



## **Title VI Program**

**Prepared For:  
U.S. DEPARTMENT OF TRANSPORTATION  
FEDERAL TRANSIT ADMINISTRATION  
OFFICE OF CIVIL RIGHTS**

**2024-2027  
Adopted Aug. 27, 2024**

**Luzerne County Transportation Authority  
300 South Pennsylvania Ave.  
Wilkes-Barre, PA 18701**



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**TABLE OF CONTENTS**

1) Introduction..... 3

2) About LCTA ..... 3

3) Notice to Public and Posting Locations ..... 4

4) Title VI Complaint Procedures and Form ..... 9

5) List of Title VI Investigations, Complaints and Lawsuits ..... 13

6) Public Participation Plan..... 14

    The Plan..... 15

    Plan Steps..... 15

    Public Hearing Procedures & Guidelines ..... 17

7) Outreach Efforts to Encourage Participation..... 17

8) Summary of Public Outreach Activities..... 19

9) Limited English Proficiency Plan..... 20

    Limited English Proficiency (LEP) Plan Summary ..... 20

    LCTA’s Limited English Proficient/Language Assistance Implementation Plan ..... 26

10) Membership of Non-Elected Committees ..... 33

11) Monitoring Sub-Recipients for Title VI Compliance..... 34

12) Title VI Equity Analysis for Construction of Facilities Projects ..... 34

13) Service Standards..... 34

    Vehicle Load Standard..... 34

    Vehicle Headway Standard..... 35

    On-Time Performance Standard ..... 35

    Service Availability ..... 35

14) Service Policies..... 36

    Transit Amenities ..... 36

    Vehicle Assignment ..... 36

    Major Service Change Policy ..... 37

    Fare Change Policy ..... 37

15) Documentation of Approval of Title VI Program..... 39

16) Attachment A – Title VI and LEP Training..... 40



**FIGURES**

Figure 1 – Title VI Public Notice – English ..... 6  
Figure 2 – Title VI Public Notice – Spanish ..... 7  
Figure 3 – Title VI Public Notice – Vehicle Poster ..... 8  
Figure 4 – Title VI Complaint Procedures – English..... 9  
Figure 5 – Title VI Complaint Form – English ..... 10  
Figure 6 – Title VI Complaint Procedures – Spanish ..... 11  
Figure 7 – Title VI Complaint Form – Spanish ..... 12  
Figure 8 – Title VI Investigations, Lawsuits and Complaints Tracking Form ..... 13  
Figure 9 – Title VI Investigations, Lawsuits and Complaints Summary Form ..... 14  
Figure 10 – I Speak Cards (3 Pages)..... 28  
Figure 11 – Dissemination of I Speak Cards ..... 31

**TABLES**

Table 1 – Minority, Senior and Disabled Demographics ..... 4  
Table 2 – Poverty Demographics ..... 4  
Table 3 – LEP Population ..... 21  
Table 4 – LCTA LEP Population by Language ..... 22  
Table 5 – Employee Survey – Frequency of Contact with LEP Persons ..... 24  
Table 6 – Cost of Language Services..... 25  
Table 7 – Make Up of Citizens’ Advisory Committee ..... 33  
Table 8 – Vehicle Maximum Load..... 34



**1) INTRODUCTION**

The Luzerne County Transportation Authority (LCTA) is an independent local governmental unit, classified as a Pennsylvania Municipal Authority, which is responsible for providing fixed route bus and paratransit public transportation services in greater Luzerne County, Pennsylvania.

Title VI (codified at 42 U.S.C §2000d et seq.) was enacted as part of the landmark Civil Rights Act of 1964 signed by President Lyndon B. Johnson. It prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance.

LCTA initially developed and periodically updates its Title VI Program on a triennial basis. This Title VI Program is a compilation of documents, plans, policies and standards that demonstrate LCTA's compliance with Title VI.

**2) ABOUT LCTA**

Luzerne County Transportation Authority is a public transportation authority that was formed in 1972 in Wilkes-Barre, PA.

LCTA's mission statement is:

Luzerne County Transportation Authority (LCTA), through the operation of fixed route and shared ride divisions, seeks to provide high quality affordable public transportation services that are safe, reliable, useful, accessible and efficient. To this end, members of the Board of Directors and all employees shall conduct themselves in a professional manner; work to ensure the safety and security of passengers; seek new opportunities to improve and/or expand services; and coordinate public transit services with other agencies, organizations, and transit providers.

LCTA's fixed route primary service area is defined as greater Luzerne County operating in 36 of the 76 municipalities in the County as well as serving a small portion in Lackawanna County including the City of Scranton. The span of service for fixed route is Monday through Saturday from 5:00 a.m. to after midnight and a key transfer location is the Intermodal Transit Center in downtown Wilkes-Barre. The fixed route fleet consists of hybrid buses, compressed natural gas (CNG) buses, vans and microtransit vehicles.

Shared-ride services are provided throughout Luzerne County. LCTA provides ADA complementary service through its Special Transportation Efforts Program, or STEP; through the Persons with Disabilities program; Medical Assistance Transportation Program, and the Senior Shared Ride program. Each program has its own restrictions.



LCTA’s service area minority and disabled populations are slightly higher than Luzerne County’s population percentages. Persons 65 years of age and older were slightly less (18.1 percent versus 19.3 percent).

**Table 1 – Minority, Senior and Disabled Demographics**

<b>Minority, Senior and Disabled Demographics</b>				
	<b>Luzerne County</b>		<b>Service Area</b>	
Total Civilian Non-Institutionalized Population	318,566		231,060	
Total Minority	60,843	19.1%	50,329	21.8%
Total 65 and over	61,495	19.3%	41,757	18.1%
Total With a Disability	50,172	15.8%	38,326	16.6%
<i>US Census, American Community Service 2022 - 5-Year Estimates</i>				

The percentage of individuals below the poverty level in three (3) measurements shows that LCTA’s service area has a higher percentage when compared to Luzerne County.

**Table 2 – Poverty Demographics**

<b>Poverty Demographics</b>				
	<b>Luzerne County</b>		<b>Service Area</b>	
Population for whom poverty status is determined	313,804		225,067	
50% below poverty level	22,320	7.1%	19,359	8.6%
150% below poverty level	75,667	24.1%	62,851	27.9%
Below poverty level	46,812	14.9%	39,977	17.8%
<i>US Census, American Community Service 2022 - 5-Year Estimates</i>				

LCTA employs about 165 people and some of the employees are represented by a union. The Agency works with two unions, the Teamsters Local 401 and the Amalgamated Transit Union Local 164.

A Board of Directors oversees the Executive Director and his staff; members of the board are appointed by the Luzerne County Council. They have staggered five-year terms. Each January, the Board elects its officers for the year. The Board of Directors is appointed by the Luzerne County Council.

**3) NOTICE TO PUBLIC AND POSTING LOCATIONS**

The Title VI Public Notice is posted at the following locations:

- on the LCTA web site, lctabus.com



## TITLE VI PLAN 2024 TO 2027


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- at the James F. Conahan Intermodal Transit Center
- on all buses and vans
- in the lobby of the administrative offices
- in employee lunch areas

The Title VI Notice shall be translated into languages other than English and in accessible formats as needed, and currently it is posted in Spanish. Figures 1 and 2 provide a copy of the Public Notice in English and Spanish respectively. Figure 3 shows the Public Notices that is posted in LCTA's vehicles.



Figure 1 – Title VI Public Notice – English



**TITLE VI POLICY  
NOTICE TO THE PUBLIC**

Luzerne County Transportation Authority (LCTA) gives public notice that it complies with Title VI of the Civil Rights Act of 1964 and all related statutes. Title VI provides that “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” LCTA operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with LCTA. For more information on LCTA’s Title VI Program, and the procedures to file a complaint, please:

- Call 570-288-9356, ext. 227
- Email: [gwintermantel@lctabus.com](mailto:gwintermantel@lctabus.com)
- Mail or visit our administrative office at 300 South Pennsylvania Ave., Wilkes-Barre, PA 18701

Complaint procedures and forms are also available on LCTA’s web site [www.lctabus.com](http://www.lctabus.com).


A complainant may file a complaint directly with the Federal Transit Administration at the following address:

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

**If information is needed in another language, please call 570-288-9356, extension 227.**  
**Si se necesita información en otro idioma, por favor llame al 570-288-9356, extensión 227.**



Figure 2 – Title VI Public Notice – Spanish



**TITULO VI POLITICAS  
AVISO AL PUBLICO**

Autoridad de Transporte del Condado de Luzerne (LCTA) da aviso público de que cumple con el Título VI de la Ley de Derechos Civiles de 1964 y todos los estatutos relacionados. El Título VI dispone que "ninguna persona en los Estados Unidos, por motivos de raza, color u origen nacional, será excluida de la participación en, será negada los beneficios o será objeto de discriminación bajo cualquier programa o actividad que reciba financiamiento federal". Asistencia ". LCTA opera sus programas y servicios sin consideración de raza, color y origen nacional de acuerdo con el Título VI de la Ley de Derechos Civiles.

Cualquier persona que crea que ha sido agraviada por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja ante LCTA. Para obtener más información sobre el Programa Título VI de LCTA y los procedimientos para presentar una queja, por favor:

- Llame al 570-288-9356, extensión 227
- Email: [gwintermantel@lctabus.com](mailto:gwintermantel@lctabus.com)
- Por correo o visite nuestra oficina administrativa en: 300 South Pennsylvania Ave., Wilkes-Barre, PA 18704

Los procedimientos de reclamación y los formularios también están disponibles en el sitio web de LCTA [www.lctabus.com](http://www.lctabus.com).


Un reclamante puede presentar una queja directamente con la Administración Federal de Tránsito en la siguiente Dirección:  
Oficina Federal de la Administración de Tránsito de los Derechos Civiles  
Atención: Coordinador del Programa del Título VI  
East Building, 5th Floor - TCR  
1200 New Jersey Ave., SE  
Washington, DC 20590

**Si necesita información en otro idioma, por favor llame al 570-288-9356, extensión 227.**  
**If information is needed in another language, please call 570-288-9356, extension 227.**





Figure 3 – Title VI Public Notice – Vehicle Poster




<b>TITLE VI POLICY NOTICE TO THE PUBLIC</b>	<b>TITULO VI POLITICAS AVISO AL PUBLICO</b>
<p>Luzerne County Transportation Authority (LCTA) gives public notice that it complies with Title VI of the Civil Rights Act of 1964 and all related statutes. Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." LCTA operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.</p> <p>Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with LCTA. For more information on LCTA's Title VI Program, and the procedures to file a complaint, please:</p> <ul style="list-style-type: none"> <li>• Call 570-288-9356, ext. 227</li> <li>• Email: <a href="mailto:gwintermantel@lctabus.com">gwintermantel@lctabus.com</a></li> <li>• Mail or visit our administrative office at 300 South Pennsylvania Ave., Wilkes-Barre, PA 18701</li> </ul> <p>Complaint procedures and forms are also available on LCTA's web site <a href="http://www.lctabus.com">www.lctabus.com</a>.</p> <p>A complainant may file a complaint directly with the Federal Transit Administration at the following address:            Federal Transit Administration Office of Civil Rights            Attention: Title VI Program Coordinator            East Building, 5th Floor - TCR            1200 New Jersey Ave., SE            Washington, DC 20590</p> <p><b><u>If information is needed in another language, please call 570-288-9356, extension 227.</u></b>  <b><u>Si se necesita información en otro idioma, por favor llame al 570-288-9356, extensión 227.</u></b></p>	<p>Autoridad de Transporte del Condado de Luzerne (LCTA) da aviso público de que cumple con el Título VI de la Ley de Derechos Civiles de 1964 y todos los estatutos relacionados. El Título VI dispone que "ninguna persona en los Estados Unidos, por motivos de raza, color u origen nacional, será excluida de la participación en, será negada los beneficios o será objeto de discriminación bajo cualquier programa o actividad que reciba financiamiento federal". Asistencia ". LCTA opera sus programas y servicios sin consideración de raza, color y origen nacional de acuerdo con el Título VI de la Ley de Derechos Civiles.</p> <p>Cualquier persona que crea que ha sido agraviada por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja ante LCTA. Para obtener más información sobre el Programa Título VI de LCTA y los procedimientos para presentar una queja, por favor:</p> <ul style="list-style-type: none"> <li>• Llame al 570-288-9356, extensión 227</li> <li>• Email: <a href="mailto:gwintermantel@lctabus.com">gwintermantel@lctabus.com</a></li> <li>• Por correo o visite nuestra oficina administrativa en: 300 South Pennsylvania Ave., Wilkes-Barre, PA 18704</li> </ul> <p>Los procedimientos de reclamación y los formularios también están disponibles en el sitio web de LCTA <a href="http://www.lctabus.com">www.lctabus.com</a>.</p> <p>Un reclamante puede presentar una queja directamente con la Administración Federal de Tránsito en la siguiente Dirección:            Oficina Federal de la Administración de Tránsito de los Derechos Civiles            Atención: Coordinador del Programa del Título VI            East Building, 5th Floor - TCR            1200 New Jersey Ave., SE            Washington, DC 20590</p> <p><b><u>Si necesita información en otro idioma, por favor llame al 570-288-9356, extensión 227.</u></b>  <b><u>If information is needed in another language, please call 570-288-9356, extension 227.</u></b></p>



4) **TITLE VI COMPLAINT PROCEDURES AND FORM**

Figures 4 and 5 provide a copy of LCTA’s compliant procedures and complaint form in English followed by the Spanish version in Figures 6 and 7.

**Figure 4 – Title VI Complaint Procedures – English**



**TITLE VI COMPLAINT INSTRUCTIONS AND PROCEDURES**

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the Luzerne County Transportation Authority (LCTA) may file a Title VI complaint by completing and submitting LCTA’s Complaint Form. The Luzerne County Transportation Authority investigates complaints received no more than 180 days after the alleged incident. LCTA will process complaints that are complete.

Once the complaint is received, the complainant will receive an acknowledgment letter informing her/him whether the complaint will be investigated by our office.

LCTA has 60 days to investigate the complaint. If more information is needed to resolve the complaint, LCTA may contact the complainant. The complainant has 30 business days from the date of the letter to send requested information to the investigator assigned to the complaint. If the investigator is not contacted by the complainant or does not receive the additional information within the 30 business days, LCTA can administratively close the complaint. A complaint can be administratively closed if the complainant no longer wishes to pursue the complaint.

After the investigator reviews the complaint, she/he will issue one of the two letters to the complainant; a closure letter or a date of finding. A closure letter summarizes the allegations and states that there was not a Title VI violation and that the complaint will be closed. A letter of finding summarizes the allegations and the interviews regarding the alleged incident and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has 30 days after the date of the closure letter or letter of finding to do so.

A person may also file a complaint directly with the Federal Transit Administration at: FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, D.C. 20590.

**If information is needed in another language, please call 570-288-9356, extension 227.**  
**Si se necesita información en otro idioma, por favor llame al 570-288-9356, extensión 227.**



**TITLE VI PLAN  
2024 TO 2027**

**Figure 5 – Title VI Complaint Form – English**

TITLE VI COMPLAINT FORM			
SECTION 1			
Name: _____			
Address: _____			
Street Address	City	State	Zip Code
Telephone (Home): _____ Telephone (Alternate): _____			
Electronic Mail Address: _____			
If you require accessible format(s), please check the appropriate box(es):			
<input type="checkbox"/> Large Print <input type="checkbox"/> Audio Tape <input type="checkbox"/> TDD <input type="checkbox"/> Other, please specify _____			
SECTION 2			
Are you filing this complaint on your own? <input type="checkbox"/> Yes (If yes, Go to Section 3) <input type="checkbox"/> No (If no, go to next line)			
Please provide the name and address of the person who alleges discrimination:			
Name: _____			
Address: _____			
Street Address	City	State	Zip Code
Please explain why you are filing this claim for a third party:			
Please confirm that you have obtained permission. <input type="checkbox"/> Yes <input type="checkbox"/> No			
SECTION 3			
I believe that the discrimination experienced was based on (check all that apply):			
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin (includes Limited English Proficiency)			
Date of alleged discrimination (Month, Day, Year): _____			
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved and include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of the form or another sheet of paper.			
_____			
_____			
_____			
SECTION 4			
Have you previously filed a complaint with Luzerne County Transportation Authority (LCTA)? <input type="checkbox"/> Yes <input type="checkbox"/> No			
SECTION 5			
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?			
<input type="checkbox"/> Yes <input type="checkbox"/> No   If yes, check all that apply and provide the name of the agency or court: <input type="checkbox"/> Federal			
Agency: _____ <input type="checkbox"/> Federal Court: _____ <input type="checkbox"/> State Agency: _____			
<input type="checkbox"/> State Court: _____ <input type="checkbox"/> Local Agency: _____			
Please provide information about a contact person at the agency/court where the complaint was filed.			
Name: _____ Title: _____			
Agency: _____ Telephone Number: _____			
Address: _____			
SECTION 6			
<i>You may attach any written materials or other information that you think is relevant to your complaint.</i>			
I affirm that I have read the above and that it is true to the best of my knowledge, information and belief.			
<b><u>Signature and date required.</u></b>			
_____			
Complainant's Signature			Date
Please submit this form and any additional materials in person or mail to: LCTA, Title VI Compliance Officer, 300 South Pennsylvania Ave., Wilkes-Barre, PA 18701.			
<b><i>Sí se necesita información en otro idioma, por favor llame al 570-288-9356, extensión 227.</i></b>			
LCTA use only: Date Received:		Person receiving complaint:	



Figure 6 – Title VI Complaint Procedures – Spanish



**TITULO VI INSTRUCCIONES Y PROCEDIMIENTOS DE QUEJAS**

Cualquier persona que crea que ha sido discriminada por raza, color u origen nacional por el Autoridad de Transporte del Condado de Luzerne (LCTA) puede presentar una queja de Título VI completando y presentando el Formulario de Queja de LCTA. Autoridad de Transporte del Condado de Luzerne (LCTA) investiga las quejas recibidas no más de 180 días después del presunto incidente. LCTA procesará las quejas que estén completas.

Una vez recibida la queja, el reclamante recibirá una carta de reconocimiento informándole si la queja será investigada por nuestra oficina.

LCTA tiene 60 días para investigar la queja. Si se necesita más información para resolver la queja, LCTA puede contactar al demandante. El reclamante tiene 30 días hábiles desde la fecha de la carta para enviar la información solicitada al investigador asignado a la queja. Si el investigador no es contactado por el demandante o no recibe la información adicional dentro de los 30 días hábiles, LCTA puede cerrar administrativamente la queja. Una queja puede ser archivada administrativamente si el demandante ya no desea continuar con la misma.

Después de que el investigador revise la queja, emitirá una de las dos cartas al demandante; Una carta de cierre o una fecha de hallazgo. Una carta de cierre resume las alegaciones y Estados que no hubo una violación de Título VI y que la queja será cerrada. Una carta de hallazgo resume las alegaciones y las entrevistas sobre el supuesto incidente y explica si se producirá alguna acción disciplinaria, entrenamiento adicional del miembro del personal u otra acción. Si el reclamante desea apelar la decisión, tiene 30 días después de la fecha de la carta de cierre o carta de hallazgo para hacerlo.

Una persona también puede presentar una queja directamente con la Administración Federal de Tránsito en: FTA Oficina de Derechos Civiles, 1200 New Jersey Avenue SE, Washington, D.C. 20590.

**Si necesita información en otro idioma, por favor llame al 570-288-9356, extensión 227.**  
**If information is needed in another language, please call 570-288-9356, extension 227.**



**Figure 7 – Title VI Complaint Form – Spanish**

TITULO VI FORMULARIO DE QUEJAS			
Sección 1			
Nombre: _____			
Dirección: _____			
Dirección: Calle	Ciudad	Estado	Código Postal
Teléfono (Hogar): _____		Teléfono (Alternativo): _____	
Dirección de Correo Electrónico: _____			
Si necesita formatos accesibles, marque la casilla correspondiente:			
<input type="checkbox"/> Impresión Grande <input type="checkbox"/> Cinta de Audio <input type="checkbox"/> TDD <input type="checkbox"/> Otro, Especifique _____			
Sección 2			
¿Está llenando esta queja usted mismo? <input type="checkbox"/> Sí (Sí, Ir a la Sección 3) <input type="checkbox"/> No (No, ir siguiente línea)			
Por favor proveer el Nombre y Dirección de la persona que alega discriminación:			
Nombre: _____			
Dirección: _____			
Dirección: Calle	Ciudad	Estado	Código Postal
Por favor explique por qué está llenando este formulario para un tercero:			
Por favor confirme que ha obtenido permiso. <input type="checkbox"/> Sí <input type="checkbox"/> No			
Sección 3			
Creo que la discriminación experimentada se basó en (marque todas las que apliquen):			
<input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen Nacionalidad (incluye limitaciones en Idioma inglés)			
Fecha de la alegada discriminación (Día, Mes, Año): _____			
Explique lo más claramente posible lo que sucedió y por qué cree que fue discriminado. Describa a todas las personas involucradas e incluya el Nombre y la información de contacto de la persona (s) que discriminó (si se conoce), así como Nombres e información de contacto de cualquier testigo. Si necesita más espacio, utilice la parte posterior del formulario u otra hoja de papel.			
_____			
_____			
_____			
Sección 4			
¿Ha llenado previamente una queja con Autoridad de Transporte del Condado de Luzerne (LCTA)? <input type="checkbox"/> Sí <input type="checkbox"/> No			
Sección 5			
¿Ha presentado esta queja ante cualquier otra agencia federal, estatal o local, o con cualquier tribunal federal o estatal? <input type="checkbox"/> Sí <input type="checkbox"/> No   Sí, marque todas las que aplique y en nombre de la Agencia o Corte: <input type="checkbox"/> Agencia Federal: _____ <input type="checkbox"/> Corte Federal: _____ <input type="checkbox"/> Agencia Estado: _____			
<input type="checkbox"/> Corte Estado: _____ <input type="checkbox"/> Agencia Local: _____			
Proporcione información sobre una persona de contacto en la agencia / tribunal donde se presentó la queja.			
Nombre: _____		Título: _____	
Agencia: _____		Número Teléfono: _____	
Dirección: _____			
Sección 6			
<i>Usted puede adjuntar cualquier material escrito u otra información que considere pertinente a su queja.</i>			
Afirmo que he leído lo anterior y que es fiel a lo mejor de mi conocimiento, información y creencia. <b><u>Se requiere firma y fecha.</u></b>			
_____		_____	
Firma del Querellante		Fecha	
Por favor envíe este formulario y cualquier material adicional en persona o por correo a: LCTA, Título VI Officer, 300 South Pennsylvania Ave., Wilkes-Barre, PA 18701			
<b><i>Si se necesita información en otro idioma, por favor llame al 570-288-9356, ext. 227.</i></b> <b><i>If information is needed in another language, please call 570-288-9356, ext. 227.</i></b>			
Para uso Exclusivo de LCTA: Fecha Recibido: _____		Persona Recibe la Queja: _____	



**5) LIST OF TITLE VI INVESTIGATIONS, COMPLAINTS AND LAWSUITS**

LCTA has received no transit-related Title VI investigations, complaints, or lawsuits. LCTA did not have any other transit-related Title VI active investigations conducted by FTA or entities other than FTA, or any lawsuits or complaints naming LCTA, alleging discrimination on the basis of race, color, or national origin.

LCTA has developed a spreadsheet to track and maintain transit-related Title VI investigations, lawsuits, or complaints. LCTA’s Title VI Coordinator will maintain the spreadsheet that contains two worksheets to be used as the tracking mechanism. The first worksheet is titled “Tracking” and the second is titled “Summary.”

Following is a list of the row headers for the tracking form followed by a copy of the worksheet. Row Headers: Case Number; Case Type (Investigation, Lawsuit or Complaint); Complainant name, address, phone number and e-mail; Basis of Complaint (Race, Color and/or National Origin); Summary of Complaint, Date Submitted, Date of Alleged Incident; Complaint Complete?; Acknowledgement Due Date; Date Acknowledgement Sent; Decision to Investigate?; Complainant Notification Due; Actual Date Complainant Notified; Investigation Completion Date; Actual Investigation Completed; Comments; Actions Taken; and Status.

**Figure 8 – Title VI Investigations, Lawsuits and Complaints Tracking Form**

<b>Case Number</b>		
<b>Case Type: Investigation, Lawsuit or Complaint</b>		
<b>Name</b>		
<b>Address</b>		
<b>Phone #</b>		
<b>Email</b>		
<b>Basis of Complaint: Race, Color, National Origin and/or Other</b>		
<b>Summary of Complaint</b>		
<b>Date Submitted</b>		
<b>Date of Alleged Incident</b>		
<b>Complaint Complete?</b>		
<b>Acknowledgement Due Date</b>		
<b>Date Acknowledgement Sent</b>		
<b>Decision to Investigate?</b>		





Environmental Justice (EJ) principles are considered through all LCTA's public outreach and participation efforts. The principles are to:

- avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations;
- ensure the full and fair participation by all potentially affected communities in the transportation decision-making process; and
- prevent the denial of, reduction of, or significant delay in the receipt of benefits by minority and low-income populations.

EJ principles and PPPs will be incorporated in all National Environmental Policy Act (NEPA) decision making and documented accordingly.

Public hearings will be conducted when LCTA is considering making fare changes and/or major service changes. Comments relative to topics at public hearings and public meetings can be submitted by mail, email, phone, and in-person at public meetings, etc. Comments are reviewed and given full consideration.

#### **THE PLAN**

LCTA tailors its PPP based on the type of activity and the degree of impact on the community. The agency also takes actions to increase outreach and develop partnerships with the objective of obtaining meaningful input into LCTA's transportation decisions.

LCTA actively conducts outreach and develops partnerships to learn more about the people it serves with the goal of identifying "linguistic, institutional, cultural, economic, historical or other barriers" that prevent or reduce community participation. Activities include: community activities, neighborhood groups, educational institutions, faith-based organizations, businesses, social services, advocacy groups, organizations, and agencies.

LCTA strives to identify ways to reduce or eliminate barriers for LEP persons to participate in its transportation programs. The Agency advertises that free language interpretation services are available upon request. This is on our website as well as posted at our administrative offices.

#### **PLAN STEPS**

1. Develop Plan
  - Determine desired outcome of plan.
  - Determine type of public participation plan from basic to comprehensive. The type of public participation plan or public outreach will depend on the magnitude of LCTA's initiative and its impact on the community.





## TITLE VI PLAN 2024 TO 2027

- 
- Determine audience based on topic and demographic analyses activity impact. Audience can be the community-at-large and/or community segments with or without targeted group(s).
  - Determine type of public outreach such as printed material, direct mail, surveys, or meetings. If a meeting, further define, such as, formal public meeting, informal public meeting, public hearing, town hall, open house, community forum, workshop, focus group, and nontraditional (i.e., community-led meetings or partnerships).
  - Determine public outreach format such as formal, informal, question and answer.
  - Determine meeting logistics, including number of meetings, location, room size, time, registration table, flexible setup, audiovisual equipment, flip charts, event signage, accessibility issues (e.g., disabled, LEP, low-income persons, etc.).
    - Flexible setup to change the arrangement and format of the room and meeting to accommodate the room to the number of attendees. For example, if there is a large turnout, you may want to restrict the public comments to “x” minutes.
    - Meeting time and location must be convenient and accessible for minority, LEP communities, low-income and disabled persons.
    - Meeting location should be accessible by transit.
    - Meeting room should be comfortable.
    - Meeting time should be selected for maximum participation of minority and low-income populations.
  - Determine the audience’s preferred communication method and identify presenters and facilitators.
  - Identify a person responsible for ensuring that the meeting is accessible to all, including accommodating the needs of persons who are linguistically and culturally isolated, LEP persons, and disabled persons.
  - Identify presentation materials, handouts, and visualization techniques, including PowerPoint, flyers, posters, brochures, flip charts, etc. Material should be designed to reach multiple educational levels and learning styles, including visual (charts, graphs, photos, maps) and tactile tools. Ensure materials meet the community’s needs (i.e., LEP and disabled persons).
  - Determine the process for obtaining public comments, such as written, personal interviews, audio, and video.
  - Determine who and how the public outreach will be documented, including public comments.
  - Develop meeting notice and determine how the notice will be advertised, including: radio, television, local and community newspapers, ethnic or community media, audio programs on podcasts, targeted billboards, community businesses, event booths, transit stops, transit shelters, transfer centers, on transit vehicles (flyers and bus advertisements), LCTA’s website, other websites and/or digital media, including video sharing, social networking, and blogs.
    - Accessible formats, including LEP and disabled persons, such as printings in another language and braille.
  - Notices, presentations, documents, and materials should be written in clear, concise, and plain language.



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- Use words that the audience will clearly understand. Avoid technical terminology and acronyms.
  - Information and materials should be electronically accessible.
2. Post notices.
  3. Post major activity documents on LCTA's website, local social service organizations, and on buses.
  4. Conduct meeting.
  5. If applicable, monitor and conduct follow-up.
  6. Evaluate public input and if appropriate. Take actions to avoid, minimize, or mitigate negative effects on minority, low-income persons, LEP persons, and disabled persons.
  7. Incorporate public input into LCTA's program, plan, or activity.
  8. Document public participation plans, desired outcomes, efforts, and results.

#### **PUBLIC HEARING PROCEDURES & GUIDELINES**

When a public hearing is required, LCTA shall make every effort to ensure that scheduling and locations are accessible to the public, this includes:

- Location(s) near public transportation;
- Community-oriented and easily known/accessible locations;
- Convenient meeting times;
- A time and day when public transportation is available; and/or
- An accessible building/room for individuals with disabilities.

A public hearing is held when there is a major service change or a fare change is proposed.

All public information meetings shall be held in a central location to inform the public of the planning process, solicit ideas, input, and feedback. The intent of holding a public hearing at a central location is to inform the public of the proposed changes, and receive public comments based on the proposed changes.

Upon request, LCTA shall provide: interpreters for those who do not speak the English language; written materials for those who do not read the English language; alternative formats of written and presentation materials for those who are disabled; and sign language interpreters.

Additionally, upon request, LCTA shall provide notices of public hearing(s) to person(s) or groups identified as being LEP.

#### **7) OUTREACH EFFORTS TO ENCOURAGE PARTICIPTION**

LCTA values the ethnic and cultural diversity of the public it serves in Luzerne County. Accordingly,



LCTA actively seeks and encourages the participation of underrepresented groups on its non-elected/informal committees, and when formally filling Board appointment vacancies.

LCTA makes concerted efforts to provide the opportunity for individuals from underrepresented groups to join advisory committees so that these bodies more accurately represent the diversity of Luzerne County.

LCTA utilizes a number of strategies to promote meaningful participation by underrepresented groups, including targeted outreach. Methods may include, but are not limited to, one or more of the following:

- Utilize paid and free notices in the local media, especially those culturally-based for the targeted group we are trying to reach. This effort includes print, televised, electronic and social media outreach campaigns.
- Translate and post meeting notices into the native language of the targeted group.
- Visit and conduct presentations and workshops at civic, cultural, or human services organizations known to serve the targeted group.
- Place notification bulletins on LCTA's revenue vehicles, shelters, and intermodal transit center announcing public participation opportunities.
- Distribute emails and/or written letters notifying organizations that represent target populations in the community of board vacancies and of the application process, as well as invitations to join, or provide recommendations for, the Citizens' Advisory Committee (CAC).
- Scheduling of public meetings and hearings at times and locations that are convenient and accessible for minority, low-income, and LEP communities.
- Staff attendance is required by key managers at quarterly Citizens' Advisory Committee meetings. CAC meeting times and dates will be adjusted to allow greater flexibility for attendees.
- Consider the use of radio, local television news outlets, social media, and print media advertising to relay public participation opportunities to minority and LEP populations, and the overall community.
- Coordinate with area community groups, civil rights organizations, institutions of higher education, media sources, non-profit organizations, and economic development organizations to implement public engagement strategies that reach out specifically to members of affected minority, low-income, and/or LEP communities.
- A customer complaint process has been implemented for citizens to contact LCTA and file a formal complaint or compliment. All complaints/comments are logged into a database for tracking purposes, and then distributed to the relevant manager who researches the complaint and responds back to the citizen with a resolution call or letter if requested.
- Consider onboard rider customer service and focus group surveys to assist in gathering feedback and information to improve service.
- Coordinate with community service organizations and agencies to attend or present information at meetings and public events.



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**8) SUMMARY OF PUBLIC OUTREACH ACTIVITIES**

In March of 2023, LCTA started the planning process for a Transit Development Plan. In addition to conducting two public meetings, there were two open-houses. Other outreach initiatives included postings on LCTA’s website and social media. A survey (English and Spanish) was made available to the public in print and digital formats. A presentation was also made to the Citizen’s Advisory Committee (CAC).

In May 2024, LCTA released the final TDP Draft for a 30-day public comment period. The plan was available on lctabus.com with a link for public comment. A physical copy of the plan was also made available at several locations around Luzerne County: the main LCTA front office, 315 Northampton Street Kingston; Misericordia University, Admissions Office Lobby in Mercy Hall; Osterhout Free Library 71 South Franklin Street, Wilkes-Barre; Hoyt Library, 284 Wyoming Avenue, Kingston; Wyoming Free Library, 358 Wyoming Avenue, Wyoming; Pittston Memorial Library, 47 Broad Street, Pittston; and Mill Memorial Library, 495 East Main Street, Nanticoke.

Public comment was collected via email and in person. The public comment period closed June 9, 2024. Staff reviewed the comments and minor changes were made to the Transit Development Plan. LCTA had an employee roundtable in April to present microtransit, and also presented a PowerPoint to the Citizens’ Advisory Committee on July 31, 2024. LCTA presented the microtransit plans at a Newport Township Board of Supervisors meeting and a Nanticoke Council meeting in Nanticoke to discuss changes. At the time of this writing, LCTA had also offered to present the plans for route changes and microtransit to the other main municipalities impacted by the TDP. These include: Wilkes-Barre Township, Swoyersville, Kingston, Plymouth, Larksville, and Sugar Notch.

The bullets below summarize additional outreach activities for the past three years.

- AmeriHealth Caritas Wellness & Opportunity Center Fall Health & Home Checkup
- CEO Mobile Food Bank at Hilltop Apartments in Edwardsville
- Citizens' Advisory Committee Meetings
- Healthy Senior Days at YMCA
- Johnson College Career Fair
- Junior League of Scranton Touch A Truck Event
- Kingston Manor
- Kistler Health Clinic Fair
- La Mega Spanish Radio Interview
- LCTA / CEO Mobile Food Bank / Distribution (Hilltop Apartments, Edwardsville)
- Luzerne County Community Cares Human Services Day at Mohegan Sun
- Luzerne Intermediate Unit / Vo-Tech Career Fair
- Luzerne Intermediate Unit /Vo-Tech Student Career Expo
- Micro Transit Roundtable in Industrial Park
- Monthly Ridership Meetings
- Newport Township Supervisors' Meeting
- Northeast Sight Services



- Osterhout Library Story Time
- Outreach at Pittston Housing Authority's Infantino Towers
- Outreach at Exeter Housing Hi-Rise
- Outreach at Riverview Manor (Pittston Housing Authority)
- Pittston Area High School Career Fair / Career Exploration Day
- Pittston Area School District/Pittston Chamber of Commerce Career Expo
- Presentation for Telespond Foster Grandparents' Program
- Rail Riders Baseball Game (resource table)
- Rider Appreciation Days - info table at Transit Center, Intermodal Center, staff rode buses
- Scranton Area Foundation Transportation Roundtable at Johnson College
- Senior Citizen Expo, Misericordia University
- Senior Citizen Transportation Programs: Kingston Senior Center, WB-Active Adult Center, Telespond Senior Care, Royal Bakery
- Shickshinny Hi-Rise and Active Adult Center Outreach
- "Stop the Stigma" Wellness Festival at King's College (Wilkes-Barre, PA)
- Times Leader Job Fair, Arena
- Times Leader Job Fair, Mohegan Sun Arena
- Touch a Truck Events (Wilkes-Barre/Scranton Airport and West Wyoming, PA)
- Travel Training (Hanover Area HS, Luzerne County Community College, Luzerne Intermediate Unit, Lighthouse Academy, Wilkes-Barre Catholic Yputh Center, Pineapple 2.0 Program Life Skill Students, Academy of Learning, One-on-One Travel Training)
- USMC Toys for Tots Stuff the Bus Toy Drive (Pittston Walmart and community partners)
- "Walk for Hope" on Public Square, Wilkes-Barre (resource table)
- Wilkes-Barre Riders Community Organization of the Day
- "Wheel Life / Touch a Truck" (W-B/S Airport)
- Wilkes University "Club Hours"
- YMCA Health Equity Fair
- YMCA Healthy Seniors Day Fair (Wilkes-Barre, PA)
- YMCA Y Walk Wednesday (New Building Site)

## 9) LIMITED ENGLISH PROFICIENCY PLAN

### **LIMITED ENGLISH PROFICIENCY (LEP) PLAN SUMMARY**

LCTA has developed this Limited English Proficiency (LEP) Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by LCTA.

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



LCTA uses the United States Department of Transportation (U.S. DOT) outline of a four-factor LEP analysis, which considers the following factors:

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

**The number or proportion of LEP persons in the service area who may be served or are likely to encounter a LCTA program, activity or service.**

Table 3 shows that 4.1 percent of the population in LCTA’s service area is limited English proficient. This percentage is slightly higher than Luzerne County (3.9 percent)

**Table 3 – LEP Population**

	Luzerne County		LCTA’s Service Area	
Population	303,969		223,860	
Speak only English	274,599	90.3%	202,971	90.7%
Speak English "less than very well"	11,919	3.9%	9,095	4.1%
<i>US Census, American Community Survey 2015 - 5-Year Estimates</i>				

The US Census Bureau, American Community Survey table B16001 provides details for over forty languages for population 5-years and over by language spoken at home by the ability to speak English for LCTA’s service area. The most recent table is for the years 2015 to 2019. Table 4 shows the number of people in LCTA’s service area that speak English less than very well by language spoken at home.

Spanish spoken at home had the highest number (4,547) of individuals that spoke English less than very well. This is two percent of LCTA’s service area population. The second highest number was “other Indic languages” was 0.5 percent of the population or 1,165 individuals that spoke English less than very well. There are multiple languages under the US Census “other Indic languages” and as such, the actual number for one specific



language is much less. LCTA will continue to work with community groups to ascertain how LCTA can provide language assistance for LEP individuals who speak other Indic languages. At this time, LCTA’s internal survey has not indicated that staff have encountered limited English proficient individuals that speak an Indic language. LCTA translates its vital documents into Spanish and will continue to monitor “other Indic languages”.

**Table 4 – LCTA LEP Population by Language**

	Luzerne County		LCTA Service Area	
Total:	303,969		223,860	
Speak only English	274,599	90.3%	202,971	90.7%
Spanish or Spanish Creole:	20,403	6.7%	10,852	4.8%
Speak English less than "very well"	9,153	3.0%	4,547	2.0%
French (incl. Patois, Cajun):	847	0.3%	533	0.2%
Speak English less than "very well"	157	0.1%	144	0.1%
French Creole:	7	0.0%	17	0.0%
Speak English less than "very well"	0	0.0%	-	0.0%
Italian:	1,148	0.4%	727	0.3%
Speak English less than "very well"	244	0.1%	130	0.1%
Portuguese or Portuguese Creole:	135	0.0%	456	0.2%
Speak English less than "very well"	7	0.0%	100	0.0%
German:	447	0.1%	522	0.2%
Speak English less than "very well"	50	0.0%	61	0.0%
Yiddish:	18	0.0%	41	0.0%
Speak English less than "very well"	18	0.0%	18	0.0%
Other West Germanic languages:	222	0.1%	243	0.1%
Speak English less than "very well"	43	0.0%	26	0.0%
Scandinavian languages:	12	0.0%	12	0.0%
Speak English less than "very well"	0	0.0%	-	0.0%
Greek:	54	0.0%	15	0.0%
Speak English less than "very well"	36	0.0%	-	0.0%
Russian:	369	0.1%	362	0.2%
Speak English less than "very well"	95	0.0%	117	0.1%
Polish:	885	0.3%	601	0.3%
Speak English less than "very well"	195	0.1%	82	0.0%
Serbo-Croatian:	97	0.0%	60	0.0%
Speak English less than "very well"	38	0.0%	33	0.0%
Other Slavic languages:	484	0.2%	386	0.2%



**TITLE VI PLAN  
2024 TO 2027**

Speak English less than "very well"	137	0.0%	210	0.1%
Armenian:	0	0.0%	-	0.0%
Speak English less than "very well"	0	0.0%	-	0.0%
Persian:	51	0.0%	103	0.0%
Speak English less than "very well"	0	0.0%	66	0.0%
Gujarati:	217	0.1%	936	0.4%
Speak English less than "very well"	102	0.0%	664	0.3%
Hindi:	333	0.1%	430	0.2%
Speak English less than "very well"	94	0.0%	201	0.1%
Urdu:	68	0.0%	47	0.0%
Speak English less than "very well"	7	0.0%	10	0.0%
Other Indic languages:	576	0.2%	1,358	0.6%
Speak English less than "very well"	305	0.1%	1,165	0.5%
Other Indo-European languages:	368	0.1%	456	0.2%
Speak English less than "very well"	134	0.0%	113	0.1%
Chinese:	675	0.2%	814	0.4%
Speak English less than "very well"	460	0.2%	578	0.3%
Japanese:	94	0.0%	53	0.0%
Speak English less than "very well"	57	0.0%	33	0.0%
Korean:	219	0.1%	123	0.1%
Speak English less than "very well"	114	0.0%	44	0.0%
Mon-Khmer, Cambodian:	4	0.0%	-	0.0%
Speak English less than "very well"	0	0.0%	-	0.0%
Hmong:	0	0.0%	-	0.0%
Speak English less than "very well"	0	0.0%	-	0.0%
Thai:	55	0.0%	26	0.0%
Speak English less than "very well"	16	0.0%	16	0.0%
Laotian:	31	0.0%	98	0.0%
Speak English less than "very well"	10	0.0%	30	0.0%
Vietnamese:	124	0.0%	222	0.1%
Speak English less than "very well"	39	0.0%	119	0.1%
Other Asian languages:	354	0.1%	266	0.1%
Speak English less than "very well"	116	0.0%	92	0.0%
Tagalog:	131	0.0%	93	0.0%
Speak English less than "very well"	42	0.0%	39	0.0%
Other Pacific Island languages:	66	0.0%	291	0.1%
Speak English less than "very well"	31	0.0%	221	0.1%
Navajo:	34	0.0%	34	0.0%





Speak English less than "very well"	0	0.0%	-	0.0%
Other Native North American languages:	91	0.0%	-	0.0%
Speak English less than "very well"	0	0.0%	-	0.0%
Hungarian:	63	0.0%	50	0.0%
Speak English less than "very well"	15	0.0%	-	0.0%
Arabic:	523	0.2%	471	0.2%
Speak English less than "very well"	157	0.1%	175	0.1%
Hebrew:	33	0.0%	112	0.1%
Speak English less than "very well"	0	0.0%	40	0.0%
African languages:	106	0.0%	64	0.0%
Speak English less than "very well"	47	0.0%	21	0.0%
Other and unspecified languages:	26	0.0%	15	0.0%
Speak English less than "very well"	0	0.0%	-	0.0%
<i>US Census, American Community Survey 2015 - 5-Year Estimates</i>				

**The frequency with which Limited English Proficiency (LEP) come in contact with a LCTA program, activity, or service?**

LCTA continues to assess the frequency with which staff and drivers have, or could have, contact with LEP persons. This includes documenting phone requests for translation through Interpreters Unlimited. It also includes surveys of all employees.

The most recent employee survey revealed that 44 percent of employees frequently came in contact with LEP persons and the most prevalent language was Spanish. There were a few instances of contacts with persons that spoke Polish and Russian. Fixed route and shared-ride drivers often came in contact with LEP persons as well as dispatchers and customer service representatives.

**Table 5 – Employee Survey – Frequency of Contact with LEP Persons**

<b>Employee Survey</b>		
Frequently	27	44%
Not Frequently	30	48%
Never	5	5%

**The nature and importance of the program, activity, or service provided by LCTA to people’s lives**

LCTA provides public transportation services to persons who need to travel within and between 36 municipalities in Luzerne County, the largest of which are the Cities of Wilkes-Barre and Pittston, and the boroughs of Kingston and Nanticoke. Major destinations



include medical facilities, Luzerne County Community College, industrial parks, Wyoming Valley Mall, and other shopping locations. Persons rely on public transit services to get to work, school, medical services, shopping, recreation, and other daily life-activities.

LCTA has identified access to our fixed route and shared ride services as potentially critical to the LEP persons. Examination of timetables, fare and payment information, system rules, how to ride, public service announcements and complaint and commendation forms are potential instruments that could be used to increase the LEP individual’s access to our fixed route service. LCTA will continue to reach out to organization for assistance with its’ LEP program.

**The resources available to LCTA and costs**

LCTA provides several options to assist in communicating with person(s) having a Limited English Proficiency (LEP).

LCTA contracts with Interpreters Unlimited, LLC to provide translation services as needed (<http://www.interpretersunlimited.com>) to provide language translation and interpretation services. A person who identifies their communication needs upon contacting LCTA, and a staff member (CSR/Dispatch) will conference call in a certified language interpreter/ translator. Many of staff members, including operators, are bilingual and as such, assist with translations.

LCTA has limited resources; however, the organization is committed to ensuring LEP persons have meaningful access to LCTA’s programs, services and activities. LCTA will continue to monitor LEP populations and provide language services on an as-needed basis.

**Table 6 – Cost of Language Services**

<b>Cost of Language Services</b>	
Document Translation	\$0.20 to \$0.28 per word
Telephone Interpretation/Over the Phone Interpretation	\$1.30 to \$1.70 per minute
Video Interpretation/Video Remote Interpretation	\$150 to \$160 per hour
On-site Interpretation	\$175 to \$200 per hour, plus travel time
<i>Source: Keylingo (<a href="https://keylingo.com">https://keylingo.com</a>)</i>	

Various tools such as Census Bureau’s “I Speak” cards are used to help in the identification of specific languages for individuals with Limited English Proficiency.

Google Translate is available on LCTA’s web site, [lctabus.com](http://lctabus.com), providing 80 different selected language translation options.

All translation and interpretation communications services are free of charge.



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**LCTA'S LIMITED ENGLISH PROFICIENT/LANGUAGE ASSISTANCE IMPLEMENTATION PLAN**

**How LCTA staff may identify an LEP person who needs language assistance:**

- Analyze LEP interaction data to determine if requests for language assistance have been received in the past, either at meetings, reviewing monthly interpretation service invoices or over the phone, to monitor whether language assistance might be needed at future events or in daily operations.
- Language Identification Cards are available onboard all LCTA transit vehicles to assist vehicle operators in identifying specific language assistance needs of passengers. If such individuals are encountered, the vehicle operators are instructed to try to obtain contact information to give to the operations manager for follow-up. Dispatchers, customer service representatives, and schedulers are surveyed regarding LEP individuals they encounter, either in-person or over the telephone.
- Language Identification cards are available at the Wilkes-Barre Intermodal Transportation Center Authority ticket office, and available at the reception desk for customer service staff at LCTA's administrative offices.
- Staff are periodically surveyed to determine the frequency in which they come in contact with LEP persons.

LCTA will continue to monitor key program areas to assess major points of contact LEP population, such as:

- Encounters during use of fixed route and paratransit services
- Purchase of passes and tickets through the LCTA website, in-person, and over the phone
- Participation in public meetings
- Customer service interactions
- Requests for translations services (documents/interpretation, monthly invoices)
- Ridership surveys and focus groups
- Operator and internal operations' surveys

**Language Assistance Measures**

LCTA has implemented the following LEP procedures.

- Census Bureau's "I Speak" Cards are located in all buses, at the main office Customer Service desk, and at the Customer Service Desk in the Transit Center.
- When an interpreter is needed, in person or on the telephone, staff utilize Interpreters Unlimited services. Directions for using this service are given to all administrative staff.
- Periodically survey staff on how often they have occurrences with a Limited English Proficient passenger or client.
- Contact local community, cultural and human service organizations that provide services to LEP individuals and seek opportunities to provide information on LCTA programs and services.



- LCTA’s website utilizes the “Google Translate” translation service. This service allows users to translate any, or all, parts of the website into their native language.
- Include the statement, “*Bilingual or Spanish speaking a plus*”, on vehicle operator and customer service staff recruitment flyers and employment vacancy advertisements.
- When an interpreter is needed, either in person or on the telephone, LCTA staff member will attempt to determine what language is required and then access language assistance services from the contracted translator services.
- As needed, conduct cost benefit analysis for key/vital document translations, including: services, routes, schedules, fare information, how to ride, right-to-know, etc.
- Review routes and service materials for increasing symbolic signs (pictographs).

If we engage the services of a company, LCTA will:

- Ensure that our internal and external translators demonstrate their ability to accurately translate English and the other language in which they are fluent.
- Ensure that outside resources are versed in our industry terminology so they can better serve the community.
- Instruct the interpreter or translator that they should not deviate into a role as counselor, legal advisor, or any other role aside from interpreting or translating.
- Request that the interpreter or translator attest that they will not have a conflict of interest on the issues for which they would be providing interpretation services.

### **LCTA Staff Training**

LCTA uses a standard presentation (See Attachment A) that provides employees with an overview of Title VI, LEP Policy, LEP Procedures, a review of Title VI requirements, procedures for staff to work effectively with LEP persons and a description of LCTA’s LEP plan, services and materials. The training program includes a discussion of responding to LEP persons by telephone, in-person, correspondence, complaints as well as document needs.

Information and training are also a part of the orientation process for new hires.

Training refreshers will also be given to current staff on the following:

- Understanding the Title VI policy and LEP responsibilities;
- What language assistance services LCTA offers;
- Use of LEP “I Speak” Cards;
- How to use the Interpreters Unlimited interpretation and translation services; and
- Documentation of language assistance requests

Figure 10 provides an example of LCTA’s I Speak Cards followed by Figure 11 that provides a copy of the most recent memorandum from the Executive Director disseminating the I Speak Cards to staff.

**Figure 10 – I Speak Cards (3 Pages)**

2004 Census Test	United States Census 2010
<b>LANGUAGE IDENTIFICATION FLASHCARD</b>	
<input type="checkbox"/> ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.	1. Arabic
<input type="checkbox"/> Ներդրում հանք նշում կատարվեց այս քառակուսում, եթե խոսում կամ կարդում եք հայերեն:	2. Armenian
<input type="checkbox"/> যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।	3. Bengali
<input type="checkbox"/> ឈ្លបញ្ជាក់ក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។	4. Cambodian
<input type="checkbox"/> Motka i kakhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.	5. Chamorro
<input type="checkbox"/> 如果你能读中文或讲中文，请选择此框。	6. Simplified Chinese
<input type="checkbox"/> 如果你能讀中文或講中文，請選擇此框。	7. Traditional Chinese
<input type="checkbox"/> Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.	8. Croatian
<input type="checkbox"/> Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.	9. Czech
<input type="checkbox"/> Kruis dit vakje aan als u Nederlands kunt lezen of spreken.	10. Dutch
<input type="checkbox"/> Mark this box if you read or speak English.	11. English
<input type="checkbox"/> اگر خواندن و نوشتن فارسی بلد هستید، این مربع را علامت بزنید.	12. Farsi

DB-3309 U.S. DEPARTMENT OF COMMERCE  
Economics and Statistics Administration  
U.S. CENSUS BUREAU



# TITLE VI PLAN 2024 TO 2027

<input type="checkbox"/> Cocher ici si vous lisez ou parlez le français.	13. French
<input type="checkbox"/> Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	14. German
<input type="checkbox"/> Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.	15. Greek
<input type="checkbox"/> Make kazyè sa a si ou li oswa ou pale kreyòl ayisyen.	16. Haitian Creole
<input type="checkbox"/> अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएँ।	17. Hindi
<input type="checkbox"/> Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	18. Hmong
<input type="checkbox"/> Jelölje meg ezt a kockát, ha megérti vagy beszél a magyar nyelvet.	19. Hungarian
<input type="checkbox"/> Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	20. Ilocano
<input type="checkbox"/> Marchi questa casella se legge o parla italiano.	21. Italian
<input type="checkbox"/> 日本語を読んだり、話せる場合はここに印を付けてください。	22. Japanese
<input type="checkbox"/> 한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	23. Korean
<input type="checkbox"/> ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກົດພາສາລາວ.	24. Laotian
<input type="checkbox"/> Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	25. Polish

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## TITLE VI PLAN 2024 TO 2027

- |   |                |
|---|----------------|
| <input type="checkbox"/> Assinale este quadrado se você lê ou fala português.                           | 26. Portuguese |
| <input type="checkbox"/> Însemnați această căsuță dacă citiți sau vorbiți românește.                    | 27. Romanian   |
| <input type="checkbox"/> Поставьте этот квадратик, если вы читаете или говорите по-русски.              | 28. Russian    |
| <input type="checkbox"/> Обележите овај квадратик уколико читате или говорите српски језик.             | 29. Serbian    |
| <input type="checkbox"/> Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.             | 30. Slovak     |
| <input type="checkbox"/> Marque esta casilla si lee o habla español.                                    | 31. Spanish    |
| <input type="checkbox"/> Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog. | 32. Tagalog    |
| <input type="checkbox"/> ให้กาเครื่องหมายลงในช่องถ้าท่านอ่านหรือพูดภาษาไทย.                             | 33. Thai       |
| <input type="checkbox"/> Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.                        | 34. Tongan     |
| <input type="checkbox"/> Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою.         | 35. Ukrainian  |
| <input type="checkbox"/> اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔                     | 36. Urdu       |
| <input type="checkbox"/> Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.               | 37. Vietnamese |
| <input type="checkbox"/> באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.                            | 38. Yiddish    |

DB-3309

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**Figure 11 – Dissemination of I Speak Cards**



## **MEMO**

To: All LCTA Employees  
From: Robert Fiume, Executive Director  
Date: August 14, 2024  
RE: Language Identification Flash Cards

### Language Identification ‘Flash Cards’

There are ISPEAK Language Identification ‘Flash Cards’ located on every bus, van, and at each customer service window.

Please take the following steps to determine what language a person speaks:

- The Language Identification Card lists languages most frequently encountered in North America.
- To use this card effectively, show the person the packet so they may identify their language.
- Once the person identifies the language, you can proceed with using translation services provided by Interpreters Unlimited. If you are a driver, please call in to Dispatch.
- **When using the translation process:**
  - For CSR’s:
    - Hit the “CONF” button and call Interpreters Unlimited at 1-877-652-6482.
    - Enter Code: 11478.
    - You will be conferenced in with a linguist, who will ask for the customer ID, which is your first and last name.
    - Connect the caller in by hitting the “CONF” button again.
    - The linguist will translate for you and the customer; ask for the customer’s name and how we can help.
  - If you are unable to identify the language, contact your immediate Supervisor or Dispatcher for assistance.





### **Outreach**

The following are a few options that LCTA utilizes to conduct outreach to LEP individuals:

- When staff is making a presentation on a topic that might be of importance to LEP or if staff is hosting a meeting or workshop in a geographic location with a known concentration of LEP persons, meeting notices, advertisements, and agendas will include the alternative language based on the known LEP population;
- When publishing a general public meeting notice, based on the LEP population and when relevant, a clause that translates into “A (*insert language(s)*) translator will be provided.”
- Key printed materials can be translated and made available at LCTA’s Intermodal Center, on board vehicles and in communities when a specific and concentrated LEP population is identified.
- LCTA utilizes Google translate on its web site.

### **Monitoring and Updating the LEP Plan**

This plan is designed to be flexible and can be easily updated. At a minimum, LCTA will follow the Title VI Program update schedule for updating the LEP Plan.

Each update examines all plan components including:

- How many LEP persons were encountered;
- Were their needs met;
- What is the current LEP population in LCTA service area;
- Has there been a change in the types of languages where translation services are needed;
- Is there still a need for continued language assistance for previously identified LCTA programs?
- Have LCTA’s available resources, such as technology, staff and financial costs changed;
- Has LCTA fulfilled the goals of the LEP Plan; and
- Were any complaints received?

### **Dissemination of the Limited English Proficiency Plan**

LCTA includes its LEP Plan on its website (lctabus.com) together with its Title VI Policy and Complaint Procedures. LCTA’s Notice of Rights under Title VI to the public is posted in LCTA’s transit center and in selected printed materials also refers to the LEP Plan’s availability.

Copies of the LEP Plan will be provided, on request, to any person requesting the document via telephone, in person, by mail or email. LEP persons may obtain copies/translations of the plan upon request.



**10) MEMBERSHIP OF NON-ELECTED COMMITTEES**

LCTA formed a Citizens’ Advisory Committee in August 2023. Members of this committee are volunteers, not elected. Meetings are presided over by a LCTA Board member responsible for chairing the Customer Service Committee. In addition, staff also participate on the committee. All members of LCTA’s Board of Directors are encouraged to attend.

There are no formal membership requirements for the Citizens’ Advisory Committee; all members are either community stakeholders or riders. Attendance by the public at CAC meetings is open to anyone participate. Minutes are recorded at each meeting and on average 12 to 15 members of the committee (non-staff) attend.

There are thirty-five non-staff members on the committee. A survey was sent to the committee members to determine the make-up of the non-staff members. Table 7 summarizes the results. It is important to note that many of the members represent underserved populations including minority and low income populations.

**Table 7 – Make Up of Citizens’ Advisory Committee**

<b>Gender</b>	
Female (including transgender female)	12
Male (including transgender male)	7
Non-binary	
No response	16
<b>Race</b>	
American Indian or Alaska Native	
Asian	
Black or African American	
Native Hawaiian or Other Pacific Islander	
White	19
Mixed Race	
No response	16

Recruitment to the CAC was initially solicited through emails to social and human service agencies, municipalities, non-profit organizations, and other stakeholders with whom LCTA works. Passenger members are solicited through posts on social media, ads in the newspaper, and phone calls directly made to Shared Ride clients. Passengers who attended Board meetings were also asked to join the CAC. At the time of this writing, CAC has two Shared Ride clients and three fixed route riders who are members.



Advertisements to join the CAC and to attend meetings are placed on LCTA’s website and social media. Citizens’ Advisory Committee meetings are held at differing times that are convenient for citizens and riders to participate.

Meetings are held in person and available virtually to accommodate members who cannot attend in person.

**11) MONITORING SUB-RECIPIENTS FOR TITLE VI COMPLIANCE**

LCTA does not have subrecipients and therefore, subrecipient monitoring in not applicable.

**12) TITLE VI EQUITY ANALYSIS FOR CONSTRUCTION OF FACILITIES PROJECTS**

During the past three years, LCTA did not begin the construction of a facility project. LCTA completed a Facility project in July of 2024. This project began in July 2019 when the Agency purchased the former Murray Complex on South Pennsylvania Avenue in Wilkes-Barre to be used as its new headquarters. Mike Baker Corporation conducted the Equity Analysis for this facility.

**13) SERVICE STANDARDS**

**VEHICLE LOAD STANDARD**

Vehicle Load is a capacity guideline that the number of passengers will not exceed the maximum load factor at the maximum load point in the prevailing direction. LCTA will not exceed the manufacturer’s seating and standee maximum load. 2013 Gillig Low Floor Diesel Electric Hybrid will not exceed 39 passengers and 2018 through 2023 Gillig Low Floor CNG will not exceed 36 passengers.

**Table 8 – Vehicle Maximum Load**

<b># of Vehicles</b>	<b>Vehicle Description</b>	<b>Seated</b>	<b>Standees</b>	<b>Maximum Load</b>	<b>Vehicle Load Standard</b>
5	2013 Gillig Low Floor – Diesel Electric Hybrid	32	7	39	1.2
2	2018 Gillig Low Floor - CNG	32	4	36	1.1
5	2019 Gillig Low Floor - CNG	32	4	36	1.1
1	2020 Gillig Low Floor - CNG	32	4	36	1.1
11	2021 Gillig Low Floor - CNG	32	4	36	1.1
11	2022 Gillig Low Floor - CNG	32	4	36	1.1
5	2023 Gillig Low Floor - CNG	32	4	36	1.1

If LCTA were to receive complaints of overcrowding or standees, the review would include



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addressing and taking corrective actions on negative impact on minority and/or low-income populations.

**VEHICLE HEADWAY STANDARD**

LCTA operates 23 fixed routes on weekdays and 17 on Saturdays. The system span of service is 5:00 a.m. to 1:00 a.m. Four (4) of the 23 routes are designed to operate from 7:00 p.m. to 1:00 a.m. on weekdays combining service areas. Currently, LCTA’s headways vary by route. The system headway averages 54 minutes for weekday service and 56 minutes for Saturday service. Each route leaves and returns to the Intermodal Transportation Center in downtown Wilkes-Barre at a system average of 65 minutes (trip duration). Systemwide, a route repeats and departs at a system average of every 55 minutes. LCTA has worked with the Kimley-Horn to develop a Transit Development Plan. All LCTA fixed routes are being revamped and improved to be more customer-friendly including more consistent headways. The TDP is expected to be implemented in late October or November 2024.

Service levels and service periods are monitored and adjusted based on key route attributes in relation to overall system performance and ridership (demand) requirements. These factors determine the establishment of headways, to include:

- Ridership trends;
- Load factor;
- Service span of operating hours;
- Population density and population trends;
- Stop spacing: Standard “start and end” times of major destinations along the route;
- Route spacing, service frequency, and proximity to other routes;
- Stop amenities;
- Access to service;
- Connectivity; and
- Customer Demand: Number of passengers boardings and alighting.

LCTA review its’ route headways through customer complaints and takes actions to address disparities if there is a negative impact on minority and/or low-income populations.

**ON-TIME PERFORMANCE STANDARD**

LCTA measures fixed-route schedule adherence based on “On-Time” performance. On-time performance is defined as one (1) minute before the scheduled time and up to five (5) minutes after the scheduled bus arrival time. LCTA’s goal is 90 percent on-time performance.

LCTA review its’ on-time performance through customer complaints and takes actions to address disparities if there is a negative impact on minority and/or low-income populations.

**SERVICE AVAILABILITY**

LCTA provides service that is within ¼-mile of 85% of all residents in LCTA’s service area.

LCTA’s developed stop spacing standard goals of:



- ¼ to ½ miles between stops for each route; and
- 90% of all stops composing the total system average are at a distance of 1/2 (0.50) miles or less between stops.

#### **14) SERVICE POLICIES**

##### **TRANSIT AMENITIES**

It is the policy of LCTA to equitably distribute transit amenities. LCTA does not discriminate in the distribution of its transit amenities.

LCTA coordinates and advises external parties of the Agency's Title VI obligations who own and maintain transit amenities for LCTA's customers.

LCTA reviews complaints for distribution of transit amenities and takes actions to address disparities if there is a negative impact on minority and/or low-income populations.

Transit amenities include bus stops, shelters, benches, information boards, schedule information kiosks, lighting fixtures, and trash receptacles. The location of transit amenities is determined by factors such as ridership demand, individual requests and jurisdictional limitations.

Currently, all of LCTA's fixed route vehicles operate from the Intermodal Transportation Center in downtown Wilkes-Barre, PA. The Intermodal Transportation Center is owned and operated by the City of Wilkes-Barre and Martz Trailways, respectively. LCTA leases space at the intermodal that includes a ticket box office and shared bus stalls. LCTA maintains static and electronic schedule information boards at this site.

LCTA staff monitors the location of all transit amenities along a route to ensure they are distributed equitably. LCTA maintains an inventory database of all bus stops and transit-related amenities distributed within the fixed route transit system. LCTA coordinates with each municipal jurisdiction to provide transit amenities to the public at all applicable fixed route bus stops. All FTA-defined transit amenities must meet ADA and local zoning standards.

Bus stop transit amenities are provided by several sources, including local governments, citizen groups, advertising companies, and private developers. LCTA works with the source to provide guidance on LCTA's Title VI obligations and the need to ensure that transit amenities are distributed equitably.

##### **VEHICLE ASSIGNMENT**

LCTA has a fleet of forty (40) fixed route buses. All vehicles are Gillig and the majority operate on compressed natural gas (CNG). Five (5) buses are diesel-electric hybrid. All of LCTA's fixed route vehicles contain the same level of amenities available to all riders, to include:



- ADA accessible ramp or lift to board mobility-limited individuals;
- ADA accessible seating/securement area (2) for wheelchairs and electric power chairs;
- Dispatch radio equipped;
- Bike rack (2);
- Climate control (A/C and heat);
- Interior lighting;
- FRITS AVL tracking capabilities for use with the LCTA Bus Locator website; and
- ADA automatic stop announcement display board with verbal annunciations both inside and outside of the vehicle.

LCTA randomly assigns its vehicles to daily service. It is LCTA’s policy to equitably assign vehicles to its routes. LCTA does not discriminate on assigning vehicles to routes. To ensure that the assignment of vehicles is equitable, LCTA monitors customer complaints and addresses and takes corrective actions on disparities and/or negative impacts on minority or low-income populations.

**MAJOR SERVICE CHANGE POLICY**

A major service change is defined as: 1) a decrease in 25 percent of total service miles and/or hours, excluding tripper service; 2) when the service change will be longer in duration than 180 days; 3) when a new transit route is established; and/or 4) a transit route is eliminated.

It is the policy of LCTA to engage the public in any major service change. LCTA will engage the public, as outlined in its Public Participation Plan (PPP) and will conduct public hearings.

LCTA will review the change and identify the following:

- Adverse effects on minority and low-income populations
- Disparate impact on minorities (race, color, or national origin)
- Disproportionate burden on low-income populations

LCTA will take actions to eliminate, reduce, and/or mitigate the impacts.

**FARE CHANGE POLICY**

It is LCTA’s policy to periodically review its fixed route base fare to determine if it should be adjusted for inflation. If LCTA determines that the base fare should be adjusted, LCTA will engage the public as outlined in its PPP and will conduct public hearings.

LCTA will compare the National Consumer Price Index (CPI) as published by the Bureau of Labor Statistics (BLS) for the year the most recent base fare took effect to the current year under review and apply the inflation factor to determine a projected base fare.

LCTA will review any fare changes (increase or decrease in fares) and identify the following:

- Adverse effects on minority and low-income populations



## TITLE VI PLAN 2024 TO 2027

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- Disparate impact on minorities (race, color, or national origin)
- Disproportionate burden on low-income populations

LCTA will take actions to eliminate, reduce, and/or mitigate the impacts. LCTA has not had a fare increase since 01/05/2018.



**15) DOCUMENTATION OF APPROVAL OF TITLE VI PROGRAM**

The 2024-2027 Title VI Program has been reviewed and approved by LCTA's Board of Directors at its August 27, 2024 meeting. A copy of the resolution is provided at the end of this document.





16) ATTACHMENT A – TITLE VI AND LEP TRAINING

8/19/2024

# Title VI and LEP Training



1

## What is Title VI?

Title VI of the Civil Right Act of 1964 provides that “no person in the United State shall, on the ground 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 financial assistance.”

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8/19/2024

LCTA operates its programs and services without regard for race, color, or national origin in accordance with Title VI of the Civil Right Act of 1964.

3

Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with LCTA.

4

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8/19/2024

## Complaint forms are available:

- By calling 570-288-9356, ext. 227
- By emailing [gwintermantel@lctabus.com](mailto:gwintermantel@lctabus.com)
- By mailing a request or visiting 300 South Pennsylvania Ave., Wilkes-Barre, PA 18701
- On LCTA's web site, [lctabus.com](http://lctabus.com)

5

A complainant may also file a complaint directly with the Federal Transit Administration.

6

3



8/19/2024

If Title VI information or complaint forms are needed in another language, customers may call 570-288-9356, ext. 227.

7

## What does LEP mean?

A person who is "Limited English Proficient" (LEP) does not speak English as his or her primary language and can have a limited ability to read, speak, write, or understand English.

8

4



8/19/2024

## What do you do if you come in contact with a person of Limited English Proficiency?

You should use all available resources to determine what language the person speaks so you may try to help him or her.

9

## Language Assistance Resources Offered by LCTA:

- Census Bureau "I-Speak" Language Assistance Flash Cards on all buses and vans, as well as customer service windows at Main Office and Transit Center
- Interpreters Unlimited
- Google Translate on web site
- Bilingual Staff

10

5

8/19/2024

## I-Speak Card:

The image displays three I-Speak Cards, which are survey forms used for Title VI compliance. Each card contains a series of questions in both English and Spanish, designed to assess the needs and preferences of non-English speaking passengers. The questions cover topics such as language assistance, communication methods, and general service feedback.

11

## LCTA Documentation of LEP Requests

- Occasional surveys of all staff members by Title VI Program Manager
- Monthly logs kept by CSRs and turned in to Title VI Program Manager
- Data from Interpreters Unlimited

12

6



8/19/2024

## LEP Video

<https://www.lep.gov/video/understanding-and-abiding-title-vi-civil-rights-act-1964>

13

## Discussion and Questions

14

7

**SHARED RIDE**

(570) 288-8420  
1-800-679-4135  
FAX (570) 288-7455



**FIXED ROUTE**

(570) 288-9356  
FAX (570) 288-7327  
www.lctabus.com

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ROBERT FIUME, Executive Director  
300 South Pennsylvania Ave.  
Wilkes-Barre, PA 18701

MICHAEL CEFALO  
JOHN YOUNG  
JOSEPH PADAVAN

**RESOLUTION TO APPROVE UPDATED TITLE VI PROGRAM**

The Board of Directors of the Luzerne County Transportation Authority (LCTA) hereby adopts the updated 2024-2027 Title VI Program at a regularly scheduled meeting held on this 27<sup>th</sup> day of August, 2024, at which a quorum was present.

I, Charles Sciandra, Chairman of the Board of Directors of LCTA, do hereby certify the foregoing to be a true and correct copy of the Resolution.

Date: Aug 27, 2024

Signature & Title Charles Sciandra  
Board Chairman

Attest:

Date: Aug 27, 2024

Signature & Title Robert Fiume  
EXECUTIVE DIRECTOR