



WRTA TITLE VI PROGRAM



PRESENTED AT PUBLIC MEETING ON APRIL 8, 2024

ACCEPTED BY WRTA ADVISORY BOARD ON APRIL 18, 2024

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Introduction

WRTA's Commitment to Civil Rights

The Worcester Regional Transit Authority's (WRTA) Title VI Program has been prepared to ensure that the level and quality of WRTA's fixed-route and demand response services are provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to WRTA's riders and other community members. Additionally, through this program, WRTA has examined the need for services and materials for persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English in compliance with US Department of Transportation policy and guidance on federal Executive Order 13166.

Title VI of the Civil Rights Act of 1964 states that "no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance." All federal agencies which provide financial assistance for any program are authorized and directed by the United States Department of Justice to apply provisions of Title VI to each program by issuing applicable rules, regulations, or requirements. elated federal nondiscrimination laws administered by the Federal Transit Administration prohibit discrimination on the basis of age, sex, and disability. These protected categories are discussed within WRTA's Title VI Program and are consistent with federal interpretation and administration.

This document assures that the Title VI requirements are fully met, that the WRTA is compliant with federal guidelines, and that the WRTA is responsive to the needs of Title VI for its beneficiaries, customers, and constituencies. The Central Massachusetts Regional Planning Commission (CMRPC) has been a contributing partner in the development of this Title VI document and is the primary author. CMRPC is responsible for the statistical analysis of most of the necessary data, production of all graphics, and lending its planning and technical expertise to the development of the Program.

Pandemic safety measures such as masks, face shields, hand sanitizer, and gloves are optional for drivers and riders. Plexiglass barriers have been installed on all vehicles to protect the driver. The use of virtual meetings remains in effect and transitioned to a hybrid format, as needed. The introduction of virtual meetings has dramatically increased public participation and has improved

the availability of interpreters, since they are no longer impacted by travel time and other restrictions. In March 2020, the WRTA temporarily suspended its fare collection policy due to the impacts of COVID-19 and as a method to improve safety measures for everyone onboard the vehicle. Through June 30, 2024, the WRTA Advisory Board has voted to continue the suspension of its fare collection policy. WRTA uses its newly updated website, text alerts, and social media to alert riders of service announcements, holiday service reminders, upcoming service changes, and other matters of interest.

2. General Requirements

2.1 Notice to the Public

To make WRTA's riders aware of its commitment to Title VI compliance, and of their right to file a civil rights complaint, WRTA has made available the following information in English, Spanish, and Vietnamese on both its website and in print. Printed notices are located in the lobby of the WRTA Hub at Union Station, Advisory Board conference room, and employee break rooms at both the Hub, and the WRTA Maintenance and Operations (M&O) facility.

The Notice to Beneficiaries and related information is available in English and Spanish on the WRTA website: [Title VI and Nondiscrimination Notice of Rights of Beneficiaries](#).

2.2 Discrimination Complaint Procedures

Complaint procedures are detailed on the WRTA website in English, Spanish, and Vietnamese and can be filed using the online complaint form, written, or by any other appropriate method. Links to the Procedure forms are included for reference.

[WRTA Title VI Nondiscrimination Complaint Procedure \(English\)](#)

[WRTA Title VI Nondiscrimination Complaint Procedure \(Spanish\)](#)

[WRTA Title VI Nondiscrimination Complaint Procedure \(Vietnamese\)](#)

2.3 The Procedure

All Title VI complaints are acknowledged within ten (10) business days of receipt by either the WRTA's Customer Service staff, or WRTA Administration. Complaints are then reviewed by the WRTA Administrator who must respond within 60 days after the date on which the WRTA Administrator received the complaint. The Title VI Complaint Form is available in English, Spanish and Vietnamese on the WRTA website. Links to the Complaint forms are included for reference.

[WRTA Title VI Complaint Form \(English\)](#)

[WRTA Title VI Complaint Form \(Spanish\)](#)

[WRTA Title VI Complaint Form \(Vietnamese\)](#)

2.3.1 Active Lawsuits, Complaints or Inquiries Alleging Discrimination

WRTA maintains a list of active investigations conducted by the Federal Transit Administration (FTA) and other entities including lawsuits and complaints naming WRTA 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 WRTA 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.

2.3.2 Record Keeping

The WRTA's Public Records Access Officer (RAO) is Administrator Joshua Rickman who leads in the development of contracts and other Title VI relevant materials. The WRTA has the resources available to translate the Title VI Program and other related materials into multiple languages and can coordinate in-person interpretation, phone interpretation, video meeting interpretation, and translation of documents as needed. A log of Title VI complaints, follow-up activities, and resolutions are maintained by the WRTA. Information about Public Records Access at WRTA and the related Public Records Request Form are available on the WRTA website: [WRTA Public Records Access and Public Records Request Form](#)

3. WRTA Public Participation Plan

3.1 Key Principles

The WRTA's Public Participation Plan has been prepared to ensure that no one is prevented from participating in the agencies transit service planning and development activities. The WRTA website was recently updated and implemented in the summer of 2023 to ensure timely and accurate delivery of information. The website also provides schedules, real-time bus location information, individual route and system alerts, Advisory Board meeting agendas and minutes, and agency news and updates. The website features a dropdown menu which allows users to

translate the website into 14 languages including those identified in the Language Assistance Plan.

3.2 Early, Continuous and Meaningful

The steps outlined in the public participation process offer early, continuous and meaningful opportunities for the public to be involved in the identification of social, economic, and environmental impacts of decisions made at the WRTA. It is a guide for WRTA to follow as it engages with its diverse community. The WRTA 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 actively reaching out to local organizations that work with diverse and vulnerable populations in the WRTA region.

3.3 Goals of the Public Participation Plan

The overarching goals of WRTA's Public Participation Plan include:

- Provide adequate public notice of public participation activities and time for public review and comment at key decision points, including but not limited to a reasonable opportunity to comment on the proposed service or fare changes.
- Provide timely notice and reasonable access to information about WRTA issues and processes.
- Employ visualization and data gathering techniques to describe service and fare changes.
- Make public information (including technical information and meeting notices) available in electronically accessible formats and means and to those persons with Limited English Proficiency.
- Hold public meetings at convenient and accessible locations and times. This may include virtual public meetings which would be available to a larger population.
- Demonstrate explicit consideration and response to public input received during the development of fare and/or service changes.
- Seek out and consider the needs of those traditionally underserved by existing transportation systems, such as low-income, and minority households who may face challenges accessing employment and other services.
- Provide an additional opportunity for public comment if the final service or fare change differ significantly from the first version offered for public comment.
- Coordinate with the statewide transportation planning public involvement and consultation process responsible for other planning activities.

- Review periodically the effectiveness of the procedures and strategies contained in the plan to ensure a full and open participation process.

3.4 Objectives of the Public Participation Plan

WRTA shall use its Public Participation Plan when considering fare changes, modifications to routes and schedules, and other transit planning projects. Specifically, this involves establishment of a new route, elimination of an existing route, or a change of 25% or more of overall route miles. For minor service changes not rising to the 25% threshold, WRTA will post change notices on the website, social media, all vehicles, and along appropriate bus routes.

3.5 WRTA's Public Participation Process

When a service or fare change proposal is developed, WRTA Administration brings the proposal before the WRTA Advisory Board to consider releasing for public review and comment. Once the WRTA Advisory Board has voted to authorize WRTA Administration to conduct public meetings on any fare or service proposal, potential meeting venues/formats, and interpreters are contacted for availability. Notices of public meeting locations and times are prepared and distributed widely including to all member communities, and a variety of social service organizations. Comments on the proposals are recorded, and notes from any public meetings are summarized for the WRTA Advisory Board, who then votes on how to implement the proposed changes.

3.5.1 Outreach Efforts – Alerting Riders and Encouraging Engagement

WRTA's public participation process begins with traditional approaches including legal notices (when required), and notification to the media through press releases but has been expanded in recent years. WRTA has found that these approaches only reach a small percentage of riders and has developed extensive outreach methods including stronger use of social media, and more frequent postings to the WRTA website. Since March 2020, the WRTA Advisory Board meetings have changed from an in-person format to a virtual webinar format. The virtual webinar format has proven successful with new riders attending the meetings, and with higher attendance and participation from Board members.

Generally, when in-person public meetings are scheduled, the venue location and time correspond with WRTA fixed-route schedules and paratransit availability. Further, the locations must be accessible to people with disabilities. These locations often include public buildings such

as town halls, libraries, and senior centers but can be held in other types of buildings such as the community room of a house of worship, or the meeting room of a residential building.

Additional outreach efforts include the development and implementation of the WRTA Travel Training program, which is offered for free to all members of the public. This program provides comprehensive instruction to familiarize individuals and groups with the WRTA system. This program not only provides a marketing and outreach opportunity for new and existing riders, but also provides a feedback forum for WRTA staff to hear about current service and ideas for improvement. WRTA Travel Training outreach has been held at public housing authorities, senior centers, health fairs, public schools, local colleges, and disability advocacy organizations. The Travel Trainer is able to meet with the rider to assess their current experience and skills with using the WRTA and modifies the training accordingly.

3.5.2 WRTA Mediums

Notification about public meetings is done primarily through the WRTA website and its social media platforms including Facebook and X (formerly Twitter), information distributed at the Customer Service window, through email using its community partnerships, using radio advertisements, and by forwarding information to the Audio Journal, a radio reading service for people who are blind. Announcement flyers/meeting notices are made available on all WRTA-operated vehicles.

3.5.3 Addressing Comments

All comments received from the public are given careful and thoughtful consideration. These comments can be received by US mail, email, phone call or through the WRTA's feedback form ([WRTA Customer Service Feedback Form](#)). Comments are summarized and presented to the WRTA Advisory Board, as needed.

3.5.4 Identification of Stakeholders

Stakeholders are those who are either directly or indirectly affected by a plan or its recommendations. Those who may be adversely affected, or who may be denied benefit of a plan's recommendations are of particular interest in the identification of specific stakeholders. Stakeholders can come from a number of groups including the general population and specifically Environmental Justice population, public agencies and private organizations and

businesses. While stakeholders may vary based on the plan being considered, WRTA has assembled stakeholders that are communicated with through email and direct mail.

4. Language Assistance Plan - Improving Access for People with Limited English Proficiency (LEP)

In order to ensure meaningful access to programs and activities, WRTA uses the information obtained in a Four-Factor Analysis to determine the specific language services that are appropriate. This analysis helps WRTA to determine if it communicates effectively with LEP population and informs language access planning. This plan is continually reviewed, updated and improved to better meet the needs of transit customers in the WRTA Service Area. The WRTA aims to ensure that LEP 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.

In order to effectively communicate with the LEP community, WRTA has:

- maintained a 'language line' with direct service to a translation agency through the WRTA Hub Customer Service Center;
- trained Customer Service and Operations staff on language encounters and best practices;
- incorporated Notices of Language Assistance Availability into existing outreach materials;
- created a Spanish version of the WRTA System Map, which has been made available and posted at the WRTA Hub, and;
- implemented a direct translation tool onto the WRTA website to provide real-time content translation into 14 languages.

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

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

Factor 2: The frequency with which LEP people come into contact with WRTA services and programs.

Factor 3: The nature and importance of WRTA services and programs in people's lives.

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

4.1 Factor 1: Proportion, Number and Distribution of LEP Persons

Since 2010, the American Community Survey (ACS) has generated sample data in one, three, and five-year periods relative to population size, as conducted by the United States Census Bureau. The four distinctions of level of proficiency that the Census used in the past are now reduced to two levels of proficiency: "Speak English Very Well" and "Speak English Less than Very Well". The latter proficiency distinction is not further categorized as was done previously. Further, while previous surveys identified specific languages, the 2018-2022 Survey only discusses languages in broad categories of Spanish, Other Indo-European languages, Asian and Pacific Island languages and Other languages due to privacy concerns. Data used for this Plan was obtained from the 2018-2022 American Community Survey (ACS) Five-Year Estimates, concurrent with use of this same dataset by the Central Massachusetts Metropolitan Planning Organization (CMMPO). Those who reported to speak English "less than very well" are considered limited English proficient persons.

Since the language groupings from the 2018-2022 ACS are the same data from the previous ACS, this Title VI program is using the ACS dataset from 2011-2015 as there is a lack of language data breakdown in the 2018-2022 ACS data. Other usable data sources are currently being discussed at the regional and state level.

4.1.1 Service Area Geographic Boundaries /Area Overview

The WRTA service area consists of the 37 municipalities listed below. Its service area's 2018-2022 ACS population estimate was 576,030, or 8.25% of the 2018-2022 ACS total population estimate for Massachusetts (6,981,974). For comparison purposes, this was 8.1% during the 2011-2015 ACS.

Table 1: WRTA Member Communities

Auburn	East Brookfield	Oakham	Wales
Barre	Grafton	Oxford	Warren
Berlin	Holden	Paxton	Webster
Boylston	Holland	Princeton	Westborough
Brimfield	Leicester	Rutland	West Boylston
Brookfield	Millbury	Shrewsbury	West Brookfield
Charlton	New Braintree	Southbridge	Worcester
Clinton	Northborough	Spencer	
Douglas	Northbridge	Sturbridge	
Dudley	North Brookfield	Sutton	

4.1.2 Locations of the LEP Community Number/Proportion of LEP Persons Eligible to Be Served in WRTA Service Area

Using the ACS 2022, the population that are five years of age and older within the WRTA service area is 547,122. The estimated proportion of the population that speaks only English declined to just below 77%, as compared to just below 80% previously (total of 419,732). According to US Census data, the proportion of LEP population within the WRTA service area who speak languages other than English at home was 19.9% in 2010. This increased to 20.8% in the 2011-2015 ACS data and was 23% in the 2018-2022 ACS. Additionally, using the same sources those who speak English “less than very well” also increased from 8.4% to 8.8%.

Using the 2011-2015 ACS data, additional details for the population speaking languages other than English in the WRTA service area as shown below. Six languages were identified; Arabic, Chinese, Polish, Portuguese, Spanish, and Vietnamese, meet the Safe Harbor threshold of 1,000 persons in the WRTA Service Area when measuring ability to speak English “less than very well”.

Table 2: Persons in WRTA Service Area that speak English "less than very well"

Language	Total Speak English Less Than Very Well (2018-2022 ACS)	Percent
Languages other than English	127,390	23.28%
SPANISH	53,192	9.72%

OTHER INDO-EUROPEAN LANGUAGES	37,985	6.94%
ASIAN AND PACIFIC ISLAND LANGUAGES	20,752	3.79%
ALL OTHER LANGUAGES	15,461	2.83%

The WRTA fixed-route service area is contained within the overall WRTA service area and is defined as the area within one-quarter mile from a transit route. The most spoken languages other than English spoken at home in the WRTA Fixed-Route Service Area are similar to the top languages spoken in the region. Spanish (8.3%) is, by far, the language most frequently spoken other than English (10.4%), followed by African languages (2.0%), Vietnamese (1.8%), Portuguese (1.3%), Chinese (1.1%) and French (0.9%).

By combining the ACS data with Customer Service and Operations data which includes surveys and logs of actual encounters, the basis of this part of the LEP analysis was formed. In the WRTA Service Area, as previously stated, the most prominent language besides English that is spoken at home is Spanish (8.3%). The proportion of Other Indo-European languages spoken at home is 6.5% with Portuguese and French (1.1%) having the largest proportion, followed by Polish (0.7%). In relation to the Asian and Pacific Island languages, Vietnamese (1.1%) and Chinese (0.9%) show the largest proportion of the 3.1% in this language category. All other languages comprised 2.0%, of which African languages is 1.4%.

The next consideration is the identification of persons speaking English less than very well in the WRTA Service Area and in Census block groups intersecting WRTA fixed routes. The block groups intersected by WRTA fixed routes have the highest probability for WRTA language interactions, as they are the areas likely to capture most (if not all) riders on both fixed route and paratransit services. Using this measure, eight languages/language groups exceed the Safe Harbor threshold for the WRTA fixed-route service area.

It is important to note that both “African Languages”, “Asian Languages”, and “Indo-European” language groups comprise many different languages. Thus, it has been unclear what specific languages should be targeted within the 1,000 persons Safe Harbor threshold – and, what specific languages the WRTA would focus upon on a case-by-case basis.

Using a combination of Census, ACS data and staff interactions, the WRTA has included these three additional language groups:

- African Languages: Swahili
- Indo-European: Albanian
- Asian: Chinese and Vietnamese

With respect to the Asian Languages, of the top languages that meet the 1,000-person threshold, the Vietnamese population aged 5 years and over is the most “vulnerable” since 64.7% of the population that speaks Vietnamese at home speaks English “less than very well” (4,415 of 6,822 that speak Vietnamese at home). Note that the ACS-estimated percentage of persons speaking Vietnamese at home who report that they are limited English proficient is lower than the WRTA reported in 2015 using 2010 Census data (66.0%). The following table outlines the data in more detail.

Table 3: Native Language of Persons Speaking English Less Than "Very Well", WRTA Service Area and Block Groups Intersection WRTA Fixed Routes

Language or Language Group	Persons Speaking English less than "Very Well"	
	WRTA Service Area	Block Groups intersecting WRTA Fixed Routes
Spanish or Spanish Creole	18,504	17,383
Vietnamese	4,415	4,300
Chinese	3,023	2,436
African languages (incl. Swahili)	2,891	2,765
Portuguese or Portuguese Creole	2,700	2,413
Other Indo-European languages (incl. Afrikaans, Bosnian, Greek, German, Albanian)	1,877	1,812
Arabic	1,543	1,340
Other Indic languages (Hindi, Gujarati)	1,204	1,117
Polish	1,149	753
Other Asian languages (incl. Khmer)	1,088	713
French (incl. Patois, Cajun)	992	783
Source: 2015 5 Year American Community Survey, 2011 - 2015. Table B16001 Limited English Proficiency		

WRTA interactions with the general public (including LEP individuals) occur at four key intake points, in descending order of frequency:

- Customer Service office staff
- Operations (bus operators)
- Administration, Customer Service, and Operations staffs (public meetings)
- WRTA website

Operator/passenger interactions most frequently occur at the bus door, followed by interactions on the platform at the WRTA Hub. This can be a challenging context for communication in any language. Anecdotal information supports that most interactions involved questions about the route (if, when, or where a bus will stop), or questions about fare payment. Interactions at the Customer Service office at the Hub allows for interpretation and translation as needed. The number of interactions by language shown below.

Table 4: WRTA Customer Service Language Interactions (2020)

Languages	# of Interactions Recorded
Albanian	4
Arabic	11
Chinese	1
Mandarin	3
Nepali	4
Punjabi	2
Spanish	760
Swahili	3
Vietnamese	8
Total	792

WRTA passenger surveys are also considered when assessing the likelihood of encounters in certain languages. Print versions were circulated and posted in English and Spanish, and written translations were offered in other languages upon request. Google Translate usage from the former WRTA website was also considered as a potential indicator of the likelihood and frequency of Program/Service contact with LEP individuals.

Due to its geography, and comparative more affordable housing and living cost to other regions closer to Boston, as anticipated, the WRTA service area minority and LEP population has been

continuously growing. In particular, this growth is expected to occur in the City of Worcester, Southbridge, and at the western edge of the WRTA service area along MA Route 9. In 2010, the minority population in the WRTA Service Area represented 23.2% of the total population, showing a 42.6% increase between 2000 and 2010. However, the 2011-2015 ACS estimates suggest that the Service Area's minority population may be declining while its population of Hispanic origin continues to grow. The mix of ethnicities and languages spoken in the Service Area is transitioning, and some of the languages other than English that have long been spoken at home in the Service Area (i.e. Polish and French) may continue to decline.

The cost of translating materials into many different languages is prohibitive; therefore, the WRTA prioritizes preparation of written translations into the languages it most frequently encounters. The WRTA is always prepared to provide written translations in languages less frequently encountered. At present, the WRTA is relying upon the combination of 2010 Census and 2011-2015 ACS data with documented Customer Service and Operations encounters to establish its list of Safe Harbor languages. For this Title VI Program, the WRTA is focusing its language outreach and assistance resources on these languages: Arabic, Chinese, Polish, Portuguese, Spanish, and Vietnamese.

USDOT guidance specifies circumstances that signify strong evidence of a Recipient's compliance with its written translation obligations. If a Recipient provides written translations of Vital Documents into languages that meet certain thresholds—called "Safe Harbor languages"—then its obligation is likely considered met.

4.1.3 Safe Harbor Provision

The Safe Harbor provision is provided by Federal Law to the WRTA and other FTA recipients in order to ensure with greater certainty compliances with Federal requirements of providing written translation in language other than English. In certain circumstances, FTA will consider such an action as strong evidence of compliance with the recipient's written translation obligation under Title VI. Nonetheless, it is important to know that a decision to not provide written translations does not necessarily mean that the recipient is noncompliant.

Under Safe Harbor, strong evidence of compliance with the recipient's written translation obligation includes providing written translations of Vital Documents for each eligible LEP language group that constitutes five (5) percent or 1,000 persons, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. If needed, the

WRTA's translation can be provided orally. This provision applies to the translation of written documents only. It does not change the requirement to also provide essential access to LEP persons through skilled oral interpreters where oral language services are needed and are reasonable.

The WRTA has employed the Safe Harbor approach in prior reporting cycles to demonstrate its compliance. For this Program, the WRTA is using 2018-2022 ACS data as a starting point and making best use of passenger interaction data.

In addition, information from CMRPC Transit Staff is used, particularly as the WRTA's language work is relevant to CMMPO activities. Furthermore, the WRTA was able to determine which languages to offer complete translations by using calculations from the cost of staff time and production/circulation as a guide. When additional information is necessary, the WRTA also uses guidance provided by MassDOT to prompt request of language assistance in the Safe Harbor. In accordance with Federal requirements, other translations are provided upon request at no charge.

The languages that meet the threshold of 1,000 persons (but not necessarily 5% of the population) within the WRTA Fixed-Route Service Area using Census and ACS data are: **Arabic, Chinese, Polish, Portuguese, Spanish, and Vietnamese.**

The WRTA has determined 'Vital Documents' to include the following:

- Public Notices
- Title VI Notice to Beneficiaries, Complaint Procedure, and Complaint Forms
- Notice of Information Availability in Another Language through Translation on Website
- System Map

4.2 Factor 2: Frequency of Contact with LEP persons

Surveying the frequency of interaction with LEP persons is essential to providing quality services. WRTA employees are in contact with LEP persons on a daily basis.

The following is a list of types of encounters:

- Walk-in customers to the WRTA's Customer Service Center
- Customer telephone calls to WRTA Customer Service Center
- Operator and passenger conversations

- Customer surveys
- Public hearings/meetings, principally for fare and service changes
- Meetings with community-based organizations
- WRTA website, monitored by translation usage

The WRTA has also implemented and maintained a language line with direct service to a translation agency through its Customer Service Center.

4.3 Factor 3: Nature and Importance of WRTA Services to LEP persons

Transportation is a crucial service to everyday life for all people. The WRTA is committed to creating services that are easily available and as accessible as possible to all persons living within its service area, including LEP communities. It acknowledges that the latter may tend to be more dependent on transit services than English speakers in the service area. Hence, the WRTA is strongly dedicated to tailoring its outreach to LEP persons depending on their proximity to, and projected use of, its services. Further, it is important to note that the proportion of LEP persons in its fixed-route service area exceeds the LEP proportion for its service area.

The WRTA recognizes that thousands of people depend on transit services each day for critical mobility needs not limited to traveling for medical services, shopping for nutrition, access to recreational spaces, commuting to work, or getting to school.

Within its service area, the WRTA has extensively documented the importance of public transportation to LEP constituents-particularly during fare and/or service change public meetings. Furthermore, public transportation importance to refugees in the WRTA service area was well illustrated by Ascentria Care Alliance, through a previous MassDOT Community Transit Grant Program application. As previously noted, Ascentria Care Alliance is under contract to provide language assistance services to the WRTA and has an extensive knowledge of language assistance needs in the WRTA service area.

4.4 Factor 4: Resources Available to WRTA and Overall Cost for LEP Outreach

The WRTA utilizes both Federal and State sources of operating and capital assistance for programs and services for LEP population. LEP is fundamental to WRTA Operations and Customer Service and has been integrated into its marketing efforts as well.

Resources available to the WRTA through non-profit, State, and Federal agencies include, but are not limited to:

- MassDOT’s Office of Diversity and Civil Rights (ODCR)
- The Massachusetts Office of Public Health and Communications
- Language assistance resources outlined in FTA’s LEP Handbook
- Local non-profit organizations that assist persons with LEP (Ascentria Care Alliance, Centro, Worcester Community Coalition, the Refugee and Immigrant Assistance Center, Southeast Asian Coalition of Central Massachusetts, and others)

The WRTA will continue to revise language service equity, identify LEP concerns and seek appropriate additional funding that may be available for LEP services.

5. Outcomes – New Tools and Alerting Riders of Language Assistance

5.1 Oversight and Post-Event Assessment

WRTA Administration is responsible to ensure compliance with WRTA’s Title VI Program, Public Participation Plan, Language Assistance Plan, and other community outreach efforts. This includes an assessment of the effectiveness of public involvement and determines whether the public was aware of the opportunity to participate, the purpose of the participation, and whether the public had appropriate access to resources and information. Further reflection of the compliance efforts allows for improvement and refinement of the overall process.

5.2 Training Employees

Customer Service staff and Operators are provided with a brochure to assist LEP individuals with any questions related to the WRTA. This brochure directs them to a language assistance phone line that provides direct interpretation as appropriate.

5.3 Translation of Vital Documents

Vital documents are available on the WRTA website in English, Spanish, and Vietnamese. Additional services are in place to accommodate speakers of other languages as needed, either through the use of a professional translation service, or direct translation into 14 languages via a drop-down tool on the WRTA website.

6. Decision Making Bodies

6.1 Non-Elected Committees and Councils – WRTA Advisory Board

The WRTA Advisory Board is responsible for the policy making decisions of the WRTA including decisions on service changes, and fares. The Advisory Board members are appointed by their

respective community with each community having a weighted vote based on population and level of service. In addition to members appointed by the communities, two members are appointed; one represents the passenger community, and a second represents the disability community. Traditionally, Advisory Board meetings are conducted monthly, and Advisory Board subcommittee meetings are held as needed. Due to the COVID-19 pandemic, WRTA has transitioned from in-person meetings at the WRTA Hub to a virtual webinar meeting format which currently remains in place. The virtual format will remain in operation in some fashion to encourage continued participation, and the WRTA is exploring hybrid-meeting options for future meetings.

6.2 Non-Decision-Making Working Groups

6.2.1 Drivers Council

The Driver's Council consists of Operators who meet monthly with the General Manager/Assistant General Manager to discuss WRTA service. Drivers note their observations and concerns with an eye toward service improvements and efficiencies. Information is shared with the WRTA Administrator, as appropriate.

6.2.2 Transportation Planning Advisory Group (TPAG)

The Transportation Planning Advisory Group (TPAG) is an open public meeting of riders who meet generally bi-monthly to discuss WRTA fixed-route and paratransit services, as it relates to people aged sixty and over, and those with disabilities. This independent volunteer body of riders formulated a set of by-laws that established an Executive Committee. This Executive Committee meets as needed for more in-depth discussions of service issues and to prepare TPAG meeting agendas. At the full TPAG meetings, WRTA representatives present ridership information, customer service reports, upcoming changes to service, and hears concerns and comments, answers questions and takes compliments from service users. Information is shared with the WRTA Administrator, as appropriate.

7. Service Standards and Policies

7.1 Vehicle Load

Service should provide a seat for everyone in most periods except for the peak 60 minutes. During the peak 60 minutes some overloads are tolerable and may be considered necessary within the constraints of equipment and labor availability and cost effectiveness.

The "maximum load factor" is calculated by dividing the total number of seats passing the

maximum load point in one direction into the number of patrons passing the same point and in the same direction during the operating period considered. Since the load factor is an average, individual trips may exceed the average during a particular operating period.

Table 5: Maximum Loading Standards (Fixed-Route)

Maximum Loading Standards	
<u>Operating Period</u>	<u>Loading Standard</u>
Each Peak Period (by direction)	125% average
Base (Non-Peak)	No Standees
Night	No Standees
Saturday/Sunday/Holidays	No Standees

7.2 On Time Performance

The WRTA monitors fixed-route on-time performance utilizing data from its Automatic Passenger Counter (APC) equipment, that is onboard of all fixed-route vehicles.

Prior to December 2023, "On-time" is defined as one minute early to ten minutes late at designated time points. Under no circumstances should buses leave a designated time points ahead of schedule. On the other hand, a vehicle is considered late if it arrives at a designated time point more than ten minutes later than the scheduled time. Currently, the WRTA measures on-time performance by route as a percentage of fixed-route vehicles that reach their assigned timepoints on-time in the system. WRTA’s on-time performance goal is 80% systemwide.

Table 6: WRTA Fixed-Route On-Time Performance

Fiscal Year (FY)	Weekday OTP %	Saturday OTP %	Sunday OTP %
FY 2021	82.2	82.0	82.8
FY 2022	80.2	79.2	81.2
FY 2023	76.8	80.1	79.8
FY 2024 (July 2023-Nov. 2023)	74.6	80.5	82.6

In December 2023, the WRTA updated its on-time definition to reflect as one minute early to five minutes late at designated time points. The update was made to strengthen the performance measure using best practice(s) throughout the industry, and as an exercise to strengthen available data to re-align route schedules in an effort to improve on-time

performance system-wide. As of this plan, the WRTA is beginning efforts to synchronize route schedules, and anticipate draft proposals to release to the public this upcoming fall.

Pre-pandemic, the Central Massachusetts region experienced an increase in Vehicle Miles Traveled (VMT), which had an impact on all roadway operations, regardless of mode. The trip purposes and the peak periods have shifted slightly but the Central Mass regional VMT levels have returned to pre-pandemic levels.

7.3 Vehicle Headway

Vehicle headway is the amount of time between two buses traveling in the same direction on a given route. While a policy-based ‘clock headway’ is preferable, budget and asset constraints, and operational needs make this objective difficult to achieve. The WRTA will continue to refine its headways toward this goal, to the best of its operational ability.

7.4 Service Availability – Access to the Bus

WRTA services are extended to all member communities, through either fixed-route or demand response. The level of service in each community is determined by their level of financial support to WRTA. For fixed-route the WRTA determines routing within and/or through, and to each community to best serve as many people as possible and are designed with sensitivity to origins and destinations like apartment buildings, congregate housing, senior centers, employment centers, medical facilities, and shopping plazas.

WRTA routes operate primarily on main roads. Within the City of Worcester, WRTA has assigned designated stops for passenger boardings and alightings. Outside Worcester, WRTA service operates on a flag-stop system. WRTA also offers two flex routes outside Worcester as deviated fixed routes where the bus will deviate up to $\frac{3}{4}$ mile, upon reservation.

7.5 Vehicle Assignment Policy

WRTA vehicles are randomly assigned to routes to ensure equal approximate mileage and so that vehicles are disbursed throughout the service area without prejudice. All vehicles are equipped with interior and exterior cameras which capture visual details. Footage from these cameras can be viewed in the case of a complaint or an accident.

7.5.1 Transit Facility, Bus Stops and Amenities

The WRTA Hub at the Union Station intermodal facility provides state-of-the-art amenities to its riders. Individual bus bays are numbered and the platform is covered with a canopy. The outdoor area is equipped with benches, screens showing buses arrival times, informational displays with route departure times and, system maps. The indoor lobby waiting area is equipped with indoor seating, HDTV-screens showing arrival times, and its Customer Service Center.

Additionally, the WRTA Hub was designed and built following ADA accessibility guidelines and regulations. In the process, the WRTA consulted with riders with disabilities and organizations that represent this population. The WRTA Hub has tactile warning strips that guide individuals who are visually impaired to the bus platform. The WRTA installed Bus Time Talking Signs (push buttons) for audible announcements for those who are visually-impaired. Each individual bus bay has a large print sign and information in Braille. The buses are equipped Automatic Vehicle Location (AVL) equipment that deploys automatic bus stop announcements onboard the vehicle.

WRTA schedules are designed to be easily read, and include a route map, time points, major destinations along the route, and information about connections with other routes. Schedules are available onboard all fixed-route vehicles; and are available in print at the Customer Service window. Online PDF and HTML versions of route schedules are available on the WRTA website. Schedules are available at major trip generators throughout the service area including colleges, major employers, social service agencies, and other locations within proximity to a fixed-route.

Outside the WRTA Hub, the placement of shelters and the identification of priority locations consider two major factors: the number of boarding passengers at a specific stop, and the frequency of service at the stop. Shelters are considered at stops with the highest number of boarding during a typical weekday.

The WRTA owns and maintains 24 of the 37 total bus shelters along the WRTA's fixed route system. A large majority of these shelters are in minority census tracts. This is consistent with the fact that population densities and transit ridership are higher in these same tracts. The remaining shelters, while located in non-minority census tracts, also serve minority designated bus routes with substantial ridership. The WRTA has contractors that cleans and maintains WRTA-owned bus shelters, and performs snow removal at WRTA-owned bus shelters and select

bus stops and transfer locations.

Another amenity available to WRTA riders is the application of ITS technologies. This technology helps people to connect to digital content and real-time information. The WRTA has implemented an Automatic Vehicle Location (AVL) system which allows for “Next Bus” arrival times at major stops and transfer locations. Currently this information is accessible by phone, automatic message alerts by email or text, on the web (maps, Estimated Time of Arrival page, schedules page), LED kiosks in public locations (libraries, colleges), and through Quick Response (QR) codes at bus stop signs. Detailed BusTracker information is available on the WRTA website: [WRTA BusTracker](#).

In terms of fleet amenities, all WRTA vehicles are air-conditioned; contains seating and grab handles for standees, and all buses are equipped with kneelers, bicycle racks, and wheelchair ramps. Noise, exhaust emissions and odors had been minimized with WRTA’s emission-reducing efforts by investing in energy efficient vehicles. The implementation of Automatic Vehicle Maintenance (AVM) systems in every bus is a proactive measure to maintain a high state of operational readiness through effective corrective and preventive maintenance. In addition, WRTA’s goal is to provide the most attractive and comfortable vehicles to our patrons.

Per the WRTA Transit Asset Management (TAM) Plan, updated and adopted in 2022, the minimum service-life for fixed-route buses ranges between ten and twelve years, depending on vehicle length, and between six and seven years for demand response vehicles, depending on type of vehicle. As of February 2024, the average fleet age of WRTA fixed-route vehicles is 5.45 years old, and the average fleet age of WRTA demand response vehicles is 3.8 years old.

7.5.2 Monitoring Service Standards

WRTA is required to have systemwide performance measures in place to monitor transit service. The performance measures are updated periodically and are primarily used for service planning.

Another method the WRTA uses to monitor transit service is through direct communication with its customers. The WRTA Customer Service Center, located at the WRTA Hub houses staff who typically provide services to thousands of customers every month. In FY18, the Customer Service Center attended to over 50,700 people. In FY19, the Center was on track to attend to a

similar number of customers. From March 2020 through December 2020, when pandemic precautions were in effect, the Center has attended to a total of 5,708 people, a significant decrease in line with the decrease in overall ridership. In FY24, the Customer Service Center is projected to attend to 17,000 customers. At the Center, customers can get information about routes, schedules, how to use the BusTracker, submit a service complaint, among other inquiries. Since March 2020, when the WRTA Advisory Board began its fare policy suspension, the number of people coming to the Customer Service Center has decreased dramatically since assistance with paying fare is not needed at this time.

WRTA has customer relationship management software and is able to immediately communicate any changes or disturbances on the road that may affect or delay service, answer customer questions, and provide trip planning assistance. This platform has proven effective to reach out to customers who filed a service complaint and allows WRTA to easily keep track of the complaint type, and volume of calls.

WRTA aims to conduct a customer satisfaction survey on a biennial basis. The survey includes “origin and destination” questions, and information about overall quality of the fixed route service and facilities. Respondents completing the survey are asked to answer socio-demographic questions, at their discretion. WRTA is in the process of conducting a survey in April 2024, with results available this summer.

7.5.3 Summary of Changes

WRTA frequently reviews its services for performance measurement and efficiencies. Service changes are performed three times a year in January, June, and August; though most service changes only include minor schedule adjustments to specific routes, or internal timing improvements. In FY 2021, and FY 2022, the WRTA implemented service changes to improve the performance of select routes by increasing service during the peak time period, and extending the schedule into the ‘late night’ time period (ending 11/11:30 PM) – and introduced new services. The expanded service and introduction of new services remain in operation as of this Program development.

Although the majority of WRTA fixed-routes travel through the WRTA Hub, three routes do not travel through the Hub, but connect with other routes that do. Additionally, WRTA received funding to begin a pilot microtransit service in the Shrewsbury/Westborough area to replace an underperforming community shuttle route. The original goal of the pilot was to provide first

mile-last mile service between the Westborough and Southborough MBTA Commuter Rail stations and nearby office parks, but due to the pandemic, this has evolved into a service that serves people traveling locally to supermarkets and medical offices as well as to students traveling home from after school activities.

7.5.4 Construction Equity Analysis

The WRTA Hub at Union Station opened in 2013, and includes dedicated bus slips and waiting area, and an indoor lobby featuring a waiting area for passengers, and access to the Customer Service Center. The Hub houses Customer Service, Paratransit Brokerage, and WRTA Administration offices. The WRTA Maintenance and Operations facility opened in 2016 and houses all WRTA-operated buses and vans, containing nine maintenance bays, a refueling bay, office space for Operations and Management Administration, training course, and a community meeting room. Currently, the WRTA does not have active plans for additional construction or expansion of its facilities.

8. Program Specific Requirements

8.1 Title VI Monitoring

Since WRTA operates fewer than 50 fixed-route buses in peak service, some service analyses are not required to be performed as part of WRTA's Title VI Program.

8.2 Subrecipient Compliance

All contractors, subcontractors, and vendors receiving federal funds are subject to the provisions of Title VI of the Civil Rights Act. Federally funded contracts and procurements (where applicable) include non-discrimination provisions to ensure that Title VI requirements are followed. Title VI compliance remains an important element of the WRTA.

8.3 Equity Analysis for Facility

During the past three years, WRTA has not constructed a vehicle storage, operations center, or maintenance facility. No facilities are in the development, permitting, or construction stages.

8.4 Demographic Service Profile

Since WRTA operates fewer than 50 fixed-route buses in peak service, a demographic service profile was not required for WRTA's Title VI Program.

9. Grants, Reviews and Certifications

9.1 Pending Applications for Financial Assistance

At this time, the WRTA has no pending applications for financial assistance from any Federal agency, aside from FTA.

9.2 Pending FTA Grants

At this time, the WRTA does not have any pending FTA grant applications. The Fiscal Year 2024 Apportionments were recently released, and the WRTA will be preparing a grant application in the upcoming months for its annual Section 5307, and Section 5339 appropriations.

9.3 Open FTA Grants

As of March 2024, the WRTA has the following grants open with FTA:

- MA-2018-021-01
- MA-2020-005-01
- MA-2020-039-00
- MA-2021-031-00
- MA-2021-045-01
- MA-2022-019-00
- MA-2022-036-00
- MA-2023-025-01

The following grants are on behalf of the Worcester Redevelopment Authority (WRA), the lone subrecipient to the WRTA:

- MA-54-0004
- MA-2016-016-00
- MA-2018-018-01
- MA-2019-019-01
- MA-2021-048-01

9.4 Civil Rights Compliance Reviews in the Past 3 Years

The WRTA underwent a Triennial Review by FTA in Fiscal Year 2022. As part of the Triennial Review process, the WRTA Title VI Program was examined.

9.5 Recent Annual Certifications and Assurances

The Federal Fiscal Year (FFY) 2024 Certifications and Assurances were executed on March 15, 2024.

9.6 Previous Triennial Review Findings

During the FY 2022 Triennial Review, two Title VI findings were identified; TVI 3-1, and TVI 6-1. The WRTA has submitted Corrective Actions to FTA for review and approval.

10. **Contacts**

For additional information on the Worcester Regional Transit Authority's Title VI Program or its efforts to comply with the Civil Rights Act of 1964 or Executive Order 13166 Improving Access to Services for Persons with Limited English Proficiency, please contact:

Joshua Rickman, Administrator
Worcester Regional Transit Authority
60 Foster Street
Worcester, MA 01608
(508) 791-9782
csfeedback@therta.com



Title VI and Nondiscrimination Notice of Rights of Beneficiaries

The WRTA hereby states its policy to uphold and assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related federal and state statutes and regulations. Title VI prohibits discrimination in federally assisted programs and requires that no person in the United States of America shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal assistance. Massachusetts law also prohibits discrimination based on race, color and/or national origin, and the WRTA assures compliance with these laws and related federal and state civil rights laws prohibiting discrimination based on sex, age, and/or disability. Individuals who feel they have been discriminated against in violation of Title VI may file a complaint within 180 days with the WRTA Title VI/Nondiscrimination Program Coordinator.

For information or to file a complaint under Title VI, the contacts are as follows:

Title VI/Nondiscrimination Program Coordinator

Worcester Regional Transit Authority
60 Foster Street
Worcester, MA 01604
(508) 791-9782
csfeedback@therta.com

Massachusetts Commission Against Discrimination (MCAD)

One Ashburton Place, 6th Floor
Boston, MA 02109
(617) 994-6000
TTY: 617-994-6196

Federal Transit Administration Office of Civil Rights

Attention: Complaint Team
East Building, 5th Floor – TCR
1200 New Jersey Avenue, SE
Washington, DC 20590

Título VI y no discriminación. Aviso de derechos de los beneficiarios

WRTA declara su política de mantener y asegurar el cumplimiento total del Título VI de la Ley de Derechos Civiles de 1964, la Ley de Restauración de los Derechos Civiles de 1987 relacionados con los estatutos y reglamentos federales y estatales. El Título VI prohíbe la discriminación en los programas con asistencia federal y exige que ninguna persona en los Estados Unidos de América, por motivos de raza, color u origen nacional, sea excluida de la participar, ni se le nieguen los beneficios o sea sometida a discriminación bajo cualquier programa o actividad que reciba asistencia federal. La ley de Massachusetts también prohíbe la discriminación basada en la raza, el color y / o el origen nacional, y WRTA garantiza el cumplimiento de estas leyes y las leyes de derechos civiles federales y estatales que prohíben la discriminación por sexo, edad y / o discapacidad. Las personas que sienten que han sido discriminadas en violación del Título VI pueden presentar una queja dentro de los 180 días con el Coordinador del Programa de Título VI / No Discriminación de la WRTA.

Para información o para presentar una queja bajo el Título VI, los contactos son los siguientes:

Coordinador del Programa de Título VI / No Discriminación

Autoridad de Tránsito Regional de Worcester
60 Foster Street
Worcester, MA 01604
(508) 791-9782
csfeedback@therta.com

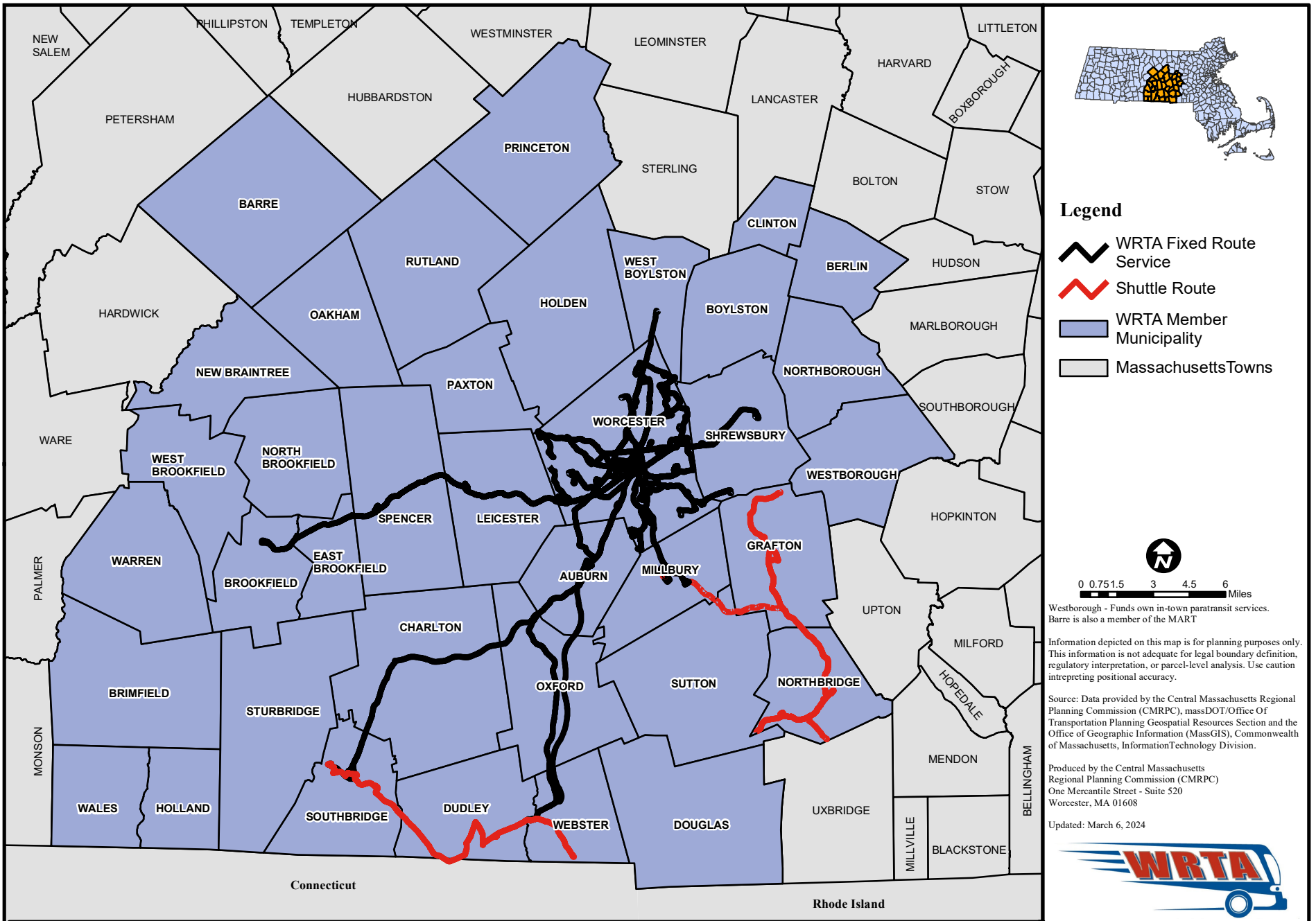
Comisión de Massachusetts contra la discriminación (MCAD)

One Ashburton Place, 6th Floor
Boston, MA 02109
(617) 994-6000
TTY: 617-994-6196





Administración Federal de Tránsito Oficina de Derechos Civiles

Attention: Complaint Team
East Building, 5th Floor – TCR
1200 New Jersey Avenue, SE
Washington, DC 20590

APPENDIX B: WRTA SERVICE AREA MAP



Legend

-  WRTA Fixed Route Service
-  Shuttle Route
-  WRTA Member Municipality
-  Massachusetts Towns

0 0.75 1.5 3 4.5 6 Miles

Westborough - Funds own in-town paratransit services.
Barre is also a member of the MART

Information depicted on this map is for planning purposes only. This information is not adequate for legal boundary definition, regulatory interpretation, or parcel-level analysis. Use caution interpreting positional accuracy.

Source: Data provided by the Central Massachusetts Regional Planning Commission (CMRPC), massDOT/Office Of Transportation Planning Geospatial Resources Section and the Office of Geographic Information (MassGIS), Commonwealth of Massachusetts, Information Technology Division.

Produced by the Central Massachusetts Regional Planning Commission (CMRPC)
One Mercantile Street - Suite 520
Worcester, MA 01608

Updated: March 6, 2024



Fixed Route and Shuttle Route Service Within WRTA Member Communities

Language Services



Thank you for riding the

Worcester Regional Transit Authority



ENGLISH
PORTUGUÊS
ESPAÑOL
FRANÇAIS
JĘZYK POLSKI
TIẾNG VIỆT
中文
KISWAHILI
العربية



English

For language assistance, please call:

(508)791-9782 Option #2
8a.m. - 4:30 p.m. Monday -Friday
After hours questions about your bus ride,
call: (508)453-3430
WWW.THERTA.COM

Português

Para assistência de idioma
por favor ligar:

(508)791-9782 Opção #2
8 a.m. - 4:30 p.m. Segunda –Sexta
Se tiver perguntas depois do horário
de funcionamento sobre transporte de
autocarro ligar: (508)453-3430
WWW.THERTA.COM

Español

Para asistencia de idioma
por favor llamar:

(508)791-9782 Opción #2
8a.m. - 4:30 p.m. Lunes –Viernes
Si tiene preguntas fuera del horario laboral
sobre transporte de autobús llamar:
(508)453-3430
WWW.THERTA.COM

Français

Pour une assistance linguistique,
s'il vous plaît appelez:

(508)791-9782 Option #2
8a.m. - 4:30 p.m. Lundi-Vendredi
Pour des questions après les heures de
travail sur votre trajet en bus, appelez :
(508)453-3430
WWW.THERTA.COM

Język Polski

Aby uzyskać pomoc w języku polskim,
proszę dzwonić pod numer:

(508)791-9782 Opcja #2
8a.m. - 4:30 p.m. Poniedziałek –Piątek
Po godzinach pytania o jazdę autobusem
proszę kierować pod numer :
(508)453-3430
WWW.THERTA.COM

Tiếng Việt

Để có sự hỗ trợ về ngôn ngữ,
xin vui lòng gọi số:

(508)791-9782 Chọn #2
8a.m. - 4:30 p.m. Từ thứ hai đến thứ sáu
Nếu có thắc mắc gì về xe buýt phục vụ cho
quí vị sau giờ làm việc, xin gọi số:
(508)453-3430
WWW.THERTA.COM

中文

语言帮助请打电话：

(508)791-9782 选择 #2
8a.m. - 4:30 p.m. 星期一星期五
下班后乘坐公车的问题,打电话:
(508)453-3430
WWW.THERTA.COM

Kiswahili

Ukihitaji msaada wa lugha, piga simu kwa
namba hii:

(508)791-9782 Chaguo #2
8a.m. - 4:30 p.m. Jumatatu - Ijumaa
Baada ya masaa maswali kuhusiana na
kuchukua basi yako, piga:
(508)453-3430
WWW.THERTA.COM

العربية

للحصول على مساعدة اللغة، يرجى الاتصال

(508)791-9782 خيار #2
04:30 - 8:00 من الاثنين إلى الجمعة
معلومات بعد ساعات العمل حول مسار ركوب الحافلة اتصل:
(508)453-3430
WWW.THERTA.COM