstown will make it known to the public that those person or persons alleging discrimination on the basis of race, color, or national origin as it relates to the provision of Transportation services and transit related benefits may file a complaint to FTA and/or the U.S. Department of Transportation.

The person or persons whose signature appears below are authorized to sign this assurance on behalf of the Borough of Pottstown.

Dan Weand
Borough Council President

II.

Pottstown Area Rapid Transit

Title VI Program Statement

Pottstown Area Rapid Transit, (PART) operates in compliance with Federal Transit Administration, (FTA) program requirements and ensures that transit services are made available and equitably distributed, and provides equal access and mobility to any person without regard to race, color, or national origin.

Title VI of the Civil Rights Act of 1964; FTA Circular 4702.1B, "Title VI and Title VI Dependent Guidelines for Federal Transit Administration Recipients."

The Borough of Pottstown/PART does not have subrecipients or pass FTA funds through to subrecipients.

FOR MORE INFORMATION, OR IF YOU HAVE ANY QUESTIONS, COMPLIMENTS, CONCERNS, PLEASE CONTACT the Borough of Pottstown, Office of the Borough Manager **via email at takepart@pottstown.org** or **via telephone at 610-970-6511** or the **Pottstown Area Rapid Transit Office at 610-326-5413**. The Title VI Policy can also be viewed at <https://www.pottstown.org/DocumentCenter/View/376>.



III.

Background

The Borough of Pottstown is the owner of the Pottstown Area Rapid Transit System, (PART). Pottstown Area Rapid Transit, Inc. is the current contractor with facilities located in Upper Pottsgrove Township, Pottstown, PA 19464. PART Inc. provides the daily public transit operations, as well as facility and vehicle maintenance. The Borough owns a bus fleet of 30, 35, and 40 foot transit buses, paratransit vans, and a rubber-tired trolley. PART operates 5 buses in maximum service, as well as two complementary paratransit vans. The Borough is a political subdivision of the Commonwealth of Pennsylvania located in Montgomery County, Pennsylvania.

PART is a small urban public transit system offering the community an important and viable public transportation option in the greater Pottstown region. The Borough's mission for PART is to provide, "safe, affordable, and reliable quality transportation service in the Borough of Pottstown and surrounding region."

The Delaware Valley Regional Planning Commission, (DVRPC) is the metropolitan planning organization, (MPO) for the Borough of Pottstown. The total population of the Borough's service area is 57,000.

The Borough of Pottstown employees designated to oversee the PART operation include the Borough Manager, and Grants Administrator. Borough Hall offices are located at 100 East High Street, Pottstown, PA 19464, in downtown Pottstown next to the Charles W. Dickinson Transportation Center and Smith Family Plaza Transit Park.

The Borough of Pottstown is governed by a seven (7) member elected Borough Council. Each January following an election year, Borough Council elects a President, Vice President, and President Pro-Tem. Council Members choose Committees to serve on, with the President making the official assignment.

IV.

Board Selection

The Borough Council President officially assigns three Councilors to serve on the Transportation Committee, as well as Borough staff, Contractor representatives, and community members. The Transportation Committee meets quarterly. The makeup of the Committee is as follows:

Borough of Pottstown Transportation Committee Statistics

<u>Category</u>	<u>Number</u>	<u>Percent of Committee</u>
TOTAL	8	100%
White	6	75%
Black	2	25%
Hispanic	0	0%
Total Minority	2	25%

V.

Public Notice

PART hereby gives notice of its policy to assure full compliance with Title VI of the Civil Rights Act of 1964; Civil Rights Restoration Act of 1987; FTA Circular 4702.1B, "Title VI and Title VI Dependent Guidelines for Federal Transit Administration Recipients." PART is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services on the basis of race, color, or national origin.

The Borough of Pottstown operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights. Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin may file a written complaint with PART, directed to the **Borough Manager, 100 East High Street, Pottstown, PA 19464, by email at takepart@pottstown.org, or by telephone, 610-970-6511.** We encourage you to file your complaint in writing. Complainants have the right to complain directly to the appropriate Federal agency. Every effort will be made to obtain early resolution of complaints. The option of informal meetings between the affected parties and the Borough Manager will be utilized. All complaints will be investigated promptly. Reasonable measures will be undertaken to preserve any information that is confidential. The Borough Manager will review every complaint, and when necessary, assign a neutral party to investigate.

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

This policy will be made available on buses, in print materials, on the PART and Borough websites, and the local newspaper. Visit <https://www.pottstown.org/DocumentCenter/View/376> to view the full policy or for more information.

Aviso Público

PARTE por la presente le da cuenta de su política para asegurar la completa conformidad con el título VI de la ley de derechos civiles de 1964; Acto de la restauración de los derechos civiles de 1987; FTA Circular 4702.1B, A: "Título VI y título VI dependiente directrices para los receptores de la Administración Federal de tránsito". PARTE se compromete a garantizar que ninguna

persona es excluida de la participación en, o negada los beneficios de ella servicios sobre la base de raza, color u origen nacional.

La ciudad de Pottstown opera sus programas y servicios sin distinción de raza, color y origen nacional de acuerdo con el Título VI de los Derechos Civiles. Cualquier persona que crea que él o ella, individualmente o como miembro de una clase específica de personas, ha sido objeto de discriminación por motivos de raza, color u origen nacional, puede presentar una queja por escrito a PART, **dirigida al Municipio. Gerente, 100 East High Street, Pottstown, PA 19464, por correo electrónico a takepart@pottstown.org o por teléfono, 610-970-6511.** Le recomendamos que presente su queja por escrito. Los reclamantes tienen derecho a presentar una queja directamente ante la agencia federal correspondiente. Se hará todo lo posible para obtener una resolución temprana de las quejas. Se utilizará la opción de reuniones informales entre las partes afectadas y el Gerente del distrito. Todas las quejas serán investigadas con prontitud. Se tomarán medidas razonables para preservar cualquier información que sea confidencial. El administrador del distrito revisará cada queja y, cuando sea necesario, asignará una parte neutral para investigar.

Un demandante puede presentar una queja directamente ante la Administración Federal de Tránsito presentando una queja ante la Oficina de Derechos Civiles, Atención: Coordinador del Programa Título VI, Edificio Este, 5to piso - TCR, 1200 New Jersey Ave., SE, Washington, DC 20590 .

Esta política estarán disponible en los autobuses, en materiales impresos, en los sitios web parte y municipio y el periódico local. Visite <https://www.pottstown.org/DocumentCenter/View/376> para ver la política completa.

VI.

LIMITED ENGLISH PROFICIENCY POLICY STATEMENT, NOTIFICATION, AND AVAILABLE RESOURCES

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., provides that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity. Title VI and its implementing regulations require programs and activities to take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of the programs and activities for individuals who are Limited English Proficient, (LEP).

To that end, PART provides translation and interpretation services free of charge upon request **by emailing takepart@pottstown.org or by calling 610-970-6512.**

For additional information, or to file a complaint, please contact PART at **by email at takepart@pottstown.org or by calling 610-970-6512 or 610-970-6511.**

VII.

LIMITED ENGLISH PROFICIENCY PLAN, (LEP)

BOROUGH OF POTTSTOWN

POTTSTOWN AREA RAPID TRANSIT (BOP/PART)

INTRODUCTION

This Limited English Proficiency (LEP) Plan has been prepared to address the Borough of Pottstown/Pottstown Area Rapid Transit (BOP/PART) responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, Civil Rights Restoration Act of 1987, and Federal Transit Administration Circular 4702.1B dated October 1, 2012, which states that no person shall be subjected to discrimination on the basis of race, color, or national origin.

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

PLAN SUMMARY

BOP is the owner, and PART, the operator, for the transit system, and has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by PART. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write, or understand English.

This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP person that assistance is available.

In order to prepare this plan, PART undertook the U.S. Department of Transportation (U.S. DOT) four-factor LEP analysis, which considers the following factors:

- 1.) The number or proportion of LEP persons in the service area who may be served or are likely to encounter a PART program, activity, or service.
- 2.) The frequency with which LEP persons come in contact with PART programs, activities, or services.
- 3.) The nature and importance of programs, activities or services provided by PART to the LEP population.
- 4.) The resources available to PART and overall cost to provide LEP assistance.

A **summary** of the results of the PART Four Factor analyses is in the following section.

FOUR – FACTOR ANALYSIS

1. The number or proportion of LEP person in the service area who may be served or are likely to encounter a PART program, activity, or service.

PART staff reviewed the 2010 U.S. Census Report and determined that 6.3% of citizens in Pottstown speak a language other than English. Citizens in Pottstown who have limited English proficiency, that is, they speak English “not well” or “not at all,” constitute 2.3%.

In Pottstown, of those with limited English proficiency, 5.1% speak Spanish, .1% speak Asian and Pacific Island languages, and 1.0% speak other Indo-European languages. Those with limited English proficiency which are utilizing PART services speak Spanish.

Subject	Pottstown borough, Pennsylvania					
	Total		Percent of specified language speakers			
			Speak English "very well"		Speak English less than "very well"	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	20,673	+/-257	97.7%	+/-0.9	2.3%	+/-0.9
Speak only English	93.7%	+/-1.8	(X)	(X)	(X)	(X)
Speak a language other than English	6.3%	+/-1.8	63.4%	+/-10.4	36.6%	+/-10.4
Spanish or Spanish Creole	5.1%	+/-1.7	58.3%	+/-12.2	41.7%	+/-12.2
Other Indo-European languages	1.0%	+/-0.5	100.0%	+/-10.9	0.0%	+/-10.9
Asian and Pacific Island languages	0.1%	+/-0.1	0.0%	+/-54.2	100.0%	+/-54.2
Other languages	0.1%	+/-0.2	19.2%	+/-80.8	80.8%	+/-80.8
SPEAK A LANGUAGE OTHER THAN ENGLISH						
Spanish or Spanish Creole	1,045	+/-348	58.3%	+/-12.2	41.7%	+/-12.2
5-17 years	351	+/-188	83.8%	+/-15.8	16.2%	+/-15.8

Subject	Pottstown borough, Pennsylvania					
	Total		Percent of specified language speakers			
			Speak English "very well"		Speak English less than "very well"	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
18-64 years	664	+/-206	45.5%	+/-17.7	54.5%	+/-17.7
65 years and over	30	+/-33	43.3%	+/-56.7	56.7%	+/-56.7
Other Indo-European languages	217	+/-96	100.0%	+/-10.9	0.0%	+/-10.9
5-17 years	0	+/-19	-	**	-	**
18-64 years	154	+/-83	100.0%	+/-14.9	0.0%	+/-14.9
65 years and over	63	+/-43	100.0%	+/-31.6	0.0%	+/-31.6
Asian and Pacific Island languages	23	+/-26	0.0%	+/-54.2	100.0%	+/-54.2
5-17 years	0	+/-19	-	**	-	**
18-64 years	23	+/-26	0.0%	+/-54.2	100.0%	+/-54.2
65 years and over	0	+/-19	-	**	-	**
Other languages	26	+/-35	19.2%	+/-80.8	80.8%	+/-80.8
5-17 years	0	+/-19	-	**	-	**
18-64 years	26	+/-35	19.2%	+/-80.8	80.8%	+/-80.8
65 years and over	0	+/-19	-	**	-	**
CITIZENS 18 YEARS AND OVER						
All citizens 18 years and over	16,662	+/-393	98.6%	+/-0.6	1.4%	+/-0.6
Speak only English	95.4%	+/-1.4	(X)	(X)	(X)	(X)
Speak a language other than English	4.6%	+/-1.4	69.5%	+/-11.7	30.5%	+/-11.7
Spanish or Spanish Creole	3.1%	+/-1.2	61.6%	+/-16.6	38.4%	+/-16.6
Other languages	1.5%	+/-0.6	85.5%	+/-12.1	14.5%	+/-12.1
PERCENT IMPUTED						
Language status	2.8%	(X)	(X)	(X)	(X)	(X)
Language status (speak a language other than English)	0.0%	(X)	(X)	(X)	(X)	(X)
Ability to speak English	0.5%	(X)	(X)	(X)	(X)	(X)

2. The frequency with which LEP persons come in contact with PART programs, activities, or services.

PART assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries and surveying vehicle operators for requests for interpreters and translated documents. To date, the most frequent contact between LEP persons is with bus drivers. Translated documents have included postings on the busses relating to fares and transit rules, ride guides, fare guides, and newsletter written in Spanish.

The Borough of Pottstown and the Pottstown Police Department, which share the same building as PART offices, have multiple Spanish speaking staff members who serve as interpreters or translators when required.

3. The nature and importance of programs, activities, or services provided by PART to the LEP population.

The largest geographic concentration of LEP individuals in the PART service area is Spanish. These concentrated areas have been identified in Pottstown. Services provided by PART that are most likely to encounter LEP individuals are the fixed route system which serves the general public and demand – response Paratransit service, which services primarily senior and disabled riders. PART programs and services play an important role to the LEP population by providing transportation to places of employment, medical appointments, shopping, and recreation.

It is also likely that PART will encounter LEP individuals at the downtown Intermodal Transit Facility, or Charles W. Dickinson Transportation Center, where the main transfer point is located. Based on the four – factor analysis, PART developed its LEP Plan as outlined in the following section.

4. The resources available to PART and overall cost to provide LEP assistance.

PART has the ability to seek assistance with local community organizations and non-profit agencies to facilitate services and provide LEP individuals with resources to better enable communication. Interpretive and translation services can be provided through operating, and bilingual materials will be provided within reason through annual budgeting. PART will incorporate LEP plans through media outlets and available networking.

LEP - PLAN OUTLINE

How PART and staff may identify an LEP person who needs language assistance:

1. Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
2. Have vehicle operators and other front-line staff, like dispatchers, schedulers, and service development planners; be surveyed on their experience concerning any contacts with LEP persons during the previous year.

LANGUAGE ASSISTANCE MEASURES

There are numerous language assistance measures available to LEP persons, including both oral and written language services. PART offers Ride Guides and Fare Guides to LEP persons in Spanish. The Borough of Pottstown and the Pottstown Police Department, which share the same building as PART offices, have multiple Spanish speaking staff members who serve as interpreters or translators when required. There are also various ways in which PART staff responds to LEP persons, whether in person, by telephone or in writing.

- Network with local human service organizations that provide services to LEP individuals and seek opportunities to provide information on PART programs and services quarterly.
- Placement of statements in notices and publications that interpreter services are available for meetings, with seven day advance notice. This is done on an as-needed basis.
- Survey bus drivers and other front-line staff, dispatchers, schedulers, and service development planners, annually on their experience concerning any contacts with LEP persons during the previous year.
- Post the PART Title VI Policy and LEP Plan on the agency website, www.pottstownarearapidtransit.com.
- Provides interpreters/translators on an as-needed basis.

STAFF TRAINING

The following training will be provided to and reviewed with PART staff quarterly:

1. Information on the PART Title VI Procedures and LEP responsibilities
2. Description of language assistance services offered to the public
3. Documentation of language assistance requests
4. How to handle a potential Title VI/LEP complaint

OUTREACH TECHNIQUES

When staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas, will be printed in an alternative language based on the known LEP population. If interpreters are needed, staff will network with the appropriate contacts to provide an interpreter and related language assistance services.

MONITORING & UPDATING THE LEP PLAN

PART will update the LEP as required by U.S. DOT. At minimum, the plan will be reviewed and updated when new U.S. Census data is available or when it is clear that higher concentrations of LEP individuals are present in the PART service area. Updates will include the following:

- The number of documented LEP person contacts encountered annually
- How the needs of LEP persons have been addressed
- Determination of the current LEP population in the service area
- Determination as to whether the need for translation services has changed
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether PART's financial resources are sufficient to fund language assistance resources needed.

DISEMINATION OF THE LEP PLAN

A link to the PART LEP Plan and the Title VI Procedures is included on the PART website at www.pottstownarearapidtransit.com.

Any person or agency with internet access will be able to access and download the plan from the PART website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person and shall be provided a copy of the plan at no cost. LEP individuals request copies of the plan in translation, which PART provide, if feasible.

Questions or comments regarding the LEP Plan may be submitted to the Borough Manager, Borough Hall, 100 East High Street, Pottstown, PA 19464.

Phone: 610-970-6511

Fax: 610-970-6513

Email: takepart@pottstown.org

SAFE HARBOR PROVISION

The Borough of Pottstown/PART translates all vital documents, including but not limited to, Ride Guides, Fare Guides, and PART Periodical Newsletter, into other languages consistent with the Safe Harbor Provision. The Safe Harbor Provision threshold states that written translation of vital documents should be provided for each LEP group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered. The LEP group constituting 5% in the PART service area is Spanish/Spanish Creole. At this time, all vital documents are translated into Spanish.

VIII.

TITLE VI COMPLAINT PROCEDURES

This section outlines the Title VI complaint procedures related to providing programs, services, and benefits within the Pottstown Area Rapid Transit system. However, it does not deny the complainant the right to file formal complaints with the Pennsylvania Human Relations Commission, Equal Employment Opportunity Commission, and Pottstown Borough Human Relations Commission, Federal Transit Administration, or seek private counsel for complaints alleging discrimination, intimidation, or retaliation of any kind that is prohibited by law.

Title VI of Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin.

Pottstown Area Rapid Transit (PART) is committed to a policy of non-discrimination in the conduct of its business, including its Title VI responsibilities – the delivery of equitable and accessible transportation services. PART recognizes its responsibilities to the communities in which it operates and to the society it serves. It is PART's policy to utilize its best efforts to assure that no person shall, on the grounds of race, color, or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under its program of transit service delivery and related benefits.

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin as noted below may file a written complaint with PART, directed to the **Borough Manager, 100 East High Street, Pottstown, PA 19464, by email at takepart@pottstown.org, or by telephone, 610-970-6511.** We encourage you to file your complaint in writing. Complainants have the right to complain directly to the appropriate federal agency. Every effort will be made to obtain early resolution of complaints. The option of informal meetings between the affected parties and the Borough Manager will be utilized. All complaints will be investigated promptly. Reasonable measures will be undertaken to preserve any information that is confidential. The Borough Manager will review every complaint, and when necessary, assign a neutral party to investigate.

As of June 13, 2023, the Borough of Pottstown/PART has had no complaints, investigations, or lawsuits within the last three fiscal years: FY20-21, FY21-22, FY22-23.

PROCEDURE

- 1.) The complaint must meet the following requirements:
 - a. Complaint shall be in writing and signed by the complainant(s). In cases where Complainant is unable or incapable of providing a written statement, a verbal

complaint may be made. The Borough Manager will interview the Complainant and assist the person in converting verbal complaints to writing. All complaints must, however, be signed by the Complainant or his/her representative.

- b. Include the date of the alleged act of discrimination date when the Complainants became aware for the alleged act of discrimination; or the date on which the conduct was discontinued or the latest instance of conduct.
 - c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complaint.
 - d. Federal and state law requires complaints be filed with 180 calendar days of the alleged incident.
- 2.) Upon receipt of the complaint, the Borough Manager will determine its jurisdiction, acceptability, need for additional information, as well as assign the complaint to an EEO Representative to investigate the merit of the complaint.
- 3.) The Complainant will be provided with a written acknowledgment that PART has either accepted or rejected the complaint.
- 4.) A complaint must meet the following criteria for acceptance:
 - a. The Complaint must be filed within **180 days** of the alleged occurrence.
 - b. The allegation must involve a covered **basis** such as race, color, or national origin.
 - c. The allegation must involve a PART program or activity.
- 5.) A complaint may be dismissed for the following reasons:
 - a. The Complainant requests the withdrawal of the complaint.
 - b. The Complainant fails to respond to repeated requests for additional information needed to process the complaint.
 - c. The Complainant cannot be located after reasonable attempts.
- 6.) Once PART's EEO Representative decides to accept that complaint for investigation, the Complainant will be notified in writing of such determination. The complaint will receive a case number and will then be logged in a database identifying: **Complainant's name, basis, alleged harm, race, color, and national origin of the Complainant.**
- 7.) In cases where PART's EEO Representative assumes the investigation of the complaint, within 90 calendar days of the acceptance of the complaint, PART's EEO Representative will prepare an investigative report for review by the Borough Manager. The report shall include a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition.

8.) The investigative report and its findings will be reviewed by the Borough Manager, EEO, and in some cases the investigative report and findings will be reviewed by PART's legal counsel. The report will be modified as needed.

9.) The Borough Manager, EEO, and Legal Counsel will make a determination on the disposition of the complaint. Dispositions will be stated as follows:

- a. In the event PART is in noncompliance with Title VI regulations remedial actions will be listed.

10.) Notice of the Borough Manager's determination will be mailed to the Complainant. Notice shall include information regarding appeal rights of the Complainant and instructions for initiating such an appeal. Notice of appeals are as follows:

- a. PART will reconsider this determination, if new facts, come to light.
- b. If Complainant is dissatisfied with the determination and/or resolution set forth by PART, the same complaint may be submitted to FTA for investigation. Complainant will be advised to contact the **Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor – TCR, 1200 New Hersey Ave., SE, Washington, DC 20590**

11.) A copy of the complaint and PART's investigation report/letter of finding and Final Remedial Action Plan, if appropriate will be issued to FTA within 120 days of the receipt of the complaint.

12.) A summary of the complaint and its resolution will be included as part of the Title VI updates to the FTA.

RECORDKEEPING REQUIREMENT

The Borough Manager will ensure that all records related to PART's Title VI Complaint Process are maintained with department records for at least five years from date of complaint.

Records will be available for compliance review audits.

As of June 13, 2023, PART has received no Title VI complaints.

IX.

POTTSTOWN AREA RAPID TRANSIT

BOROUGH OF POTTSTOWN

TRANSIT DEVELOPMENT PLAN & PUBLIC PARTICIPATION PLAN

PURPOSE

The purpose of this Public Participation Plan, (PPP), is to establish procedures that allow for, encourage, and monitor participation of all citizens in the **Pottstown Area Rapid Transit** system service area, including but not limited to low income and minority individuals, and those with limited English proficiency. While traditional means of soliciting public involvement may not reach such individuals, or might not allow for meaningful avenues of input, the intent of this effort is to take reasonable actions throughout the planning process to provide opportunities for historically under-served populations to participate.

This document will lay out procedures to provide opportunities for all area citizens to participate in the development of a Transit Development Plan (TDP) for the Pottstown Area Rapid Transit System. The TDP is a short-range plan, (roughly 5 years) which analyzes all aspects of transit operations. Where appropriate, recommendations are made to improve these aspects of transit operations.

Upon initiating a TDP, notice will be posted in the local newspaper, noting the existence of this public participation plan and a copy of the PPP will be sent, at a minimum, to planning stakeholders.

Goals and Objectives for the Public Participation Plan

Goal:

The goal of the PPP is to offer real opportunities for the engagement of all citizens of the Pottstown Area Rapid Transit service area to participate in the development of a Transit Development Plan (TDP). PART strives to promote full and fair participation of all affected populations in transportation decision making; ensure meaningful access to programs and activities by persons with limited English proficiency; and to prevent the denial, reduction, or delay in benefits of programs and/or activities that benefit minority or low-income populations.

Objectives:

- To determine what non-English languages and other cultural barriers exist to public participation within the Pottstown area.

- To provide a general notification of meetings, particularly forums for public input, in a manner that is understandable to all populations in the area.
- To hold meetings in locations which are accessible and reasonably welcoming to all area residents, including, but not limited to, low-income and minority members of the public.
- To provide avenues for two-way flow of information and input from populations, which are not likely to attend meetings.
- To provide a framework of actions appropriate to various types of plans and programs, as well as amendments or alterations to any such plan or program.
- To use various illustrative visualization techniques to convey the information including but not limited to charts, graphs, photos, maps, and the Internet.

Identification of Stakeholders

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 are broken down into several groups: general citizens, minority and low-income persons, public agencies, and private organizations and businesses.

General Citizens:

There are 22,377 residents in the Pottstown area. Pottstown is categorized as an Urbanized Area (UA), comprised of 74,115 people.

Language Statistics: Residents who speak English comprise of 20,673, or 93.7% of the population. 1,045 or 6.3% of people speak a language other than English. 5.1% people speak Spanish. 1.0% speak Indo-European, .1% speak Asian/Pacific Islander.

Some techniques that can be used to engage the general population are public notices of meetings in the local newspaper, with an open house format to distribute information and notices regarding planning. While these techniques will continue, staff will make a greater effort to engage the general public, possibly with techniques such as, nominal group exercises, surveys, use of local news media and social networking, etc.

Minorities:

Demographic Statistics: Of the Pottstown population, 19.5% of residents are black or African American, 2.7% are some/other races, 4.4% are two or more races, 8% Hispanic or Latino, and 72.1% are white.

In terms of gender, the female population is 52%, and the male population is 48%.

Engaging minority, and low-English proficiency populations is a goal of PART. In PART planning affairs, there will be reasonable efforts to engage minority populations using techniques, such

as including notation in public notices in appropriate non-English languages that will provide a contact where the individual can be informed of the process/project, and will have the opportunity to give input. Focus groups may also be established for the purpose of gaining input from a particular defined portion of the community. Also, advocacy groups can be a good resource for contacts and dissemination of information to minority and low-English proficiency populations. Such advocacy groups or agencies can have insight into the needs of the under-represented populations, as well as providing valuable contacts or areas for input. Contacts with local translators should also be maintained, and used as requested and needed.

PART strives to communicate effectively with and encourage participation among minority groups and will do so in various ways, including, but not limited to:

- Posting information on vehicles, at bus shelters and the Charles W. Dickinson Transportation Center
- Distributing flyers at the Ricketts' Community Center, YWCA, YMCA, shopping centers, and churches
- Provide materials for the LEP population
- Meeting with various minority groups including the NAACP, Human Relations Commission, Centro Cultural Latinos Unidos, and ACLAMO

TABLE 1

Pottstown Area Rapid Transit Population Statistics

<u>Category</u>	<u>Number</u>	<u>Percent of Population</u>
Total	23,377	100%
Total One Race	21,039	90%
White	15,476	66.2%
Black	5,026	21.5%
<u>Amer. Indian/</u>		
Alaskan Native	0	0.0%
Asian	117	0.5%
<u>Hawaiian</u>		
& Pac. Islander	0	0.0%

Two or More Races	2,377	10%
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Hispanic	1,917	8.2%
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Low-income households:

Pottstown's median household income is estimated at \$42,969, median family income at \$54,597, and per capita income at \$23,190. 12.7% of families fall below the poverty level, while 18.6% of individuals fall below the poverty level. As compared to the national average, Pottstown has a more concentrated low-moderate income population.

While low income individuals may have access to all of the traditional means of public involvement, discussed under "general public," they may be less likely to become involved, or offer input. Some methods of gaining input either directly or indirectly form this portion of the population include focus groups, informal interviews and agency/advocacy group contacts.

Public Agencies:

Public agencies can provide valuable input to the planning process, in addition to assisting in gaining participation from traditionally under-represented populations. Pertinent public agencies include those that have clients who fall into under-represented populations, including but not limited to minorities, low-income, and limited English proficiency households. These agencies have great insight into the transportation needs of their clients and are useful partners in overcoming difficult barriers that may not be understood by professionals dealing more distinctly with the provision of transportation services. Local public agencies related to the PPP would include the Tri-County Community Network, the Pottstown Borough Human Relations Committee, and the United Way of Southeastern PA.

Private Organizations and Business:

Private organizations and businesses offer a number of perspectives that are valuable to the planning process. Often, transportation for employees is of critical concern to private sector employers. For that reason, representation of private business interests will be welcomed in the planning process. Examples of private sector engagement would include the Tri-County Area Chamber of Commerce and associated members, the Pottstown Hospital Tower Health, and merchants on the transit system route schedule.

Public Participation Plan

This document, upon its adoption, is to serve as the PPP for the Pottstown Area Rapid Transit system. The policy will be made available, and be advertised in creating any Transportation Development Plans in the future. All opportunities for Public Participation will be advertised in both English and Spanish to allow for equal opportunity for the LEP population to participate. An interpreter/translator will be on hand to provide assistance if required. Opportunities for

public participation and engagement are offered at various times to accommodate varying schedules and are adjusted as needed. Meetings are held in locations which are full accessible and hospitable to all residents, including but not limited to, low-income and minority members of the public. The locations are also relevant to the topics being presented.

Outreach Efforts

In addition to the outreach efforts identified earlier in this policy, staff will use the following techniques during its planning studies, as deemed appropriate by staff and the Pottstown Area Rapid Transit.

Discussions with the NAACP and the Centro Cultural Latinos Unidos, Inc (a bilingual non-profit committed to enriching the lives of Latinos) to establish the transit needs of the community.

Presentations to professional, citizen, and student organizations.

Articles in community newsletters.

Press releases and meetings with local media representatives.

Informal conversations with individuals and small groups.

Interviews with people who are or could be affected by study recommendations.

Presentations by experts on various transit related subjects.

User and non-user surveys.

Use various illustrations and visualization techniques to convey the information including but not limited to charts, graphs, photos, maps, and the internet.

Other techniques will be examined to determine the best methods of involving all segments of the service area population in the planning process.

Outreach efforts conducted within the last three years:

Presentations to Tri-County Community Network

Tri-County Community Network (TCN) is an organization dedicated to forming partnerships to improve health, social, and environmental conditions. They work with various agencies throughout the PART service area and are a useful tool for dissemination of information. PART made presentations at several TCN meetings, focusing on services offered and our dedication to adhering to Title VI. Members were provided with information on the policy and how to file a complaint. Schedules, newsletters, and fare guides were distributed in

English and Spanish, each highlighting the policy. PART continues to engage with the Executive Director of TCN on a regular basis to provide updated information and opportunities for public participation.

Meetings with TriCounty Chamber of Commerce

The TriCounty Chamber of Commerce (TCCC) serves businesses and organizations in Pottstown and the surrounding communities. Staff of PART meets with the President of TCCC on a semi-annual basis to provide updated policy information. PART presents at no less than two Chamber meetings per year to ensure that members of TCCC are aware of our service and strict adherence to said policies.

Presentation to Pottstown Trauma Informed Community Connections

PART attended the Pottstown Trauma Informed Community Connections meeting focused on transportation. PART staff presented to attendees on service and policies. Attendees represented Pottstown School District, social service agencies, minority groups, and ESL groups. The meeting broke into small groups during which PART transportation was discussed. The majority of attendees suggested free transportation for low income and minorities.

Meetings with Human Relations Commission

PART met with the Human Relations Commission on a semi-annual basis. They were provided with information on the Title VI policy and ways to file a complaint if necessary. Schedules, newsletters, and fare guides in English and Spanish were distributed, each highlighting the policy.

Outreach materials

All PART materials including updated schedules and fare guides, transit tubes, and kiosk include information on Title VI. These items are available on buses, in Borough Hall, at PART offices, and at various locations throughout the community, including TriCounty Active Adult Center, Pottstown Library, and Pottstown School District.

Surveys

PART conducted both customer satisfaction and non-rider surveys via the website, as well as in hard copy. All surveys asked for any comments or complaints. No complaints were received in regard to the Title VI Policy. A Customer Satisfaction Survey was conducted in 2022. No Title VI complaints were received.

Transit Development Plan

PART has developed a Transit Development Plan, funded by PennDOT, with the assistance of Michael Baker International. A Public Meeting was held on Tuesday, January 22, 2019, from 11am to 1pm and 5pm to 7pm at the Pottstown Regional Public Library, a central location in the Borough with excellent public transit service. Two time periods were available to serve those with varied schedules. In addition, a translator was on hand to serve the LEP population. Flyers were posted on the buses and in bus shelters in both English and Spanish.

Methods of Addressing Comments:

Comments will be documented, presented to decision-making bodies, modified in the contents of the document as necessary, and will be included in the appendices of planning products after they are approved or published. Comments received after studies and other planning products are completed and approved will be documented and referenced when amending or updating the planning products in the future.

Responses to Information Requests and Comments:

Information can be requested from staff in person and by phone, fax, email, and U.S. mail.

X.

Equity Analysis

No such projects requiring an equity analysis were conducted during this reporting period. Therefore, PART did not:

- Complete and submit an equity analysis during a project planning stage
- Conduct outreach to persons impacted by the siting of a facility
- Compare equity impacts of alternative locations
- Determine if any cumulative adverse impacts might result
- Determine that a project location will result in disparate impacts on the basis of race, color, or national origin
- Provide substantial legitimate justification for the project location

XI.**Service Standards****Vehicle Load by Route**

The average of all loads during any given operating period should not exceed the vehicles achievable capacities, which are 34 passengers seated, and 10 standing on all PART buses. All fixed route vehicles are 35 foot, low floor buses. The rubber tired trolley is used for charter purposes only.

See chart below for average passenger capacity.

Route	Weekday Vehicle Load	Saturday Vehicle Load
Blue Line	0.21	0.15
Green Line	0.18	0.15
Orange Line	0.12	0.09
Purple Line	0.14	0.12
Yellow Line	0.15	0.12

See chart below for average daily ridership.

Route	Weekday	Saturday
Blue Line	211	158
Green Line	0	98
Orange Line	256	159
Purple Line	102	61

Yellow Line	82	60
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Vehicle Headway

PART is a small, urban public transit system operating five routes in maximum service. PART does not operate more than one vehicle per route. Vehicle headway would be the next scheduled stop, which would be 60 minutes on each route.

On Time Performance

A vehicle is considered on time if it departs a scheduled time point no more than one minute early and no more than five minutes late. PART's on time performance objective is 90% or greater. At this time, PART does not have the technology to track on time performance electronically. On time performance is tracked manually via Customer Satisfaction Surveys, complaints, and spot checks. PART has received funding for an Intelligent Transportation System; the system should be in place mid-2020. The project was delayed due to PennDOT issuing a state-wide procurement to ensure that all systems maintain compatible equipment.

Service Availability

PART has a high spare ratio. If a vehicle must go out of service, it is replaced immediately, as to not impact the delivery of service. While PART has designated bus stops within downtown Pottstown, riders may stand at any corner for pick up. The Borough of Pottstown strives to distribute transit service so that 90% of all residents in the service area are within 1/3 mile of bus service.

Service Policies

When adopting service policies, PART ensures that all service design and operations are equitable and non-discriminatory by making changes to design/operations to all modes of transportation equally, as to not discriminate on the basis of race, color, or national origin.

Transit Amenities

All PART vehicles, both fixed route and non-fixed route, have the same amenities. PART maintains a rubber tired trolley which is utilized for charter purposes only.

On Vehicle Amenities for fixed and non-fixed route vehicles:

Low floor

- Air conditioning (which is now considered standard)
- Lighting at front and rear doors and stairwells
- Priority reserved seats in the front of the bus, wheelchair ramps and designated areas
- Easy to reach stop-request buttons
- Security cameras
- On-board information display
- Yellow edging on steps
- Lightly padded seats

Rubber Tired Trolley

- Air conditioning
- Lighting at front and rear doors and stairwells
- Priority reserved seats in the front of trolley, wheelchair ramps and designated areas
- Easy to reach stop-request buttons
- Security Cameras
- Yellow edging on steps

Transit system

- Transit center with benches well-lit and close to downtown businesses/facilities with maps and schedules posted
- Many local bus stops
- Bus shelters with benches
- Transit tubes at designated stops

Vehicle Assignment

PART has a limited number of vehicles. All vehicles are the same make and model, low floor diesel buses.