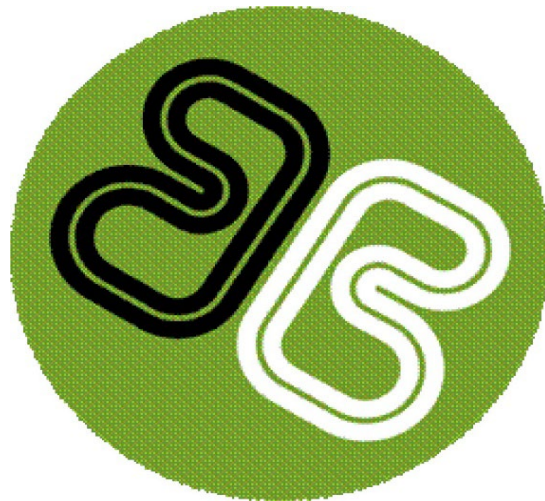


Berkshire Regional Transit Authority

Title VI Program



BRTA
1 Columbus Avenue
Pittsfield, MA 01201
(413) 499-2782
www.berkshirerta.com

Updated: March 2023

Approved by the BRTA Advisory Board 3/30/2023

Introduction

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color, and national origin in programs and activities receiving federal financial assistance. The Berkshire Regional Transit Authority (BRTA) follows the Federal Transit Administration's work to ensure nondiscriminatory transportation in support of our mission to enhance the social and economic quality of life for all Americans. Reference: FTA Circular 4702.1B. The purpose of this Title VI policy is to establish guidelines to effectively monitor and ensure that the BRTA is in compliance with all FTA Title VI requirements and regulations in order to carry out the provisions of the Department of Transportation (DOT) Title VI regulations, 49 CFR Part 21. The BRTA will ensure all programs, policies, and activities comply with FTA and DOT guidance and is committed to creating and maintaining public transit service that is free of all forms of discrimination. The BRTA will take whatever preventative, corrective, and disciplinary action necessary for behavior that violates this policy or the rights and privileges it is designed to protect.


The BRTA hereby states its policy to uphold and assure full compliance with Title VI of the Civil Rights Act of 1964 (Title VI), the Civil Rights Restoration Act of 1987, and related federal and state nondiscrimination statutes and regulations. Title VI requires that no person in the United States of America shall, on the grounds of race, color or nation origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance. The BRTA ensures that all transit services and related benefits are distributed in an equitable manner. Individuals who feel they have been discriminated against in violation of Title VI, wishing to file a complaint with the BRTA Administration must do so in writing within 180 days of the alleged discriminatory conduct.

To ensure compliance with 49 CFR Section 21.7, every application for financial assistance from FTA is accompanied by an assurance that the BRTA will carry out the program in compliance with Title VI of the Civil Rights Act of 1964. This requirement is fulfilled each year when the BRTA submits its annual certifications and assurances to FTA.

Massachusetts law (M.G.L. Chapter 272 §§92a, 98, 98a and Executive Order 526) also prohibits discrimination in public accommodations based on race, religion, color, national origin, ancestry, gender, age, handicap, sexual orientation, gender identity, veteran's status, and any other protected classes.

Title VI Notice to the Public

To make our customer aware of our commitment to the Title VI compliance and of their right to file a civil rights complaint, the following notice will be posted on our website (www.berkshirerta.com), at the transit facility, and on all bus fleets.

Title VI Information	Información de título VI												
<p>Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that “no person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving Federal financial assistance.” (42 USC Section 2000d-1)</p> <p>Individuals or organizations who believe they have been denied the benefit of, excluded from participation in, or subject to discrimination on the grounds of race, color, or national origin by the Berkshire Regional Transit Authority can file a signed, written complaint by:</p> <ol style="list-style-type: none"> 1) Submitting a signed, written complaint with contact information 2) Mail written complaint to: BRTA, One Columbus Ave, Suite 201, Pittsfield, MA 01201 Attn: Civil Rights Officer 3) E-mail the BRTA at info@berkshirerta.com <p>Copies of the BRTA’s Title VI Program may be obtained from the address above.</p> <table border="0"> <tr> <td>This notice will be made available in other languages.</td> <td>English</td> </tr> <tr> <td>Este aviso estará disponible en otros idiomas.</td> <td>Spanish</td> </tr> <tr> <td>Niniejsze obwieszczenie będą dostępne w innych językach</td> <td>Polish</td> </tr> <tr> <td>Questo avviso sarà resi disponibile in altre lingue</td> <td>Italian</td> </tr> <tr> <td>Este aviso será disponibilizado em outros idiomas</td> <td>Portuguese</td> </tr> <tr> <td>Это уведомление будет предоставляться на других языках.</td> <td>Russian</td> </tr> </table>	This notice will be made available in other languages.	English	Este aviso estará disponible en otros idiomas.	Spanish	Niniejsze obwieszczenie będą dostępne w innych językach	Polish	Questo avviso sarà resi disponibile in altre lingue	Italian	Este aviso será disponibilizado em outros idiomas	Portuguese	Это уведомление будет предоставляться на других языках.	Russian	<p><i>Título VI de la ley de derechos civiles de 1964 prohíbe la discriminación por raza, color u origen nacional en programas y actividades que reciben asistencia financiera Federal. En concreto, título VI establece que “ninguna persona en los Estados Unidos, por razón de raza, color u origen nacional, excluida de la participación en, ser negada los beneficios de o ser sujeto a discriminación bajo cualquier programa o actividad recibiendo asistencia financiera Federal”. (42 USC sección 2000d-1)</i></p> <p><i>Los individuos o organizaciones que creen que se les ha negado el beneficio de, excluidos de la participación en, o sujetos a discriminación por motivos de raza, color o nacionalidad de origen por la autoridad de tránsito Regional Berkshire pueden presentar firmado, una denuncia por escrito:</i></p> <ol style="list-style-type: none"> 1) <i>Presentar una denuncia por escrito con la información de contacto</i> 2) <i>denuncia por escrito:</i> <i>BRTA, 1 Columbus Ave, Suite 201, Pittsfield, MA 01201</i> <i>Attn: Oficial de derechos civiles</i> 3) <i>Correo electrónico de BRTA a info@berkshirerta.com</i> <p><i>Pueden obtener copias del programa del BRTA título VI de la dirección arriba indicada.</i></p> <p>Berkshire Regional Transit Authority 1 Columbus Ave, Pittsfield, MA 01201 www.berkshirerta.com (413) 499-2782</p>  <p><small>Version January 2020</small></p>
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Это уведомление будет предоставляться на других языках.	Russian												

Title VI Complaint Procedures

The BRTA is committed to ensuring that no person is excluded from participation in or denied benefits of its services on the basis of race, color or national origin as prohibited under Title VI of the Civil Rights Act of 1964. Anyone who believes there is an act of discrimination in a BRTA program or activity may file a Title VI complaint. Any person who believes that they have been subjected to discrimination on the basis of race, color, or national origin may file a complaint with the Authority within 180 days of the date of the alleged discrimination.

To file a complaint, send a letter or submit a complaint form, contact the BRTA at info@berkshirerta.com or BRTA, One Columbus Avenue, Suite 201, Pittsfield, MA 01201 Attn: Civil Rights Officer. The BRTA will respond within 60 days of receipt of this complaint. The BRTA will investigate the complaint and make a determination. Formal investigation of the complaint will be confidential and will include, but is not limited to, details of the specific incident, frequency and dates of occurrences and names of any witnesses. The customer will be notified of the resolution.

Appeals Process: If the complainant is not satisfied with the resolution, an appeal process is available. An appeal request for review of a determination of unlawful denial of access or accommodation to public transportation must be filed, in writing, within 60 calendar days of the notice of resolution. The written appeal must include the customer’s name, address, and telephone number. A statement of reason(s) why the applicant believes the denial of accommodation request or access to public transportation was inappropriate is recommended.

The Administrator will set a mutually agreed upon time and place for the review process with the applicant and/or representative(s) within 30 days of the request. The applicant may submit documents or other information to be included with the record and considered in the review process. A record of the review will be kept, as determined by the Administrator. Anyone needing special accommodations may contact the BRTA office at (413) 499-2782 for assistance. The right of the appellant to a prompt and equitable resolution of the complaint must not be impaired by the appellant's pursuit of other remedies, such as filing of a complaint with the Department of Justice or other appropriate federal agency or the filing of a suit in state of federal court.

Disposition of Complaints:

Substantiated Complaints: If the complaint is substantiated, this policy and procedure prohibiting discrimination will be reviewed with the offender. Appropriate disciplinary action and/or training will be taken pursuant to the agency disciplinary procedures.

Unsubstantiated Complaints: if there is insufficient evidence to either prove or disprove the allegation(s), both parties to the complaint will be informed of the reason(s) for this disposition.

Unfounded Complaints: If it is determined that an act reported pursuant to this policy/procedure did not in fact occur, a finding of unfounded shall be made.

Exonerated Complaints: If it is determined that an act reported pursuant to this policy/procedure did in fact occur but was lawful and proper within the guidelines established herein, a finding of exonerated shall be made.

Title VI Complaint Form

Complaint procedures are detailed on the BRTA website and can be filed using the online complaint form, written, or by any other appropriate method.

<https://berkshirerta.com/wp-content/uploads/2021/08/Title-VI-complaint-form.pdf>

List of Transit-Related Title VI Investigations, Complaints, and Lawsuits

BRTA maintains a list of active investigations conducted by the Federal Transit Administration (FTA) and other entities including lawsuits and complaints naming BRTA that allege discrimination on the basis of race, color or national origin. This list includes the date that the transit-related Title VI investigation, lawsuit, or complaint was filed, a summary of the allegations, the status of the investigation, lawsuit, or complaint and actions taken by BRTA in response or final findings related to the investigation. At this time, there are no pending service complaints which allege discrimination on the grounds of race, color or national origin or any other form of discrimination.

Public Participation Plan

The BRTA's Public Participation Plan has been prepared to ensure that no one is precluded from participating in BRTA's service planning and development process. The plan is based on the following principles:

- **Flexible**
BRTA accommodates participation in a variety of ways and can adjust as needed.
- **Inclusive**
BRTA engages with low income, minority, and LEP populations from the BRTA service area. Information will be available in electronically accessible formats for LEP persons.
- **Respectful**
All feedback is given careful and respectful consideration.

- **Proactive and Timely**
Participation methods will allow for early involvement and be ongoing. Adequate public notice and time for both public review and comments is given.
- **Clear, Focused, and Understandable**
Participation methods have a clear purpose and use for the public input and described in a language that is easy to understand.
- **Honest and Transparent**
The information is accurate, trustworthy, and complete.
- **Responsive**
BRTA will respond and incorporate applicable public comments into transportation decisions.
- **Accessible**
Meetings are held in fully accessible locations, on or near a fixed bus route during fixed route hours. They are welcoming all residents including, but not limited to, low income, minority, and LEP member of the public and in locations relevant to the presentation topics and discussion.

The BRTA will use its Public Participation Plan when considering fare changes, modifications to bus routes, and other transit planning projects when:

- A fare increase or significant change in the method of fare payment is being considered;
- A new bus route is established;
- An existing bus route is proposed for elimination; and
- Discontinuance of service for any bus route or group of bus routes on any given day when bus service is currently offered.
- Or a change of 25% or more of overall service hours or miles. For minor service changes not rising to the 25% threshold, BRTA will post change notices on the website, at the station, and in the vehicles.

When a service or fare change proposal is developed, the BRTA Administration brings the proposal before the BRTA Advisory Board to consider releasing the proposal for public review and comment. To hold a public meeting, BRTA will:

- Research accessible public venues, dates, and times with consideration of the proposed changes and their impact on specific locations/populations within the BRTA service area;
- Develop bilingual (English and Spanish) public outreach materials, posting at the BRTA and on every fixed route bus;
- Generate an email to BRTA community partners to provide information within their organization and share with others;
- Provide local media with press releases; and
- Affix the information to the BRTA's website and social media.

Summary of BRTA Outreach

Over the past three years, the BRTA has conducted public meeting for bus route service efficiencies. The COVID-19 pandemic altered the locations for the public meetings. There were public meetings that were at a variety of times via Zoom, morning, afternoon, and evenings. Public meetings were also held at the BRTA boardroom at the Intermodal Transit Center, 1 Columbus Avenue, Pittsfield, MA. The BRTA is accessible, transit friendly, and central ensuring all customers could easily participate if they wish. Meeting notices in English and Spanish were posted on BRTA vehicles, at the BRTA facility, faxed to local radio and print media, posted on the BRTA website, and sent via email to a large collaboration of agencies and individuals.

All procurements, as per FTA, have included the required Federal clauses including civil rights requirements.

The BRTA is continually looking for ways to expand its outreach base and to be more present in the community by participating in activities and events, as well as reaching out to local organizations that work with diverse and vulnerable populations in the BRTA region. Additional outreach efforts have included the BRTA Travel Training program, which is a free service to all members of the public. This program provides comprehensive instruction to familiarize individuals and groups with the BRTA system. BRTA Travel Training outreach has worked with Berkshire Immigration Center, Berkshire Advocates for Immigrants; Berkshire Community College; local high schools; BFAIR, College Internship Program, local senior centers and housing, low-income housing, United Cerebral Palsy; Mass Rehab, MRC, Pathways, and DDS, amongst others. The Travel Trainer meets with the rider to assess their current experience and skill set with using the BRTA and modifies the training accordingly.

Language Assistance Plan

The BRTA provides meaningful language assistance and access to persons with limited English proficiency (LEP), based upon DOT LEP Guidance. Public transit is a key means of achieving mobility for many LEP persons. Recent immigrants to the US (including those persons who may not be limited English proficient) use public transportation at higher rates than native-born adults. Agencies that provide language assistance to persons with limited English proficiency in a competent and effective manner will help ensure that their services are safe, reliable, convenient, and accessible to those persons. These efforts may attract riders who would otherwise be excluded from participating in the service because of language barriers.

To ensure meaningful access to programs and activities, the BRTA uses the information obtained in a Four-Factor Analysis to determine the specific language services that are appropriate. This analysis helps BRTA to determine if it communicates effectively with LEP people and informs language access planning. This plan is continually reviewed, updated, and improved to better meet the needs of transit customers. The BRTA aims to ensure that LEP (Limited English Proficiency) persons have access to all its information, services, and benefits. LEP persons are individuals who have limited or nonexistent ability to read, write, speak, or understand English. Federal regulations and guidance define persons with Limited English Proficiency as individuals with a primary or home language other than English who must, due to limited fluency in English, communicate in that primary or home language if the individuals are to have an equal opportunity to participate effectively in or benefit from any aid, service or benefit in federally funded programs and activities.

The Four-Factor Analysis is a local assessment the reviews the following:

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

The BRTA will review its LAP Plan at least every 3 years and seek to determine if changes have occurred in:

- Current LEP populations in the service area or population encountered;

- Frequency of encounters with LEP language groups;
- Available resources, sources of additional resources, and associated costs;
- Staff’s knowledge and understanding of the LAP Plan, language assistance resources, and how to serve LEP individuals; and
- The identified sources of assistance to determine their continued availability.

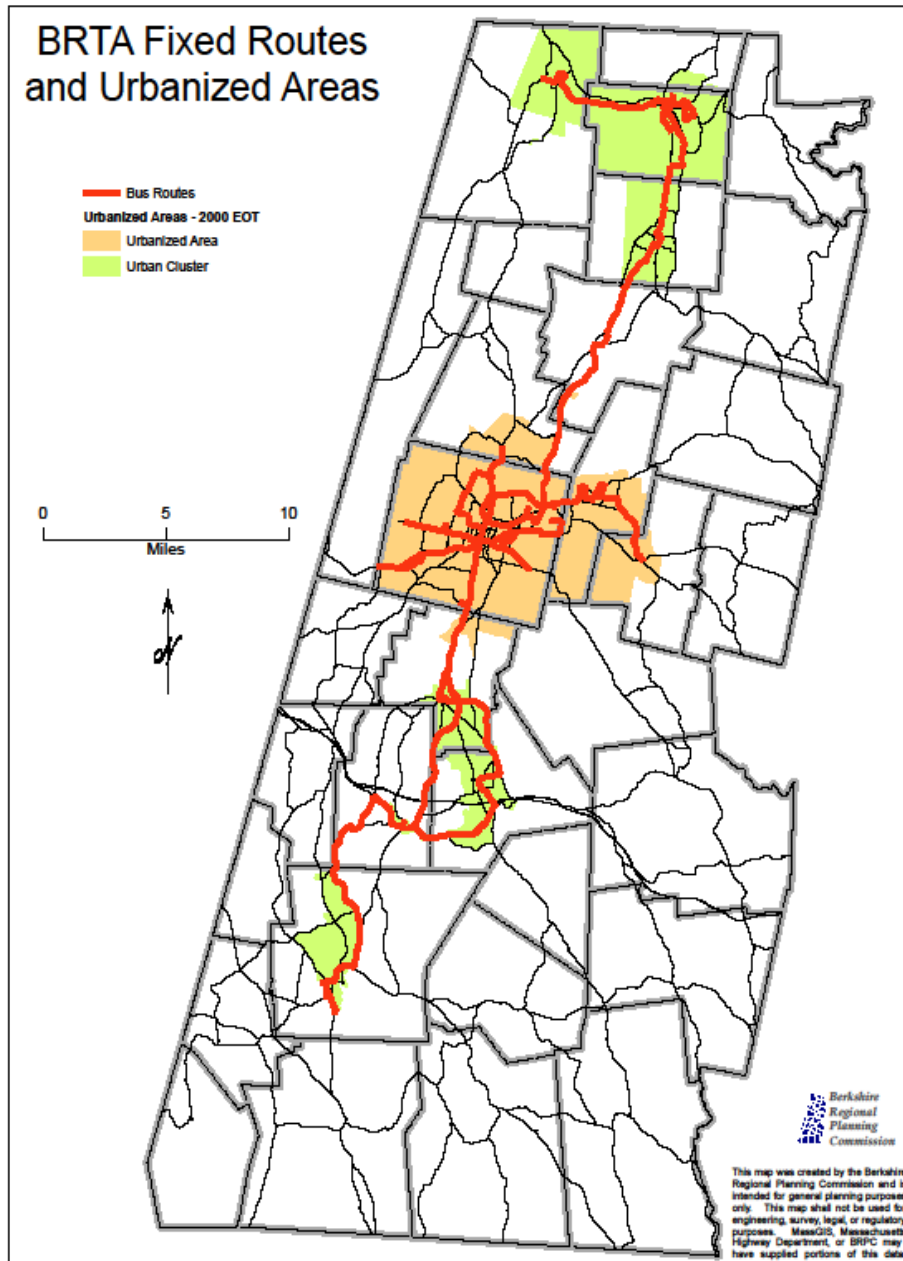
Information gathered in this review will be used to update the LAP Plan, no less often than every three years to coincide with BRTA’s submission of their updated Title VI Plan to regulatory agencies.

Factor 1: The Number and Proportion of LEP People Eligible to be Served or Likely to be Encountered by the BRTA

The BRTA provides public transportation services to its 27 member communities within Berkshire County, MA. Fixed route service is provided by 12 bus routes in 13 communities from Williamstown to Great Barrington. Paratransit service to eligible consumers is provided in all 27 member communities. Almost 1/3 of the BRTA service is provided in rural communities. Only the city of Pittsfield and some adjacent census tracts in Dalton and Lanesborough are categorized as “urbanized are” by the US DOT’s Federal Aid Program. Fixed route service is available weekdays and Saturdays, with no Sunday service.

The BRTA service area consists of the 27 municipalities listed below.

Adams	Great Barrington	North Adams	Washington
Alford	Hinsdale	Otis	Williamstown
Becket	Lanesborough	Peru	Windsor
Cheshire	Lee	Pittsfield	
Clarksburg	Lenox	Richmond	
Dalton	Monterey	Savoy	
Egremont	Mount Washington	Sheffield	
Florida	New Ashford	Stockbridge	



The 2017-2021 American Community Survey *Language Spoken at Home* table estimated the population that are five years of age and older in Berkshire County is 123,795. Of this, 121,693 people or 98.3% speak English “very well” and 2,102 or 1.7% of Berkshire County population speak English less than “very well”. The proportion of the LEP population in Berkshire County who speak languages other than English was 9,164 or 7.4%. This is broken down into Spanish (3.1%), other Indo-European languages (2.8%), Asian and Pacific Island languages (0.8%), and other languages (0.7%).

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Berkshire County	Total	Percent	Percent of specified language speakers			
			Speak English only or speak English "very well"	Percent speak English only or speak English "very well"	Speak English less than "very well"	Percent Speak English Less than "very well"
Label	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate
Population 5 years and over	123,795	(X)	121,693	98.3%	2,102	1.7%
Speak only English	114,631	92.6%	(X)	(X)	(X)	(X)
Speak a language other than English	9,164	7.4%	7,062	77.1%	2,102	22.9%
SPEAK A LANGUAGE OTHER THAN ENGLISH						
Spanish	3,839	3.1%	2,825	73.6%	1,014	26.4%
5 to 17 years old	522	0.4%	483	92.5%	39	7.5%
18 to 64 years old	3,124	2.5%	2,162	69.2%	962	30.8%
65 years old and over	193	0.2%	180	93.3%	13	6.7%
Other Indo-European languages	3,473	2.8%	2,652	76.4%	821	23.6%
5 to 17 years old	228	0.2%	200	87.7%	28	12.3%
18 to 64 years old	2,217	1.8%	1,780	80.3%	437	19.7%
65 years old and over	1,028	0.8%	672	65.4%	356	34.6%
Asian and Pacific Island languages	997	0.8%	801	80.3%	196	19.7%
5 to 17 years old	139	0.1%	110	79.1%	29	20.9%
18 to 64 years old	805	0.7%	678	84.2%	127	15.8%
65 years old and over	53	0.0%	13	24.5%	40	75.5%

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Other languages	855	0.7%	784	91.7%	71	8.3%
5 to 17 years old	145	0.1%	135	93.1%	10	6.9%
18 to 64 years old	660	0.5%	599	90.8%	61	9.2%
65 years old and over	50	0.0%	50	100.0%	0	0.0%
CITIZENS 18 YEARS AND OVER						
All citizens 18 years old and over	104,826	(X)	103,522	98.8%	1,304	1.2%
Speak only English	98,627	94.1%	(X)	(X)	(X)	(X)
Speak a language other than English	6,199	5.9%	4,895	79.0%	1,304	21.0%
Spanish	2,820	2.7%	2,142	76.0%	678	24.0%
Other languages	3,379	3.2%	2,753	81.5%	626	18.5%

The Language Spoken at Home for the Population 5 years and Over table is based between 2017-2021 American Community Survey- 5 year estimates displays all of the language spoken in Berkshire County. Spanish is spoken by 3,829 people; followed by people who speak other Indo-European languages 1,577; and thirdly Russian, Polish, or other Slavic language are spoken by 897 people.

	Berkshire County, Massachusetts
Label	Estimate
Total:	123,795
Speak only English	114,631
Spanish:	3,839
Speak English "very well"	2,825
Speak English less than "very well"	1,014
French, Haitian, or Cajun:	640
Speak English "very well"	506
Speak English less than "very well"	134

German or other West Germanic languages:	359
Speak English "very well"	303
Speak English less than "very well"	56
Russian, Polish, or other Slavic languages:	897
Speak English "very well"	664
Speak English less than "very well"	233
Other Indo-European languages:	1,577
Speak English "very well"	1,179
Speak English less than "very well"	398
Korean:	240
Speak English "very well"	183
Speak English less than "very well"	57
Chinese (incl. Mandarin, Cantonese):	286
Speak English "very well"	238
Speak English less than "very well"	48
Vietnamese:	155
Speak English "very well"	130
Speak English less than "very well"	25
Tagalog (incl. Filipino):	88
Speak English "very well"	62
Speak English less than "very well"	26
Other Asian and Pacific Island languages:	228
Speak English "very well"	188
Speak English less than "very well"	40
Arabic:	206
Speak English "very well"	186
Speak English less than "very well"	20

Other and unspecified languages:	649
Speak English "very well"	598
Speak English less than "very well"	51

Factor 2: Frequency of Contact with LEP Persons with BRTA

BRTA employees can be in contact with LEP persons through customer phone calls; bus drivers with riders; walk-in customers to BRTA’s Customer Service; travel training; public meetings; meetings with community-based organizations; and the BRTA website. As shown in the tables above, people who speak English less than well in Berkshire County is 1.7%, a small percentage of the total population. The highest majority people speaking a language other than English is Spanish at 3.1%.

From the ACS 2017-2021, *Means of Transportation to Work by Languages Spoken at Home and Ability to Speak English* consisting of workers 16+, the estimate of workers using public transportation is 781. Of those, 71 people speak Spanish and 33 speak other languages. 28 people speak English less than well.

	Berkshire County, Massachusetts
Label	Estimate
Total:	61,845
Speak only English	57,058
Speak Spanish:	2,209
Speak English "very well"	1,514
Speak English less than "very well"	695
Speak other languages:	2,578
Speak English "very well"	2,207
Speak English less than "very well"	371
Car, truck, or van - drove alone:	46,745
Speak only English	43,891
Speak Spanish:	1,438
Speak English "very well"	961
Speak English less than "very well"	477
Speak other languages:	1,416

Speak English "very well"	1,182
Speak English less than "very well"	234
Car, truck, or van - carpooled:	4,901
Speak only English	4,177
Speak Spanish:	404
Speak English "very well"	201
Speak English less than "very well"	203
Speak other languages:	320
Speak English "very well"	281
Speak English less than "very well"	39
Public transportation (excluding taxicab):	781
Speak only English	677
Speak Spanish:	71
Speak English "very well"	71
Speak English less than "very well"	0
Speak other languages:	33
Speak English "very well"	5
Speak English less than "very well"	28
Walked:	3,577
Speak only English	2,936
Speak Spanish:	135
Speak English "very well"	135
Speak English less than "very well"	0
Speak other languages:	506
Speak English "very well"	487
Speak English less than "very well"	19
Taxicab, motorcycle, bicycle, or other means:	617

Speak only English	529
Speak Spanish:	10
Speak English "very well"	10
Speak English less than "very well"	0
Speak other languages:	78
Speak English "very well"	66
Speak English less than "very well"	12
Worked from home:	5,224
Speak only English	4,848
Speak Spanish:	151
Speak English "very well"	136
Speak English less than "very well"	15
Speak other languages:	225
Speak English "very well"	186
Speak English less than "very well"	39

The cost of translating materials into many different languages is prohibitive, therefore the BRTA prioritizes preparation of written translation into the language it most frequently encounters. As the highest number of LEP persons is Spanish at 3.1% of Berkshire County's population, the BRTA will continue to translate BRTA notices in Spanish.

Factor 3: Nature and Importance of BRTA Services to LEP persons

Most transit riders are regular users of the BRTA service making routine trips, with little need for complex information. Thus information requests for route and schedule information are most likely to be made by infrequent users or users new to using transit. This population could include recent immigrants in non-English speaking households, and therefore it is important to have language resources ready to enable them to be served. The BRTA's website, www.berkshirerta.com, contains a language translator where information on bus routes, fares, services, and policies can be obtained and translated for LEP persons.

Factor 4: Resources Available to BRTA and Overall Cost for LEP

The BRTA is a small urban public transportation system receiving federal funds for transit operation under Section 5307 and a small amount of Section 5311 rural transit operating funds. It is a sub-recipient of the Governor's Apportionment of 5339 small urban funds administered through MassDOT. 5339 discretionary grants have also been awarded to BRTA.

In order to effectively communicate with the LEP community, the BRTA:

- maintains an agreement with Certified Languages International (CLI) for telephone translation services. CLI offers- exceptional customer satisfaction; HIPAA compliant; Safe Harbor certified; and Joint Commission compliant. Their call center is for on-

demand services 24/7/365 with customized reporting and detailed call analytics, using professional interpreters with industry-specific expertise.

- Uses NWI Global for document translation. NWI Global is dedicated to facilitating communication that flows freely and unites people within businesses, institutions, and organizations, regardless of any communication obstacles. This is a premium language service that makes it easier for people to exchange knowledge and ideas in more than 200 languages.
- employs staff to create smaller documents that have a light understanding of the Spanish language.
- has a google translate function on the website.
- customer facing interactions use their cell phone to help the customer.

Decision Making Bodies Non-Elected Committees and Councils

The BRTA does not have any committees and/or councils that are selected by the BRTA and does not meet this description.

Monitoring Sub-recipients

The BRTA does not have any sub-recipients.

Title VI Equity Analysis

The BRTA has not performed any recent construction projects.

Service Standards

The BRTA has developed performance measures for the fixed route and paratransit. Every month they are posted on the BRTA website, <https://berkshirerta.com/about/open-government/>

Vehicle Load Information:

Vehicle load is expressed as the ratio of passengers to the total number of seats on a vehicle. The BRTA currently has a fleet of 41 vehicles (as of March 2023-- 19 paratransit fleet / 22 fixed route fleet). Vehicles are not shared between the fixed route and Paratransit service pools.

Vehicle Type	Quantity of Vehicle	Seated Capacity	Standing Capacity	Total Capacity	Preferred Load	Maximum Load
10' Dodge Caravan	1	5	0	5	1	1
20' Ford E350 cutaway	18	8	0	8	1	1
25' Ford E450 cutaway	13	18	5	23	1	1.3
29' Gillig Corp	1	28	23	51	1	1.3
32' Eldorado National Low Floor	3	34	20	54	1	1.3
35' Gillig Corp	5	32	23	55	1	1.3

Vehicle Headway (Frequency):

The vehicle headway is the amount of time between two buses traveling in the same direction on a given route. BRTA buses are scheduled with a variety of headways ranging from 60 minutes to 120 minutes. An exception is route 21x, which takes limited trips during a service day and operates a headway greater than 120 minutes. The BRTA will consider more frequent headways in the future as additional service is added.

Route	Weekday Service	Saturday Service	Sunday
Route 1: Pittsfield, North Adams	Every 60 minutes 5:30am-6:30pm. Every 120 minutes 6:30pm-11:15pm	Every 60 minutes 6:30am-8:30pm.	No Service
Route 2: Pittsfield, Lee	Every 60 minutes 6:00am-7:20pm.	Every 60 minutes 7:30am-7:20pm.	No Service
Route 3: North Adams, Williamstown	Every 60 minutes 5:45am-7:45pm.	Every 60 minutes 7:45am-6:45pm.	No Service
Route 4: Pittsfield, Dalton, Hinsdale	Every 120 minutes 5:30am-7:15pm.	Every 120 minutes 6:25am-7:15pm.	No Service
Route 5A&B: Pittsfield, Lanesborough	Every 60 minutes 5:30am-6:15pm.	Every 60 minutes 7:30am-6:15pm.	No Service
Route 11: BCC/ West St	Every 60 minutes 6:35am-5:25pm.	Every 60 minutes 9:35am-5:25pm.	No Service
Route 12: Pittsfield Southeast Loop	Every 60 minutes 5:50am-5:50pm.	Every 60 minutes 7:50am-4:50pm.	No Service
Route 14: Pittsfield Southeast Loop	Every 60 minutes 6:30am-9:30pm.	No Service	No Service

Route 15: West Pittsfield	Every 60 minutes 5:30am-6:30pm.	Every 60 minutes 9:00am-6:30pm.	No Service
Route 21: Lee, Great Barrington	Every 60 minutes 5:40am-6:25pm.	Every 60 minutes 7:40am-6:25pm.	No Service
Route 21x: Pittsfield- Great Barrington Express	(3) round trips, 6:00am, 7:00am, 5:30pm	No Service	No Service
Route 34: North Adams Loop	Every 60 minutes 6:15am-10:30pm.	Every 60 minutes 7:30am-7:30pm.	No Service

On Time Performance:

One of the most important performance measures for our passengers is adherence to the published BRTA schedules. A vehicle is considered on time if it departs from a scheduled time point no more than one (1) minute early and more than five (5) minutes late. The BRTA’s on-time performance objective is 90% or greater from the Pittsfield ITC.

Service Availability:

Due to the BRTA’s considerable rural sections of Berkshire County, service availability varies depending on the municipality. Out of the 27 member communities, 13 have some form of fixed route service, while the other towns have only Non-ADA paratransit services.

Transit Amenities for each Mode

The BRTA owns a majority of the bus shelters that reside in municipalities through a partnership. The transit amenity may be installed at the request of the city or town. The BRTA assesses the proposed site for the shelter to ensure the safety of both pedestrians and bus operations. The bus shelter needs to be on a transit route and the bus stop would be frequently used. The BRTA has a variety of shelters placed in urban, rural, and environmental justice locations.

The BRTA has been seeking public input and comments regarding proposed fixed route bus stop locations along the BRTA bus routes throughout Berkshire County. These locations are temporarily marked with a numbered “Proposed Bus Stop Location” sign. Future bus stops will include bus stop signs. Not all locations have these “Proposed Bus Stop Location” signs out. This will be a phased approach throughout the county for the foreseeable future.

Vehicle Assignment for each Mode

The vehicle assignment for each bus route actively changes on a day-to-day basis. The 35’ fleet of buses run on routes that have the highest ridership. Historically this has been the buses that travel from Central Berkshire County to either the North or the South, Pittsfield routes, and North Adams. The mini-bus fleet are used on the routes that have less ridership. The actual bus from

either the 35' fleet or the mini-bus fleet are not assigned, but randomly disbursed to run service throughout the service area without prejudice. All vehicles have interior and exterior cameras with both audio and visual capabilities that can be reviewed in the case of a complaint or an accident.

BERKSHIRE REGIONAL TRANSIT AUTHORITY
MEETING OF THE ADVISORY BOARD

March 30, 2023
4:00 PM

ADVISORY BOARD MINUTES

Berkshire Regional Transit Authority Advisory Board Members Present:

William Elovirta, Becket; Rob Reilly, Lanesborough; Jenn Nacht, Lenox; Sherri Youngkin, New Ashford; Sandra Lamb, North Adams; Sheila Irvin, Pittsfield; Brian O’Grady, Williamstown; Douglas McNally, Windsor; and Brian Morrison, Rider Representative. Roger Manzolini, Richmond came during the Administrator’s Report.

Berkshire Regional Transit Authority Advisory Board Members Absent:

Christine Hoyt, Adams; Charles Ketchen, Alford; Michelle Francesconi, Cheshire; Jeff Levanos, Clarksburg; John Boyle, Dalton; Melanie Vicneire, Egremont; Cynthia Bosley, Florida; John Morrell, Great Barrington; Earl Peck, Hinsdale; Andrea Wadsworth, Lee; Justin Makuc, Monterey; Jim Lovejoy, Mt. Washington; Brandi Page, Otis; James Welch, Peru; Andrew Provost, Savoy; Nadine Hawver, Sheffield; Jamie Minacci, Stockbridge; and Kent Lew, Washington.

Also, present: Robert Malnati, Sarah Vallieres, and Gina LePage King- BRTA; Anuja Koirola, BRPC; Rauley Cain-BTM; and Patty Annechiarico.

	Voting Shares	Present
Adams	2.8124	0.0000
Alford	1.0000	0.0000
Becket	1.0000	1.0000
Cheshire	3.4428	0.0000
Clarksburg	1.0078	0.0000
Dalton	2.4426	0.0000
Egremont	1.0010	0.0000
Florida	1.0000	0.0000
Great Barrington	3.3315	0.0000
Hinsdale	1.2269	0.0000
Lanesborough	2.3242	2.3242
Lee	3.8089	0.0000
Lenox	4.7367	4.7367
Monterey	1.0000	0.0000
Mt. Washington	1.0000	0.0000
New Ashford	1.1044	1.1044
North Adams	5.7136	5.7136
Otis	1.0000	0.0000
Peru	1.0123	0.0000
Pittsfield	16.6803	16.6803
Richmond	1.0000	1.0000
Savoy	1.0000	0.0000
Sheffield	1.0673	0.0000
Stockbridge	3.0741	0.0000
Washington	1.0000	0.0000
Williamstown	2.7121	2.7121
Windsor	1.0010	1.0010
Disability Community	1.0000	0.0000
Rider Representative	1.0000	1.0000
		34.75 needed for quorum
		36.2723 when meeting was called to order
		37.2723 present during Administrator’s Report

SFY 24 BUDGET

R. Malnati explained the BRTA has begun the process of developing the budget. Originally the RTA's collectively asked for \$150M which is 10% of the MBTA's budget from the state. The Governor's budget is \$98.6M, including \$6M in Fare Share funding for a total of \$102.8M. It's an increase from the past, but BRTA receives 3.12% of that. The \$150M would ensure equity, sustainability, and predictability of services. MassDOT has a discretionary grant of \$15M million and an additional \$4M for the Community Transportation Grant Program. R. Malnati discussed the RTAs virtual introductory meeting with Undersecretary of Transportation, Monica Tibbitts-Nutt and it was a very good meeting. The RTAs were able to discuss their concerns including equitable and sustainable funding. During the meeting, he mentioned the fact that BTM's GM and AGM have been collaborating with MassHire, BCC, and BIC to develop a CDL program in Berkshire County.

TITLE VI

The Title VI Program has been updated and will require a BRTA Advisory Board vote.

5) UPDATED TITLE VI PROGRAM – VOTE

S. Vallieres provided a synopsis of what the BRTA Title VI Program is, how the Language Assistance Plan for Limited English Persons was updated, and how BRTA provides a variety of language translation methods. Spanish continues to be the primary language for translation at 3.1%.

B. O'Grady made the motion to accept the updated BRTA Title VI Program. S. Lamb seconded the motion. All said aye and the updated Title VI Program was passed unanimously.

Town	(2) Minutes of the October 27, 2022 Meeting	(3) Minutes of the November 7, 2022 Special Meeting	(5) Updated Title VI Program	(6) Administrators Review	(7) Cash Reports for October, November, and December 2022	(8) Cash Reports for January and February 2023
Becket			Yes			
Lanesborough			Yes			
Lenox			Yes			
New Ashford			Yes			
North Adams			Yes			
Pittsfield			Yes			
Richmond			Yes			
Williamstown			Yes			
Windsor			Yes			
Rider Representative			Yes			

9) BUDGET YTD

R. Malnati provided an overview of the BRTA through February 2023. Fares are \$13K over budget due to increases in ridership and total expenses are \$10K over. BRTA's budget is on the conservative side.

10) RIDERSHIP YTD

R. Malnati discussed the ridership packet which has 3 years of wheelchair data to compare. Fixed route ridership and paratransit are doing well. December, January and February has marked increases as a result of the Try Transit initiative. Ridership increased to 97% of pre-COVID levels. Route 34, followed by Route 1 continues to have the highest wheelchair ridership. BRTA's Performance Measures can be found on BRTA's website.

11) TOPICS FOR FUTURE ADVISORY BOARD MEETING

R. Malnati stated the election of officers, the Safety Plan, and the draft 2024 budget will be presented and voted on at the next meeting.

12) NEXT MEETING DATE/TIME

R. Malnati scheduled the next meeting for Thursday, May 18, 2023, at 4 PM.

13) ADJOURNMENT

The meeting was adjourned at 4:51 PM.

Meeting Materials:

**BRTA Advisory Board Packet, including BRTA Title VI Program
BRTA Public Notice and Agenda**

Title VI Complaint Form

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic 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):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin				
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.				

Title VI Complaint Form

Section IV		
Have you previously filed a Title VI complaint with this agency?	Yes	No
Section V		
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?		
<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, check all that apply:		
<input type="checkbox"/> Federal Agency: _____		
<input type="checkbox"/> Federal Court _____		<input type="checkbox"/> State Agency _____
<input type="checkbox"/> State Court _____		<input type="checkbox"/> Local Agency _____
Please provide 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:
 Berkshire Regional Transit Authority
 Title VI Coordinator
 1 Columbus Avenue, Suite 201
 Pittsfield, MA 01201