



Civil Rights Title VI Program Update

Huntington
Area
Rapid
Transit
BUS



Huntington Town Board

Frank P. Petrone, Supervisor
Mark Cuthbertson, Councilman
Susan A. Berland, Councilwoman
Eugene Cook, Councilman
Tracey A. Edwards, Councilwoman

Transportation & Traffic Safety (TTS)

Stephen McGloin, Director
Town Hall (Room 109)
100 Main Street
Huntington, NY 11743
Main Office/Traffic Safety
Phone: (631) 351-3053
Fax: (631) 351-3066
traffic@HuntingtonNY.gov

HART Bus Division

Mark Lowen, Sr. Transportation Planner
Phone: (631) 351-2831
Fax: (631) 351-3066
mlowen@HuntingtonNY.gov

Title VI Civil Rights Coordinator

Rhonda T. Shepardson, Esq.
Town Hall (Room 203)
100 Main Street
Phone: (631) 351-3291
Fax: (631) 351-3032
RShepardson@HuntingtonNY.gov



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Introduction

Title VI Program Overview

The Town of Huntington drafted and adopted its Civil Rights *Title VI Program* to ensure that its Huntington Area Rapid Transit (“HART Bus”) system--provider of fixed route and demand response transportation services-- offers the highest level and quality of services in a nondiscriminatory manner as set forth in the:

- Civil Rights Act of 1964
- Executive Order 13116 (Improving Access to Services for Persons with Limited English Proficiency) and
- Subsequent Federal, State and local law, regulation and executive orders

This body of law and regulation, collectively called the “Title VI Legal Safeguards,” requires public services, programs and activities be provide in a non-discriminatory manner. (A full list of the legal authorities are set forth in Attachment A.)



“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 any program or activity receiving federal assistance.”

—Civil Rights Act of 1964



“Federal agencies are to examine the services they provide, identify any need for services to those with limited English proficiency, and develop and implement a system to provide those services so LEP persons can have meaningful access to them.”
—Executive Order 13166

In accord with Title VI Legal Safeguards, no person may be denied the benefits or be subjected to discrimination with respect to the services, programs and activities of the Town of Huntington on the grounds of race, color, national origin or their Limited English Proficiency (LEP) status.

The *Title VI Program* contains all of the elements required of a transit provider operating in an urbanized area of a population of two hundred thousand or more, operating less than fifty (50) vehicles in peak service.

The Town of Huntington’s provides fixed route transportation and complies with FTA Circular 4702.1B Chapter IV. The Town of Huntington has no transit related sub-recipients.

As a recipient of federal funding, the Town of Huntington’s Department of Transportation and Traffic Safety (TTS) is committed to ensuring that the benefits of its bus services are shared equitably throughout the service area; equal access is provided to all riders; no one is precluded from the planning and development of services and a complaint procedure is in place to protect the public against discrimination.



General Requirements

Public Notice of Non-Discrimination under Title VI

The Huntington Transportation and Traffic Safety (TTS) department, which oversees the HART Bus Division, operator of the HART Bus system takes a variety of steps to make riders aware that the Town's transit system complies with the requirements of Title VI of the Civil Rights Act.

TTS advises the public and gives notice of the protections against discrimination afforded them under the law and how to file a Civil Rights complaint. Notice is published in both English and Spanish (Español) and appears on:

- Huntington's website: www.huntingtonny.gov
- TV public access channels (Cablevision-18 and Verizon-38)
- Reception Desk & Public Areas
- Interior of Transit Vehicles
- Bus Schedules

Notice of Non-Discrimination as Posted in English and Spanish



NOTICE OF NONDISCRIMINATION UNDER TITLE VI

The Town of Huntington is committed to providing public transportation services in a non-discriminatory manner without regard to race, color, and national origin.

If you believe that you have been discriminated against by HART or any member of its staff and wish to file a complaint, please call the Department of Transportation and Traffic Safety at (631) 351-3056, or write to Department of Transportation and Traffic Safety, 100 Main Street, Huntington, NY 11743.

For more information on the Town of Huntington's nondiscrimination obligations as a grantee of the Federal Transit Administration under Title VI of the Civil Rights Act of 1964, go to: <http://HuntingtonNY.gov/hart>.



AVISO DE NO DISCRIMINACIÓN BAJO TÍTULO VI

La Ciudad de Huntington se compromete a proporcionar servicios de transporte público de una manera no discriminatoria, sin distinción de raza, color y origen nacional.

Si usted cree que ha sido discriminado por HART o cualquier miembro de su personal y desea presentar una queja, por favor llame al Departamento de Transportación y Seguridad en el Tránsito a (631) 351-3056, o escribir al Departamento de Transportación y Seguridad en el Tránsito, 100 Main Street, Huntington, NY 11743.

Para obtener más información acerca de la Ciudad de Huntington obligaciones de no discriminación como un concesionario de la Administración Federal de Tránsito bajo Título VI en el Ley de Derechos Civiles de 1964, vaya al: <http://HuntingtonNY.gov/hart>.



Filing a Title VI Complaint

TTS has established a process for HART Bus riders to file Title VI Civil Rights complaints with Huntington.

Any person who believes that she or he has been discriminated against on the basis of the equal rights protections in Title VI is encouraged to fill out and submit a *Title VI Complaint Form*, available in the department's administrative office: Huntington Town Hall, Room 109, 100 Main Street, Huntington, NY 11743. The form can also be downloaded from the Town's website at: www.huntingtonny.gov

Title VI complaints should be made in writing and filed with Transportation & Traffic Safety or with the Town Board's official designated Title VI Coordinator:

Rhonda Shepardson, Esq.
Huntington Town Hall (Room 203)
100 Main Street, Huntington, NY 11743

Title VI Complaint Form

Using the Title VI Complaint form that can be downloaded from the link below or using plain paper, a complaint should list the following points, which are essential for HART Bus to respond to the complaint promptly:

English

For Official use only
Complaint #: _____

TITLE VI CIVIL RIGHTS COMPLAINT FORM

Rhonda T. Shepardson, Esq.
Town of Huntington, Title VI Coordinator
100 Main Street (Room 203)
Huntington NY 11743

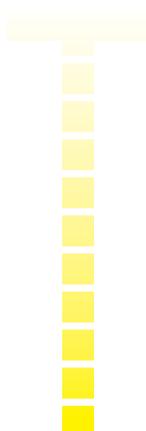
Español

For Official use only
Complaint #: _____

Formulario de Queja Título VI

Rhonda T. Shepardson, Esq.
Town of Huntington, Title VI Coordinator
100 Main Street (Room 203)
Huntington NY 11743



- 
- Full Name of the Complainant
 - Home Address (and Mailing Address if different)
 - Phone Number
 - Clear and concise statement of the facts constituting the Complaint
 - Citation of Title VI Legal Safeguards believed to have been violated

Timeliness: Title VI Complaint must be filed within 180-days of the incident giving rise to the Complaint.

Delivery: A complaint may be delivered in person at Town Hall during normal business hours or via the United States Postal Service, as regular, registered or certified mail.

Complaints may be addressed to either the Town Title VI Coordinator or the Director of the Department of Transportation & Traffic Safety.

Jurisdiction: In the case where a Title VI Complaint filed with the Town of Huntington is then filed with an outside agency (Federal, State or Local) action on the Town complaint will be stayed until the Federal, State and/or other Local complaint is resolved. In the case where a Complainant has filed a complaint with a Federal, State or Local agency and attempts to file the same Complaint with the Town, review and disposition will be determined by Town Attorney.

In either instance, the outcome of a complaint acted on by an outside agency may bar redress under this Policy. A Complaint filed with and only with the Town of Huntington shall proceed in accordance with the resolution procedure set forth in the following steps:



Complaint Resolution Procedure

In order to ensure timely resolution of Title VI complaints, the Town asks complainants to familiarize themselves with the resolution process.

Preliminary Interview with Title VI Coordinator (Optional)

A Complainant has the option of requesting a *Preliminary Interview*. The interview is a private, informal discussion with only the person making the complaint and the Title VI Coordinator present. A successful interview may mutually determine:

- The matter fails to rise to the level of an equal rights violation, in which case the matter will be considered closed, or
- The matter rises to the level of a violation and a satisfactory solution is reached. In this case, the Title VI Coordinator will memorialize the determination in writing and begin to implement the resolution within fourteen (14) days.

If the optional interview is unsuccessful, the Complaint proceeds to the formal Hearing process. In this case, the *Preliminary Interview* shall have no bearing on further proceedings and neither party will be allowed to use the *Preliminary Interview* or any portion thereof to advance or defend the Title VI Complaint.

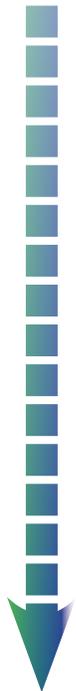
Scheduling Hearings & Fact Finding

The Title VI Coordinator will act as quickly as possible (and within no longer than sixty days) establish a date, time and place for a Title VI Complaint Hearing, for which the Complainant receives at least ten (10) days advance notice.

In addition, the Town Attorney, Personnel Officer, and director of any Town department involved will also receive notice. (The Title VI Coordinator may schedule as many follow up hearing sessions as may be necessary. In such cases, the ten day notice requirement may be waived upon written consent of the Complainant.)



Resolve a Complaint



Adjournments: The Title VI Coordinator will give consideration to any reasonable written request for the adjournment and rescheduling of a Title VI hearing or follow up hearing.

Records: The purpose of Title VI hearings is to elicit facts and relevant information in a productive and non-adversarial manner. The Title VI Coordinator (or designee) will take non-verbatim minutes. Other parties present may, likewise, take written notes. No other recording methods will be permitted.

Involved Parties: In addition to those required to receive notice, the Title VI Coordinator may request other persons with direct knowledge of the matter to be present and/or provide information related to the Complaint. Any information deemed relevant and used by the Coordinator as a finding shall be made available to the Complainant.

Legal Representation: None of the parties present at the hearing shall be represented by a lawyer, employment advisor, union representative or other advocate. Professional information and advice may be solicited by any involved party prior to or after the Hearing, but counsel shall not be permitted to attend the Hearing or any follow up hearings. (The Town Attorney and Personnel Officer may, if the Title VI Coordinator identifies them as an involved department, attend a hearing in their capacity as and acting as department directors.)

Additional Information/Documentation: A Hearing or follow up hearing may reveal the existence or potential existence of other relevant sources of information. At the conclusion of a Hearing or follow up hearing, the Title VI Coordinator may request additional information and/or documentation to assist in making a determination.

Any party present at a hearing may, likewise, submit to the Title VI Coordinator additional information and/or documentation they believe relevant by forwarding it within ten (10) days of the hearing. Copies of relevant submissions used by the Title VI Coordinator as a finding must be made available to the Complainant.



Resolve a Complaint

Open Meetings Law: Hearings pursuant to this policy will be considered and treated as personnel matters and shall not be subject to FOIL or the New York State Open Meetings Law.

Determination & Complaint Resolution

Following the hearing, information gathering and findings, the Title VI Coordinator has forty-five (45) days to issue to the Complainant a written letter of *Determination and Recommendation for Resolution (DRR)*, stating a conclusion of a determination of “No Violation” in which case no further action is required or a determination of “Violation” of the Title VI policy. If a Violation is found the *DRR* will set forth recommended corrective actions. Copies of the *DRR* will be furnished to the Town Supervisor, the Town Attorney, the Town Personnel Officer and the directors of all involved or affected departments.

Findings/Recommendations: While the findings and recommendations of the Title VI Coordinator cannot bind an involved department, the director of any Town department refusing to accept and act on a *DRR* by the Title VI Coordinator shall do so in writing and set for the basis for such refusal. In addition to the Title VI Coordinator the director will forward copies to the Town Supervisor, Town Attorney and Town Personnel Officer. A department director who fails to accept and act on a *DRR* without following the refusal protocol is subject to disciplinary action.

Confidentiality: All Complaints claims will be treated as confidential to the full extent permitted by law.

Non-Retaliation: The Town of Huntington prohibits retaliation against any employee or individual who reports, testifies in a case or otherwise opposes unlawful discriminatory practices which violate Title VI Legal Safeguards within the Civil Rights Act of 1964 and subsequent laws, regulations and executive orders.

Violations: Employees found to have violated the Town’s Title VI Policy are subject to disciplinary action, up to and including termination of Town employment.



Resolve a Complaint



Transit Related Title VI Investigations, Complaints & Lawsuits

The Department of Transportation and Traffic Safety (TTS) maintains a list of active investigations conducted by Federal Transit Administration (FTA) and entities other than FTA, including lawsuits and complaints naming the Department of Transportation and Traffic Safety that allege discrimination on the basis of race, color or national origin.

This list includes:

- Date that the transit-related Title VI investigation;
- Lawsuit or complaint filed;
- Summary of allegations;
- Status of the investigation, lawsuit or complaint;
- Final Findings or response actions taken by TTS.

As of the writing of this program, there are no lawsuits, complaints or investigations pending which alleges discrimination on the grounds of race color, national origin or any other form of discrimination.



Public Participation Plan (PPP)

Public Participation Plan Overview

HART Bus is a municipal public transportation system operated by Huntington’s Department of Transportation and Traffic Safety’s HART Bus Division. As such the department is the lead agency for matters involving the FTA and FTA grant management. TTS is responsible for implementing the Public Participation Plan (PPP), which is a key part of transit-related decision making. This includes decisions related to all FTA-assisted public transportation projects, those related to HART Bus and those dealing with public transportation generally.

Key Plan Principles

The purpose of the PPP is to assure that all residents have the opportunity to participate in HART Bus and the public transportation service and capital planning processes with a special emphasis on welcoming and encouraging the participation of the town’s diverse minority, low-income and LEP populations.

This plan describes the overall goals, guiding principles and outreach methods that Huntington and the HART Bus Division use to reach riders and other community stakeholders. The plan’s intent is to provide a meaningful basis on which to judge the potential social, economic, and environmental impacts of proposed transportation decisions. Finally, the plan is fluid and seeks to develop and improve, as the diverse elements that make up this community become comfortable with expressing opinions and sharing ideas related to public transportation:

- The Town will seek out and facilitate the involvement of those potentially affected by proposed service changes and capital investments;
- Potentially affected community members will have appropriate and meaningful opportunities to learn about and provide input on transit proposals;



- The concerns of all participants involved will be fully considered;
- Public contribution can and will influence HART's decision making.

Plan Goals

- **Clear Pathway for Influence:** Clearly identify and communicate where and how participants can have influence and direct impact on decision making.
- **Consistent Commitment:** Communicate regularly to develop trust with the ridership and community at large.
- **Diversity:** Engage a full range of socioeconomic, ethnic, and cultural perspectives, with special emphasis on engagement of historically under-represented (low-income, minority and LEP) populations.
- **Accessibility:** Take steps to ensure opportunities to participate are physically, geographically, temporally, linguistically and culturally accessible.
- **Relevance:** Frame issues in such a way that the significance and potential impacts of decisions are transparent and understood by all segments of the community.
- **Satisfaction:** Meaningful participation initiates a positive feedback loop that will encourage more meaningful discussion and better decision making.
- **Partnerships:** Strive to develop, build and maintain partnerships with community members and groups that can channel input both formally and informally into the decision making process.
- **Quality Input:** Reinforce the usefulness, relevance and benefits that constructive community input lends to developing better plans, projects, strategies, and decisions in the public sector.

Plan Objectives

- **Flexibility:** Accommodate participation in a variety of ways and adjust as needed.



- **Inclusiveness:** Be pro-active and reach out to and engage low income, minority and LEP populations.
- **Respect:** Treat all feedback with care and give respectful consideration.
- **Timeliness:** Ensure that participants have opportunity for early and ongoing involvement in the decision making process.
- **Clarity, Focus & Understandability:** Ensure that participation opportunities have a clear purpose and path to offer useful input and presentation of materials is described in language (or languages) that are easily understandable.
- **Honesty & Transparency:** Ensure that information distributed is accurate and complete.
- **Responsiveness:** Respond to and incorporate public comments into the official record of public transportation decisions.
- **Accessibility:** Hold meetings, gatherings and events in locations that are fully accessible and welcoming to all area residents and in locations relevant to the population most effected by the topics being presented and discussed.



TTS and the HART Bus Division will use the PPP when formulating Programs of Projects for capital planning and grant development purposes and, in addition, when considering major service changes or fare increases, as follows:

- A service change with expected duration in excess of three months is proposed that would affect more than 25% of the route-miles on any particular route or would affect the frequency of service by 50% or more on any route.
- A public hearing and comment period is necessary for paratransit development and planning purposes.
- A fare increase with expected duration in excess of three months is proposed.

In satisfaction of the Federal Transit Administration’s specified public participation requirements for the Program of Projects, TTS and the HART Bus Division among its other methods, joins in the New York Metropolitan Transportation Council’s public participation process.

PPP Public Outreach Activities

To alert ridership and encourage engagement, TTS and HART Bus perform outreach based on a variety of factors including: statutory requirements, the nature and importance of the message or pending decision and the resources available and cost to distribute the message. Outreach channels available include both traditional and new age media:



<u>Traditional Information Outlets</u>	<u>New Age Information Outlets</u>
Legal Notices & Public Hearings	Huntington Website (www.HuntingtonNY.gov)
Newspaper: Press Releases; Ads	Huntington Government Access Television
Newspaper Ads	Broadcast/Cable TV Press Conferences
Public Information Sessions	Social Media: Facebook; Twitter, etc.
Direct Mail	Streaming Video: You-Tube, etc.
In-Bus: Posters; Audio, Seat Drops	
Bus Shelter Notices	

The general steps for engaging riders in the decision making process using a change in Schedules or Fares as an example.

- Develop proposal based on internal demands and/or external public input;
- Conduct Title VI review of proposal implications;
- Enact Town Board resolution authorizing the scheduling of a public hearing, if required, and/or establish a public comment period according to FTA guidelines;
- Set times, dates and venues for Public outreach events with consideration of the proposed changes and their impact on specific locations/ populations within the HART Bus service area;

- Develop appropriate bi-lingual (English-Spanish) explanatory and public outreach materials;
- Publicize public engagement opportunities through information outlets above;
- Hold scheduled public hearing and/or information sessions and continue to collect comments until the end of comment period;
- Compile and summarize public comments based upon which a service/ fare change is finalized;
- Conduct further public outreach, engagement and information distribution prior to the implementation of any service or fare change as proposed (or as may have been amended as a result of the public comment process.)

Selection of Meeting Locations

- Set times and locations convenient for minority and LEP communities and accessible to the handicapped;
- Provide additional transportation to and from the public meetings as resources permit based on nature and relative importance of subject matter;
- Employ different meeting sizes and formats to best suit the subject at hand;
- Consider alerting organizations and institutions that serve affected minority and/or LEP communities to further awareness of the public meetings;
- Provide opportunities for public participation through means other than writing, such as one-on-one interviews and audio/video recordings;
- Have interpreters present to facilitate participation of the LEP community.



Incorporating Public Comments into Decisions

All public comments are given careful thought and consideration. Public comments come in many forms (e.g., mail, email, social media, public meetings, etc). These must all be summarized for presentation to decision making staff or the Town Board as appropriate.

Identification of Stakeholders and Community Partners

Stakeholders are those who are either directly or indirectly affected by a plan or plan recommendations. Of particular interest is the identification of specific stakeholders who may be adversely affected, or who may be denied benefit of a plan's recommendation(s). Stakeholders may come from a number of groups including general citizens/residents, minority and low-income persons, public agencies, and private organizations and businesses. Stakeholders may vary based on the plan or program being considered.





Limited English Proficiency (LEP)

Limited English Proficient Language Assistance Planning

The Department of Transportation and Traffic Safety's (TTS) plan for LEP assistance provides help for people who have limited ability to read, speak, write or understand English and ensures that these people have access to Huntington's services, programs and activities.

LIMITED ENGLISH PROFICIENT (LEP)

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. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

As required for an LEP plan, TTS conducted a Four-Factor Analysis, taking into account:

1. The number or proportion of LEP persons in the service area who are likely to use fixed route transit services;
2. The frequency with which LEP persons come in contact with fixed route transit services;
3. The nature and importance of the services provided in people's lives;
4. The resources available for LEP outreach, and overall cost to provide LEP assistance.



Four-Factor Analysis

Factor 1

The first factor in the analysis is the number (or proportion) of the LEP population living in the service area who may or are likely to need transit services. TTS, reviewing the pertinent US census data, determined that Huntington's total serviceable population--those age five and older--was slightly more than one hundred eighty one thousand (181,016).

Of that number, nearly thirty thousand (29,569) persons or 16.3% of the population are non-native English speakers. Of that number, forty-five hundred (4,573) have limited English proficiency. According to the Census, this group speaks English less than "well" or "not at all." Based on this, TTS calculates that 2.5% of the serviceable population qualifies as LEP as follows:



<u>Language Group</u>	<u>Speakers</u>	<u>% of Total</u>
Spanish	3,018	1.67%
Indo-European	1,048	0.58%
Asian/Pacific	489	0.27%
Other	18	0.01%

Factor 2

The second factor is the frequency with which the LEP population comes into contact with the HART Bus system.

The US Census has determined that the Town of Huntington has just over ninety-one hundred public transportation users (9,147). A review of the frequency of use based on US Census data determined that of the four hundred seventy-five (475) Spanish speaking public transportation users, only one hundred eighty-seven (187) would be considered LEP because of limited ability to understand or speak English.



Public Transportation Users	9,147	100%
English Speakers	7,413	81.0%
Spanish Speakers	475	5.2%
English Proficient Spanish Speakers	288	3.2%
LEP Spanish Speakers	187	2.0%

Factor 3

The third factor is the nature and importance of program, activity, or service provided by the transit system.

TTS operates a transit system and provides services that are vital to the lives and livelihoods of the residents of the town, particularly those without access to personal vehicles and those with disabilities that prevent them from operating personal vehicles safely.

HART Bus is used for transportation to job sites, shopping centers and downtown business districts in Huntington, Northport, Greenlawn and East Northport, and to community services locations like the Northport Veterans Hospital, Huntington Hospital and community medical centers.

Riders eligible for service under the American’s with Disabilities Act (ADA) are eligible for complementary paratransit service. TTS goes to considerable lengths to ensure that people who depend on transit services participate in the transit capital planning process and learn of any changes in schedules and pricing related to services.

TTS assesses and re-assesses the “criticality” of its various communications and documents to identify those for which language assistance would be appropriate.



These communications include:

- Route Timetable
- Transit rider information
- Paratransit brochure
- Paratransit user's guide
- Paratransit application
- Passenger inquiries
- POP publications
- DBE publications
- Job application
- Title VI complaint form

Factor 4

The final factor for consideration is resources available and overall costs to provide LEP assistance.

TTS' canvassed the resources available within its department and in other Town departments, including bilingual staff members, translation services, web translation support, and telephone interpretation service. The costs to provide language support for critical communications were determined to be acceptable and, accordingly, have been made available as part of the HART Bus plan for LEP customers.

The Department has and will continue to provide language assistance for critical communications. A list of critical documents for LEP translation, includes:

- Complaint Form
- POP Public Notices
- POP Detailed Project Descriptions
- Notifications regarding service changes
- Notifications regarding fare increases
- Service Advisories



LEP Plan Elements

HART Bus will provide language assistance, as necessary, in order to convert oral information from one language into another (Interpretation Services) and likewise the written conversions of such information (Translation Services). Implementation of services is guided directly by the 4-Factor LEP Access Analysis.

Applicability

HART Bus employees and, by contract, all contractors and subcontractors performing work for the HART Bus system will be required to comply with LEP Plan elements, inclusive of: (i) Identification, (ii) Methods, (iii) Training and (iv) Notification.

Identification of People Requiring LEP Assistance

- Post notice of LEP plan and the availability of free interpretation/translation services for languages identified by the 4-Factor Analysis.
- Provide “Language Identification Cards” for use by staff to advise LEP speakers that services are available to them.
- Title VI Coordinator will survey HART Bus staff periodically to determine frequency and nature of contacts with LEP customers.
- HART uses “greeters” at informational meetings trained to engage participants and assess the ability of participants to speak and understand English. Those needing LEP assistance are directed to bi-lingual staff members. (Aggregate LEP data can be used for analysis and assessment and to judge the need for interpreters at other events.)

LEP Service Methods

- Directory of bi-lingual staff townwide who can serve as interpreters.
- Telephone interpretation services for LEP populations.
- Incorporate translation functionality into Town’s Internet website.



Staff Training Practices led by Title VI Coordinator

- Information on the Title VI Policy and LEP responsibilities.
- How to handle a Title VI and LEP related complaints.
- Description of language assistance services available to the public.
- Proper use of language identification cards.
- Proper documentation of all language assistance requests.

Notification of Availability of LEP Assistance

- Post signs in Town Hall and major facilities explaining steps to access free language and translation services.
- Publish agendas and notices in languages identified in 4-Factor Analysis.
- Post the LEP plan and steps for accessing language services on Town website.
- Issue press releases and similar advisories about the LEP plan and send or e-mail copies of the plan and releases to advocacy groups and agencies that regularly serve LEP populations.

Interpretation and Translation Service Updates & Outreach

- HART Bus will translate documents for LEP populations as often as necessary weighing the cost and benefits and determining the likelihood of frequent revisions and other relevant factors.
- HART Bus will assess all requests for Interpretation and Translation services on the basis of impacts to known LEP populations.
- HART Bus will prepare appropriate translations of documents, schedules and agendas for meetings where LEP target audiences are expected to attend and publicize such availability to LEP populations.



Additional Program Considerations

Minority Representation On Planning And Advisory Bodies

The Department of Transportation & Traffic Safety (TTS) has no transit-related, non-elected planning boards, advisory councils or committees at this time.

Providing Assistance to Sub-Recipients

TTS has no sub-recipients at this time.

Equity Analysis to Determine Site or Location of Facilities

TTS has not experienced a change in services or engaged in projects requiring land acquisition.

System-Wide Fixed Route Service Standards, Policies & Definitions

Vehicle Load: This is the ratio of the number of passengers on a vehicle to the number of seats. Vehicle load is monitored regularly to determine compliance with the standard load as follows: 1.25 passengers/seat during peak periods and 1.00 during off-peak periods.

Vehicle Headway: This is calculated as the time difference between two vehicles traveling in the same direction on the same route (or how often the vehicle travels the route.) The standard is a maximum of 60-minutes between trips during peak periods and 120-minutes during off-peak periods.

On Time Performance: This is calculated as a percentage of randomly sampled bus runs that pass predetermined time points along a route that occur no more than 2-minutes earlier or more than 6-minutes later than the time published in transit system timetables. The standard minimum is



an on-time rate of 75%.

Service Availability: This is the percentage of the Town's population within one-half ($\frac{1}{2}$) mile of a HART Bus route. The standard is 50%. (Note: The Town operated HART Bus network of fixed route buses are scheduled in cooperation with routes operated by Suffolk County Transit. This significantly increases both the usefulness of the system to riders and the number of destinations that can be accessed by HART Bus riders.)

Vehicle Assignment Policy: This is the process by which vehicles are placed in service on routes throughout the system. HART Bus is careful to offer the same level of amenities to all riders. HART applies strict maintenance standards to all buses in service regardless of age. HART has undertaken a critical fleet replacement regimen to ensure that all riders have access to the newest possible equipment. In addition, buses are assigned based on needs of the route, not the location of the route. For example, HART assigns its largest buses to the H40 Route because it is the most heavily used by those needing transit services (see Attachment B).

Transit Amenity Distribution Policy: This is calculated based on the number of passenger boardings and transfers at stops along the routes. It is HART Bus policy to provide bus shelters at locations having significantly higher than average passenger boardings or that serve concentrations of elderly or persons with disabilities.



Attachment A: Non-Discrimination Authorities

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin. Related statutes, which prohibit discrimination based on sex, disability and age are also covered in the HART Bus Title VI Program, services and activities in accordance with the following list of related statutes and executive orders:

- Title VI of the Civil Rights Act of 1964 (42 USC 2000d et seq)
- Section 162 (a) of the Federal-Aid Highway Act of 1973 (23 USC 324)
- Age Discrimination Act of 1975
- Section 504 of the Rehabilitation Act of 1973
- Americans With Disabilities Act of 1990
- Civil Rights Restoration Act of 1987
- 49 CFR Part 21
- 23 CFR Part 200
- USDOT Order 1050.2
- Executive Order #12898 (Environmental Justice)
- Executive Order #13166 (Limited-English-Proficiency)
- Civil Rights Act of 1991
- Section 503 of the Rehabilitation Act of 1973
- Age Discrimination in Employment Act of 1967 (as amended)
- Section 402 of the Vietnam Era Veterans Readjustment Assistance Act of 1964
- Articles 15 and 15-a of the New York State Executive Law
- Genetic Information Nondiscrimination Act of 2008.

Attachment B: Bus Fleet

HART Bus maintains a fleet of two dozen transit vehicles, including three large, 29-passenger hybrid buses, seven medium size 20-passenger buses and the remainder light-duty paratransit vehicles for up to twelve passengers.

The fleet is housed and maintained at its garage, fueling and repair facility on East 2nd Street in Huntington Station, NY, about a block away from the LIRR terminal, for which HART provides multi-modal connecting service.



Pictured in front of the maintenance bays at HART's garage and repair facility in Huntington Station are (left-to-right) a HART 29-foot hybrid heavy-duty, low-floor bus, the largest in the HART fleet, a 26-foot medium-duty bus and in the foreground is the nimble 20-foot Paratransit bus that can negotiate narrow streets for pick-ups in residential neighborhoods.

HART Bus strives to meet the highest standards in quality of service. In addition, HART Bus has adopted a vigorous replacement schedule to ensure that all riders have access to modern, efficient buses and equipment:

HART Bus Fleet Replacement	Feb 1, 2015	Feb 1, 2016
Fixed Route Service		
Average age of Fleet (years)	10.5	3.8
Vehicles one-year or newer	None	58%
Paratransit Fleet		
Average age of Fleet (years)	5.7	2.3
Vehicles one-year or newer	15%	62%

Attachment C: Title VI Complaint Forms



For Official use only

Complaint #: _____



TITLE VI CIVIL RIGHTS COMPLAINT FORM

The Town of Huntington is committed to a policy of non-discrimination to ensure compliance with Title VI of the Civil Rights Act of 1964 and subsequent laws and executive orders that hold no person shall be excluded from participating in, be denied the benefits of or be subjected to unlawful discrimination under any program or activity receiving federal financial assistance. The Town has developed this form to facilitate processing of Title VI complaints. If you require assistance completing this form or have questions, please contact Huntington's Title VI Coordinator, Rhonda Shepardson at (631) 351-3291. Completed, signed and dated forms should be sent to:

Rhonda T. Shepardson, Esq.
Town of Huntington, Title VI Coordinator
100 Main Street (Room 203)
Huntington NY 11743

Note: To protect your rights, your complaint must be filed within 180 days following the date of the alleged discrimination. Failure to file within 180 days may result in dismissal of the complaint.

Section I: Complainant Information (please print)

1. Name: _____
2. Address: _____
3. Home Phone: _____
4. Work Phone: _____
5. Mobile Phone: _____
6. E-mail: _____
7. Gender & Race: _____
8. Communication Accessibility Requirements
- Large Print
- Audio Tape
- TDD
- Other (Explain) _____

Section II: Person Discriminated Against

1. Are you filing this complaint on your own behalf? Yes No (If yes, proceed to Section III)
2. Name of the person for whom the complaint is being filed. Name: _____
3. Your relationship to the person named. Relationship: _____
4. Have you obtained the person's permission to file this form? Yes No
5. Explain why you are filing on behalf of the person named. _____

Section III: Complaint Information

1. This discrimination complaint is based on (check all that apply):
2. Race Color National Origin
3. Date of Incident: Month _____ Day _____ Year _____ Time of Day _____
4. Location of Incident: _____

Town of Huntington • 100 Main Street • Huntington, NY 11743



For Official use only

Complaint #: _____



Section III: Complaint Information (Continued)

Title VI Civil Rights Complaint Form

4. Please explain as clearly as possible what happened and why you believe discrimination under Title VI of the Civil Rights Act of 1964 occurred. Describe the involvement of all persons who you believe were involved in the discrimination, including any names and contact information you may have. Also include the names and contact information for any individuals who may have witnessed the event. *(Attach additional sheets if necessary and copies of any other documentation relevant to your complaint.)*

5. Is this your first Title VI complaint with the Town of Huntington? Yes No *(If no, please explain)*

6. Explanation: _____

7a. Have you filed this complaint with another Federal, State or Local agency or court?
Yes No *(If yes, complete 8a – 12a)*

7b. Do you intend to file this complaint with another Federal, State or Local agency or court?
Yes No *(If yes, complete 8b – 10b)*

8a. Agency or Court: _____

8b. Agency or Court: _____

9a. Address: _____

9b. Address: _____

10a. Filing Date: _____

10b. Anticipated Filing Date: _____

11a. Agency/Court Contact: _____

12a. Contact Telephone: _____

Note: Filing this complaint with another court or administrative agency may impact the ability of the Town of Huntington to provide administrative relief and require the complaint to be referred to the Town Attorney for disposition.

Section IV: Affirmation *(Please remember to sign and date this form)*

I affirm that I have carefully read the above complaint and that to the best of my knowledge, information, and belief the information contained herein is true.

Complainant's Signature (As named in Section I)

Date



For Official use only

Complaint #: _____



FORMULARIO DE QUERELLA DE DERECHOS CIVILES TÍTULO VI

El Municipio de Huntington está comprometido a una póliza de no- discriminación para asegurar cumplimiento con el Título VI del Acto de Derechos Civiles de 1964 y leyes subsecuentes y órdenes ejecutivas que dictan que ninguna persona debe ser excluida de participar en, negada los beneficios de, o ser sometido a discriminación ilegal bajo cualquier programa o actividad recibiendo asistencia federal de financia. El Municipio ha desarrollado este formulario para facilitar el proceso de quejas del Título VI. Si usted requiere asistencia llenando este formulario o si tiene preguntas, por favor contactar a la Coordinadora del Título VI de Huntington, Rhonda Shepardson al 631.351.3291. Formularios completos, firmados, y fechados deben ser mandados a:

Rhonda T. Shepardson, Esq.
Town of Huntington, Title VI Coordinator
100 Main Street (Room 203)
Huntington NY 11743

Nota: para proteger sus derechos, su querella debe ser presentada dentro de 180 días siguiendo la fecha de la discriminación alegada. Falta de presentar la queja dentro de 180 días puede resultar en desestimación de la queja.

Sección 1: información de la persona que registra la querella (por favor escriba con letra de molde)

- 1. Nombre: _____
- 2. Direccion: _____
- 3. Teléfono de Su Casa: _____
- 4. teléfono de Su Trabajo: _____
- 5. teléfono Móvil: _____
- 6. E-mail: _____
- 7. Sexo y Raza: _____
- 8. Requisitos de Accesibilidad de Comunicación
 - Letras Grandes
 - Cinta de Audio
 - TDD
 - Otro (*Explique*) _____

Sección II: Persona Discriminada

- 1. Está llenando este formulario para usted mismo? Si No (*Si es así, proceda a la Sección III*)
- 2. Nombre de la persona para cual esta llenando esta queja. Nombre: _____
- 3. Su relación a la persona nombrada. Relación: _____
- 4. Ha obtenido permiso de esta persona para llenar esta queja? Si No
- 5. Explique porque está presentando esta queja en parte de la persona nombrada. _____

Sección III: Información de la Querella

- 1. Esta queja de discriminación está basada en (*Marque todas la que apliquen*):
- 2. Raza Color Nacionalidad
- 3. Fecha de incidente: Mes _____ Dia _____ Año _____ Hora del Día _____
- 4. Lugar de incidente: _____

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Complaint #: _____



Sección III: Información de la Querella (continuado) Formulario de Queja Título VI

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4. Por favor explique lo más claro posible lo que paso y porque usted cree que ocurrió discriminación bajo el título VI del acto de derechos civiles de 1964. Describa el involucrimiento de todas las personas cuales usted cree que fuero involucradas en la discriminación, incluyendo los nombres y la información de contacto de cualquier individual que pudo haber sido testigo de este evento (*Siéntase libre de adjuntar paginas adicionales y copias de cualquier otra documentación pertinente a su queja.*)

5. Es esta su primera queja de Titulo VI con el Municipio de Huntington? Si No (*si no, por favor explique*)

6. Explicación: _____

7a. Ha presentado esta querella con otra agencia Federal, Estatal, o Local, o una Corte?
Si No *si la respuesta es sí, llena 8a – 12a*

7b. Tiene intención de presentar esta querella con otra agencia Federal, Estatal, o Local, o una Corte?
Si No (*If yes, complete 8b – 10b*)

8a. Agencia o Corte: _____

8b. Agencia o Corte: _____

9a. Dirección: _____

10a. Fecha de presentación: _____

10b. Fecha anticipada de presentación: _____

11a. Agency/Court Contact: _____

12a. Teléfono de contacto: _____

Nota: presentar esta querella con otra corte o agencia administrativa puede impactar la habilidad de Town of Huntington para proveer asistencia administrativa y puede requerir que la querella sea referida a Town Attorney para disposición.

Sección IV: Afirmación (por favor recuerde firmar y fechar este formulario)

Afirmo que he leído cuidadosamente la querella y a lo mejor de mi conocimiento, información, y creencia, la información contenida dentro de la misma es verdad.

Firma de la persona haciendo la queja (misma nombrada en Sección I)

Fecha



Attachment D: Huntington Town Board Enabling Resolution

2016-73

RESOLUTION AUTHORIZING THE ESTABLISHMENT OF A TITLE VI (CIVIL RIGHTS) POLICY FOR THE DEPARTMENT OF TRANSPORTATION AND TRAFFIC SAFETY

Resolution for Town Board Meeting dated: February 10, 2016

The following resolution was offered by: Councilwoman Edwards

and seconded by: **COUNCILMAN COOK**

WHEREAS, the Town of Huntington has received Federal financial assistance from the Federal Transit Administration (FTA), and as a condition of receiving this assistance, the Town of Huntington is required to establish a Title VI (Civil Rights) Policy for the Department of Transportation and Traffic Safety and issue assurances that there is no discrimination in the award and administration of its contracts or any program or activity receiving federal financial assistance without regard to whether specific projects or services are federally funded; and

WHEREAS, pursuant to SEQRA Section 6 N.Y.C.R.R. of 617.5 (c)(20), the actions herein involve routine agency administration, which are Type II actions and therefore no further SEQRA review is required.

NOW, THEREFORE

THE TOWN BOARD

HEREBY ESTABLISHES a Title VI (Civil Rights) Policy for the Department of Transportation and Traffic Safety including written assurances of compliance as set forth in Title VI of the Civil Rights Act of 1964 and subsequent Federal, State and Local laws, regulations and executive orders and authorizes the Supervisor to sign any documents in connection therewith upon such terms and conditions as may be acceptable to the Town Attorney.

VOTE: AYES: 5 NOES: 0 ABSTENTIONS: 0

Supervisor Frank P. Petrone	AYE
Councilwoman Susan A. Berland	AYE
Councilman Eugene Cook	AYE
Councilman Mark Cuthbertson	AYE
Councilwoman Tracey A. Edwards	AYE

THE RESOLUTION WAS THEREUPON DECLARED DULY ADOPTED.

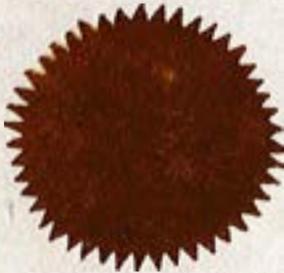


STATE OF NEW YORK)
COUNTY OF SUFFOLK)
TOWN OF HUNTINGTON)

I, **Stacy H. Colamussi, Deputy Town Clerk of the Town of Huntington**, acting in the stead of Town Clerk Jo-Ann Raia, who is custodian of the Records of said Town, **DO HEREBY CERTIFY** that I have compared the annexed with the original thereof and that the same is a true and correct copy of a resolution adopted by the Town Board of the Town of Huntington on: February 10, 2016

RESOLUTION #2016-73 AUTHORIZING THE ESTABLISHMENT OF A TITLE VI (CIVIL RIGHTS) POLICY FOR DEPARTMENT OF TRANSPORTATION AND TRAFFIC SAFETY filed in the Town Clerk's Office and the same is a true copy thereof, and of the whole of such original.

IN TESTIMONY WHEREOF, I have hereunto signed my name and affixed the seal of the Town of Huntington this 11th day of February 2016.




Deputy Town Clerk