

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

VNA at HCS

July 18,2023

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

Title VI Plan Table of Contents

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Section 1: Title VI Plan Approval & Compliance Requirements

Title VI Plan
Adopted on: July 18 , 2023 _____

Adopted by: Home Healthcare, Hospice and Community
Services/VNA at HCS Board of Directors _____

Signature(s): _____



Approval: 20230718 Board
Resolution 2023 Titl

Annual Certifications and Assurances

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

VNA at HCS will remain in compliance with this requirement by annual submission of certifications and assurances as required by NHDOT.

The date of last submission of these certifications and assurances (at the time of this Plan’s approval) is:
Month, day, year

Title VI Plan Revision Log

Date Month/day/year	Section Revised	Summary of Revisions
January, 2014	Original Submission	
November, 2016	Vehicle load Public participation process	Updated to reflect current vehicles in service Updated to reflect current membership of groups
May, 2020	Vehicle load Public participation process	Update to reflect current vehicles in service and headways Update to reflect membership in groups
July, 2023	Complaint form Vehicle load Public participation process Outreach activities	Updated to meet federal requirements Updated to reflect current vehicles in service and headways Updated to reflect membership in groups Updated to reflect current demographics

Section 2: Title VI Policy Statement

Policy Statement

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

Section 3: Notice to the Public

Title VI Notice to the Public

The VNA at HCS Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

VNA at HCS

- The VNA at HCS operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the VNA at HCS
- For more information on the **VNA at HCS** civil rights program, the procedures to file a complaint, or to file a complaint, please contact **Jessica Mack, Compliance Officer** at **603-352-2253, (TTY 711)**; email jmack@hcsservices.org; or visit our administrative office at **312 Marlboro street, Keene, NH 03431**. For more information, visit www.hcsservices.org
- For transportation-related Title VI matters, a complaint may also be filed directly with the:

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

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

- If information is needed in another language, contact **603-352-2253**.

The **VNA at HCS** Notice to the Public is posted in the public areas of the office and inside the transit vehicles.

1. On inside of buses
2. At our offices / 312 Marlboro St. Keene NH 03431
3. On our website/ hcsservices.org

Section 4: Title VI Complaint Procedure

The VNA at HCS Title VI Complaint Procedure is made available in the following locations:

- Agency website, **HCS SERVICES.ORG**
 - Hard copy in the 312 Marlboro St. Offices
 - Agency Title VI Plan
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Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color, or national origin by the **VNA at HCS**, may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

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

A complaint must be filed with the VNA at HCS no later than 180 days after the following:

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

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

The **VNA at HCS** has 45 days to investigate the complaint. If more information is needed to resolve the case, the **VNA at HCS** may contact the complainant requesting further information. The complainant has **20** business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within **20** business days, the **VNA at HCS** can administratively close the case.

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

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

If the complainant wishes to appeal the decision it must direct the appeal to the agency initially. The complainant has **30** days after the date of the closure letter or the letter of finding to do so. If there is outstanding concern, the appeal may be directed to the state DOT or FTA. The appeal process information will be included in the letter.

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

Or

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

If information is needed in another language, then contact **(603)352-2253**.

Section 5: Title VI Complaint Form

The **VNA at HCS** Title VI Complaint Procedure is made available in the following locations:

- Agency website: **HCS SERVICES.ORG**
- Hard copy in the 312 Marlboro St. office
- Agency Title VI Plan

VNA at HCS

Title VI Complaint Form

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

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

Title VI: Race Color National Origin

Other (specify): _____

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

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

Section IV

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

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

Yes No

If yes, check all that apply:

Federal Agency: _____

Federal Court _____ State Agency _____

State Court _____ Local Agency _____

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

Name:

Title:

Agency:

Address:

Telephone:

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

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

Signature and date required below

Signature **Date**

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

**VNA at HCS
 Title VI
 Corporate Compliance Officer
 312 Marlboro St
 Keene, NH 03431
 603-352-2253
 Email JMACK@HCSSERVICES.ORG**

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

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

Check One:

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

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

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

Section 7: Public Participation Plan

Strategies and Desired Outcomes

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

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

Public Outreach Activities

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

Specific Public Participation activities are listed in the table below:

Event Date	VNA at HCS Staffer(s) or Department	Activity	Communication Method (Public notice, posters, social media)	Notes
Bimonthly	Community Relations/Transportation	Transportation articles	Buslines Newsletter distributed to all riders and the public	
Semi annually	Transportation	Public notices	Poster refreshed on all vehicles and offices	
Semi annually	Community Relations	Transportation articles	Website and social media	
Monthly	Community Relations	Healthcare Access Meetings	Meetings to discuss health equity as it relates to transportation	
Monthly	Community Relations	Informational Meetings	Walk in Wednesday for the public to access information about services	
Monthly	Community Relations	Informational Meetings	Outreach at the Keene Public Library for the public to have access to information	Held January – June 2023
March 10, 2023	Community Relations	Presentation on Transportation	Presented to the Leadership Council for a Healthy Monadnock	
April 8, 2023	Community Relations	Women’s Expo	Exhibit for community	
April 20, 2023	Community Relations	Health Fair	Exhibit for the community	
April 22, 2023	Community Relations	Earth Day	Exhibit for the community	
May 31, 2023	Community Relations	Senior Health and Fitness Day	Exhibit for the Community	

Section 8: Language Assistance Plan

Plan Components

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

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

The **VNA at HCS** Language Assistance Plan includes the following elements:

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

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

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

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

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

Four Factor Analysis Methodology

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

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

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

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

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

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

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

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

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

Of the 96,524 residents in the **VNA at HCS** service area, 610 residents describe themselves as speaking English less than “very well”. For the Insert Agency Name service area, the latest U.S. Census Bureau data shows that among the area’s population .52% speak English “less than very well.”

VNA at HCS SERVICE AREA LEP PERSONS

Speak English less than “very well”	Totals	Percent of Population
Speak English less than "very well"	610	0.63%
Spanish	85	0.09%
French, Haitian, or Cajun	70	0.07%
German or other West Germanic languages	22	0.02%
Russian, Polish, or other Slavic languages	116	0.12%
Other Indo-European languages	51	0.05%
Korean	17	0.02%
Chinese (incl. Mandarin, Cantonese)	108	0.11%
Vietnamese	17	0.02%
Tagalog (incl. Filipino)	1	0.00%
Other Asian and Pacific Island languages	34	0.04%
Arabic	55	0.06%
Other and unspecified languages	34	0.04%

Source: American Community Survey, 2017-2021 5-Year Estimates C16001

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

VNA at HCS assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. VNA at HCS provides approximately 5 passenger trips per year individuals needing LEP services. If an individual has speech limitations, the dispatcher or driver will work with the Language Bank at Ascentria Care Alliance and the Organization for Refugee and Immigrant Success (ORIS) to provide addition support.

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

Access to the services provided by VNA at HCS is critical to the lives of many in the area. Many depend on VNA at HCS's services for access to jobs and essential community services like schools, shopping and medical appointments. Riders eligible for services under the American Disabilities Act (ADA) require service for the same reasons. Because of the essential nature of the services and the importance of these programs in the lives of many of the region's residents, there is a need to ensure that language is not a barrier to access.

All of VNA at HCS programs are important; however, those related to safety, public transit, nondiscrimination, and public involvement are among the most important. The VNA at HCS is committed to providing meaningful access and will provide written translation for any of its documents, when reasonable, effective and with the available resources. In other cases, the VNA at HCS will strive to provide alternative but meaningful accessibility. Moreover, the VNA at HCS continually evaluates its programs, services, and activities to ensure that persons who may be LEP are always provided with meaningful access. The Title VI policy, complaint form, and LEP policy are available [Click or tap here to enter text.](#) upon request.

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

The VNA at HCS makes every effort to make its programs, services, and activities, accessible to LEP individuals. The VNA at HCS works closely with local housing agencies, local food pantries, senior centers and many other agencies that could encounter individuals requiring LEP services. The VNA at HCS will use available resources, both internal and external to accommodate reasonable requests for translations.

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

- a) Individuals who have contact with the public are provided with "I Speak" language cards to identify language needs in order to match them with available services. Language cards verified and distributed by the Director as need.
- b) The VNA at HCS has developed partnerships with local agencies, organizations, law enforcement, colleges/universities, local school districts and social service agencies that are available to assist with it LEP responsibilities.
- c) The VNA at HCS Facilitating Communication Policy provides instruction for accessing communication/interpretation assistance through our contract with the Language Bank at Ascentria Care Alliance.

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

In order to ensure that LEP individuals are aware of VNA at HCS language assistance measures, VNA at HCS provides the following:

- Title VI Program including the Language Assistance Plan is made available on website, if applicable, and hard copy in central office.
- Drivers and dispatchers are provided "I Speak" language cards to identify language needs in order to match them with available services. Staff have information regarding the availability of the Language Bank through Ascentria Care Alliance.

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

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

Updates will continue to include the following:

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

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

The following training will continue to be provided to VNA at HCS staff during initial hiring and annually as part of VNA at HCS's required trainings, and as part of their DOT required recertifications

- Information on the VNA at HCS Title VI Procedures and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of "I Speak" language cards (used to identify language preference).
- Documentation of language assistance requests.
- How to handle a potential Title VI / LEP complaint.

Limited English Proficient (LEP) Resource Materials:

LEP Policy

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

If you need help with English, please call 603-352-2253[Click or tap here to enter text.](#)

“I Speak” Language Identification Card

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

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

Log of LEP Encounters

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

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

Section 9: Minority Representation Information

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

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

A. Minority Representation Table

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

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
HCS/VNA at HCS Board of Directors	14/100%					
Monadnock Regional Coordinating Council for Community Transportation	16/100%					

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

B. Efforts to Encourage Minority Participation

Home Healthcare, Hospice and Community Services/VNA at HCS encourages minority participation on its boards and committees and makes every effort to encourage participation. Home Healthcare, Hospice and Community Services/VNA at HCS has an active DEI Advisory Committee and has recently engaged the Chief Diversity Officer at Franklin Pierce University to guide our efforts. DEI training is mandatory for all staff using the Kantola on line training platform and in person Lunch and Learns. In addition, senior leadership of the organization is participating in region wide DEIB efforts.

Section 10: Providing Assistance to and Monitoring Subrecipients

1. Does agency provide funding to subrecipients?

No, the agency does not have subrecipients.

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

Section 11: Title VI Equity Analysis for Facility Acquisition

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

No, the agency has not built a facility.

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

Section 12: Fixed Route Transit Providers Service Standards and Policies

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

Insert Agency Name:

is a fixed route transit provider

is **not** a fixed route transit provider

All Fixed Route Transit Providers must submit:

- All requirements set out in Chapter III (General Requirements)
 - Service standards
 - Vehicle load for each mode
 - Vehicle headway for each mode
 - On time performance for each mode
 - Service availability for each mode
 - Service policies
 - Transit Amenities for each mode
 - Vehicle Assignment for each mode

Transit Providers that operate 50 or more fixed route vehicles in peak service and are located in an Urbanized Area (UZA) of 200,000 or more people must submit:

1) Does the plan contain a demographic profile of the metropolitan area that includes identification of the locations of minority populations in the aggregate?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
2) A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
3) Demographic maps that overlay the percent minority and non-minority populations as identified by Census or American Community Survey (ACS) data, at the Census tract or block group level, and charts that analyze the impacts of the distribution of State and Federal funds in the aggregate for public transportation purposes, including federal funds managed by the MPO as a designated recipient?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
4) Analysis of disparate impacts on the basis of race, color, or national origin, and, if so, determines whether there is a substantial legitimate justification for the policy that resulted in the disparate impacts, and if there are alternatives that could be employed that would have a less discriminatory impact.	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N

Insert Agency Name has adopted the following system-wide standards and policies to ensure service design and operations practices do not result in discrimination on the basis of race, color, or national origin. Service policies differ from service standards in that they are not necessarily based on a quantitative threshold.

Service Standards

FTA requires that all fixed route transit providers develop quantitative standards for all fixed route modes of operation for the following indicators. VNA at HCS has prepared standards for all modes it operates including buses and Transit vans

a. Vehicle Load

Vehicle Type	Average Passenger Capacities			
	Seated	Standing	Total	Maximum Load Factor
16 Passenger Cutaway	19	4	23	1.2
Ford Transit	12	2	14	1.2

b. Vehicle Headway

POLICY HEADWAYS AND PERIODS OF OPERATION				
<u>WEEKDAY</u>	<u>Peak</u>	<u>Base</u>	<u>Evening</u>	<u>Night</u>
City Express	60	60	--	--

c. On-Time Performance

A vehicle is considered on time if it departs a scheduled time point no more than one (1) minute early and no more than five (5) minutes late. The VNA at HCS on-time performance objective is 90% or greater. VNA at HCS continuously monitors on-time performance and system results are published and posted as part of monthly performance reports covering all aspects of operations.

d. Service Availability

VNA at HCS will distribute transit service so that 96% of all residents in the service area are within a 3/4 mile walk of bus service.

Service Policies

FTA requires fixed route transit providers to develop a policy for service indicators. VNA at HCS has prepared the following policies for its transit system.

a. **Distribution of Transit Amenities**

VNA at HCS has 22 regular stops in the service area. Stops, shelters and benches will be placed according to industry standards with consideration of permitting for local and special needs. The installation of new bus amenities can be requested through the transportation office, or at public meetings.

b. **Vehicle Assignment**

With several practical considerations, VNA at HCS assigns buses to service so that average age of the buses serving each route does not exceed the average age of the fleet. Bus assignments take into account the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route.

Service standards and policies are monitored and measured annually except for on time performance which is monitored monthly