#### RESOLUTION NO. 2020-12

## APPROVING THE 2020 TITLE VI PROGRAM UPDATE FOR SUBMISSION TO THE FEDERAL TRANSIT ADMINISTRATION

WHEREAS, the Board of Trustees has been granted the power and authority, pursuant to Chapter 306 of the Ohio Revised Code, to manage and conduct the affairs of the Greater Cleveland Regional Transit Authority ("GCRTA"); and

WHEREAS, Title VI of the Civil Rights Act of 1964 requires GCRTA and all recipients of federal financial assistance to operate their programs and services in a nondiscriminatory manner without regard to race, color or national origin; and

WHEREAS, The Federal Transit Administration ("FTA") issued Circular 4702.1B, effective October 1, 2012, setting forth requirements and guidelines for Title VI compliance; and

WHEREAS, as set forth in the above-referenced Circular, the GCRTA Board of Trustees is required to review and approve a Title VI Program Update for submittal to the FTA every three years; and

WHEREAS, on December 17, 2013, pursuant to Resolution No. 2013-123, the Board of Trustees approved the 2014 Title VI Program Update for submission to the FTA; and

WHEREAS, on December 20, 2016, pursuant to Resolution No. 2016-119, the Board of Trustees approved the 2017 Title VI Program Update for submission to the FTA; and

WHEREAS, in December 2019, the draft 2020 Title VI Program Update was mailed to all GCRTA Board Members.

WHEREAS, on January 7, 2020, GCRTA's Operational Planning & Infrastructure Committee considered the draft 2020 Title VI Program Update and recommended it to the full Board of Trustees.

NOW, THEREFORE, BE IT RESOLVED by the Board of Trustees of the Greater Cleveland Regional Transit Authority, Cuyahoga County, Ohio:

Section 1. That the 2020 Title VI Program Update, which is substantially in the form of the attachment hereto, has been reviewed and is approved and the General Manager, Chief Executive Officer is hereby authorized to submit the 2020 Title VI Program Update to the Federal Transit Administration.

Section 2. That this resolution shall be effective immediately.

Attachment: 2020 Title VI Program Update

Adopted: January 21, 2020

How Clay

Attest:

Interim Secretary-Treasurer

# 2020 TITLE VI PROGRAM UPDATE



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#### INTRODUCTION

The U.S. Department of Transportation, Federal Transit Administration has implemented guidelines governing applicants, recipients and subrecipients of federal assistance with regard to Title VI of the Civil Rights Act of 1964. Specifically, these requirements dictate that the Greater Cleveland Regional Transit Authority (hereinafter the Authority or RTA) must ensure that no person, on the ground of race, color or national origin, be excluded from participation in, be denied benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

RTA is committed to providing equality of opportunity for employees, vendors, and customers and to complying with all appropriate Federal and State laws, rules and regulations pertaining to the treatment of minorities, women, disabled persons, and Vietnam-era veterans in all facets of the Authority's activities. With regard to Title VI, RTA is equally committed to:

- Ensuring any federally-funded transit-related benefits and services are made available and are equitably distributed without regard to race, color or national origin;
- Ensuring that the level and quality of transit services provide equal access and mobility for any person without regard to race, color, or national origin;
- Ensuring that opportunities to participate in the transit planning and decision-making processes are provided to persons without regard to race, color, or national origin;
- Ensuring that decisions on the location of transit services and facilities are made without regard to race, color or national origin; and
- Ensuring that corrective and remedial action is taken to prevent discriminatory treatment of any beneficiary based on race, color, or national origin.

The U.S. Department of Transportation, Federal Transit Administration, Region V, approved the Authority's 2017 Title VI Program Update. The approval expires on February 17, 2020. This Program Update conforms to the requirements set forth in Circular 4702.1B, dated October 1, 2012.

#### What Is Title VI?

Title VI is a provision that resulted from the Civil Rights Act of 1964.

"No person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance."

-Civil Rights Act of 1964

The purpose of Title VI is to remove barriers and conditions that prevent minority, low-income, and persons with limited English proficiency (LEP) from access to public goods and services. In result, Title VI promotes fairness and equity in federally assisted programs and activities.

#### What Does This Mean For GCRTA?

GCRTA, as a recipient of federal financial assistance through the Federal Transit Administration (FTA) is required to prepare a Title VI program update every three years.

GCRTA is subjected to rules and regulations provided through FTA Circular 4702.1B. "Title VI Requirements and Guidelines for Federal Transit Administration Recipients effective October 1, 2012 Circular". This report is provided as documentation of compliance with Title VI of Civil Rights Act of 1964 in accordance with FTA grant recipient requirements. The update is to include policies, practices, and analysis that will illustrate how GCRTA ensures compliance with Title VI.

GCRTA will ensure full compliance with Title VI of the Civil Rights Act of 1964, as amended, and related statutes and regulations in all GCRTA programs and activities. With regard to Title VI, GCRTA is equally committed to ensure that:

- The benefits of its bus and rail services are shared equitably throughout the service area;
- The level and quality of bus and rail services are sufficient to provide equal access to all riders in its service area;
- No one is precluded from participating in GCRTA's service planning and development process;
- Decisions regarding service changes or facility locations are made without regard to race, color or national origin and that development and urban renewal benefitting a community as a whole.
- A program is in place for correcting any discrimination, whether intentional or unintentional.

#### Who Is Responsible For Ensuring Title VI Is Implemented?

The Board of Trustees, General Manager, Chief Civil Rights Officer, management, and all employees share the responsibility for carrying out GCRTA's commitment to Title VI.

The Senior Manager of the Office of Equal Opportunity/ADA & EEO programs (OEO) is responsible for the day-to-day operation of the program as it relates to complaints and

coordinating efforts. The Senior Manager of the OEO works with a Title VI team to ensure equal protection of the law as it relates to services and programs provided by GCRTA.

The Team consists of the following:

Joel Freilich, Director of Service Management

Stephen Bitto, Director of Marketing

Maribeth Feke, Director of Planning

Mary Flannery, Grants Administration

In order to ensure that the Authority continues to comply with all the requirements set forth in Circular 4702.1B, effective date October 12, 2012, the Senior Manager of the OEO will report semi-annually to the Equal Opportunity (EO) Committee regarding Title VI and Title VII updates. The EO Committee is responsible for reporting formal and informal personnel practices to ensure equal treatment; making recommendations to the General Manager, Chief Executive Officer for modifications of GCRTA's policies and practices in order to enhance affirmative action and equal opportunity efforts; reviewing quarterly department/division reports on goals and timetables and recommending approval; and reporting on Title VI Updates.

GCRTA Board of Directors must also approve the Authority's Title VI program prior to its submittal to FTA.

#### THE GENERAL REQUIREMENTS

FTA requires that a Title VI document be submitted in accordance with the Federal Transit Administration (FTA) as part of their Title VI Program.

The General Requirements section of this update contains Title VI Program components required in Chapter III, of FTA Circular 4702.1B. This section includes the following information:

- 1. Title VI Public Notice
- 2. Title VI Complaint Procedures
- 3. Title VI Complaint Form
- 4. List of Title VI Investigations, Complaints and Lawsuits
- 5. Public Participation Plan
- 6. Language Assistance Plan
- 7. Minorities Participation in Public Committees and Councils
- 8. Title VI Compliance for Subrecipients
- 9. Title VI Equity and Fare Analysis
- 10. Board Meeting Minutes and Resolutions

#### Notice to the Public

In accordance with Title VI, GCRTA displays a public notice to inform customers of their rights under Title VI. The notice is posted on GCRTA's website, RideRTA.com. The notice is also

displayed in all of GCRTA's transit vehicles (buses and rail cars), and transit facilities such as the main office customer service area, and transit stations.

See Attachment A for the Title VI signage in both English and Spanish.

#### **Title VI Complaint Procedures**

This section outlines the Title VI complaint procedures related to providing programs, services, and benefits. However, it does not deny the complainant the right to file formal complaints with the Ohio Civil Rights Commission, Equal Employment Opportunity Commission, and Federal Transit Administration, or seek private counsel for complaints alleging discrimination, intimidation or retaliation of any kind that is prohibited by law.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs receiving federal financial assistance.

#### General

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin as noted below may file a written complaint with the Greater Cleveland Regional Transit Authority's Office of Equal Opportunity, 1240 W. 6th Street, 6th Floor, Cleveland, Ohio 44113. Complainants have the right to complain directly to the appropriate federal agency. Every effort will be made to obtain early resolution of complaints. The option of informal meeting(s) between the affected parties and the Senior Manager of EEO & ADA Programs may be utilized for resolutions. The Senior Manager of EEO & ADA Programs will notify the Deputy General Manager, Legal Affairs/Civil Rights Officer of all Title VI related complaints as well as all resolutions.

#### **Procedure**

- 1. The complaint must meet the following requirements:
  - a. Complaint shall be in writing and signed by the complainant(s). In cases where Complainant is unable or incapable of providing a written statement, a verbal complaint may be made. The Senior Manager of EEO & ADA Programs will interview the Complainant and assist the person in converting verbal complaints in writing. All complaints must, however, be signed by the Complainant or his/her representative.
  - b. Include the date of the alleged act of discrimination, the date when the Complainant became aware of the alleged act of discrimination; or the date on which that conduct was discontinued or the latest instance of conduct.
  - c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complaint.
  - d. Federal and state law requires complaints be filed within 180 calendar days of the alleged incident.
- 2. Upon receipt of the complaint, the Senior Manager of EEO & ADA Programs will determine its jurisdiction, acceptability and need for additional information, as well investigate the merit of the complaint.
- 3. The Complainant will be provided with a written acknowledgement that GCRTA has either accepted or rejected the complaint.
- 4. A complaint must meet the following criteria for acceptance:

- a. The Complaint must be filed within 180 days of the alleged occurrence.
- b. The allegation must involve a covered basis such as race, color or national origin, age, gender, or disabled.
- c. The allegation must involve a GCRTA service of a Federal-aid recipient, sub-recipient or contactor.
- 5. A complaint may be dismissed for the following reasons:
  - a. The Complainant requests the withdrawal of the complaint.
  - b. The Complainant fails to respond to repeated requests for additional information needed to process the complaint.
  - c. The Complainant cannot be located after reasonable attempts.
- 6. Once GCRTA's Office of Equal Opportunity decides to accept the complaint for investigation, the Complainant will be notified in writing of such determination. The complaint will receive a case number and will then be logged in a database identifying Complainant's name, basis, alleged harm, race, color and national origin.
- 7. In cases where GCRTA's Office of Equal Opportunity assumes the investigation of the complaint, within 90 calendar days of the acceptance of the complaint, the Senior Manager of EEO & ADA Programs will prepare an investigative report for review by the Civil Rights Officer. The report shall include a narrative description of the incident, identification of persons interviewed, findings and recommendations for disposition.
- 8. The Senior Manager of EEO & ADA Programs will make a determination on the disposition of the complaint. Dispositions will be stated as follows:
  - a. In the event GCRTA is in noncompliance with Title VI regulations or there is enough evidence to substantiate the allegation, a stakeholders' meeting is conducted. A stakeholders meeting includes all the managers and executives that may be involved in a discussion of resolution or disciplinary action.
- 9. Notice of the Senior Manager of EEO & ADA Programs' determination will be mailed to the Complainant. Notice shall include information regarding appeal rights of Complainant and instructions for initiating such appeal. Notice of appeals are as follows:
  - a. GCRTA will reconsider this determination, if new facts come to light.
  - b. If Complainant is dissatisfied with the determination and/or resolution set forth by GCRTA, the same complaint may be submitted to the FTA for investigation. Complainant will be advised to contact the Federal Transit Administration, Office of Civil Rights, 1760 Market Street, Suite 500, Philadelphia, PA 19103, Telephone 215-656-7100.
- 10. A copy of the complaint and GCRTA's investigation report/letter of finding and Final Remedial Action Plan, if appropriate, will be issued to FTA within 120 days of the receipt of the complaint.
- 11. A summary of the complaint and its resolution will be included as part of the Title VI updates to the FTA.

## **Recordkeeping Requirement**

The Senior Manager of the Office of Equal Opportunity will ensure that all records relating to GCRTA's Title VI Complaint Process are maintained with department records.

Records will be available for compliance review audits.

### The Complaint Form



## **Greater Cleveland Regional Transit Authority**

### **Civil Rights Complaint Form**

GCRTA is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color or nation origin, disability, age, religion, gender, and veteran status. All complaints must be filed within 180 days from the date of the alleged discrimination.

The following information is necessary to assist us in processing your complaint. If you require assistance in completing this form, please contact the Office of Equal Opportunity by calling (216) 356-3085. The completed form must be returned to: GCRTA Office of Equal Opportunity, Sr. Manager of Office of Equal Opportunity, 1240 West Sixth Street, Cleveland, OH 44113-1331.

Sec	tion I:		
Tod	ay's Date:		
Y	our Name:		
Н	ome Address:		
С	ity, State & Zip Code:		
Te	elephone No.:		Email Address:
Acc	essible Format Requirer	nents? □ Large Print □	Audio Tape □ Braille □ TDD □ Other
Sec	tion II:		
	prohibits discrimination apply to the discriminati		ories shown below. Check those categories, which you
	Age Color Disability Sex National Origin Race	Physical or mental disab Male or female, masculir National birth site – may	hade of skin within group ility ne or feminine, gender identity and pregnancy also include person's language, accent or race ce or because of certain characteristics associated with
	ReligionRetaliation	Religious/Spiritual beliefs	s iscrimination complaint or for opposing illegal
	Sexual Harassment	Unsolicited and/or unwell	come sexual advances, requests for sexual favors and narassment of a sexual nature
	Sexual Orientation	bisexuality, etc.	e in or identified with heterosexuality, homosexuality,
	Veteran Status	Service in the Armed Fo	rces

### Section III:

Name of the person(s) responsible for the harm you feel you suffered:	Job Title(s) and/or ID Number:
Location(s) of the occurrence(s):	Route No. and/or Bus No.:
Date(s) and time(s) of the occurrence(s):	Direction: Eastbound or Westbound
Brief description of the person(s) (i.e. gender, race, height, etc.):	
Section IV:	
What type of harm or discriminatory action was taken against you?	
☐ Accommodation ☐ Hostile environment ☐ Servi	ice
f "Other," please specify:	
Section VI:	
Describe the harm you feel you suffered and how the person(s) you	named above are responsible.
	) Na
Did anyone witness the harm or discrimination you suffered?  If "Yes," please indicate who and what they witnessed.	I No □ Yes
n 103, piease indicate who and what they withessed.	

Section VI:	
What remedy would you like GCRTA to consider?	
Section VII:	
Have you filed this complaint with any other federal, s	tate or local agency or with any federal or state court?
□ No □ Yes	
If yes, please provide the contact information at the ac	gency/court where the complaint was filed.
Agency:	Contact Name:
Address:	Telephone Number:
City, State & Zip Code:	
Have you previously filed a Title VI complaint with GC If yes, please describe the complaint.	RTA? □ No □ Yes
Please attach any written material or other infor	mation that you think is relevant to your complaint.
	nent is true and accurate to the best of my knowledge, on and belief.
Complainant's Signature:	Date:
Please mail this form to: GCRTA Office of Equa Sr. Manager of the Office	al Opportunity ffice of Equal Opportunity

Sr. Manager of the Office of Equal Opportunity

1240 West 6th Street

Cleveland, Ohio 44113-1331

#### TRANSIT-RELATED INVESTIGATIONS, COMPLAINTS AND LAWSUITS

GCRTA maintains a list of active investigations conducted internally by the Office of Equal Opportunity or externally by FTA and entitles other than FTA, including lawsuits and complaints 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 allegation(s); the status of the investigation, lawsuit or complaint; and actions taken by GCRTA in response, or final findings related to the investigation, lawsuit, or complaint.

There are no active Title VI investigations at this time.

#### Language Assistance Plan

This Limited English Proficiency Plan has been prepared to address the Greater Regional Transit Authority (RTA) responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English proficiency language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations, which states that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled *Improving Access to Services for Persons with Limited English Proficiency*, indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including all RTA departments receiving federal grant funds.

The RTA has developed this Limited Assistance Plan to help identify reasonable steps for providing language assistance to persons with Limited English Proficiency (LEP) who wish to access services by providing a snapshot as of January 2017. As defined Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. 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 persons that assistance is available. The Implementation Plan follows the four factor framework outlined in *Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons; A Handbook for Public Transportation Providers* as prepared by the Federal Transit Administration Office of Civil Rights, April 13, 2007.

## LIMITED ENGLISH PROFICIENCY PLAN CONTENTS

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#### **FOUR FACTOR ANALYSIS**

## 1.0 FACTOR 1 – THE NUMBER OR PROPORTION OF LEP ELIGIBLE TO BE SERVED OR LIKELY TO BE ENCOUNTERED BY A GCRTA PROGRAM, ACTIVITY, OR SERVICE

GCRTA staff interaction with customers of Limited English Proficiency (LEP) varies depending on department and function of the employee. The following have been identified as the most probable locations:

- Customer Call Center
- Paratransit Reservation Center
- Paratransit Customer Registration (Disabled/Senior Transportation)
- Transit Police
- Public Meetings
- · Hiring Events

#### 1.1 Census Data

Data from the US Census Bureau identified English language proficiency of people based on the language spoken at home.

Table A compares trends over time and geography of the percent of population over 5 years who speak English less than very well. Cuyahoga County is the GCRTA service area.

Table A: Population that speaks English less than "very well"

Percent of Population 5 years or older	Census	ACS	ACS
Speak English less than very well	2000	2010	2017
United States	8.1%	8.7%	8.5%
Ohio	2.2%	2.3%	2.4%
Cuyahoga County	3.2%	4.1%	4.2%

Source: American Community Survey, 2010, 2017 S1601, Census 2000, DP-2

Within Cuyahoga County, 4.2% of the population was reported less than "very well" English speaking ability. This is the GCRTA service area boundary. This includes 58 municipalities.

People who speak English as a second language come from a variety of lingual backgrounds.

#### 1.1.1 Cuyahoga County Overview

RTA provides service throughout Cuyahoga County. According to 2014-2017 ACS 5-Year Estimates, Cuyahoga County's population 5 years or older is 1,184,832. Of that, 11.5% speak a language other than English, and 4.23% speak English less than "very well". Table B provides a breakdown of the language groups spoken at home in our service area and table C shows the percent change in LEP populations.

**Table B: Cuyahoga County Population Language Demographics** 

Cuyahoga County, Ohio 2014-2017 ACS	Total	Percent		
Population 5 years or older	1,184,832			
Speak only English	1,048,766	88.50%		
Speak a language other than	136066	11.50%		
Speak a langauge less than "very well"	50220	4.24%		
Spanish	46773	3.95%		
Speak English less than "very well"	16,239	1.37%		
Indo-European	52,283	4.41%		
Speak English less than "very well"	19,098	1.61%		
Asian and Pacific Island	19,169	1.62%		
Speak English less than "very well"	8,818	0.74%		
Other Langauges	17,841	1.51%		
Speak English less than "very well"	6,065	0.51%		
Source: US Census, American Community Survey, 2014-2017; Table S160				

Table C – Cuyahoga County Change in LEP Individuals

	Cuyahoga County 2010-2014 ACS				Percent Change
	Total	Percent	Total	Percent	Total
Population 5 years or older	1,194,128		1,184,832		-0.78%
Speak only English	1,059,192	88.70%	1,048,766	88.50%	-0.99%
Speak a language other than	134,936	11.30%	136066	11.50%	0.83%
Speak a language less than "very well"	49,387	4.14%	50220	4.24%	1.66%
Spanish	42,514	3.56%	46773	3.95%	9.11%
Speak English less than "very well"	15,560	1.30%	16,239	1.37%	4.18%
Indo-European	55,581	4.65%	52,283	4.41%	-6.31%
Speak English less than "very well"	21,121	1.77%	19,098	1.61%	-10.59%
Asian and Pacific Island	19,321	1.62%	19,169	1.62%	-0.79%
Speak English less than "very well"	8,366	0.70%	8,818	0.74%	5.13%
Other Languages	17,788	1.49%	17,841	1.51%	0.30%
Speak English less than "very well"	5,550	0.46%	6,065	0.51%	8.49%

Source: American Community Survey, 2010-2014, 2014-17; Table S1601

English only speakers, Indo-European, Asian and Pacific populations have all lost population within the two year ACS data comparison. Spanish and "other languages" have gained population, increasing individuals who speak English less than "very well". Overall Cuyahoga County population has decreased by .78%.

Table D: Population and Percent of LEP by language

	Cuyahoga County, Ohio			
	Estimate	Percent of Population	Speak English Less than "Very Well"	Percent of LEP of Total Population
Total:	1,176,604		,	•
Speak only English	1,035,803	88.03%		
Spanish:	53,336	4.53%	17,999	1.53%
French (incl. Cajun):	3,786	0.32%	518	0.04%
Haitian:	355	0.03%	0	0.00%
Italian:	4,077	0.35%	1,486	0.13%
Portuguese:	447	0.04%	0	0.00%
German:	4,097	0.35%	935	0.08%
Yiddish, Pennsylvania Dutch or other West Germanic languages:	1,832	0.16%	41	0.00%
Greek:	2,122	0.18%	117	0.01%
Russian:	6,749	0.57%	2,868	0.24%
Polish:	2,986	0.25%	659	0.06%
Serbo-Croatian:	4,853	0.41%	1,278	0.11%
Ukrainian or other Slavic languages:	7,225	0.61%	3,177	0.27%
Armenian:	76	0.01%	0	0.00%
Persian (incl. Farsi, Dari):	583	0.05%	494	0.04%
Gujarati:	710	0.06%	100	0.01%
Hindi:	3,765	0.32%	1,284	0.11%
Urdu:	457	0.04%	0	0.00%
Punjabi:	411	0.03%	144	0.01%
Bengali:	135	0.01%	97	0.01%
Nepali, Marathi, or other Indic languages:	2,473	0.21%	1,460	0.12%
Other Indo-European languages:	4,858	0.41%	939	0.08%
Telugu:	1,493	0.13%	199	0.02%
Tamil:	815	0.07%	152	0.01%
Malayalam, Kannada, or other Dravidian languages:	596	0.05%	58	0.00%
Chinese (incl. Mandarin, Cantonese):	7,419	0.63%	3,718	0.32%

Japanese:	955	0.08%	266	0.02%
Korean:	1,364	0.12%	696	0.06%
Hmong:	0	0.00%	0	0.00%
Vietnamese:	2,535	0.22%	1,602	0.14%
Khmer:	0	0.00%	0	0.00%
Thai, Lao, or other Tai-Kadai languages:	1,143	0.10%	732	0.06%
Other languages of Asia:	1,487	0.13%	1,307	0.11%
Tagalog (incl. Filipino):	3,183	0.27%	1,295	0.11%
Ilocano, Samoan, Hawaiian, or other Austronesian languages:	532	0.05%	333	0.03%
Arabic:	7,550	0.64%	2,111	0.18%
Hebrew:	473	0.04%	50	0.00%
Amharic, Somali, or other Afro- Asiatic languages:	521	0.04%	168	0.01%
Yoruba, Twi, Igbo, or other languages of Western Africa:	1,313	0.11%	88	0.01%
Swahili or other languages of Central, Eastern, and Southern Africa:	1,333	0.11%	628	0.05%
Navajo:	0	0.00%	0	0.00%
Other Native languages of North America:	0	0.00%	0	0.00%
Other and unspecified languages:	2,756	0.23%	864	0.07%

Source: US Census, ACS 2017 1 year estimates, table S160001

#### 1.1.2 Map Analysis

Geographic locations for limited English proficiency individual by language is shown on Figures 1 through 4. This distinguishes locations of where limited proficiency individuals might interact with the transit system. Data used for this analysis includes the American Community Survey 2014 and 2017 5-year estimates. The 5-year ACS data is an ongoing survey that provides vital information on a yearly basis about individuals. 2017 ACS data is the most recent information we can obtain for this plan. A map has been created for the following language groups:

- 1. All Limited English Proficiency Speakers
- 2. Spanish Speakers Less than Well or None
- 3. Indo-European Speakers, Less than Well or None
- 4. Asian-Pacific Island Speakers, Less than Well or None
- 5. Other Speakers, Less than Well or None

### Spanish Speakers include:

• Spanish or Spanish Creole

### **Indo-European Speakers include:**

- French, including Patois, Cajun
- French, Creole
- Italian
- Portuguese or Portuguese Creole
- German
- Yiddish
- Other West Germanic languages
- Scandinavian Languages
- Greek
- Russian
- Polish
- Serbo-Croatian
- Other Slavic Languages
- Armenian
- Persian
- Gujarati
- Hindi
- Urdu

• Other Indo-European Languages

#### Asian-Pacific Island Speakers include:

- Chinese
- Japanese
- Korean
- Mon-Khmer
- Hmong
- Thai
- Laotian
- Vietnamese
- Other Asian Languages
- Tagalog
- Other Pacific Island Languages

### Other Language Speakers include:

- Navajo
- Other Native North American Languages
- Hungarian
- Arabic
- Hebrew
- African Languages
- Other Specified Languages

Figure 1

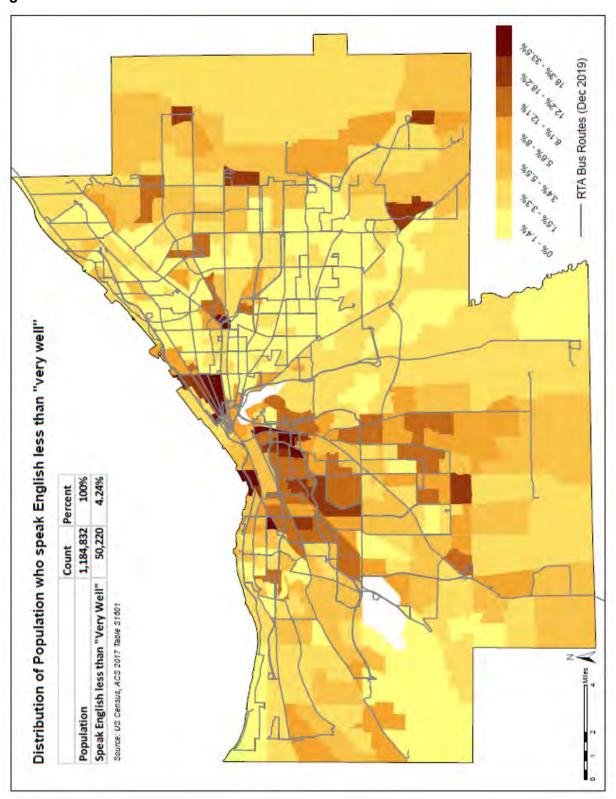


Figure 2

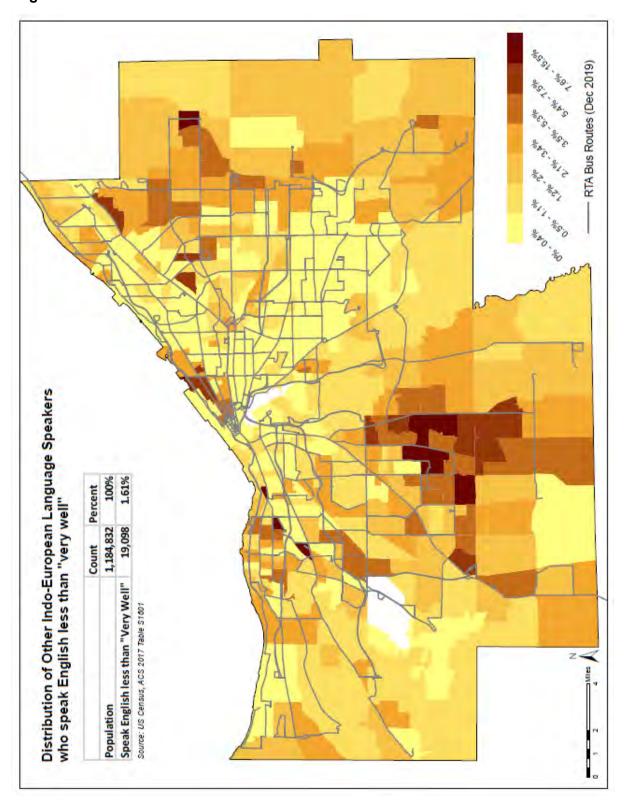


Figure 3

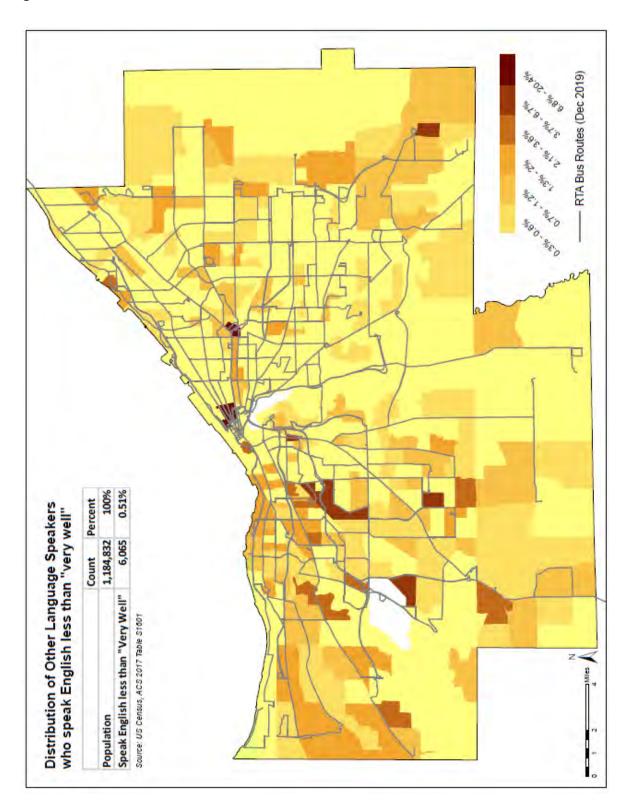


Figure 4

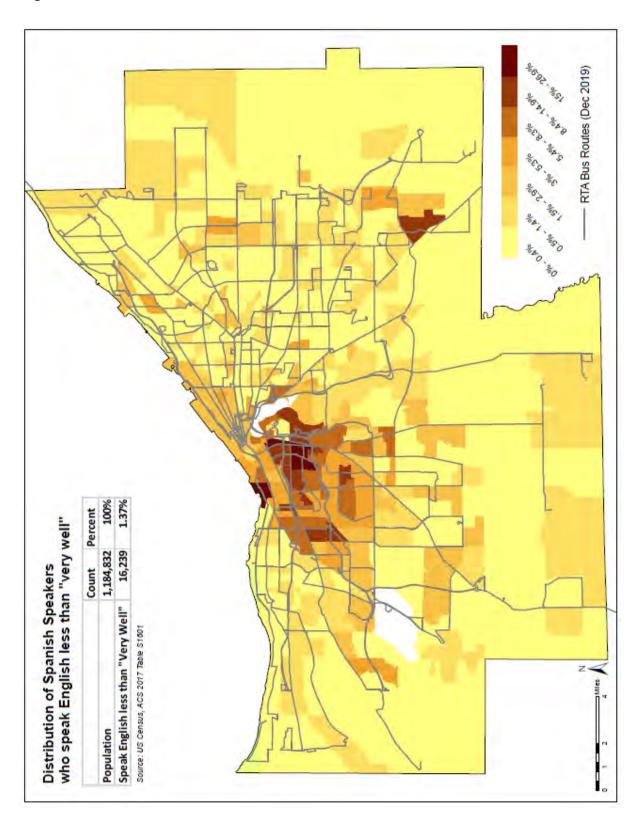
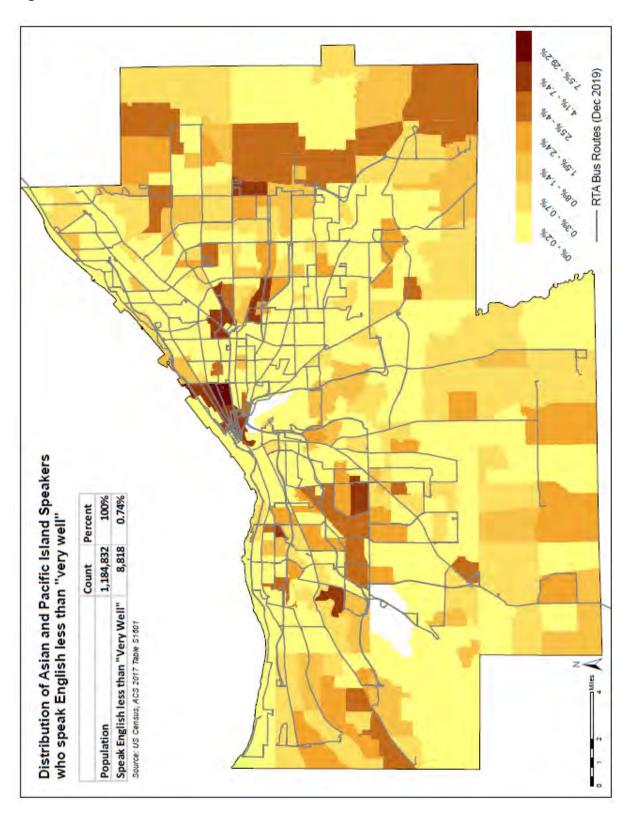


Figure 5



Summarizing the map information:

- Overall, the urban core (City of Cleveland) has a higher percentage of persons who speak another language other than English at home.
- High concentration of LEP individuals are located on the west side of City of Cleveland
- Indo-European LEP individuals have a high concentration in the southern portion of the County.
- Asian and Pacific, and "other languages" are located throughout the County.

## 2.0 FACTOR 2 – THE FREQUENCY WITH WHICH LEP PERSONS COME IN CONTACT WITH GCRTA PROGRAMS, ACTIVITIES OR SERVICES

GCRTA provides fixed route bus, rail, bus rapid transit, and demand response (Paratransit) services. Various facilities and vehicles provide these services, which requires GCRTA to have community interaction, including operator communication, services dispatch, transit police, and ADA processing.

LEP encounters are not collected. However, RTA has several public outreach groups that may discuss events related to LEP individuals and determine possible solutions. These groups include Citizens Advisory Board and ADA Council.

#### 2.1 LEP Encounters

American Community Survey 2014 data sets for workers aged 16 years and older provided data for travel to work by language proficiency. Table E displays these results. Overall, only 5% of the population use public transit as a means of transportation to work and .2% of the total working population 16 years or older speak English less than "very well".

Table E: LEP populations means of transportation to work (16 years and older)

Mode	ALL	English Only	Speak English less than "very well"
Drove Alone	80.1%	71.5%	2.6%
Carpooled	7.6%	6.1%	0.6%
Public Transit	5.0%	4.5%	0.2%
Walked	2.5%	2.2%	0.1%
Taxi, motorcycle, biked, other	1.3%	1.1%	0.0%
Worked from home	3.6%	3.3%	0.1%

Source: American Community Survey, 2014 5-year Estimates, Table B08113

RTA has several key programs and major points of contact with the public that LEP individuals may use. The following describe customer service interactions and opportunities for LEP outreach.

#### 2.1.1 Customer Call Center

The RTA Customer Call Center (RTAnswerline) provides information for general callers on RTA services. It is located within the RTA Main Office Building. The Call Center tracks requests for Spanish-speaking assistance. RTA has bilingual representatives in the Call Center to help anyone who requires Spanish language assistance.

In addition, RTA does have available the Cleveland State University Call Bank for translations to other languages. There is no tracking of usage and is rarely used.

#### 2.1.2 Paratransit Reservation Center

The Paratransit reservation center does not track requests for assistance in arranging trips in other languages. The primary language barrier is Spanish, which is handled by a full-time Spanish speaking reservationist. LEP individuals are not common, averaging four cases a month. Most frequently, the caller will have a family member or friend available on the phone for translation. The Paratransit reservation center is located at the Paratransit District Garage and not within the Main Office Building.

#### 2.1.3 Paratransit Customer Registration (Disabled/Senior Transportation), ADA Office

The Paratransit registration is located within the Main Office Building. It screens and registers individuals for reduced fares. Assistance from the Call Center bilingual employee is needed roughly six to eight times a week. It is common for individuals with limited English skills to bring a family member or friend to assist in the translation.

#### 2.1.4 Transit Police

Transit Police rarely encounters non-English speaking individuals. In the event a translator is needed, a Spanish-speaking Transit Police officer, Spanish speaking RTA employee or another first responder has been available to assist.

#### 2.1.5 Board Meetings and Public Meetings

Translators are provided for Board Meetings when notice is given. This includes American Sign Language interrupters. Public meetings are held in public areas to discuss a service change or development. If notice is given prior to attendance, GCRTA will provide translation assistance.

#### 2.1.6 Human Resources Hiring Events

In recent years, GCRTA has created a partnership with El Barrio – Workforce Development Center which is part of the Centers for Family and Children. Two or three times a year, GCRTA has an event at their facility to meet with clients and potential job applicants. These events give GCRTA the opportunity to speak to the Hispanic community about general areas of interest and possibly provide employment opportunities. El Barrio provides training to their clients that are interested in becoming a bus Operator at GCRTA, and how to obtain the temporary Commercial Driver's License (CDL) to begin the recruitment process at GCRTA.

GCRTA also has a partnership with the Spanish American Community, where our Human Resources department meet with organization representatives to present GCRTA and open job opportunities.

These processes have been successful at obtaining a diverse workforce and meeting the employment needs for GCRTA.

#### 2.2 Other Local Government Agency Experience

RTA will monitor and learn from the City of Cleveland, Cuyahoga County, and Cleveland Municipal School District experiences with LEP individuals. RTA will also reach out to the local planning departments in communities that have a cluster of LEP individuals for assistance on how to best communicate information to specific populations.

RTA participates in regional transit collaboration through the local metropolitan planning organization called NOACA (Northern Ohio Areawide Coordinating Agency). RTA participates in Transit Council where discussions related to transit services and funding, and is an opportunity to share best practices related to customer service and needs.

## 3.0 FACTOR 3 – THE NATURE AND IMPORTANCE OF PROGRAMS, ACTIVITIES, OR SERVICES PROVIDED BY RTA TO THE LEP POPULATION

RTA provides a wide array of transportation service from the regular fixed route system to Paratransit services. Making these services accessible to LEP persons provides transportation choice and is a vital service for individuals without access to personal vehicles.

In addition to transit services, RTA provides service related information at public meetings and board meetings, and LEP individuals interact and able to access transit police services and hiring events.

#### 3.1 Consequences of Language Barriers

The critical services can be divided into three groupings for potential consequences: basic service usage; emergency procedures; and public hearings.

#### 3.1.1 Basic Service Usage

LEP individuals could potentially not receive transportation service. It could be an inconvenience to LEP individuals until appropriate translation or assistance is provided. RTA provides Paratransit services, which serves customers that are unable to utilize typical fixed route service. These customers are ADA certified residents, of which some may be LEP customers.

#### 3.1.2 Emergency Procedures

For emergency procedures, it is feasible that there may be an occurrence where an LEP individual would need to evacuate an RTA vehicle or building for life safety purposes or contact the authorities for safety reasons. Recent updates to the safety evacuation signage on busses and trains provide most information pictorially, with limited usage of written instructions. Within RTA facilities, universal exit signage is utilized to direct all patrons out of the facility or to an area of safe refuge.

#### 3.1.3 Public Hearings

LEP individuals could have the inability to understand and provide comment on the proposed service changes or other issues. This may result in an unintentional under-representation of

the impact to the greatest number of LEP persons within the limits of RTA's resources. RTA analyzes site locations for public hearings and may provide translation services if needed.

## 4.0 FACTOR 4 -THE RESOURCES AVAILABLE TO RTA AND OVERALL COST TO PROVIDE LEP ASSISTANCE

#### 4.1 Inventory of RTA Resources

The RTA reviewed its available resources that could be used for providing LEP assistance, including verbal and written Spanish translation.

#### 4.1.1 Language Assistance

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to RTA services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

How the RTA staff may identify an LEP person who needs language assistance:

- Post notice of LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand.
- When the RTA sponsors an informational meeting or event, a staff person may greet participants as they arrive. By informally engaging participants in conversation, it is possible to gauge each attendee's ability to speak and understand English. Although translation may not be able to be provided at the event, it will help identify the need for translation at future events.

#### 4.1.2 Current Language Assistance Measures

Although there are a very low percentage of LEP individuals in the RTA service area, that is, persons who speak English less than "very well", the RTA staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English.

The following resources will be available to accommodate LEP persons:

- Volunteer or staff interpreters for the Spanish language are available and will be provided within a reasonable time period.
- Language interpretation will be accessed for all other languages through a telephone interpretation service.

#### 4.1.3 Printed Materials

Translation of Documents are limited due to the low threshold of LEP individuals. However, RTA provides timetables in Spanish online. RTA is currently working on a Spanish version of the system map and bi-lingual signage at specific stations surrounding larger LEP populations.

Concurrent with Title VI regulations, Title VI information and documentation is available at www.riderta.com and upon request. Any person who believes he or she has been aggrieved by an unlawful discriminatory practice under Title VI may file for a complaint with RTA. Each transit vehicle displays signage (in both English and Spanish), informing passengers of their rights protected by Title VI.

#### 4.1.4 Monitoring

The plan will be reviewed and updated periodically, or when higher concentrations of LEP individuals are present in the RTA service area. Updates will include the following:

- Current LEP population in the service area
- Need for translation services has changed
- Language assistance programs have been effective and sufficient
- RTA financial resources are sufficient to fund language assistance resources needed
- RTA fully complies with the goals of this LEP Plan
- Complaints have been received concerning LEP customers

#### 4.2 Recent LEP Service Implementations

The following services identified have been implemented to assist the LEP population:

- Fixed Route Bus/Rail Schedules
- With the re-issuance of new schedules for each route, information is now translated in Spanish to direct LEP persons to call the Customer Service Center for additional help.
- Similar information directing Spanish LEP persons to call the Customer Service Center are now placed on the RTA website.
- Emergency Evacuation Procedures
- RTA recently updated all of the emergency evacuation instructions on all busses and trains with universal graphic signage. Text has been augmented or replaced with fully pictorial versions.
- Currently use the universal "EXIT" signs and no further action is required.
- Oral Translations
- RTA has continued to pursue hiring bilingual speakers, with a focus on language group(s) identified through continued outreach as potentially having a significant LEP population using transit.

#### RTA LANGUAGE ASSISTANCE PLAN

Goals and Objectives

1. Comply with federal regulations by providing meaningful access to the benefits, services, information, and other important portions of RTA programs and activities for individuals with

limited English proficiency.

- a. Translate "vital documents" into Spanish if necessary
- b. Continue to replace text with pictograms or universal icons
- c. Notify LEP populations the availability of free translation and interpretation of important documents upon request.
- d. Identify service changes affecting areas with high concentrations of LEP individuals and provide translation services to public meetings.
- 2. Continue best hiring practices to encourage LEP individuals to apply for open positions at the RTA
  - a. Continue work with El Barrio Training Center to encourage Hispanic population to apply for available positions within the RTA
  - b. Work with Training Centers and the Cuyahoga Community College to develop training programs to provide applicants with necessary skills needed for certain positions.

#### **Primary Target Audience**

Based on the above analysis, Spanish as the only group with enough LEP speakers to warrant specific writing requirements. As the Authority is approaching the threshold of the Safe Harbor Act, we are preparing by identifying the following services that have yet to be implemented in our service.

#### **Program Elements**

- 1. Survey Customer Service staff and representatives yearly to identify the number of LEP customers' encounters.
- 2. Additional Training
  - Enhance training programs and plan dissemination to employees who may encounter a LEP customers.
  - Provide information on the Title VI Policy and LEP responsibilities to employees.
  - Description of language assistance services offered to the public.
  - Use of interpreter service provider's language identification cards.
  - Documentation of language assistance requests.
  - How to handle a potential Title VI/LEP complaint.
- 3. Improve website design to include easier accessibility for Spanish information and translation.
- 4. Fare Vending Machines
  - Reprogram fare machines to include the option for Spanish translation.
- 5. Review customer service documents to have Spanish information easy to locate.

#### Monitoring and Updating the LEP Plan

In review of the current RTA services and customer interaction points, RTA has identified several opportunities to obtain information on a more continual basis regarding interactions with LEP individuals.

This plan is designed to be flexible. With the rolling 5-year ACS data, the census analysis shall be updated on an annual basis. This, in conjunction with continued outreach with organizations representing LEP individuals, will allow RTA to proactively identify any significant increases or decreases in specific language groups that may require additional information on using public transportation.

#### Additional LEP Outreach Efforts

GCRTA operates a program with the local area school districts to educate students on how to use RTA services and how to do so safely. GCRTA partnered with Cleveland Municipal School District (CMSD) to implement the RTA Safety and public awareness programming. In addition, CMSD also passed a resolution stating that: "The District needs to utilize the community outreach programs through the Greater Cleveland Regional Transit Authority to provide STEM outreach, safety on Public Transit, public awareness, and how-to-ride information."

Through this partnership, GCRTA Safety staff presented materials to many Cleveland High Schools specifically to students whose first language was not English. CMSD provided translators and GCRTA translation of materials in several different languages spoken throughout the district.

The largest segment of the student "LEP" population speaks Spanish. GCRTA has attached copies of the literature that was translated into Spanish as well as its English equivalents. GCRTA will continue to work with CMSD to educate students on using RTA in the languages required.

Pamphlets are attached to this Update as Attachment O.

#### **PUBLIC PARTICIPATION PLAN**

It is the policy of the Greater Cleveland Regional Transit Authority (GCRTA) to encourage public involvement and participation in the decision-making process regarding issues impacting the Authority's customers, including but not limited to service reductions and fare modifications (Resolution No. 1995-25). GCRTA has established a public involvement process to ensure minority, low-income and LEP populations are engaged through public outreach and involvement activities.

GCRTA Board of Trustees meets monthly. All meetings of the Board, except executive sessions held for purposes required or permitted by law, are open to the public and no person is excluded from any meeting. Time is provided for the public to comment on any issue at each meeting. The GCRTA maintains a list of persons and organizations that wish to receive information from the GCRTA.

#### **Outreach Efforts**

GCRTA solicits comment and customer feedback from interested parties related to major decisions impacting services and fares.

- Public comment and participation is solicited in a number of ways, including:
- Public Hearings and/or Community Meetings
- Letters written to The Greater Cleveland Regional Transit Authority (GCRTA)
- Comments received via the GCRTA website
- Social media: Facebook and Twitter
- GCRTA's Citizen Advisory Board
- Direct communications with elected officials and community leaders
- Emails to public comment mailbox

#### **Public Meetings**

Public meetings are a critical element of the Authority's community involvement program. Meetings are held with the primary objective of sharing information related to specific changes, as well as soliciting feedback from interested parties.

Typically, meetings are held in affected neighborhoods, allowing those audiences that may be impacted by proposed changes, easy access to provide comment. Locations are easily accessible by public transportation and all facilities are ADA compliant.

Notification of meetings are posted at least two weeks in advance in the Cleveland Plain Dealer, as well as the Call and Post (weekly publication targeting Northeast Ohio's African-American community). Scheduled meetings are also promoted in the Authority's customer newsletters, website, signage posted on revenue vehicles, audio announcements are aired in passenger facilities, as well as through postings in various media outlets.

The format of the meeting/hearing varies based on the audience and magnitude of the proposed change. In most cases, an "open-house" type meeting is held that spans several hours and is typically conducted in communities that may be potentially be impacted by the proposed changes. The meeting would begin with GCRTA staff proving a detailed description of the changes proposed, followed by a period of open comment from meeting attendees. Throughout the meeting, staff would be present to respond directly to customer inquiries and questions.

To encourage the participation of those with a hearing impairment, GCRTA provides sign language interpreters to more effectively communicate with this audience. Additionally, a court reporter is present to capture an accurate transcript of comments provided by attendees. These comments are later reviewed and interpreted by the Authority's Service Planning staff and incorporated into the final recommendations prepared for management's consideration.

To better address the needs of those individuals with language barriers, Spanish-speaking staff members are present to provide those translation services.

Consideration of Public Comment and Feedback

All comments received regarding proposed changes are reviewed and summarized by Authority staff including Marketing, Service Management, Office of Management & Budget, and Finance. After a general review is completed, staff from affected departments will share information received from the public, along with revised recommendations to the Authority's General Manager, Deputy General Manager of Operations, and other key executive staff for final determination. The final recommendations take info full consideration comments received through the public involvement process and forwarded to the Board of Trustees for consideration. GCRTA staff is committed to

faithfully representing all comments received, positive as well as negative, when presenting the results to Management staff and Board of Trustees.

Recommendations endorsed by the Executive Management team are taken to the Authority's Board of Trustees for final action or acceptance.

#### Responsibilities

The Service Management Department and the Office of Management & Budget are responsible for the following:

- Develop proposals for consideration related to service modifications and fare increases
- Develop and implement the community involvement plan to solicit customer comments
- Review and summarize the comments
- Based on public comment and input, revise recommendations
- Package final recommendations for approval by the Board of Trustees

The Marketing department is responsible for the following:

- Maintain all documentation related to the public participation process
- Placement of legal notices promoting public hearings at least two weeks prior to scheduled events. Also responsible for the development of other communication strategies to promote the meetings (signs, media releases, flyers)
- Compile and maintain the public comment file for all comments received through all sources (meetings, emails, letters)
- Coordinate use of web-based media for both posting of information and collecting customer comments
- Determine the best format for the meeting
- Make all arrangements for public meetings, including but not limited to, securing the meeting space, retaining hearing interpreters and court reporters, and development and production of all collateral materials for the meeting
- Communicate with elected officials and community leaders in affected areas prior to meetings to review proposals and solicit comment

Summary of Outreach Activities since last Title VI submission

The Authority had neither a fare policy modification nor a service change since our last Title VI submission that would have required implementation of our Public Participation plan.

### **Non-Elected Committee Membership**

The Citizens Advisory Committee (CAC) is comprised of representatives selected from public and private agencies, consumer groups, interested individuals and users of the transit system. The CAC is a transit-related group of volunteers that meet monthly to discuss relevant issues pertaining to the operations of the Authority. Nine (9) members have been directly appointed by the Board of Trustees and eight (8) members have been selected through the application process.

Members of the CAC work to increase citizens' participation in community activities and involve the public in transit decision-making.

CITIZENS ADVISORY BOARD			
MEMBER COMPOSITION: SE	X/ETHNICITY		
African American Male	3		
African American Female	3		
Hispanic Female	1		
White Male	6		
White Female	4		
Total Members	17		

### **Monitoring Sub-Recipient**

### **Senior Transportation Connection (STC)**

STC's Title VI program was adopted by their Board on November 20, 2019. See Attachments C and D for photos showing CTS's posted Title VI signage.



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### INTRODUCTION

The U.S. Department of Transportation, Federal Transit Administration has implemented guidelines governing applicants, recipients and subrecipients of federal assistance with regard to Title VI of the Civil Rights Act of 1964. Specifically, these requirements dictate that Senior Transportation Connection (herein after STC) must ensure that no person, on the ground of race, color or national origin, be excluded from participation in, be denied benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

STC is committed to providing equality of opportunity for employees, vendors, and customers and to complying with all appropriate Federal and State laws, rules and regulations pertaining to the treatment of minorities, women, disabled persons, and Vietnam-era veterans in all facets of STC's activities. With regard to Title VI, STC is equally committed to:

- Ensuring any federally-funded transit-related benefits and services are made available and are equitably distributed without regard to race, color or national origin;
- Ensuring that the level and quality of transit services provide equal access and mobility for any person without regard to race, color, or national origin;
- Ensuring that opportunities to participate in the transit planning and decision-making processes are provided to persons without regard to race, color, or national origin;
- Ensuring that decisions on the location of transit services and facilities are made without regard to race, color or national origin; and
- Ensuring that corrective and remedial action is taken to prevent discriminatory treatment of any beneficiary based on race, color, or national origin.

This is the first plan prepared by STC.

### WHAT IS TITLE VI?

Title VI is a provision that resulted from the Civil Rights Act of 1964.

"No person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance."

-Civil Rights Act of 1964

The purpose of Title VI is to remove barriers and conditions that prevent minority, low-income, and persons with limited English proficiency (LEP) from access to public goods and services. In result, Title VI promotes fairness and equity in federally assisted programs and activities.

### WHAT DOES THIS MEAN FOR STC?

STC, as a recipient of federal financial assistance through the Federal Transit Administration (FTA) and GCRTA is required to prepare a Title VI program update every three years. STC is subjected to rules and regulations provided through FTA Circular 4702.1B. "Title VI

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Requirements and Guidelines for Federal Transit Administration Recipients effective October 1.

2012 Circular". This report is provided as documentation of compliance with Title VI of Civil Rights Act of 1964 in accordance with FTA grant recipient requirements. The update is to include policies, practices, and analysis that will illustrate how STC ensures compliance with Title VI.

STC, will ensure full compliance with Title VI of the Civil Rights Act of 1964, as amended, and related statutes and regulations in all STC programs and activities. With regard to Title VI, STC is equally committed to ensure that:

- The benefits of its bus services are shared equitably throughout the service area;
- The level and quality of bus services are sufficient to provide equal access to all riders in its service area:
- No one is precluded from participating in STC's service planning and development process;
- Decisions regarding service changes or facility locations are made without regard to race, color or national origin and that development and urban renewal benefitting a community as a whole.
- A program is in place for correcting any discrimination, whether intentional or unintentional.

### WHO IS RESPONSIBLE FOR ENSURING TITLE VI IS IMPLEMENTED?

The Board of Directors, Executive Director, Human Resources Manager, and all employees share the responsibility for carrying out STC's commitment to Title VI.

The Human Resource Manager is responsible for the day-to-day operation of the program as it relates to complaints and coordinating efforts. The Human Resource Manager works with the management team to ensure equal protection of the law as it relates to services and programs provided by STC. The Team consists of the following:

Edward Eucker, Director of Operation Marti Pytel, Director of Call Center Janice Dzigiel, Executive Director

In order to ensure that STC continues to comply with all the requirements set forth in Circular 4702.1B, effective date October 12, 2012, the Human Resource Manager will report semi-annually to the Board of Directors regarding Title VI and Title VII updates. The management team is responsible for reporting formal and informal personnel practices to ensure that equal treatment; making recommendations to the Executive Director for modifications of STC's policies and practices in order to enhance affirmative action and equal opportunity efforts; reviewing quarterly department/division reports on goals and timetables, and recommending approval; and report on Title VI Updates.

STC Board of Directors must also approve STC's Title VI program prior to its submittal to FTA.

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### THE GENERAL REQUIREMENTS

FTA requires that a Title VI document is submitted in accordance to the Federal Transit Administration (FTA) as part of their Title VI Program.

The General Requirements section of this update contains Title VI Program components required in Chapter III, of FTA Circular 4702.1B. This section includes the following information:

- 1. Title VI Public Notice
- 2. Title VI Complaint Procedures
- 3. Title VI Complaint Form
- 4. List of Title VI Investigations, Complaints and Lawsuits
- 5. Public Participation Plan
- 6. Board Meeting Minutes and Notice to the Public

In accordance with Title VI, STC displays a public notice to inform customers of their rights under Title VI. The notice is posted on STC's website, www.ridestc.org. The notice is also displayed in all of STC's transit vehicles and in the main administrative office.

### **Title VI Complaint Procedures**

This section outlines the Title VI complaint procedures related to providing programs, services, and benefits. However, it does not deny the complainant the right to file formal complaints with the Ohio Civil Rights Commission, Equal Employment Opportunity Commission, and Federal Transit Administration, or seek private counsel for complaints alleging discrimination, intimidation or retaliation of any kind that is prohibited by law. Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs receiving federal financial assistance.

### <u>General</u>

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin as noted below may file a written complaint with the Senior Transportation Connection at 4735 W. 150<sup>th</sup> Street, Suite A, Cleveland, Ohio 44135. Complainants have the right to complain directly to the appropriate Federal Agency. Every effort will be made to obtain early resolution of complaints. The option of informal meeting(s) between the affected parties and the Human Resource Manager may be utilized for resolutions. The Human Resource Manager will notify the Executive Director of all Title VI related complaints as well as all resolutions.

### **Procedure**

- 1. The complaint must meet the following requirements:
- a. Complaint shall be in writing and signed by the complainant(s). In cases where Complainant is unable or incapable of providing a written statement, a verbal complaint may be made.

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- b. The Human Resource Manager will interview the Complainant and assist the person in converting verbal complaints in writing. All complaints must, however, be signed by the Complainant or his/her representative.
- c. Include the date of the alleged act of discrimination; date when the Complainants became aware of the alleged act of discrimination; or, the date on which that conduct was discontinued or the latest instance of conduct.
- d. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complaint.
- e. Federal and state law requires complaints be filed within 180 calendar days of the alleged incident.

Upon receipt of the complaint, the Human Resource Manager will determine its jurisdiction, acceptability, need for additional information, as well investigate the merit of the complaint.

- 2. The Complainant will be provided with a written acknowledgement that STC has either accepted or rejected the complaint.
- 3. A complaint must meet the following criteria for acceptance:
  - a. The Complaint must be filed within 180 days of the alleged occurrence.
  - b. The allegation must involve a covered basis such as race, color or national origin, age, gender, or disability. The Human Resources Manager will accept the complaint for investigation, the Complainant will be notified in writing of such determination. The complaint will receive a case number and will then be logged in a database identifying Complainant's name, basis, alleged harm, race, color and national origin of the Complainant.
- 5. In cases where STC's Human Resource Manager assumes the investigation of the complaint, within 90 calendar days of the acceptance of the complaint, STC's Executive Director will prepare an investigative report for review by the agency's legal counsel. The report shall include a narrative description of the incident, identification of persons interviewed, findings and recommendations for disposition.
- 6. The Human Resource Manager will make a determination on the disposition of the complaint. Dispositions will be stated as follows:
  - a. In the event STC is in noncompliance with Title VI regulations or there is enough evidence to substantiate the allegation, an Executive Committee of the Board meeting is conducted. A meeting includes all the Executive Committee, managers and executives that may be involved in a discussion of resolution or disciplinary action.
- 7. Notice of Human Resources Manager's determination will be mailed to the Complainant. Notice shall include information regarding appeal rights of Complainant and instructions for initiating such an appeal. Notice of appeals are as follows:

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- a. STC will reconsider this determination if new facts come to light.
- b. If Complainant is dissatisfied with the determination and/or resolution set forth by STC, the same complaint may be submitted to the FTA for investigation. Complainant will be advised to contact the Federal Transit Administration, Office of Civil Rights, 1760 Market Street, Suite 500, Philadelphia, PA 19103, Telephone 215-656-7100.
- 8. A copy of the complaint and STC's investigation report/letter of finding and Final Remedial Action Plan, if appropriate will be issued to FTA within 120 days of the receipt of the complaint.
- 9. A summary of the complaint and its resolution will be included as part of the Title VI updates to the FTA.

### **Record Keeping Requirement**

The Human Resource Manager will ensure that all records relating to STC's Title VI Complaint Process are maintained with department records.

Records will be available for compliance review audits.

### **STC Complaint Form**

STC is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color or nation origin, disability, age, religion, gender, and veteran status. All complaints must be filed within 180 days from the date of the alleged discrimination.

The following information is necessary to assist us in processing your complaint. If you require assistance in completing this form, please contact the Office of Equal Opportunity by calling (216) 265-1489. The completed form must be returned to: Human Resource Manager, Senior Transportation Connection, 4735 W 150 St. Ste A, Cleveland OH 44135.

Sectio	n I:	
Today	s Date:	
Your Name		
Home Addres	ss:	
•	tate & Zip	
Teleph	one No.:	Email
Addres	ss:	
Acces	sible Format Requirem	ents? □ Large Print □ Audio Tape □ Braille □ TDD □ Other
	ohibits discrimination of	on the basis of the categories shown below. Check those ply to the discrimination you experienced.
	Age	Age 40 or over
	Color	Color of skin, including shade of skin within group
	Disability	Physical or mental disability
	Sex	Male or female, masculine or feminine, gender identity and pregnancy
	National Origin	National birth site – may also include person's language, accent or race
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	Race	Belonging to a certain rac associated with race	e or because of	certain characteristics
	Religion	. Religious/Spiritual beliefs		
	-	Retaliation for filing a discillegal discriminatory prac	crimination comp	laint or for opposing
	Sexual Harassment.	<ul> <li>Unsolicited and/or unweld sexual favors and other vanature</li> </ul>		•
	Sexual Orientation	. Perceived by others to be homosexuality, bisexuality		vith heterosexuality,
	Veteran Status	. Service in the Armed Ford	ces	
STC	Complaint Form – co	ntinued.		
Nam	ion III: e of the person(s) resp	onsible for the harm you fee	el you suffered	
Job <sup>-</sup>	Title(s) and/or ID Numb	er:		
Loca	ition(s) of the occurrenc	e(s):		
Rout	e No. and/or Bus No.:_			
Date	(s) and time(s) of the o	ccurrence(s):		
Brief	description of the perso	on(s) (i.e. gender, race, heig	yht, etc.):	
	ion IV: t type of harm or discrir	ninatory action was taken a	gainst you?	
	Accommodation	☐ Hostile environment	☐ Service	☐ Other
				f "Other," please specify
				010

<b>Section VI:</b> Describe the harm you feel you suffered and how the person(s) you named above are responsible.
Did anyone witness the harm or discrimination you suffered? ☐ No ☐ Yes
If "Yes," please indicate who and what they witnessed.
Section VI: What remedy would you like STC to consider?
Section VII: Have you filed this complaint with any other federal, state or local agency or with any federal or state court? □ No □ Yes
If yes, please provide the contact information at the agency/court where the complaint was filed.
Agency:
Contact Name:Telephone:
Address:
City, State & Zip Code:
Have you previously filed a Title VI complaint with STC? ☐ No ☐ Yes 9   P a g e

If yes, please describe the complaint.					
Please attach any written material or other inform complaint.	nation that you think is relevant to your				
I affirm that the information contained in this doc knowledge, information and belief.	ument is true and accurate to the best of my				
Complainant's Signature	Date:				

Please mail this form to: Human Resource Manager Senior Transportation Connection 4735 W 150 St. Ste A Cleveland OH 44135

### TITLE VI TRANSIT-RELATED INVESTIGATIONS, COMPLAINTS AND LAWSUITS

There have been no Title VI transit related investigations, complaints or lawsuits processed through STC.

### Discrimination Complaint Reporting Requirements

STC has a documented process to complete and investigate any complaint of discrimination for vendors, customers and employees. Upon completion of the Discrimination Complaint Form, the human resources director promptly initiates an investigation. Results are presented to the executive director for review and final decision. Investigations and decisions are completed within 90 days of filing. Policies, forms and procedures area available to the public by request.

All STC vehicles and facilities have notices posted describing how to file a discrimination complaint. Notice is also posted on the STC website. The personnel manual includes a non-discrimination statement and description of the process. The topic is covered in new employee orientation. STC public presentations focus upon our inclusion of all eligible consumers when providing transportation services.

As a subcontractor for Greater Cleveland Regional Transit Authority(GCRTA), STC is monitored for Title VI compliance. The STC Affirmative Action Plan and procedures were reviewed by GCRTA and updated in 2017, with no deficiencies noted. The Title VI program was prepared in 2019 and will be reviewed every 3 years.

### STC LANGUAGE ASSISTANCE PLAN

STC Policies permit passengers to register a personal care assistant (PCA) when needed for communication purposes such as limited English proficiency, when appropriate. Registered PCAs ride at no cost to the passenger.

STC participates in regional transit collaboration through the local metropolitan planning organization called NOACA (Northern Ohio Areawide Coordinating Agency). STC monitors Transit Council minutes where discussions related to transit services and funding, and is an opportunity to share best practices related to customer service and needs.

STC provides a wide array of transportation service from community routes and subcontracted Paratransit services. Making these services accessible to LEP persons provides transportation choice and is a vital service for individuals without access to personal vehicles.

In addition to transit services, STC provides service related information at public meetings and board meetings, and LEP individuals interact and able to and hiring events.

The STC reviewed its available resources that could be used for providing LEP assistance, including verbal and written Spanish translation.

### Goals and Objectives

- Comply with federal regulations by providing meaningful access to the benefits, services, information, and other important portions of STC programs and activities for individuals with limited English proficiency.
  - a. Continue to replace text with pictograms or universal icons
  - b. Notify LEP populations the availability of free translation and interpretation of important documents upon request.
  - c. Identify service changes affecting areas with high concentrations of LEP individuals and provide translation services to public meetings.
- 2. Continue best hiring practices to encourage LEP individuals to apply for open positions at the STC
  - a. Continue work with El Barrio Training Center to encourage Hispanic population to apply for available positions within the STC

### Primary Target Audience

Based on the GCRTA analysis, Spanish as the only group with enough LEP speakers to warrant specific writing requirements. As STC is approaching the threshold of the Safe Harbor Act, we are preparing by identifying the following services that have yet to be implemented in our service.

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### **Program Elements**

- Survey Customer Service staff and representatives yearly to identify the number of LEP customers' encounters.
- Additional Training
- Enhance training programs and plan dissemination to employees who may encounter a LEP customers.
- Provide information on the Title VI Policy and LEP responsibilities to employees.
- Description of language assistance services offered to the public.
- Use of interpreter service provider's language identification cards.
- Documentation of language assistance requests.
- How to handle a potential Title VI/LEP complaint.
- 2. Improve website design to include easier accessibility for Spanish information and translation.
- 3. Review customer service documents to have Spanish information easy to locate.

Monitoring and Updating the LEP Plan

In review of the current STC services and customer interaction points, STC has identified several opportunities to obtain information on a more continual basis regarding interactions with LEP individuals.

### **PUBLIC PARTICIPATION PLAN**

It is the policy of STC to encourage public involvement and participation in the decision-making process regarding issues impacting the organization's customers, including but not limited to service reductions and fare modifications. STC has established a public involvement process to ensure minority, low-income and LEP populations are engaged through public outreach and involvement activities.

STC Board of Directors meets bi-monthly. All meetings of the Board, except executive sessions held for purposes required or permitted by law, are open to the public and no person is excluded from any meeting. Time is provided for the public to comment on any issue at each meeting. The STC maintains a list of persons and organizations that wish to receive information from the STC.

### **Outreach Efforts**

STC solicits comment and customer feedback from interested parties related to major decisions impacting services and fares.

- Public comment and participation is solicited in a number of ways, including:
- Public Hearings and/or Community Meetings
- · Comments received via the STC website
- · Social media: Facebook and Twitter

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- STC Passenger Advisory Committee
- · Direct communications with elected officials and community leaders
- Emails to public comment mailbox

### **Non-Elected Committee Membership**

The Passenger Advisory Committee (PAC) consists of representatives selected from public and private agencies, consumer groups, interested individuals, caregivers of STC passengers, and users of STC services The PAC is group of volunteers that meet quarterly to discuss relevant issues pertaining to the operations of STC. Nine (9) members have been nominated directly communities and organizations served by STC.

Members of the PAC work to increase citizens' participation in community activities and involve the public in transit decision-making.

Passenger Advisory Committee Composition by Gender/Ethnicity				
African American Male	1			
African American Female	3			
Hispanic Female	1			
White Male	1			
White Female 1				
Total Members	9			

### **Board Meeting Documentation**

In accordance to the FTA C 4702.1B, it is required that STC include in the Title VI Update a copy of board meeting minutes, resolution, and other appropriate documentation showing the board of directors reviewed and approved the Title VI Program. The Executive Committee approved the plan in September 2019 and the full board approved on November 20, 2019.

### **Senior Transportation Connection (STC) Board Minutes**

### Senior Transportation Connection

### Minutes of the Board of Directors Meeting

November 20, 2019

### NOACA

Board Chair Julie Rittenhouse called the meeting to order at 12:35 p.m.

Board members present were Mitch Balk, Jackie Chavez-Anderson, Jeri Chaikin, Joe Cicero, Lois Goodman, Mary McNamara, Eric Martin, Barbara Zaas- Partington, Dale Nowak, Stacey O'Brien, Honorable Patrick Ward, Karen Webb, Dwayne Brake, Barbara Zaas Partington, LaJean Ray.

Also present were Janice Dzigiel, Executive Director, Ed Eucker, Director of Operations, James Hailey, Director of Finance, Catherine Ciha, Director of Development, and Marti Pytel, Director of Call Center.

The first item of business was the approval of the minutes for the July 17, board meeting and the September 21, 2019 finance and executive committee meeting. A motion to approve the minutes was made and seconded and was unanimously approved by the board members present.

Mayor Ward asked James Hailey to review the Finance Committee conference call from November 15. James reviewed the 5310 reimbursement payment, expected revenue from the City of Cleveland, and 2020 budget and contract negotiations. The goal is to increase billable rates by 3% and up to \$33 per trip. He reviewed year-end assumptions for 2019 with a projection of a \$220,000 deficit. Effective contract negotiations are critical to the sustainability of STC moving forward. MS. Chaikin noted that there must financial equity across the communities served by STC.

Mayor Ward noted that the 990 had been reviewed and approved by the Finance Committee, and had been submitted within the required time line.

Mrs. Goodman reported on behalf of the Operations Committee. She noted the committee reviewed the advertising strategies and revenue goals for 2019. On behalf of the committee, she expressed appreciation for the gift of \$200,000 from the Mt. Sinai Health Care Foundation.

Janice gave a brief report from the Board Development/Nominating Committee. She encouraged members to review membership terms, and indicate if they were interested in continuing service. She thanked Steve Wertheim for his service on the board.

Ms. Ciha indicated that we were still advocating with Cuyahoga County support for 2020-2021. She reported that grants in process include the Cleveland Foundation; Mt. Sinai Health Care Foundation and the McGregor Foundation. The annual appeal is in process with a goal of 100% board participation. She noted that is the board raises \$15,000 by the end of the year, it would be matched by and additional \$5,000 grant.

Ms. Rittenhouse expressed her appreciation to the board members that attended the Cuyahoga County Council meeting on September 21. She stated that that the committee noticed the level of commitment of STC board members. She also stressed the importance of board members making personal contributions to STC. It sends a strong message to other philanthropic supporters that the board supports the mission of the organization.

Ms. Dzigiel reported that she has engaged a Human Resource consultant to review roles and responsibilities and make recommendations regarding the functionality of human resources. Ms. Dzigiel asked that if contacted, you take the time to speak with her.

Ms. Dzigiel noted that STC staff would be meeting with departmental representatives of the City of Cleveland Community Development Department in early December, and with Councilman Blain Griffin of Cleveland City Council. The purpose of the meetings is to explain STC operations and discuss increasing contract rates for services in the City.

Ms. Dzigiel shared the insurance renewal rates for 2020, which had a minimal increase in price.

She noted that the executive committee had approved the Title VI program, which was required by FTA/RTA. The program outlines the process for handling complaints of discrimination by STC customers. Ms. Rittenhouse asked for a motion to approve, which was seconded and unanimously approved by the board members present.

There was no new business, or old business. The meeting adjourned at 1:30 p.m.

### **Board Meeting Policy Decision Documentation**

In accordance to the FTA C 4702.1B, it is required to include in the Title VI Update, a copy of board meeting minutes, resolution, and other appropriate documentation showing the board of trustees reviewed and approved the Title VI Program. The following information consist of the:

- The Title VI Board Presentation
- Resolution No. 2016-119: Approving the 2020 Title VI Program Update
- Staff Summary & Comments: Approving the 2020 Title VI Program Update
- Board Meeting Minutes

### **Title VI Board Presentation**

Pages 51 - 71

### Resolution

### **Staff Summary**

# **Board Meeting Minutes**

### Fare and Service Equity Analysis

# Fare Equity Analysis for Proposed Fare Increase Prepared in Conformance to FTA Circular 4702.1B, Appendix K, Item (2) Submitted to the RTA Board of Trustees, May 2016

GCRTA has briefly and clearly stated its policy to determine when a "disparate impact" occurs in the contexts of fare changes. In particular, GCRTA has developed policy thresholds (in terms of absolute numbers or proportions) for identifying disparate impacts.

The Greater Cleveland Regional Transit Authority (GCRTA) briefly and clearly stated its policy to determine "disparate impact" in Resolution No. 2013-122, Exhibit C, third paragraph. It explicitly addresses the contexts, thresholds, and analysis procedure for fare changes as follows:

"Analysis procedure for fare changes: RTA will calculate the percent change in average fare for minority and non-minority riders. If the percent change for minorities exceeds the percent change for non-minorities by more than five percentage points, RTA will view that as a disparate impact on minority populations."

# GCRTA policy specifies how we engaged the public in developing our policy for measuring disparate impacts

GCRTA's Title VI Program Update submitted to the United States Department of Transportation, Federal Transit Administration on February 14<sup>th</sup>, 2014 details specific information related to engagement of the public in developing the policy for measuring disparate impacts. An overview of the information is as follows:

GCRTA incorporated reference to its public involvement activities into Resolution 2013-122 approving the policies, measures, and definitions for disparate impacts and disproportionate burden.

Specially, GCRTA released drafts of the standards and policies on October 23, 2013. Three (3) public hearings were held on November 6, 2013. Public comments were accepted by mail or email through November 23, 2013. The proposed standards and policies were discussed with GCRTA's Citizens Advisory Board (CAB) on November 14, 2013 with verbal input included as public comments. GCRTA's Committee of the Whole considered and recommended approval of the standards and policies, with further refinements, to the full Board of Trustees on December 3, 2013. The Board of Trustees approved the standards and policies, as recommended, on December 17, 2013. All meetings of CAB, Committee of the Whole, and Board of Trustees are open to the public and advertised on the website.

# GCRTA has briefly and clearly stated its disproportionate burden policy, and the policy describes how we engaged the public in developing the disproportionate burden policy

The Greater Cleveland Regional Transit Authority (GCRTA) briefly and clearly stated its policy to determine "disproportionate burden" in Resolution No. 2013-122, Exhibit D, fourth paragraph. It explicitly addresses the contexts, thresholds, and analysis procedure for fare changes as follows:

"Analysis procedure for fare changes: RTA will calculate the percent change in average fare for low-income and non-low-income riders. If the percent change for low-income riders exceeds the percent change for non-low-income riders by more than five percentage points, RTA will view that as a disproportionate burden on low-income riders."

GCRTA's Title VI Program Update submitted to the United States Department of Transportation, Federal Transit Administration on February 14<sup>th</sup>, 2014 details specific information related to engagement of the public in developing the policy for measuring disproportionate burden. An overview of the information is as follows:

GCRTA incorporated reference to its public involvement activities into Resolution 2013-122 approving the policies, measures, and definitions for disparate impacts and disproportionate burden.

Specially, GCRTA released drafts of the standards and policies on October 23, 2013. Three (3) public hearings were held on November 6, 2013. Public comments were accepted by mail or email through November 23, 2013. The proposed standards and policies were discussed with GCRTA's Citizens Advisory Board (CAB) on November 14, 2013 with verbal input included as public comments. GCRTA's Committee of the Whole considered and recommended approval of the standards and policies, with further refinements, to the full Board of Trustees on December 3, 2013. The Board of Trustees approved the standards and policies as, recommended, on December 17, 2013. All meetings of CAB, Committee of the Whole, and Board of Trustees are open to the public and advertised on the website.

GCRTA has analyzed the fare media generated from ridership surveys indicating whether minority and/or low-income riders are disproportionately more likely to use the mode of service, payment type, or fare media that would be subject to the fare increase or decrease

GCRTA conducted an onboard survey, within the past five years, and collected specific information from a sample of riders. Questions included transit mode of service, fare media usage/payment type, race, and income. Utilizing this data and the resulting statistically valid data, GCRTA built a model to analyze current minority, low-income, non-minority, and non-low-income riders weighted average fare per trip. A weighted average was used to account for data irregularities and ensure a fair, accurate account of fare media usage and impact by race and income.

This model has allowed GCRTA to estimate average cost per trip to the rider. Analysis of the survey results has produced the following information:

- In order of estimated usage, combining fare type by category, <u>non-minority riders</u> are most likely to use a Monthly Pass, All Day Pass, Cash fare, Weekly Pass, and then Farecard.
- In order of estimated usage, combining fare type by category, minority riders are most likely to use a Weekly Pass, All Day Pass, Cash fare, Monthly Pass, and then Farecard.
- In order of estimated usage, combining fare type by category, <u>non-low-income riders</u> are most likely to use a Weekly Pass, All Day Pass, Monthly Pass, Cash Fare, and then Farecard.
- In order of estimated usage, <u>low income riders</u> are most likely to use an All Day Pass, Weekly Pass, Cash Fare, Monthly Pass, and then Farecard.

Usage gives GCRTA the picture necessary to ensure that minority and low-income riders are not disproportionally affected by a fare change (increase or decrease). The model accounts for the variance in usage by minority, low-income, non-minority, and non-low-income. Equity is established when analyzing fare changes. GCRTA has been considering fare increases to take

effect in 2016 and 2018. These proposed increases are applied equitably across all fare media and analyzed by the model to ensure GCRTA policy compliance with Title VI.

GCRTA has determined the number and percent of users of each fare media proposed for increase or decrease:

- Analysis includes a profile of fare usage by group- minority, low-income, and overall ridership-as shown below
- If the proposed changes would only affect certain fare media, the analysis should address whether focusing changes on those fare media may lead to a disparate impact or disproportionate burden

GCRTA's working fare model contain a detailed review of the number of users of each fare media and impacts that will occur with a fare change (increase or decrease). The working models include a profile of fare usage by group: minority, low-income, non-minority, and non-low income. If the proposed changes would only affect certain fare media, the model addresses whether these changes may lead to a disparate impact or disproportionate burden.

Tables 1 through 4 are excerpts from the GCRTA working fare model. These tables detail the number and percent of users of each fare media. This information is built into the working model for accurate estimation of the impacts of any fare change. The percent change from current weighted average fare to proposed weighted average fare is calculated for minority, non-minority, low-income, and non-low-income.

Table 1 details number of Minority and Non-Minority Daily trips

Table 2 details Percent usage by Minority and Non-Minority Status by Fare Media Type

Table 3 details number of Low-Income and Non-Low-Income Daily trips

Table 4 details Percent usage by Low-Income and Non-Low-Income Status by Fare Media Type

### **Minority and Non-Minority Riders**

Total Trips from On Board Survey

Non-Minority					
	Bus/Rapid	Senior/ Disabled*	Park-N-Ride	Student	TOTAL
Monthly Pass	3,935	650	725	N/A	5,310
Weekly Pass	3,363	349	24	N/A	3,735
All Day Pass	3,996	914	N/A	47	4,957
Farecard	1,591	182	764	231	2,768
Cash Fare	3,981	472	259	82	4,793
TOTALS	16,866	2,567	1,771	360	21,564

Minority					
	Bus/Rapid	Senior/ Disabled*	Park-N-Ride	Student	TOTAL
Monthly Pass	8,054	1,204	169	N/A	9,427
Weekly Pass	23,741	1,146	13	N/A	24,899
All Day Pass	21,174	2,069	N/A	808	24,050
Farecard	1,577	128	31	4,454	6,190
Cash Fare	11,780	1,003	31	445	13,259
TOTALS	66,326	5,549	243	5,706	77,825
*Includes Accomp	anied Children A	All Day			
N/A designates th	at that combinati	ion of fare media does n	ot exist	•	

Table 1- Minority & Non-Minority Daily Trips

Percent of Total Trips by Fare Media

Non-Minority					
_	Bus/Rapid	Senior/Disabled*	Park-N-Ride	Student	TOTAL
Monthly Pass	18%	3%	3%	N/A	25%
Weekly Pass	16%	2%	0.1%	N/A	17%
All Day Pass	19%	4%	N/A	0.2%	23%
Farecard	7%	1%	4%	1%	13%
Cash Fare	18%	2%	1%	0.4%	22%
TOTALS	78%	12%	8%	2%	100%

Minority					
	Bus/Rapid	Senior/Disabled*	Park-N-Ride	Student	TOTAL
Monthly Pass	10%	2%	0.2%	N/A	12%
Weekly Pass	31%	1%	0.02%	N/A	32%
All Day Pass	27%	3%	N/A	1%	31%
Farecard	2%	0.2%	0.04%	6%	8%
Cash Fare	15%	1%	0.04%	1%	17%
TOTALS	85%	7%	0.3%	7%	100%
*Includes Accompa	anied Children A	ll Day			

N/A designates that that combination of fare media does not exist

Table 2- Percent usage by Minority/Non-Minority Status by Fare Media Type

### **Low Income and Non-Low-Income**

Total Trips from On Board Survey

Non-Low Income	)				
	Bus/Rapid	Senior/Disabled*	Park-N-Ride	Student	TOTAL
Monthly Pass	6,800	487	828	N/A	8,116
Weekly Pass	8,615	302	28	N/A	8,945
All Day Pass	7,394	519	N/A	303	8,216
Farecard	1,996	93	632	1,406	4,128
Cash Fare	5,786	298	265	94	6,443
TOTALS	30,591	1,700	1,754	1,803	35,848

Low Income					
	Bus/Rapid	Senior/Disabled*	Park-N-Ride	Student	TOTAL
Monthly Pass	4,636	1,286	65	N/A	5,987
Weekly Pass	17,583	1,152	8	N/A	18,744
All Day Pass	16,523	2,286	N/A	451	19,260
Farecard	1,038	217	71	2,686	4,011
Cash Fare	9,201	1,074	25	351	10,651
TOTALS	48,982	6,015	169	3,488	58,654

<sup>\*</sup>Includes Accompanied Children All Day

N/A designates that that combination of fare media does not exist Table 3 Low-Income & Non-Low-Income Daily Trips

### Percent of Total Trips by Fare Media

Non-Low Income	е				
	Bus/Rapid	Senior/ Disabled*	Park-N-Ride	Student	TOTAL
Monthly Pass	19%	1%	2%	N/A	23%
Weekly Pass	24%	1%	0.1%	N/A	25%
All Day Pass	21%	1%	N/A	1%	23%
Farecard	6%	0.3%	2%	4%	12%
Cash Fare	16%	1%	1%	0.3%	18%
TOTALS	85%	5%	5%	5%	100%

Low Income					
	Bus/Rapid	Senior/ Disabled*	Park-N-Ride	Student	TOTAL
Monthly Pass	8%	2%	0.1%	N/A	10%
Weekly Pass	30%	2%	0.01%	N/A	32%
All Day Pass	28%	4%	N/A	1%	33%
Farecard	2%	0.4%	0.1%	5%	7%
Cash Fare	16%	2%	0.04%	1%	18%
TOTALS	84%	10%	0.3%	6%	100%

<sup>\*</sup>Includes Accompanied Children All Day

### GCRTA has clearly depicted the information in tabular format.

 The tables depict the fare media comparing the existing cost, the percent change, and the usage of minority groups as compared to overall usage and low-income groups as compared to overall usage. GCRTA has clearly analyzed fare media for minority groups distinct from low-income

Tables 1 and 2, above, depict the usage and percent usage of fare media by minority groups as compared to non-minority groups. Tables 3 and 4, above, depict the usage and percent usage of fare media by low-income persons as compared to non-low-income persons.

GCRTA's fare analysis model is structured to include GCRTA's current and proposed fares and generate a weighted average fare based on the trips occurring as calculated from the onboard survey. This gives a baseline of what the weighted average fare is for a rider (broken out by minority/non-minority and low-income/non-low-income status).

GCRTA's disparate impact policy compliance is analyzed through the following calculation:

- (A) Calculate percent change for weighted average fare of non-minority group
- (B) Calculate percent change for weighted average fare of minority group
- Subtract (A) from (B) to determine the number of percentage points by which (B) exceeds (A)
- If (B) exceeds (A) by more than 5 percentage points, this is a disparate impact. If not, there is no disparate impact.

GCRTA's disproportionate burden policy compliance is analyzed through the following calculation:

- (A) Calculate percent change for weighted average fare of non-low-income group
- (B) Calculate percent change for weighted average fare of low-income group
- Subtract (A) from (B) to determine the number of percentage points by which (B) exceeds (A)

N/A designates that that combination of fare media does not exist

Table 4- Percent usage by Low-Income/Non-Low-Income Status by Fare Media Type

• If (B) exceeds (A) by more than 5 percentage points, this is a disproportionate burden. If not, there is no disproportionate burden.

Figures 1 – 4 were created to explicitly show fare media comparing existing cost and percent change for minority, non-minority, low-income, and non-low-income groups. Figures 1 and 2 detail a 2016 fare increase proposal comparison against existing fares and provides analysis of existing cost, percent change, and GCRTA policy compliance. Figures 3 and 4 detail a 2018 fare increase proposal comparison against existing fares and provides analysis of existing cost, percent change, and GCRTA policy compliance. GCRTA has clearly analyzed fare media for minority groups (Figures 1 and 3) distinct from low income (Figures 2 and 4).

# Title VI Compliance- August 2016 Fare Increase

### Title VI- Non-Minority v. Minority

### Disparate Impact

if the percent change for minorities exceeds the percent change for non-minorities by more than five (5) percentage points

Current Fares				
		Senior/		
	Bus/Rapid	Disabled	Park-N-Ride	Student
Monthly Pass	\$85.00	\$38.00	\$95.00	\$0.00
Weekly Pass	\$22.50	\$10.00	\$25.00	\$0.00
All Day Pass	\$5.00	\$2.50	\$5.00	\$4.00
Farecard (per trip)	\$2.25	\$1.00	\$2.50	\$1.50
Cash Fare	\$2.25	\$1.00	\$2.50	\$1.50

Current Non-Minority Weighted Average Fare \$2.00
Current Minority Weighted Average Fare \$1.98

Proposed				
		Senior/	Park-N-	
	Bus/Rapid	Disabled	Ride	Student
Monthly Pass	\$95.00	\$48.00	\$105.00	\$0.00
Weekly Pass	\$25.00	\$12.50	\$27.50	\$0.00
All Day Pass	\$5.50	\$2.75	\$5.50	\$4.50
Farecard (per trip)	\$2.50	\$1.25	\$2.75	\$1.75
Cash Fare	\$2.50	\$1.25	\$2.75	\$1.75

Proposed Non-Minority Weighted Average Fare \$2.23 Proposed Minority Weighted Average Fare \$2.21

(A) Percent Change Non-Minority 11.46%
(B) Percent Change Minority 11.41%
Percentage Points by which B exceeds A -0.05

If greater than 5.0, GCRTA defines this as a disparate impact.

If 5.0 or less than 5.0, GCRTA defines this as having NO disparate impact

Figure 1- Proposed 2016 Fare Increase Impact Minority/Non-Minority

### Title VI- Non-Low Income v. Low Income

### Disproportionate Burden

if the percent change for low-income riders exceeds the percent change for non low-income riders by more than five (5) percentage points

Current Fares				
		Senior/		
	Bus/Rapid	Disabled	Park-N-Ride	Student
Monthly Pass	\$85.00	\$38.00	\$95.00	\$0.00
Weekly Pass	\$22.50	\$10.00	\$25.00	\$0.00
All Day Pass	\$5.00	\$2.50	\$5.00	\$4.00
Farecard (per trip)	\$2.25	\$1.00	\$2.50	\$1.50
Cash Fare	\$2.25	\$1.00	\$2.50	\$1.50

Current Non-Low Income Weighted Average Fare \$2.03
Current Low Income Weighted Average Fare \$1.97

Proposed				
		Senior/	Park-N-	
	Bus/Rapid	Disabled	Ride	Student
Monthly Pass	\$95.00	\$48.00	\$105.00	\$0.00
Weekly Pass	\$25.00	\$12.50	\$27.50	\$0.00
All Day Pass	\$5.50	\$2.75	\$5.50	\$4.50
Farecard (per trip)	\$2.50	\$1.25	\$2.75	\$1.75
Cash Fare	\$2.50	\$1.25	\$2.75	\$1.75

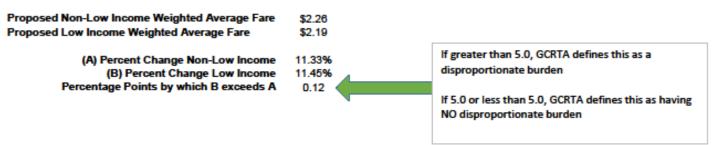


Figure 2- Proposed 2016 Fare Increase Impact Low-Income/Non-Low-Income

# Title VI Compliance- August 2018 Fare Increase

### Title VI- Non-Minority v. Minority

### Disparate Impact

if the percent change for minorities exceeds the percent change for non-minorities by more than five (5) percentage points

Current Fares				
		Senior/		
	Bus/Rapid	Disabled	Park-N-Ride	Student
Monthly Pass	\$85.00	\$38.00	\$95.00	\$0.00
Weekly Pass	\$22.50	\$10.00	\$25.00	\$0.00
All Day Pass	\$5.00	\$2.50	\$5.00	\$4.00
Farecard (per trip)	\$2.25	\$1.00	\$2.50	\$1.50
Cash Fare	\$2.25	\$1.00	\$2.50	\$1.50

Current Non-Minority Weighted Average Fare \$2.00
Current Minority Weighted Average Fare \$1.98

Proposed				
		Senior/	Park-N-	
	Bus/Rapid	Disabled	Ride	Student
Monthly Pass	\$105.00	\$51.00	\$120.00	\$0.00
Weekly Pass	\$27.50	\$13.50	\$32.50	\$0.00
All Day Pass	\$6.00	\$3.00	\$6.00	\$5.00
Farecard (per trip)	\$2.75	\$1.35	\$3,25	\$2.00
Cash Fare	\$2.75	\$1.35	\$3.25	\$2.00

23.15%

22.50%

Proposed Non-Minority Weighted Average Fare \$2.48 Proposed Minority Weighted Average Fare \$2.43

> (A) Percent Change Non-Minority (B) Percent Change Minority Percentage Points by which B exceeds A

If greater than 5.0, GCRTA defines this as a disparate impact.

If 5.0 or less than 5.0, GCRTA defines this as having NO disparate impact

### Title VI- Non-Low Income v. Low Income

### Disproportionate Burden

if the percent change for low-income riders exceeds the percent change for non low-income riders by more than five (5) percentage points

Current Fares				
		Senior/		
	Bus/Rapid	Disabled	Park-N-Ride	Student
Monthly Pass	\$85.00	\$38.00	\$95.00	\$0.00
Weekly Pass	\$22.50	\$10.00	\$25.00	\$0.00
All Day Pass	\$5.00	\$2.50	\$5.00	\$4.00
Farecard (per trip)	\$2.25	\$1.00	\$2.50	\$1.50
Cash Fare	\$2.25	\$1.00	\$2.50	\$1.50

Current Non-Low Income Weighted Average Fare \$2.03
Current Low Income Weighted Average Fare \$1.97

Proposed				
		Senior/	Park-N-	
	Bus/Rapid	Disabled	Ride	Student
Monthly Pass	\$105.00	\$51.00	\$120.00	\$0.00
Weekly Pass	\$27.50	\$13.50	\$32.50	\$0.00
All Day Pass	\$6.00	\$3.00	\$6.00	\$5.00
Farecard (per trip)	\$2.75	\$1.35	\$3,25	\$2.00
Cash Fare	\$2.75	\$1.35	\$3.25	\$2.00

Proposed Non-Low Income Weighted Average Fare
Proposed Low Income Weighted Average Fare

(A) Percent Change Non-Low Income
(B) Percent Change Low Income
Percentage Points by which B exceeds A

(B) Percent Change Low Income
Percentage Points by which B exceeds A

(B) Percent Change Low Income
Percentage Points by which B exceeds A

(B) Percent Change Low Income
(B)

Figure 4- Proposed 2018 Fare Increase Impact Low-Income/Non-Low-Income

### GCRTA has compared the differences in impacts between minority users and overall users

GCRTA has compared the percentage point difference between a fare increase for minority and non-minority users.

GCRTA has compared the differences in impacts between low-income users and overall users

GCRTA has compared the percentage point difference between a fare increase for low-income and non-low-income users.

GCRTA has analyzed any alternative transit modes, fare payment types, or fare media available for people affected by the fare change

- Analysis compared the fares paid by the proposed changes with fares that would be paid through available alternatives
- Analysis shows whether vendors that distribute/sell the fare media are located in areas that would be convenient to impacted populations

GCRTA's fare analysis, presented above, compared current fares to proposed fares with all alternative fare payment methods including cash and pre-paid fare media.

Figure 5 illustrates the location of vendors that distribute/sell fare media for GCRTA and the location of minority populations by census tract. Figure 6 illustrates the location of vendors that distribute/sell fare media for GCRTA and the location of low-income populations by census tract.

As can be seen in the Figures 5 and 6, availability of fare media for purchase is located in areas that would be convenient to all populations. GCRTA's distribution outlets are not skewed towards non-minority or non-low-income groups. Additionally, all GCRTA buses utilize fareboxes that accept all fare media types. In addition, all-day passes are offered for sale at all fareboxes.

### <u>CHAPTER IV</u>

### ASSESSMENT AND MONITORING

This report's organization follows the organization of FTA Circular 4702.1B. It includes only chapters and sections applicable to transit systems, assessment and monitoring. Monitoring is based on RTA's current Title VI Standards and Policies, which were substantially updated by Board Resolution 2013-122 in December 2013, and subsequently revised in response to FTA comments by Board Resolutions 2018-31 on March 27, 2018 and 2018-72 on July 24, 2018.

# PROGRAM SPECIFIC REQUIREMENTS AND GUIDELINES FOR RECIPIENTS SERVING LARGE URBANIZED AREAS

### **Demographic and Service Profile Maps and Charts**

See the following files (transmitted to FTA digitally):

- Map of Interstate Highways, Arterials, and Major Streets
- Map of Cuyahoga County Census Tracts
- Map of 2018 GCRTA Levels of Service
- Map of Percent Minority Population by Census Tract
- Map of Low-Income Population by Census Tract
- Map of Low-Income & Below Poverty population by Census Tract
- Map of Minority, Below Poverty, and Low-Income Census
- Map of GCRTA Service Availability
- Map of GCRTA Transit Facilities
- Map of Distribution of Transit Amenities (Shelter Locations)
- Map of Location of Fare Media Distribution by Census Tract
- Map of Service Quality Supervisory Work Zones
- Table identifying each tract with its minority/non-minority and low-income/non low-income composition, with tracts highlighted that exceed Cuyahoga County average for both categories. (GCRTA Tracts ACS 2017)

### Requirement to Set Service Standards and Policies

The Title VI Standards and Policies mentioned above are directly related to Title VI. Specific standard and policies for Vehicle Load, Vehicle Headway (Service Frequency), Vehicle Assignment, On Time Performance, Transit Amenities, can be found in the attached copy of that document.

### **Assessment of Compliance**

(a) Establish Procedures: After each decennial census, RTA analyzes census tracts in its service area (Cuyahoga County). RTA designates a tract as "MINLOW" if it meets **either or both** of the following criteria:

- The minority population percentage of the tract exceeds that of the county.
- The low-income population percentage of the tract exceeds that of the county.

A tract that meets **neither** of the above criteria is designated "NONMINLOW"

- (b) Establish procedures: Annually, RTA staff classifies routes into two categories according to areas served. RTA classifies a route as MINLOW if at least 1/3 of the route is located in a MINLOW census tract; otherwise the route is classified as NONMINLOW. The RTA staff compares the number of vehicle trips, vehicle miles, and vehicle hours by route category to ensure that minority and/or low-income areas are getting their fair share of service.
  - Establish internal guidelines: RTA's internal guidelines are presented in section IV of RTA's Title VI Program Update, January 2020.
- (c) Evaluate system-wide service changes: Any time RTA plans a significant system-wide service change, RTA will use the procedure in IV.3.7 (4) (a) above to determine whether the plan is discriminatory. If so, RTA will not implement the plan. A significant service change is one that increases or decreases total annual vehicle revenue miles by at least 10 percent.
- (d) Conduct compliance assessments: Every three years RTA will assess its service for Title VI compliance in a manner similar to that presented in this document.
- (e) Take action on findings: RTA will take action on any findings made by FTA or by RTA's Manager of EEO/ADA Programs.

### Other Areas of Title VI Considerations

### **Changes in Service Features**

RTA's service planning document is the Service Management Plan (SMP), which is prepared annually. The 2020 Service Management Plan is attached. It calls for no significant service changes in 2020, and none occurred in the time frame covered by this report.

### Information Dissemination

Methods used to inform minority, low-income and LEP (communities of service changes (e.g. public notices, public hearings, other formal and informal public discussions, presentations, meeting, etc.) are as follows:

- Public notices published in local newspapers including those with significant Minority community readership.
- Informational flyers pertaining to hearings or meeting are sent to local community development groups, educational institutions, public officials, senior citizen organizations, churches community groups, and libraries throughout the metropolitan area.

- Flyers or Rider's Alerts are posted on RTA buses and rapid cars, and press releases are sent to all print and electronic media.
- Special attention is given to affected service areas.

Service change information is also mailed out to local community service organizations, governmental offices, and in the case of major changes, public hearings are held in the neighborhoods affected. Information community meetings are also scheduled. Please see the LEP Communication Plan for more details.

# **Meaningful Access to LEP Persons**

Please reference the Meaningful Access to LEP Persons Communication Plan for more detailed information. Information is provided to the Hispanic population with the assistance of our Hispanic Community Relations Specialist. The Specialist translates as needed to provide two way communication between the Hispanic Community and RTA. RTA also employs staff in the Telephone Information Center (Call Center) who speak Spanish, and RTA translates key documents into Spanish.

# CHAPTER V

# MONITORING PROCEDURES FOR TRANSIT PROVIDERS

# Requirement for Transit Providers

The Service Planning Section operates with Title VI considerations as basic criteria of service development. Care is given to ensure Title VI compliance when service changes are made. The Senior Manager of EEO/ADA Programs is informed of service change proposals that require public involvement pursuant to RTA's Service Policy.

# Level of Service Methodology

# **Vehicle Load**

Overloads are investigated and corrected on a case-by-case basis. Reviewing 2018 complaints, RTA does not have a persistent or chronic overload problem. Vehicle load issues are reported to RTA Management via drivers, supervisors, service monitors, scheduling committee members and customers through website, phone calls, email, written and walk-in reports. The following table summarizes customer complaints related to overcrowding for 2018.

Customer Complaints regarding Overcrowding in 2018

Items	
Overcrowding	34
Total Complaints	5,328
Overcrowding Complaints as a Percentage of Total Complaints	0.64%
Ridership	35,001,993
One Overcrowding complaint for every rides	1,029,470

On average RTA receives one overcrowding complaint for every 1,029,470 rides.

The RTA staff has verified the absence of an overcrowding problem by reviewing maximum passenger loads on trips sampled for the National Transit Database. For each route, the average of the observed maximum passenger loads was calculated. Each route was classified as either MINLOW or NONMINLOW as described in Section IV.3.7.b. The average maximum load of all routes in the MINLOW category and NONMINLOW category were averaged. Both averages are less than 15 passengers. These low averages are consistent with the absence of an overcrowding problem in minority and low-income areas.

# **Vehicle Assignment**

As stated in RTA's Service Code, newer buses have lower per-mile maintenance costs and shall therefore be assigned to higher mileage blocks. Care shall be taken to maintain compliance with Title VI (nondiscrimination) regulations. Coincidently, high mileage blocks serve minority and low-income areas.

However, to measure whether RTA vehicle assignments comply with Title VI, RTA sampled eight dates in 2018, as shown in the following table:

Date	Day	Quarter
January 10, 2018	Wednesday	1
March 1, 2018	Thursday	1
April 10, 2018	Tuesday	2
June 19, 2018	Tuesday	2
August 23, 2018	Thursday	3
September 18, 2018	Tuesday	3

October 29, 2018	Monday	4	Randomly Selected
November 30, 2018	Friday	4	Dates

All pull-out sheets and vehicle assignments by date and garage were extracted from HASTUS daily bus dispatch database. As described in Section IV.3.7.b, all routes were categorized as either MINLOW or NONMINLOW. As shown in the table, buses serving MINLOW routes are newer, on average, than those serving NONMINLOW routes.

## Vehicle Assignment

Route Category	Average Age
MINLOW	8.45
NONMINLOW	13.11

For more detail, see the "GCRTA Vehicle Assignment by Route 2018" file included with this report.

## **Vehicle Headway**

All routes in the minority and low-income service area comply with RTA's headway policy. All routes are reviewed and investigated further in response to customer complaints, suggestions, and comments.

Each route was classified as either MINLOW or NONMINLOW as described in Section IV.3.7.b. An average headway for each category was calculated. As indicated in the following table, MINLOW routes have shorter (i.e. better) average headways than NONMINLOW routes. This is true during peak and off-peak time periods.

#### Average Vehicle Headways

Route	Headways	
Category	Peak	Midday
MINLOW	24	36
NONMINLOW	36	54

(Schedules effective November 2018)

For more detail, see the "GCRTA Vehicle Headway by Route 2018" file included with this report.

#### **On-Time Performance**

RTA on-time performance metrics are outlined in the Service Code. As described in Section IV.3.7.b, all routes were categorized as either MINLOW or NONMINLOW. As shown in the table below, on-time performance on MINLOW routes averages better than NONMINLOW routes, and GCRTA as a whole.

2018 Annual On-time Performance

Route Category	Percent On-time
MINLOW	80.32%
NONMINLOW	77.49%
All GCRTA	79.96%

For more detail, see the "GCRTA On-Time Performance 2018" file included with this report.

#### **Distribution of Transit Amenities**

See Transit Amenities map file included with this report. Shelter concentration is higher in MINLOW areas than NONMINLOW areas.

# **Service Availability**

See Service Availability map. It shows a ¾ mile radius around each transit stop. As shown, an insignificant fraction of MINLOW areas are not within ¾ mile of a stop, while a significant fraction of NONMINLOW areas are more than ¾ mile from a stop.

# **Service Quality Supervisory Work Zones**

See Map of Service Quality Supervisory Work Zones. The work zones show no inequality in design of the zones.

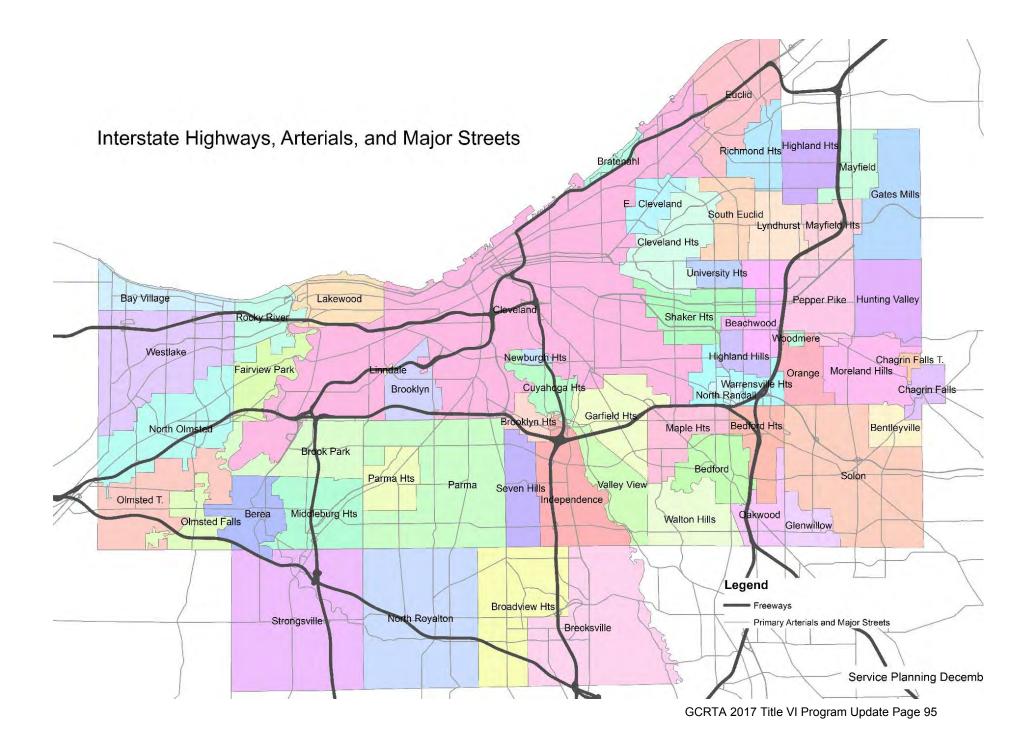
#### **List of Attachments**

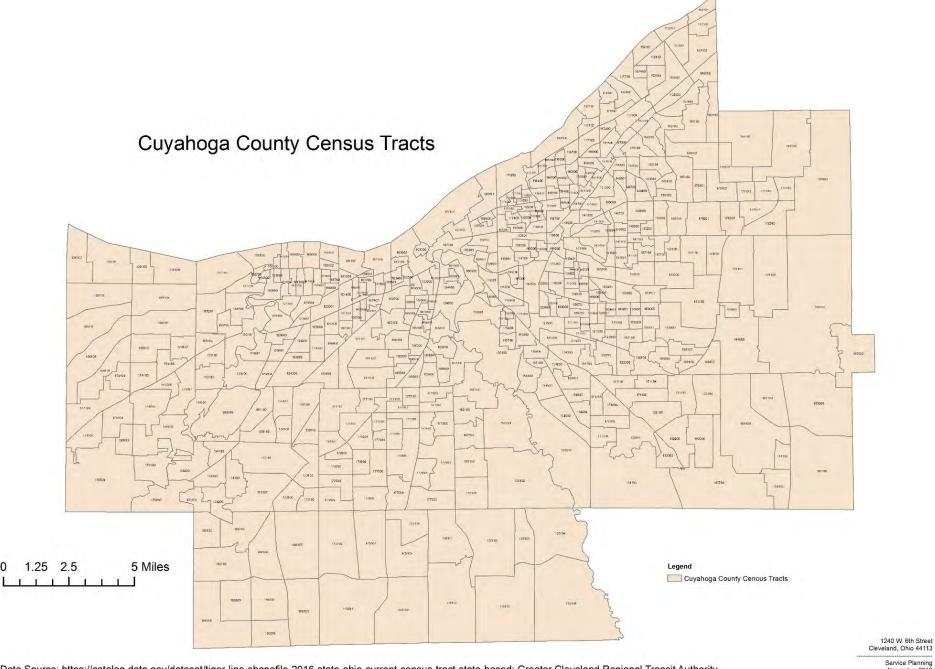
#### A. Maps

- 1. Map of Interstate Highways, Arterials, and Major Streets
- 2. Map of Cuyahoga County Census Tracts
- 3. Map of 2018 GCRTA Levels of Service
- 4. Map of Percent Minority Population by Census Tract
- 5. Map of Low-Income Population by Census Tract
- 6. Map of Low-Income & Below Poverty population by Census Tract
- 7. Map of Minority, Below Poverty, and Low-Income Census
- 8. Map of GCRTA Service Availability
- 9. Map of GCRTA Transit Facilities
- 10. Map of Distribution of Transit Amenities (Shelter Locations)
- 11. Map of Location of Fare Media Distribution by Census Tract
- 12. Map of Service Quality Supervisory Work Zones

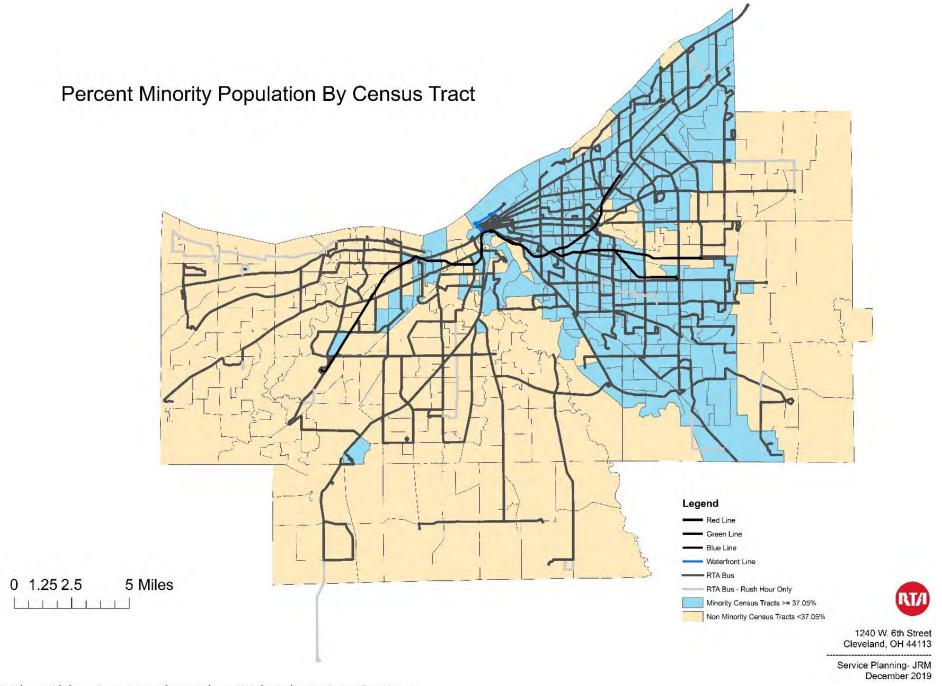
#### B. Documents

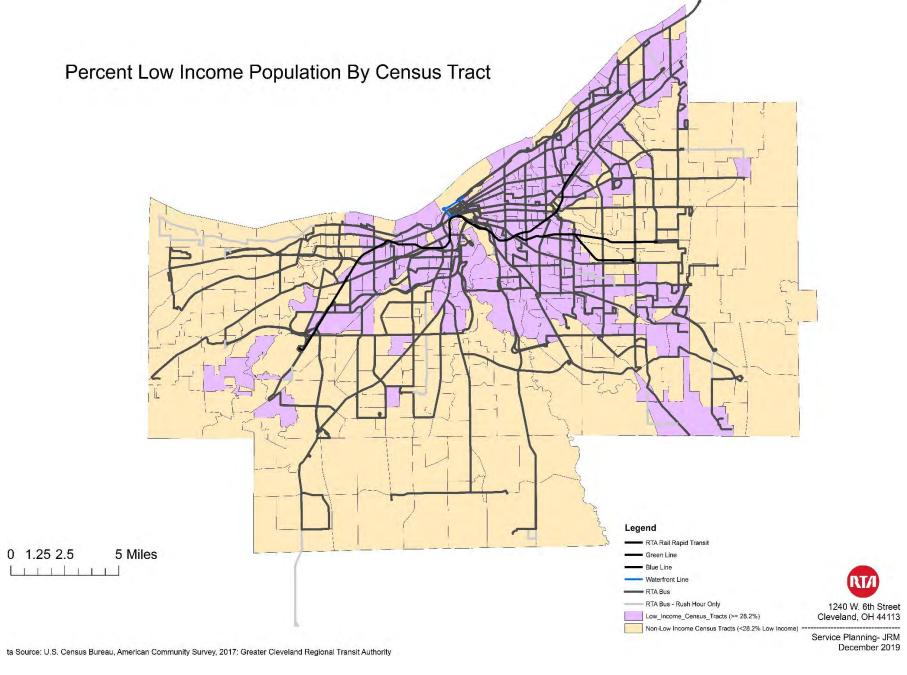
- 1. GCRTA Services code (July 2018)
- 2. Resolution 2013-122 Revised Title VI Policies
- 3. Resolution No. 2017-58 Repealing Chapters 1010, 1014, 1016, 1018, 1020,1022,1062, and 1078 of the Codified Rules and regulations of the Greater Cleveland Regional Transit Authority and Enacting a New Service Code
- 4. Resolution 2018-031 Amending Section 1013.04(Service availability for each mode)
- 5. Resolution 2018-072 Amending Section 1013.04 (Service Availability)
- 6. 2020 Service Management Plan (2020 SMP)
- 7. Table identifying each tract with its minority/non-minority and low-income/non low-income composition, with tracts highlighted that exceed Cuyahoga County average for both categories. (GCRTA Tracts ACS 2017)
- 8. GCRTA Vehicle Assignment by Route 2018
- 9. GCRTA Vehicle Headway by Route 2018
- 10. GCRTA On-Time Performance 2018

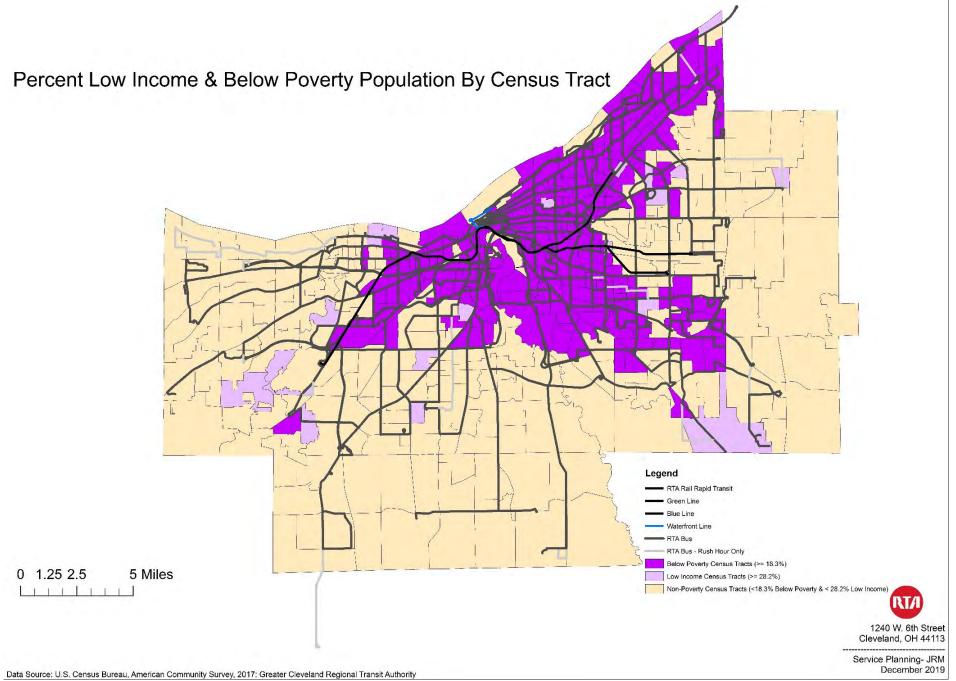


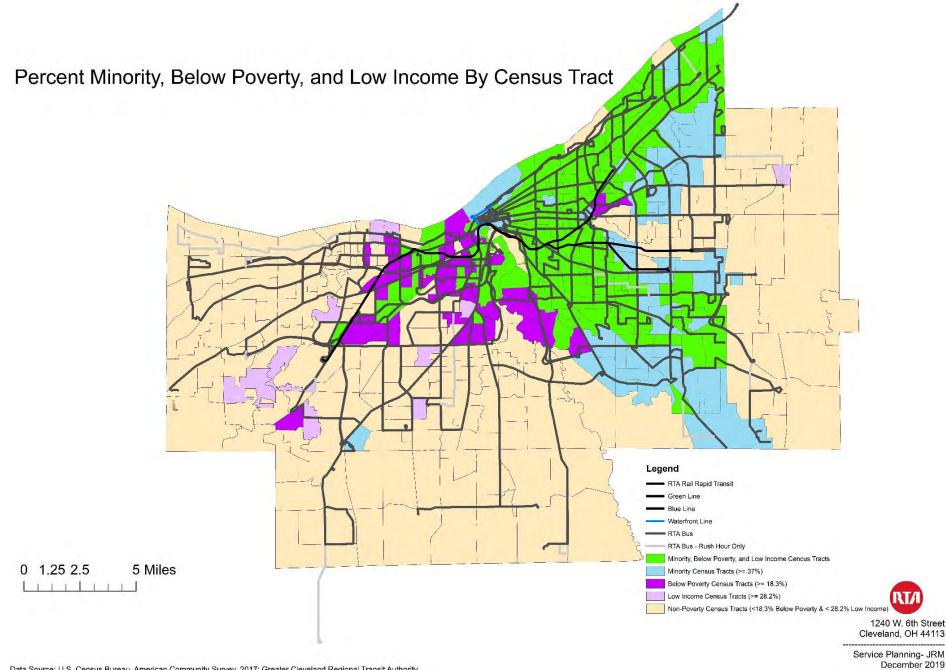


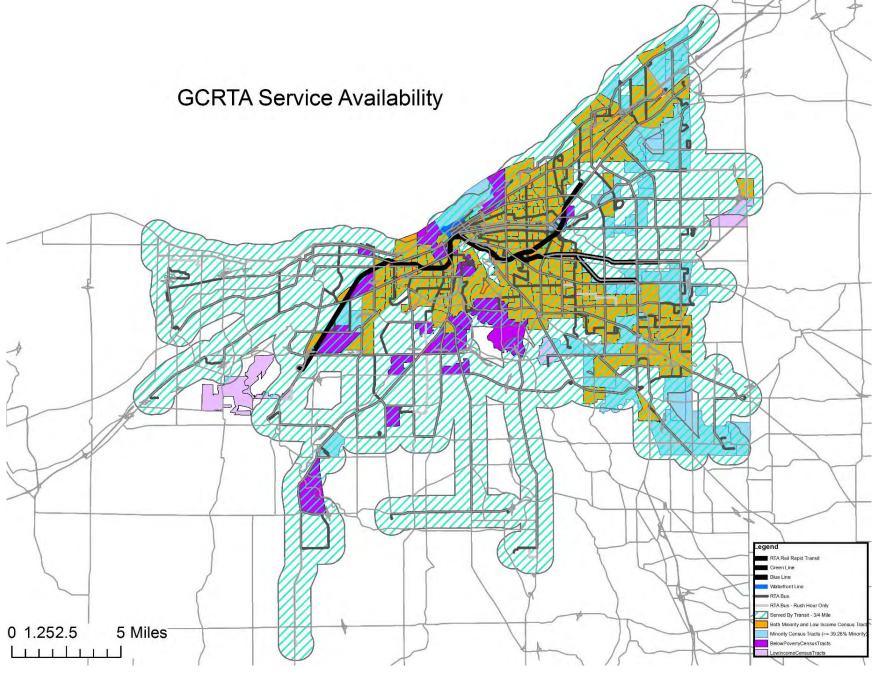




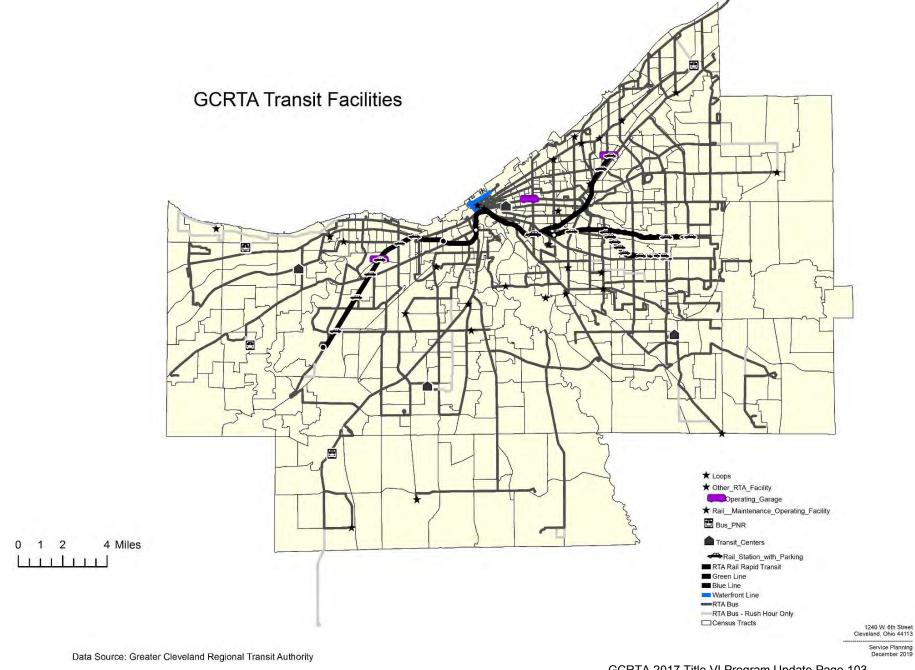




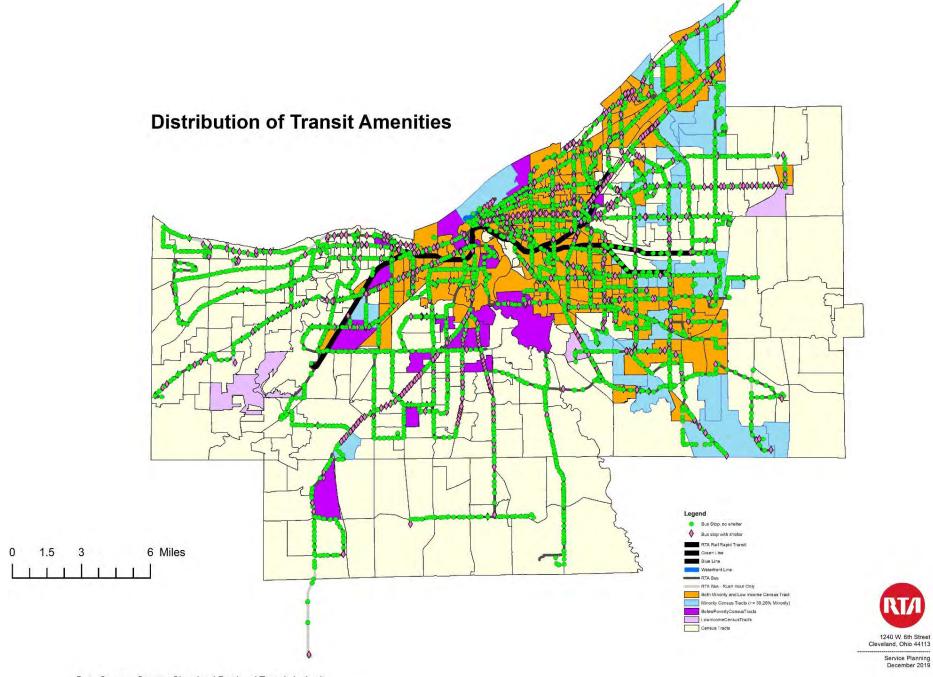


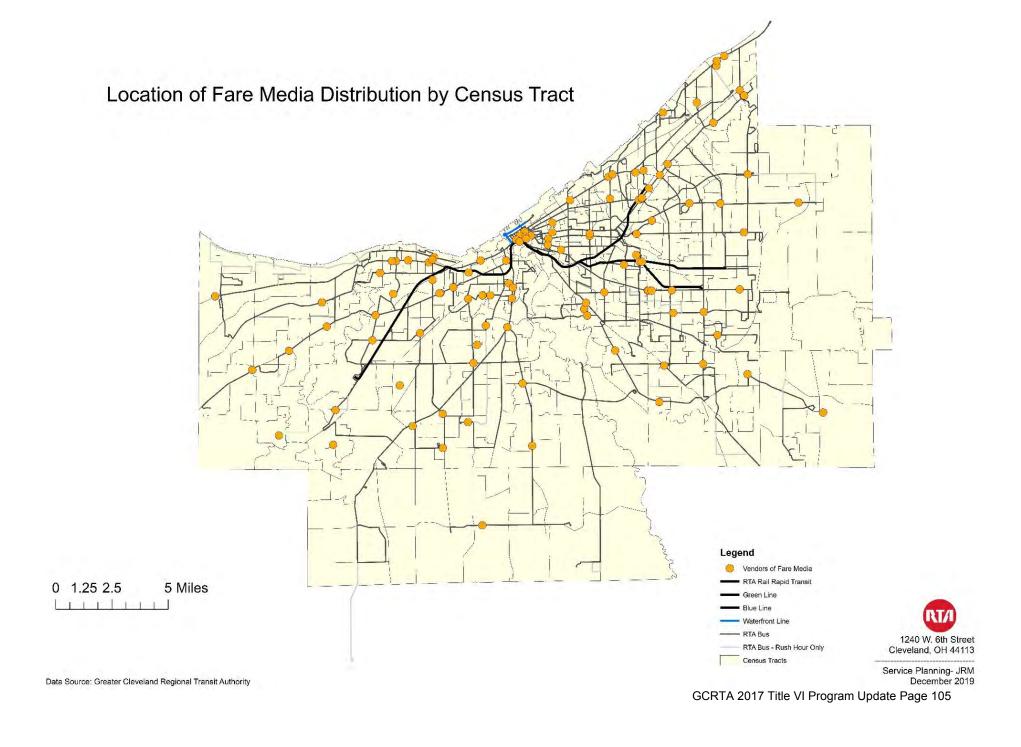


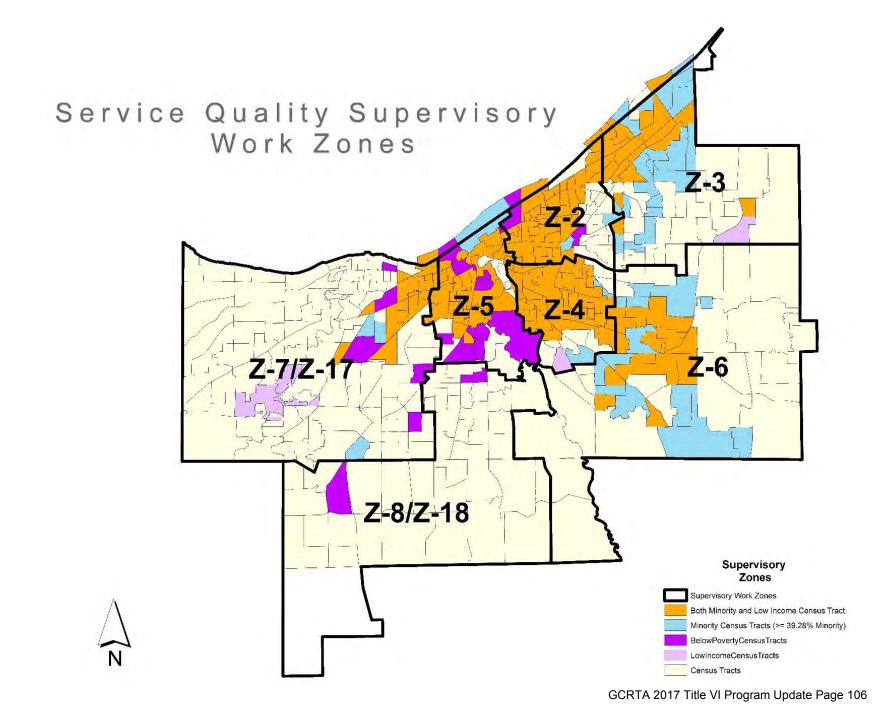
GCRTA 2017 Title VI Program Update Page 102



GCRTA 2017 Title VI Program Update Page 103







# **ATTACHMENTS**

# Attachment A - Title VI Signage in English and Spanish

#### Rights Under Title VI Greater Cleveland Regional Transit Authority (GCRTA)

GCRTA operates its programs and services without regards 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 GCRTA's Office of Equal Opportunity.

GCRTA is committed to providing equality of opportunity for employees, customers, and vendors and to complying with all appropriate Federal and State laws, rules and regulations pertaining to the treatment of minorities, women, disabled persons, and veterans in all facets of the Authority's activities. Any person who believes she or he has been discriminated against based on any unlawful discriminatory practices may file a complaint with GCRTA.

For more information on GCRTA's civil rights program or to file a complaint :

- · Call (216) 356-3085
- Go to RideRTA.com/oeo/ Download the complaint form and mail it to:

GCRTA, 1240 West 6th Street Cleveland, Ohio 44113-1331 Attn: Office of Equal Opportunity

 Come to our administrative office located at

> 1240 West 6th Street, Cleveland, Ohio 44113-1331 and request a complaint form.

 If information is needed in another (anguage call (216) 356-3085)

#### Derechos bajo Título VI Greater Cleveland Regional Transit Authority (GCRTA)

GCHTA opera sus programas y servicios sin distinción de raza, color y origen nacional de acuerdo con el Titulo VI de la Ley de Derechos Civiles.

Cualquier persona que crea que ha sido perjudicada por alguna práctica discriminatoria ilegal bajo el Titulo VI puede presentar una queja ante la Oficina de Igualdad de Oportunidades de GCRTA.

GCRTA se compromete a brindar igualdad de oportunidades a los empleados, clientes y proveedores y cumplir con todas las leyes, normas y reglamentos federales y estatales correspondientes al tratamiento de minorias, mujeres, personas discapacitadas y veteranos en todas las facetas de las actividades de la Autoridad. Cualquier persona que crea que ha sido discriminada en base a prácticas discriminatorias ilegales puede presentar una queia ante GCRTA.

Para obtener más información sobre el programa de derechos civiles de GCRTA o para presentar una queja:

- Liame al (216) 356-3085
- Página de internet a RideRTA.com/oeo y descargue el archivo de queja y envielo por correo a:

GCRTA, 1240 West 6th Street Cleveland, Ohio 44113-1302 A la atención de: Office of Equal Opportunity

 Venga a nuestra oficina administrativa ubicada en

> 1240 West 6th Street, Cleveland, Ohio 44113-1302 y solicite un formulario de queja.

 Si se necesita información en otro idioma, llame al (216) 356-3085.

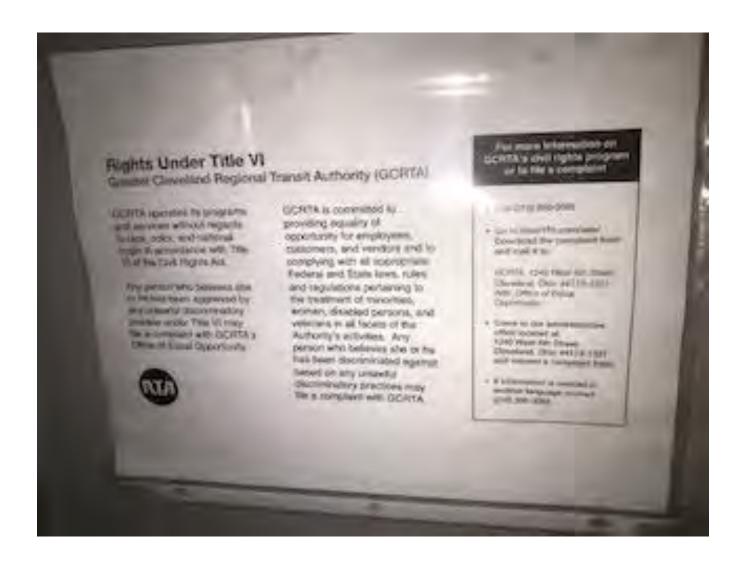
# Attachment B - Notice to the Public



# Attachment C – STC Title VI Posted Signage 1



# Attachment D - STC Title VI Posted Signage 2



# **Attachment E – Services Code, including the Service Management Plan**

Greater Cleveland Regional Transit Authority

# **Services Code**

Cross References	1
CHAPTER 1010 General Provisions & Definitions	1
Purpose	1
Definitions	1
Chapter 1011 Route Network Design	2
1011.02 Bus Stop Policy	2
Chapter 1012 Service Management	3
Monitoring of Service Utilization & Productivity	3
Service Management Plan	3
Public Involvement Requirements for Service Changes	4
Chapter 1013 Service Standards	4
Vehicle Load For Each Mode	4
Vehicle Headway For Each Mode	5
On-Time Performance	5
Service Availability	6
Chapter 1014 Service Policies	6
Transit Amenities	6
Vehicle Assignment	6
Disparate Impact	7
Disproportionate Burden	7
Facilities	8

#### **CROSS REFERENCES**

# **Chapter 1010 General Provisions & Definitions**

Purpose

The purposes of this service policy are:

To establish guidance for public transit service operation including network design, implementation, and monitoring; and

To ensure resources are utilized efficiently and produce the greatest value for the service area.

**Definitions** 

As used in this service policy:

Adverse Effect: a major geographical or time-based change in service which may include, but is not limited to, span of service changes, frequency changes, route segment extension or elimination, route alignment changes, increase or decrease in headways, or route creation or elimination.

Block: daily operation assignment of a bus.

Community Meeting: a publicized meeting, accessible via public transit, open to the public, and held within an Americans with Disabilities Act accessible meeting room for the purpose of gathering comments on a transit-related proposal. The requirements of Chapter 214 Public Hearing Process do not apply.

Facility: any Authority-owned building.

Fare change: increase or decrease in the price of service.

Fixed route: a transit route that is scheduled to operate over a specific alignment.

Headway: time interval between vehicles moving along the same road or track in the same direction.

Major Service Change: service change that increases or decreases total vehicle-miles of service by 10% or more.

Maximum load point: the location along a transit line where the greatest vehicle loads occur.

Rush Hours: the weekday hours from 6:00 to 9:00 a.m. and 3:00 to 6:00 p.m.

Public Hearing: a community meeting that meets all requirements of Chapter 214 Public Hearing Process.

Route deviation: a scheduled exception to the normal fixed route of a bus line in order to serve a specific activity center.

Page 1 of 8

Revised by Resolution 2018-072 Approved July 24, 2018 Span of Service: number of hours and days when service operates.

# **Chapter 1011 Route Network Design**

Objectives

The objectives of the Authority's route network design are:

To maximize bus/rail interface opportunities;

To minimize route duplication;

Two-way service on a street is desirable;

Service should utilize the most direct routing possible;

Deviations should not be considered unless there is a compelling reason such as a major activity generator.

Benefits of such deviations must outweigh disadvantages to passengers.

Factors to be considered include percentage of passengers benefiting from the deviation, the amount of time to make the deviation, and the additional costs.

It is not appropriate to deviate into private development sites, except at a route terminus.

Route length should be limited by the ability to keep service operating on schedule; and

To the extent possible, schedules will be coordinated to facilitate transfers.

**Bus Stop Policy** 

Safety of customers and vehicles is the highest priority for bus stop placement, including relocating an existing bus stop or establishing a new bus stop.

Topography, vehicular traffic, land use, pedestrian activity, and street conditions will be considered in the placement of bus stops.

Bus stop spacing will seek a balance between customer preferences for a reasonably fast trip on the bus and a reasonably short walk to/from a bus stop.

Bus stop establishment, relocation, and removal will be at the discretion of the Authority for the betterment of its customers.

Bus stops are to be located close to signalized intersections and crosswalks when possible.

The CEO, General Manager/Secretary-Treasurer shall implement and publicize specific standards and guidelines for bus stops to implement this policy

## **Chapter 1012 Service Management**

Monitoring of Service Utilization & Productivity

The CEO, General Manager/Secretary-Treasurer will monitor the utilization (ridership), productivity (boardings per bus/train hour), and overall network performance of bus and rail services at least annually.

To provide fair comparisons of bus route performance, bus routes are compared with other routes in the same category of service:

Radial - routes that travel to and from downtown (excluding Park-N-Ride);

Crosstown - routes that run entirely outside of downtown;

Park-N-Ride - routes that operate on freeways between downtown and Park-N- Ride lots;

Trolley - routes that operate a local service traveling entirely within a small, dense area.

Service Management Plan

An annual service management plan ("Plan") will be submitted to the Board.

The Plan will describe changes to fixed-route transit service that the Authority plans to implement within the next fiscal year.

The Plan will contain, at minimum, the following sections:

Current Plans for Service

Bus Route Performance Summary by Route Category

Bus Routes in the Bottom Quartile of Their Route Category

Routes that perform in the bottom quartile of their route category will be analyzed for the following potential actions:

Schedule adjustments

Service span adjustments

Alignment changes

Route discontinuance or consolidation with another route

Seeking outside funding opportunities

Public Involvement Requirements for Service Changes

A public hearing shall be conducted when the Authority is considering a service frequency reduction if the frequency being considered is less than the policy standard in

1013.02 Vehicle Headway For Each Mode.

When considering a permanent removal of all rail service during any time period from a rail station, the following requirements apply:

A public hearing shall be conducted if the time period is longer than 2 hours.

Either a public hearing or a community meeting shall be conducted if the time period is longer than 1 hour.

When considering a permanent removal of all fixed-route transit service during any time period from a road segment, the following requirements apply:

A public hearing shall be conducted if the time period is longer than 2 hours and the road segment is longer than 1 mile.

Either a public hearing or a community meeting shall be conducted if the time period is longer than 1 hour and the road segment is longer than 1/2 mile.

Public involvement is not required for construction-related service changes, or for changes to special event or seasonal services, non-fixed route services, and subsidized services.

Any service can be discontinued or changed within 13 months of implementation without public involvement.

The Authority recognizes that a series of small service reductions, each not requiring a public hearing, can have the effect of a single large service reduction that requires a public hearing. Therefore, to determine whether a public hearing is required, the contemplated change on a street segment or at a rail station shall be combined with all other changes made on that street segment or at that rail station since the more recent of two dates:

The date one year before the effective date of the contemplated change; or

The date of the last public-hearing-supported change.

A public hearing will be conducted in accordance with Chapter 214 for changes to service standards and/or policies not addressed above.

#### **Chapter 1013 Service Standards**

Vehicle Load For Each Mode

Adherence to the maximum load standards in the table below shall be monitored as follows:

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Passengers are counted at the point on the route where most trips carry the highest load.

Passenger loads are averaged for 30-minute intervals during rush hours and 60- minute intervals during other time periods.

If one trip has an unusually high load, it shall be excluded from the average.

MAXIMUM LOAD STANDARDS		
SERVICE TYPE	RUSH HOURS	NON-RUSH HOURS
Park-N-Ride	54-63	49-57
Regular Bus (approx. 40-ft.)	54	44
Trolley (approx 30-35 ft.)	36	36
Heavy Rail (per car)	142	117
Light Rail (per car)	132	108
Articulated bus (approx 60 ft.)	80	65

Vehicle Headway For Each Mode

Service frequency is based on ridership, but, during each time period that a route operates, the minimum number of trips per hour per direction will be as follows:

To maintain service coverage with limited resources, the Authority may make an exception to the minimums shown above. The Authority will conduct a public hearing before initiating such an exception.

On-Time Performance

The following standard applies to all modes:

A trip is deemed "late" if it arrives or departs more than 5 minutes after the scheduled time.

A trip is deemed "early" if it departs before the scheduled time.

A trip is deemed "on-time" if it is neither "late" nor "early" as defined above.

The long-term goal is 100% "on time"; the near-term goal is 80% on-time.

Transit service availability is critical for providing access to jobs, education, medical care and other activities and opportunities necessary for quality of life.

<sup>\* =</sup> Does not apply to minor branches and special services

#### Service Availability

ADA-certified residents who live within  $\frac{3}{4}$  mile of bus or rapid transit service can use complementary Paratransit service to access all other areas served by regular transit routes.

Ideally, 365-day bus or rapid transit service should be located near every Cuyahoga County resident. Rapid transit service includes rail and bus rapid transit service.

Resource limitations and low-density settlement patterns currently preclude realization of the ideal.

The Authority will provide 365-day public transit service within  $\frac{3}{4}$  mile of **at least** 60 percent of Cuyahoga County residents. Public transit service is any transit service open to the general public, including bus, rail and bus rapid transit service.

## **Chapter 1014 Service Policies**

#### **Transit Amenities**

The Authority seeks to provide seating and shelter at bus stops and rail stations if sufficient space is available and 50 or more daily riders are expected to use the shelter. The Authority considers a canopy to be one form of passenger shelter. The Authority installs and services waste receptacles only on Authority property. Each municipality decides whether to install and service waste receptacles in the public right-of-way.

On Rail/BRT, printed and/or digital service information is attached to walls and shelters if they exist; digital displays are provided at busier stations. On bus routes, printed and/or digital service information is provided at transit centers and Park-N-Ride lots.

Elevators will be installed and maintained to the extent required by the Americans with Disabilities Act. Existing escalators will remain in service unless they become cost- prohibitive to maintain.

#### Vehicle Assignment

**Euclid Corridor vehicles** are specially designed for use on the HealthLine with its combination of left-side and right-side stations. These buses may not be utilized on any other route.

**Standard articulated buses** must be assigned to routes whose schedules have been built for high-capacity buses.

**Over-the-road buses** have narrow aisles, lack rear doors and are not well suited to regular transit routes where passengers board and alight at the same stop. These vehicles shall be assigned exclusively to Park-N-Ride routes.

**Trolleys** may be assigned only to the designated trolley services. These vehicles carry the "Trolley" brand and will create passenger confusion if utilized on other services.

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**Standard transit buses** shall be assigned to all other routes based on block mileage. Newer buses have lower per-mile maintenance costs and shall therefore be assigned to higher mileage blocks. Care shall be taken to maintain compliance with Title VI (non- discrimination) regulations.

#### Disparate Impact

When considering a fare change and/or major service change, the Authority will conduct a fare and/or service equity analysis. If the fare and/or service equity analysis demonstrates a disparate impact on minority populations, the Authority will revise its plan and reanalyze impacts until analysis shows that the alternative(s) would not have a disparate impact.

Should the impact of any fare change cause the percent change in average fare for minority populations to exceed the percent change in average fare for non-minority populations by more than five (5) percentage points, that impact will be considered a disparate impact.

Should the impact of any major service change require the minority population to bear adverse effects more than ten (10) percentage points greater than those adverse effects borne by the non-minority population, that impact will be considered a disparate impact.

If no alternative can be found that would not have a disparate impact on minority populations, then the Authority may implement the least discriminatory alternative only if:

The Authority has a substantial legitimate justification for the proposed fare and/or service change, and

The Authority can show that there are no alternatives that would have a less disparate impact on minority riders but would still accomplish the Authority's legitimate program goal.

# Disproportionate Burden

When considering a fare change and/or major service change, the Authority will conduct a fare and/or service equity analysis.

For the purpose of this policy, the Authority will include in the "low-income" category any person whose median household income is at or below the U.S. Department of Health and Human Services ("HHS") poverty guidelines and everyone whose total household income is less than \$25,000.

The Authority will periodically reconsider the \$25,000 threshold because of the effects of inflation.

Should the impact of any fare change cause the percent change in the average fare for low-income populations to exceed the percent change in the average fare for non-low-income populations by more than five (5) percentage points, that burden will be considered a disproportionate burden.

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Revised by Resolution 2018-072 Approved July 24, 2018 Should the impact of any major service change require a low-income population to bear adverse effects more than ten (10) percentage points greater than those adverse effects borne by the non-low-income population, that burden will be considered a disproportionate burden.

If the fare and/or service equity analysis demonstrates a disproportionate burden borne by low-income riders, the Authority will describe alternatives and will avoid, minimize, or mitigate impacts where practicable.

#### **Facilities**

When making decisions about facilities, the Authority will:

Comply with Title VI of the Civil Rights Act of 1964 and all other applicable laws and regulations.

Comply with the National Environmental Policy Act, 42 U.S.C. §4321 et seq. and implementing regulations at 23 CFR Part 771 and with 23 CFR Part 774, Section 4(f).

Comply with Section 106 of the National Historic Preservation Act, 54 U.S.C. 300101 et seq. and implementing regulations at 36 CFR Part 800.

Evaluate the impact of facilities per Environmental Justice Executive Order 12898 (1994), DOT Order 5610.2(a) (May 2012) and FTA Circular 4703.1.

Seek to avoid negative impacts on areas and neighborhoods near the facility.

Where negative impacts cannot be avoided, the Authority will seek to mitigate such impacts.

#### Attachment F - Resolution 2013-122

#### RESOLUTION NO. 2013-122

ADOPTING POLICIES REQUIRED FOR COMPLIANCE WITH TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

WHEREAS, the Board of Trustees has been granted the power and authority, pursuant to Chapter 306 of the Ohio Revised Code, to manage and conduct the affairs of the Greater Cleveland Regional Transit Authority (GCRTA); and

WHEREAS, Title VI of the Civil Rights Act of 1964 requires GCRTA and all recipients of Federal financial assistance to operate their programs and services in a nondiscriminatory manner without regard to race, color or national origin; and

WHEREAS, the Federal Transit Administration (FTA) issued Circular 4702.1B, effective October 1, 2012, setting forth requirements and guidelines for Title VI compliance; and

WHEREAS, as set forth in the above-referenced Circular, GCRTA is required to adopt policies and definitions to determine when a fare change or major service reduction will have a disparate impact on minority populations or impose a disproportionate burden on low-income populations; and

WHEREAS, as set forth in the above-referenced Circular, GCRTA is required to adopt specific standards and policies to guide the equitable distribution of its services and facilities; and

WHEREAS, before adopting the aforementioned standards and policies, GCRTA is required to solicit and consider public comments on drafts of the standards and policies; and

WHEREAS, during the past two months, draft standards and policies were widely distributed to the RTA Citizens Advisory Committee, RTA passengers, and the public, and GCRTA has refined the draft standards and policies in response to the comments received in writing and comments received at public hearings; and

WHEREAS, on December 3, 2013, GCRTA's Committee of the Whole considered the standards and policies, along with the public comments, and referred the standards and policies, with further refinements, to the full Board of Trustees.

NOW, THEREFORE, BE IT RESOLVED by the Board of Trustees of the Greater Cleveland Regional Transit Authority:

- Section 1. The Board of Trustees, having considered the public comments, hereby adopts the standards and policies attached hereto as Exhibit A through Exhibit F.
- Section 2. The "Revised Service Policy," adopted by the Board of Trustees in May 2003 is hereby amended to conform to Exhibits E and F of this resolution.
  - Section 3. This resolution shall be effective immediately upon its adoption.

Resolution No. 2013-122 Page 2

#### Attachments:

Exhibit A: Title VI Policy

Exhibit B: Major Service Reduction Policy

Exhibit C: Disparate Impact Policy

Exhibit D: Disproportionate Burden Policy

Exhibit E: Service Standards Exhibit F: Service Policies

Adopted: December 17, 2013

President

Attest

CEO, Gen⁄eral Manager/Secretary-Treasurer

# Attachment G -Resolution 2017-058

Form 100-326 07-03-97



# Greater Cleveland Regional Transit Authority STAFF SUMMARY AND COMMENTS

TITLE/DESCRIPTION: REPEALING CHAPTERS 1010, 1014, 1016, 1018, 1020, 1022, 1062,	Resolution No.: 2017-58
AND 1078 OF THE CODIFIED RULES AND REGULATIONS OF THE GREATER CLEVELAND REGIONAL TRANSIT AUTHORITY	Date: July 13, 2017
AND ENACTING A NEW SERVICES CODE.	Initiator: Legal
ACTION REQUEST:	

- 1.0 PURPOSE/SCOPE: This resolution will repeal Chapters 1010, 1014, 1016, 1018, 1020, 1022, 1062, and 1078 and also enact Chapters 1010, 1011, 1012, 1013 and 1014 of the Codified Rules and Regulations ("Code") of the Greater Cleveland Regional Transit Authority.
- 2.0 DESCRIPTION/JUSTIFICATION: The Policies and Procedures of the Board of Trustees were codified in 1989, pursuant to Resolution 1989-176. The code book has been updated periodically. It is now time for a comprehensive review and update so that the updated Code will conform to the current structure and operations of the Authority.

A new services code is being enacted to consolidate and streamline the code, provide improved usability and match current department practices. The new code will also meet pertinent legal requirements.

- 3.0 PROCUREMENT BACKGROUND: Does not apply.
- 4.0 AFFIRMATIVE ACTION/DBE BACKGROUND: Does not apply.
- 5.0 POLICY IMPACT: Adoption of the resolution will result in a clear, accurate and current policy.
- 6.0 ECONOMIC IMPACT: Does not apply.
- 7.0 ALTERNATIVES: Not adopting this resolution. Not adopting this resolution would result in the Code remaining out of date.
- 8.0 RECOMMENDATION: It is recommended that this resolution be adopted.
- ATTACHMENTS: Redline copies of Chapters 1010, 1014, 1016, 1018, 1020, 1022, 1062, and 1078.

Recommended and certified as appropriate to the availability of funds, legal form and conformance with the Procurement requirements.

CEO, General Manager/Secretary-Treasurer

#### CHAPTER 1010

## General Provisions and Definitions

1010.01 Purpose.

1010.02 Revisions and amendments; review by Operations Committee.

1010.03 Definitions.

#### CROSS REFERENCES

Expenditure of funds in connection with acquisition of buses, bus equipment, or bus related facilities - see 49 U.S.C.A. 1602(h)

Conversion of equipment and facilities loans to grants for public transportation facilities - see 49 U.S.C.A. 1602-1

Approval of projects for acquisition, construction, and improvement of facilities and equipment, and payment of operating expenses; terms and conditions; regulations - see 49 U.S.C.A. 1604(d)

Research, development and demonstration projects - see 49 U.S.C.A. 1605

Regulation of operation of systems, rates, rentals, or other charges; compliance with undertakings - see 49 U.S.C.A. 1608(d)

Charter service - see 49 C.F.R. Part 604

School bus operations - see 49 C.F.R. Part 605

Buy America requirements - see 49 C.F.R. Part 660

Buy America requirements - Surface Transportation Assistance Act of 1982 - see 49 C.F.R. Part 661

Transfer of commuter services - see 49 C.F.R. Part 670

Service to auxiliary and reserve police - see VEH. & OP. 840.07;

SERV. Ch. 1082

Reward program for crimes involving Authority property - see VEH. & OP. Ch. 852

Modification in service - see SERV. 1022.05; Ch. 1050

Bus passenger shelter program policy - see SERV. Ch. 1062

Promotional activities - see SERV. Ch. 1066

Service outside County - see SERV. Ch. 1078

Service to activity centers - see SERV. Ch. 1080

Service to elderly and handicapped - see SERV. Ch. 1084

#### 1010.01 PURPOSE.

- (a) The purpose of this service policy (Title Two of Part Ten of these Policies and Procedures) is to establish goals, objectives, measures, standards and procedures for both the management of existing GCRTA (hereinafter referred to as the "Authority") transit services as well as the planning and implementation of new transit services. It is also intended to provide direction for Authority staff as well as to provide elected officials and the general public with a clearer understanding of how both existing and new transit services are managed.
  - (b) It is intended that this policy will accomplish the following:

- (1) Provide consistent criteria for evaluating, maintaining and improving the quality and productivity of existing transit services;
- (2) Provide guidelines for planning and developing new transit services; and
- (3) Provide objective framework for the allocation of limited service resources among existing services and new services. (Res. 2003-068. Passed 5-20-03.)

# 1010.02 REVISIONS AND AMENDMENTS; REVIEW BY OPERATIONS COMMITTEE.

- (a) The service policies delineated in this service policy shall be subject to review and revision by the Board of Trustees on an as-needed basis.
- (b) Amendments or revisions to this service policy may be initiated or proposed by any member of the Board of Trustees or by the General Manager/Secretary-Treasurer.
- (c) Proposed amendments or revisions to this service policy shall be subject to review and study by the Operations Committee of the Board of Trustees. The Operations Committee will make recommendations on any proposed amendment or revision to the Board of Trustees. The Board of Trustees must approve any amendment or revision by majority vote, as defined in the Bylaws, before such amendment or revision will become official policy of the Authority. (Res. 2003-068. Passed 5-20-03.)

#### 1010.03 DEFINITIONS.

As used in this service policy:

- (a) "Charter service." Public transportation service on an exclusive basis, rendered in a vehicle which is licensed to render that service and engaged at a single price for the trip or a period of time agreed on by the operating licensee, its agent or the chauffeur and the charter.
- (b) "Fixed route." A transit route that is scheduled to always operate over the same alignment.
- (c) "Headway." Time interval between vehicles moving along the same road or track in the same direction.
- (d) "Line-haul bus." Bus service that is designed to provide travel between various origins and destinations along a travel corridor.
- (e) "Maximum load point." The location along a transit line where the greatest vehicle loads occur.
- (f) "Park-n-ride." A procedure that permits a patron to drive a private automobile to a transit station, park in the area provided for that purpose and ride the transit system to his or her destination.
- (g) "Peak-period," or "Rush hours." The hours, generally 6:00 a.m. to 9:00 a.m. and 3:00 p.m. to 6:00 p.m. during weekdays when the demand for transportation is greatest.

- (h) "Radial route." A fixed-route bus service that extends outward from the Central Business District, or a concentrated activity center along a main arterial road.
- (i) "Route deviation." A scheduled exception to the normal fixed route of a bus line in order to serve a specific activity center.
  (Res. 2003-068. Passed 5-20-03.)

# Greater Cleveland Regional Transit Authority Services Code

#### Cross References

## CHAPTER 1010 General Provisions & Definitions

1010.01 Purpose

The purposes of this service policy are:

To establish guidance for public transit service operation including network design, implementation, and monitoring; and

To ensure resources are utilized efficiently and produce the greatest value for the service area.

#### 1010.02 Definitions

As used in this service policy:

- (a) Adverse Effect: a major geographical or time-based change in service which may include, but is not limited to, span of service changes, frequency changes, route segment extension or elimination, route alignment changes, increase or decrease in headways, or route creation or elimination.
- (b) Block: daily operation assignment of a bus.
- (c) Community Meeting: a publicized meeting, accessible via public transit, open to the public, and held within an Americans with Disabilities Act accessible meeting room for the purpose of gathering comments on a transit-related proposal. The requirements of Chapter 214 Public Hearing Process do not apply.
- (d) Facility: any Authority-owned building.
- (e) Fare change: increase or decrease in the price of service.
- (f) Fixed route: a transit route that is scheduled to operate over a specific alignment.
- (g) Headway: time interval between vehicles moving along the same road or track in the same direction.
- (h) Major Service Change: service change that increases or decreases total vehicle-miles of service by 10% or more.
- (i) Maximum load point: the location along a transit line where the greatest vehicle loads occur.
- (j) Rush Hours: the weekday hours from 6:00 to 9:00 a.m. and 3:00 to 6:00 p.m.
- (k) Public Hearing: a community meeting that meets all requirements of Chapter 214 Public Hearing Process.
- (I) Route deviation: a scheduled exception to the normal fixed route of a bus line in order to serve a specific activity center.
- (m)Span of Service: number of hours and days when service operates.

## Chapter 1011 Route Network Design

## 1011.01 Objectives

The objectives of the Authority's route network design are:

- (a) To maximize bus/rail interface opportunities;
- (b) To minimize route duplication:
- (c) Two-way service on a street is desirable;
- (d) Service should utilize the most direct routing possible;
  - (1) Deviations should not be considered unless there is a compelling reason such as a major activity generator.
    - i. Benefits of such deviations must outweigh disadvantages to passengers.
    - ii. Factors to be considered include percentage of passengers benefiting from the deviation, the amount of time to make the deviation, and the additional costs.
  - (2) It is not appropriate to deviate into private development sites, except at a route terminus.
- (e) Route length should be limited by the ability to keep service operating on schedule; and
- (f) To the extent possible, schedules will be coordinated to facilitate transfers.

## 1011.02 Bus Stop Policy

- (a) Safety of customers and vehicles is the highest priority for bus stop placement, including relocating an existing bus stop or establishing a new bus stop.
- (b) Topography, vehicular traffic, land use, pedestrian activity, and street conditions will be considered in the placement of bus stops.
- (c) Bus stop spacing will seek a balance between customer preferences for a reasonably fast trip on the bus and a reasonably short walk to/from a bus stop.
- (d) Bus stop establishment, relocation, and removal will be at the discretion of the Authority for the betterment of its customers.
- (e) Bus stops are to be located close to signalized intersections and crosswalks when possible.
- (f) The CEO, General Manager/Secretary-Treasurer shall implement and publicize specific standards and guidelines for bus stops to implement this policy.

## Chapter 1012 Service Management

## 1012.01 Monitoring of Service Utilization & Productivity

- (a) The CEO, General Manager/Secretary-Treasurer will monitor the utilization (ridership), productivity (boardings per bus/train hour), and overall network performance of bus and rail services at least annually.
- (b) To provide fair comparisons of bus route performance, bus routes are compared with other routes in the same category of service:
  - (1) Radial routes that travel to and from downtown (excluding Park-N-Ride);
  - (2) Crosstown routes that run entirely outside of downtown;
  - (3) Park-N-Ride routes that operate on freeways between downtown and Park-N-Ride lots:
  - (4) Trolley routes that operate a local service traveling entirely within a small, dense area.

## 1012.02 Service Management Plan

- (a) An annual service management plan ("Plan") will be submitted to the Board.
  - (1) The Plan will describe changes to fixed-route transit service that the Authority plans to implement within the next fiscal year.
  - (2) The Plan will contain, at minimum, the following sections:
    - i. Current Plans for Service
    - ii. Bus Route Performance Summary by Route Category
    - iii. Bus Routes in the Bottom Quartile of Their Route Category
- (b) Routes that perform in the bottom quartile of their route category will be analyzed for the following potential actions:
  - (1) Schedule adjustments
  - (2) Service span adjustments
  - (3) Alignment changes
  - (4) Route discontinuance or consolidation with another route
  - (5) Seeking outside funding opportunities

## 1012.03 Public Involvement Requirements for Service Changes

- (a) A public hearing shall be conducted when the Authority is considering a service frequency reduction if the frequency being considered is less than the policy standard in 1013.02 Vehicle Headway For Each Mode.
- (b) When considering a permanent removal of all rail service during any time period from a rail station, the following requirements apply:
  - (1) A public hearing shall be conducted if the time period is longer than 2 hours.
  - (2) Either a public hearing or a community meeting shall be conducted if the time period is longer than 1 hour.
- (c) When considering a permanent removal of all fixed-route transit service during any time period from a road segment, the following requirements apply:
  - (1) A public hearing shall be conducted if the time period is longer than 2 hours and the road segment is longer than 1 mile.
  - (2) Either a public hearing or a community meeting shall be conducted if the time period is longer than 1 hour and the road segment is longer than 1/2 mile.

- (d) Public involvement is not required for construction-related service changes, or for changes to special event or seasonal services, non-fixed route services, and subsidized services.
- (e) Any service can be discontinued or changed within 13 months of implementation without public involvement.
- (f) The Authority recognizes that a series of small service reductions, each not requiring a public hearing, can have the effect of a single large service reduction that requires a public hearing. Therefore, to determine whether a public hearing is required, the contemplated change on a street segment or at a rail station shall be combined with all other changes made on that street segment or at that rail station since the more recent of two dates:
  - (1) The date one year before the effective date of the contemplated change; or
  - (2) The date of the last public-hearing-supported change.
- (g) A public hearing will be conducted in accordance with Chapter 214 for changes to service standards and/or policies not addressed above.

## Chapter 1013 Service Standards

#### 1013.01 Vehicle Load For Each Mode

- (a) Adherence to the maximum load standards in the table below shall be monitored as follows:
  - (1) Passengers are counted at the point on the route where most trips carry the highest load.
  - (2) Passenger loads are averaged for 30-minute intervals during rush hours and 60-minute intervals during other time periods.
  - (3) If one trip has an unusually high load, it shall be excluded from the average.

MAXIMUM LOAD STANDARDS  Number of Passengers			
SERVICE TYPE	RUSH HOURS	NON-RUSH HOURS	
Park-N-Ride	54-63	49-57	
Regular Bus (approx. 40-ft.)	54	44	
Trolley (approx 30-35 ft.)	36	36	
Heavy Rail (per car)	142	117	
Light Rail (per car)	132	108	
Articulated bus (approx 60 ft.)	80	65	

## 1013.02 Vehicle Headway For Each Mode

Service frequency is based on ridership, but, during each time period that a route operates, the minimum number of trips per hour per direction will be as follows:

To maintain service coverage with limited resources, the Authority may make an exception to the minimums shown above. The Authority will conduct a public hearing before initiating such an exception.

#### 1013.03 On-Time Performance

- (a) The following standard applies to all modes:
  - (1) A trip is deemed "late" if it arrives or departs more than 5 minutes after the scheduled time.
  - (2) A trip is deemed "early" if it departs before the scheduled time.
  - (3) A trip is deemed "on-time" if it is neither "late" nor "early" as defined above.
- (b) The long-term goal is 100% "on time"; the near-term goal is 80% on-time.

## 1013.04 Service Availability For Each Mode

(a) Route coverage and spacing should be based on demonstrated need or potential demand (ridership).

<sup>\* =</sup> Does not apply to minor branches and special services

# Chapter 1014 Service Policies 1014.01 Transit Amenities

- (a) The Authority seeks to provide seating and shelter at bus stops and rail stations if sufficient space is available and 50 or more daily riders are expected to use the shelter. The Authority considers a canopy to be one form of passenger shelter. The Authority installs and services waste receptacles only on Authority property. Each municipality decides whether to install and service waste receptacles in the public right-of-way.
- (b) On Rail/BRT, printed and/or digital service information is attached to walls and shelters if they exist; digital displays are provided at busier stations. On bus routes, printed and/or digital service information is provided at transit centers and Park-N-Ride lots.
- (c) Elevators will be installed and maintained to the extent required by the Americans with Disabilities Act. Existing escalators will remain in service unless they become cost-prohibitive to maintain.

## 1014.02 Vehicle Assignment

- (a) **Euclid Corridor vehicles** are specially designed for use on the HealthLine with its combination of left-side and right-side stations. These buses may not be utilized on any other route.
- (b) **Standard articulated buses** must be assigned to routes whose schedules have been built for high-capacity buses.
- (c) **Over-the-road buses** have narrow aisles, lack rear doors and are not well suited to regular transit routes where passengers board and alight at the same stop. These vehicles shall be assigned exclusively to Park-N-Ride routes.
- (d) **Trolleys** may be assigned only to the designated trolley services. These vehicles carry the "Trolley" brand and will create passenger confusion if utilized on other services.
- (e) **Standard transit buses** shall be assigned to all other routes based on block mileage. Newer buses have lower per-mile maintenance costs and shall therefore be assigned to higher mileage blocks. Care shall be taken to maintain compliance with Title VI (non-discrimination) regulations.

## 1014.03 Disparate Impact

- (a) When considering a fare change and/or major service change, the Authority will conduct a fare and/or service equity analysis. If the fare and/or service equity analysis demonstrates a disparate impact on minority populations, the Authority will revise its plan and reanalyze impacts until analysis shows that the alternative(s) would not have a disparate impact.
- (b) Should the impact of any fare change cause the percent change in average fare for minority populations to exceed the percent change in average fare for non-minority populations by more than five (5) percentage points, that impact will be considered a disparate impact.
- (c) Should the impact of any major service change require the minority population to bear adverse effects more than ten (10) percentage points greater than those

- adverse effects borne by the non-minority population, that impact will be considered a disparate impact.
- (d) If no alternative can be found that would not have a disparate impact on minority populations, then the Authority may implement the least discriminatory alternative only if:
  - a. The Authority has a substantial legitimate justification for the proposed fare and/or service change, and
  - b. The Authority can show that there are no alternatives that would have a less disparate impact on minority riders but would still accomplish the Authority's legitimate program goal.

## 1014.04 Disproportionate Burden

- (a) When considering a fare change and/or major service change, the Authority will conduct a fare and/or service equity analysis.
  - (1) For the purpose of this policy, the Authority will include in the "low-income" category any person whose median household income is at or below the U.S. Department of Health and Human Services ("HHS") poverty guidelines and everyone whose total household income is less than \$25,000.
  - (2) The Authority will periodically reconsider the \$25,000 threshold because of the effects of inflation.
- (b) Should the impact of any fare change cause the percent change in the average fare for low-income populations to exceed the percent change in the average fare for non-low-income populations by more than five (5) percentage points, that burden will be considered a disproportionate burden.
- (c) Should the impact of any major service change require a low-income population to bear adverse effects more than ten (10) percentage points greater than those adverse effects borne by the non-low-income population, that burden will be considered a disproportionate burden.
- (d) If the fare and/or service equity analysis demonstrates a disproportionate burden borne by low-income riders, the Authority will describe alternatives and will avoid, minimize, or mitigate impacts where practicable.

## 1014.05 Facilities

- (a) When making decisions about facilities, the Authority will:
  - (1) Comply with Title VI of the Civil Rights Act of 1964 and all other applicable laws and regulations.
  - (2) Comply with the National Environmental Policy Act, 42 U.S.C. §4321 et seq. and implementing regulations at 23 CFR Part 771 and with 23 CFR Part 774, Section 4(f).
  - (3) Comply with Section 106 of the National Historic Preservation Act, 54 U.S.C. 300101 et seq. and implementing regulations at 36 CFR Part 800.
  - (4) Evaluate the impact of facilities per Environmental Justice Executive Order 12898 (1994), DOT Order 5610.2(a) (May 2012) and FTA Circular 4703.1.
  - (5) Seek to avoid negative impacts on areas and neighborhoods near the facility.
- (b) Where negative impacts cannot be avoided, the Authority will seek to mitigate such impacts.

#### CHAPTER 1014

#### Service Categories

1014.01 Basic categories.

1014.02 Bus services.

1014.03 Paratransit services.

1014.04 Rail services.

1014.05 Special bus or rail services.

1014.06 Charter services.

1014.07 Job access services.

#### CROSS REFERENCES

Expenditure of funds in connection with acquisition of buses, bus equipment, or bus-related facilities - see 49 U.S.C.A. 1602(h)

Conversion of equipment and facilities loans to grants for public transportation facilities—see 49 U.S.C.A. 1602-1

Approval of projects for acquisition, construction, and improvement of facilities and equipment, and payment of operating expenses; terms and conditions; regulations - see 49 U.S.C.A. 1604(d)

Research, development and demonstration projects - see 49 U.S.C.A. 1605

Regulation of operation of systems, rates, rentals, or other charges; compliance with undertakings - see 49 U.S.C.A. 1608(d)

Charter service - see 49 C.F.R. Part 604

School bus operations - see 49 C.F.R. Part 605

Buy America requirements - see 49 C.F.R. Part 660

Buy America requirements - Surface Transportation Assistance Act of 1982 - see 49 C.F.R. Part 661

Transfer of commuter services - see 49 C.F.R. Part 670

Service to auxiliary and reserve police - see VEH. & OP. 840.07; SERV. Ch. 1082

Reward program for crimes involving Authority property - see VEH. & OP. Ch. 852

Modification in service - see SERV. 1022.05; Ch. 1050

Bus passenger shelter program policy - see SERV. Ch. 1062

Promotional activities - see SERV. Ch. 1066

Service outside County - see SERV. Ch. 1078

Service to activity centers - see SERV. Ch. 1080

Service to elderly and handicapped - see SERV. Ch. 1084

#### 1014.01 BASIC CATEGORIES.

This portion of the service policy describes the categories of service that the Authority currently operates or may choose to operate in the future. These categories are based on the type of vehicle utilized and the type of routing/schedule operated. Currently, the basic service categories are bus services, paratransit services, rail

services, and special services. As it becomes desirable to do so in order to penetrate new transit markets, the Authority may establish new service categories. (Res. 2003-068. Passed 5-20-03.)

#### 1014.02 BUS SERVICES.

Bus services are currently operated using small, medium or large buses on fixed routes with fixed schedules. There are four categories of existing bus services: local/radial, express/flyer, crosstown/feeder and circulator. Another category of bus service under consideration for the future is subscription bus.

- (a) <u>Local Radial Service</u>. Local radial bus service is used to collect and distribute high turnover traffic along developed corridors radiating to and from major trip generators such as the Cleveland Central Business District or other high-density activity centers. It is characterized by frequent stops, shorter passenger trips, a higher level of base or off peak patronage, and slower bus speeds due to passenger boarding and alighting and traffic conditions.
- (b) Express/Flyer Service. Express service is used to provide fast line-haul service to major trip attractions under high peak-period ridership conditions. It generally serves suburban areas and/or park-n-ride facilities. This service is characterized by longer passenger trips, reduced levels of patron turnover, and fewer passengers per mile. There are three kinds of express bus services: arterial express, arterial and freeway flyer, and exclusive park-n-ride flyer.
  - (1) Limited stop arterial express routes (denoted by an "X") travel over regular arterial roads bypassing selected marked bus stops which are served by local service.
  - (2) Freeway flyer routes (denoted by an "F") operate their express segment on freeways rather than parallel arterial roads.
  - (3) Exclusive park-n-ride flyer routes collect the majority of their riders at designated park-n-ride lots and then operate via freeway to the Central Business District.
- (e) <u>Crosstown/Feeder Service</u>. Crosstown/feeder service is used to link routes or route segments. This type of service provides travel opportunities for patrons with dispersed trip origins and destinations. This service is characterized by patrons boarding throughout a large area and frequently transferring to another bus or to the rail to complete their trip.
- (d) <u>Community Circulator Service.</u> Community Circulator bus operations provide transportation to popular destinations within selected neighborhoods or communities. Vehicles utilized for this service are typically smaller than other bus types, often running frequently over a limited span of hours to supplement and/or complement other bus service. These routes best serve areas which have the following characteristics:
  - (1) High employment and diversified activities within a well-defined area; or

- (2) High residential density with poor access to fixed-route service and/or diversified activity centers.
- (3) Future neighborhood flexible routings and/or flexible trip patterns based on passenger trip origins and destinations in specific geographic areas are envisioned under this category of service.
- (e) <u>Downtown Loop Services</u>. <u>Downtown Loop buses collect/distribute</u> passengers along the important business/commercial streets in the Cleveland CBD. The Loop Service:
  - (1) Allows passengers to complete trips made on rail or line-haul bus routes;
  - (2) Provides internal transportation within the CBD.
- (f) <u>Special Services</u>. See section 1014.05 below. (Res. 2003-068. Passed 5-20-03.)

#### 1014.03 PARATRANSIT SERVICES.

Paratransit services are special transportation services designed to meet the needs of persons with disabilities who meet the Americans with Disabilities Act (ADA) eligibility criteria for functional mobility and eligible senior citizens. These services are typically provided with smaller vehicles and are generally operated on a demand-respective schedule (i.e., the schedule and routing may vary from day to day depending on the origins and destinations of the trips that are requested). There are two types of service provided based on the ADA Complementary Paratransit Service and eligibility guidelines.

- (a) <u>Category #1 and Category #3 Door-to-Door Service.</u> All ADA certified eustomers in categories #1 and #3 will be provided door-to-door paratransit service as follows:
  - (1) For trips of five miles or less, the service will be provided without regard to whether or not there is parallel fixed route service (three fourths of a mile from a customer's trip origin/trip destination, limited to the day and times that such fixed route service operates).
  - (2) For trips greater than five miles, the provision of paratransit service is dependent on whether or not parallel fixed-route service (three-fourths of a mile from customer's trip origin/trip destination) is available at the desired time of travel.
- (b) <u>Category #2: Call-A-Lift Service.</u> This service allows ADA-eligible individuals to call 24 hours ahead and request that an accessible bus be used on a particular fixed-route at the time the person needs to travel. (Note: once RTA's bus fleet is 100% accessible, this service category will no longer be applicable.)

(Res. 2003-068. Passed 5-20-03.)

#### 1014.04 RAIL SERVICES.

Rail services consist of the heavy-rail Red Line and the light-rail Blue and Green Lines (which includes the Waterfront Line).

- (a) The heavy-rail and light-rail services differ as to how the cars are boarded.
  - (1) The heavy-rail Red Line service is boarded from high platforms which

- are at the same height as the car floors.
- (2) The light-rail Blue and Green lines are boarded from low platforms which require climbing steps to enter the car.
- (b) The heavy and light rail services also vary as to the nature of the train operation and speed over the right-of-way.
  - (1) The heavy rail Red line is fully-grade separated right-of-way which permits it to operate at relatively high speeds between stations.
  - (2) The light-rail Blue and Green lines have three unique operating segments:
    - A. Fully-grade separated right-of-way west of Shaker Square to Tower City, which allows high-speed operations comparable to the heavy-rail service.
    - B. At-grade service in a boulevard median, with grade crossings at all cross streets (eastern termini to Shaker Square). Currently this service is subject to same traffic signals as the boulevard traffic, resulting in lower operating speeds.
    - C. Private right-of-way on the Waterfront Line alignment, from Tower City to South Harbor Station. This segment is a hybrid—from Tower City to Flats East Bank, there are signalized grade crossings; from Flats East Bank to South Harbor, the alignment is fully grade separated.

(Res. 2003-068. Passed 5-20-03.)

#### 1014.05 SPECIAL BUS OR RAIL SERVICES.

- (a) Special bus or rail services are operated for single events (e.g. Air Show, Grand Prix, etc.) or for an ongoing seasonal series of events (i.e., Cleveland Indians, Cleveland Browns or Cavalier's home games). or permanent service to a location that RTA normally would not serve. RTA normally does not provide service where, (1) service is out of Cuyahoga County or (2) a location that doesn't have enough travel demand to justify a regular bus route.
  - (b) Such special service can be instituted by:
    - (1) A sponsor willing to compensate the Authority for the difference between the cost of operating the service and the fare revenues produced by the service; or
    - (2) The Authority, in order to prevent overcrowding on regularly scheduled services, to attract additional riders or to meet a community need or interest.

(Res. 2003-068. Passed 5-20-03.)

#### 1014.06 CHARTER SERVICES.

- (a) The Authority can operate charter service.
- (b) The General Manager shall annually set charter rates that will fully recover costs.

(c) The Authority will conform to Federal Charter regulations. (Res. 2003-068. Passed 5-20-03.)

#### 1014.07 JOB ACCESS SERVICES.

- (a) This specialized service was initiated under an agreement between RTA and the Cuyahoga County Board of Commissioners, authorized by the RTA Board of Trustees in June 2002. The service will continue as long as that agreement, or a successor agreement, remains in effect.
- (b) The service carries customers to and from jobs, job interviews, and job training opportunities, when regular transit service is not reasonably available.
- (c) Vehicle trips are routinely added, deleted, and modified by the RTA staff in response to changes in customer needs and resource availability.
- (d) The service is supported largely by funds that cannot be used for general transit operations.

(Res. 2003-068. Passed 5-20-03.)

## CHAPTER 1016

#### Service Design

1016.01 Criteria and guidelines.

1016.02 Network design.

1016.03 Route design guidelines.

1016.04 Scheduling design guidelines.

1016.05 Bus stop/ passenger stops guidelines.

1016.06 Transit Center guidelines.

#### CROSS REFERENCES

Expenditure of funds in connection with acquisition of buses, bus equipment, or bus-related facilities - see 49 U.S.C.A. 1602(h)

Conversion of equipment and facilities loans to grants for public transportation facilities—see 49 U.S.C.A. 1602-1

Approval of projects for acquisition, construction, and improvement of facilities and equipment, and payment of operating expenses; terms and conditions; regulations - see 49 U.S.C.A. 1604(d)

Research, development and demonstration projects - see 49 U.S.C.A. 1605

Regulation of operation of systems, rates, rentals, or other charges; compliance with undertakings - see 49 U.S.C.A. 1608(d)

Charter service - see 49 C.F.R. Part 604

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Bus passenger shelter program policy - see SERV. Ch. 1062

Promotional activities - see SERV. Ch. 1066

Service outside County - see SERV. Ch. 1078

Service to activity centers - see SERV. Ch. 1080

Service to elderly and handicapped - see SERV. Ch. 1084

#### 1016.01 CRITERIA AND GUIDELINES.

The service design section of this service policy addresses criteria and guidelines for the route network, individual route design schedules, and route facilities of the Authority's system. These criteria and guidelines ensure that:

(a) New transit services are coordinated with the existing transit network.

- (b) New and existing services are aligned based on locations of activity centers and likely transit users.
- (c) Transit services provide the most direct and the fastest service possible, given the travel needs of the customers utilizing the service.
- (d) Service schedules are tailored to provide an attractive level of service to the target market.
- (e) Route facilities are located in a logical, orderly fashion which is at the same time responsive to the needs of customers.

  (Res. 2003-068. Passed 5-20-03.)

#### 1016.02 NETWORK DESIGN.

- (a) Route coverage and spacing should be based on demonstrated need or potential demand.
  - (b) Network design should maximize bus/rail interface opportunities.
  - (c) Line-haul bus should use arterials.
  - (d) Network design should minimize route duplication, exceptions being:
    - (1) Approach roads to CBD, rail stations, and other major trip generators.
    - (2) Community Circulators can duplicate line-haul routes when such duplication provides the most cost-effective solution to linking key trip generators.

(Res. 2003-068, Passed 5-20-03.)

#### 1016.03 ROUTE DESIGN GUIDELINES.

#### (a) Service Type.

- (1) Line-haul route (local radial, express/flyer, crosstown/feeder, and downtown loop).
  - A. Heavily-traveled corridor with many trip origins/destinations within walking distance of the main travel artery.
  - B. Passenger volumes requiring larger-capacity vehicles.
- (2) Community Circulator.
  - A. Intended for collection/distribution within a neighborhood/community.
  - B. Effective in situations where:
    - 1. There is a need for new intra-community service in a previously unserved area.
    - 2. There is a low productivity branch or segment on a line-haul route.
    - 3. There is a compelling need for an intra-community service directly linking residential with retail, institutional, and medical facilities, and it is more cost-effective to provide a dedicated service as opposed to increasing service levels on existing services.

4. Typically operated with smaller vehicles, which are more appropriate for neighborhood streets.

#### (b) Route Directness.

- (1) Two-way service on a street is desirable.
- (2) Service should utilize most direct routing possible so service is attractive.
- (3) Off-route deviations on line-haul routes should not be considered unless there is a compelling reason, such as a major activity generator. Benefits of such deviations must outweigh disadvantages to passengers. Factors to be considered include percentage of passengers benefiting from the deviation amount of time to make the deviation, and the additional costs.
- (4) It is not appropriate to deviate line-haul routes off-street to serve activity centers, except at a route terminus.
- (e) Route Length. Route length should be limited by the ability to keep service operating on schedule. (Res. 2003-068. Passed 5-20-03.)

#### 1016.04 SCHEDULING DESIGN GUIDELINES.

#### (a) Days of Service.

- (1) New bus services. Days of service are designed according to anticipated travel demand and available resources.
- (2) Existing bus services. Requests for additional days of service will be evaluated according to the route's current productivity relative to its route group, as well as the potential ridership demand for the proposed service period. If the existing service is performing at or above the average for the route group and a strong ridership demand for the additional days of service exists, the request will be considered.
- (3) Rail service. All light and heavy rail services shall operate seven days a week.

#### (b) Service Span.

- (1) New bus service. Service spans are designed according to anticipated travel demand and available resources.
- (2) Existing bus service. Requests for a wider span of service in a day will be evaluated according to the route's current productivity performance relative to its route group, as well as the potential ridership demand for the proposed service period. If the existing service is performing at or above the average for the route group and a strong ridership demand for the additional span of service exists, the request will be considered.

#### (c) Service Frequency.

(1) Hourly service is generally considered a minimum service frequency for a regular transit route. When headways (i.e., time intervals between vehicles) of 10-59 minutes are required by ridership levels, RTA will, when practical, select headways that are factors of 60 minutes (i.e., 30,

- 20, 15, 12, or 10 minutes). Using these time intervals helps customers to remember the schedule because the pattern repeats itself every hour. When service operates at headways that are less than 10 minutes, remembering the schedule is not important for most customers.
- (2) Service frequency is based on ridership, but, during each time period that a route operates, the minimum number of trips per hour per direction will be as follows:

	<del>5:00 a.m 10:00 p.m.</del>	Other Times
Rail*	2	<del>1</del>
Bus*	1	<del>1</del>

- \* Does not apply to minor branches and special services
- (3) To maintain service coverage with limited resources, RTA may make an exception to the minimums shown above. RTA will conduct a public hearing before initiating such an exception.
- (d) <u>Schedule Coordination.</u> To the extent possible, schedules will be coordinated to facilitate transfers.

(Res. 2003-068. Passed 5-20-03; Res. 2013-122. Passed 12-17-13.)

#### 1016.05 BUS STOP/PASSENGER STOPS GUIDELINES.

#### (a) Bus Stop Location.

- (1) Bus stops should be located in proximity to known passenger activity centers (e.g., apartments, office buildings, hospitals, etc.) and on the basis of general spacing guidelines rather than required fixed spacing distances.
- (2) For any given route, stops shall be placed approximately 8 per mile, except in low-density areas approximately 4 per mile. The use of "flag stops," at which buses stop at locations requested by passengers, is permitted where warranted by local conditions and type of service.

#### (b) Passenger Shelters.

- (1) General policies.
  - A. The Authority will provide passenger shelters throughout the service area to protect waiting passengers from inclement weather conditions. Shelters may be installed outside the boundaries of Cuyahoga County, provided that the site meets the criteria for the placement of a shelter. However, first priority will be given to sites within the County.
  - B. The goal of the shelter program is to provide shelters at all bus stops which meet the criteria set forth in this policy.
  - C. Shelters will be installed at bus stops where:

- 1. The daily passenger volume is sufficient to justify the expense of buying, installing and maintaining the shelter.
- 2. The shelter can be installed without creating a safety hazard.
- D. The Authority will buy new shelters which are a mixture of sizes/ types in order to be able to respond to different site circumstances and requirements. All Authority passenger shelters will meet ADA specifications and be of a consistent design to minimize initial and ongoing expense. The design will be durable and easy to maintain and will provide a safe and secure environment for the Authority's customers.
- E. New passenger shelters will be bought on a regular basis to ensure that requests for new shelter locations can be responded to in a reasonable period of time and that badly damaged shelters can be replaced expeditiously.
- F. All passenger shelters will be cleaned on a regular basis and repairs will be made as quickly as possible to ensure customer satisfaction and community acceptance.
- (2) Program guidelines. The program guidelines set forth herein will ensure that passenger shelters are installed and/or replaced on an ongoing basis in a consistent and uniform pattern. As requests are received, all potential sites will be evaluated to ensure that they meet the established criteria. Passenger counts will be conducted and the sites will be inspected for operational considerations. The Authority will obtain permits and easements as required. Criteria for shelter placement shall be as follows:
  - A. In general, shelters will be installed where physically feasible at stops with 50 or more daily boardings.
  - B. At stops with fewer than 50 daily boardings, exceptions to the above guideline may be considered if special circumstances exist, such as transferring passengers, senior and/or disabled customers, or lack of any other shelter in the area.
  - C. At stops with 50 or more daily boardings, a shelter is typically not installed if there is a building overhang, canopy, or other suitable place for passengers to wait.
  - D. The Authority will consider installation of a shelter at locations not meeting these criteria if a sponsor provides funding for installation and maintenance.

(Res. 2003-068. Passed 5-20-03.)

#### 1016.06 TRANSIT CENTER GUIDELINES.

- (a) Transit Centers in the RTA system fall into three categories:
  - (1) Transit hubs where multiple routes converge. An example would be a suburban hub where several regional bus routes and a community circulator meet. Another example would be a rail station where a train line and at least one bus line meet.

- (2) Regional park-n-ride lots. Examples would be a rail station with a large customer parking lot and a suburban park-n-ride lot served by a flyer bus route.
- (3) Small local park-n-ride lots which are served by arterial routes.
- (b) Common characteristics of both transit hubs and regional park-n-rides:
  - (1) Must be a component of a Board-approved plan.
  - (2) Ownership of the facility or a long-term lease at the facility is required.
  - (3) Should be designed for easy bus ingress/egress.
  - (4) Should be designed for easy transferring between routes.
  - (5) A sheltered passenger waiting area should be provided, which can be as simple as a bus shelter.
- (e) In addition, transit hubs should have the following features:
  - (1) Should be located near trip generators.
  - (2) Should have additional passenger amenities (e.g., schedule information).
- (d) In addition, regional park-n-rides should have the following features:
  - (1) Should be located near a freeway interchange.
  - (2) Should have sufficient customer parking to support an attractive, high-frequency service.
- (e) In order to build additional customer demand along arterial radial routes, RTA staff can negotiate with private property owners to lease small parking areas for use by RTA riders within existing parking lots. (Res. 2003-068. Passed 5-20-03.)

## CHAPTER 1018 Service Quality Criteria and Guidelines

1018.01 Purpose.

1018 02 Schedule adherence

1018.03 Passenger loading standards.

#### **CROSS REFERENCES**

Expenditure of funds in connection with acquisition of buses, bus equipment, or bus-related facilities - see 49 U.S.C.A. 1602(h)

Conversion of equipment and facilities loans to grants for public transportation facilities - see 49 U.S.C.A. 1602-1

Approval of projects for acquisition, construction, and improvement of facilities and equipment, and payment of operating expenses; terms and conditions; regulations - see 49 U.S.C.A. 1604(d)

Research, development and demonstration projects - see 49 U.S.C.A. 1605

Regulation of operation of systems, rates, rentals, or other charges; compliance with undertakings - see 49 U.S.C.A. 1608(d)

Charter service - see 49 C.F.R. Part 604

School bus operations - see 49 C.F.R. Part 605

Buy America requirements - see 49 C.F.R. Part 660

Buy America requirements - Surface Transportation Assistance Act of 1982 sec 49 C.F.R. Part 661

Transfer of commuter services - see 49 C.F.R. Part 670

Service to auxiliary and reserve police - see VEH. & OP. 840.07; SERV. Ch. 1082

Reward program for crimes involving Authority property - see VEH. & OP. Ch. 852

Modification in service - see SERV. 1022.05: Ch. 1050

Bus passenger shelter program policy - see SERV. Ch. 1062

Promotional activities - see SERV. Ch. 1066

Service outside County - see SERV. Ch. 1078

Service to activity centers - see SERV. Ch. 1080

Service to elderly and handicapped - see SERV. Ch. 1084

Food and beverage sales policy - see SERV. Ch. 1092

#### PURPOSE. 1018.01

(a) This chapter of the service policy is intended to address characteristics of system services which may influence a customer's actual or potential use of Authority services. The criteria and guidelines associated with those characteristics are intended to establish a direction in which the system should be oriented and to facilitate an

assessment of how well the system is progressing in that direction. They will assist in identifying areas where remedial actions are needed to improve service quality to Authority customers.

(b) The following service quality criteria and guidelines are intended to apply to transit services contracted by the Authority as well as to those directly operated by the Authority. These criteria and appropriate penalties violating them will be incorporated into service contracts. (Res. 2003-068. Passed 5-20-03.)

#### 1018.02 SCHEDULE ADHERENCE.

- (a) The following standard applies to all modes:
  - (1) A trip is deemed "late" if it arrives or departs more than five minutes after the scheduled time.
  - (2) A trip is deemed "early" if it departs before the scheduled time.
  - (3) A trip is deemed "on-time" if it is neither "late" nor "early" as defined in paragraph (a)(1) and (a)(2) above.
- (b) The goal is that all services will be on time 100% (zero to five minutes late)
- (c) Routes and/or individual trips identified as low performers shall be subject to review, with remedial action taken at the earliest opportunity.
- (d) It is virtually impossible to achieve and maintain 100% on-time performance due to varying traffic, inclement weather conditions, and service scheduling limitations. However, objectives for improving system-wide on-time performance shall be established annually. The purpose here is to focus attention on continually improving on-time performance over time in an effort to achieve the schedule adherence goals established.

(Res. 2003-068. Passed 5-20-03; Res. 2013-122. Passed 12-17-13.)

#### 1018.03 PASSENGER LOADING STANDARDS.

- (a) The availability of seating/standing room on a transit vehicle is an important factor for both the transit customer and the transit operator. From the rider's perspective, if vehicles are repeatedly overcrowded, with no seats available and uncomfortable standing conditions, using public transit becomes a less attractive transportation option. From the transit operator's perspective, the objective is to achieve a balance between service efficiency and attractiveness.
- (b) Table A shows, for both rush hours and non-rush hours, the allowable passenger load standards by service type. The standards are expressed as the interior vehicle area, in square feet, allowed per passenger. Following that, Table B below shows, by service type, some illustrative examples of how the RTA staff would apply the standards to calculate the allowable maximum loads per bus for rush hours and non-rush hours.

Table A

LOAD STANDARDS SQUARE FEET OF INTERIOR SPACE PER PASSENGER				
SERVICE TYPE	RUSH HOURS	NON-RUSH HOURS		
Circulator	6	7		
Park & Ride	4.5	<del>5.5</del>		
Regular Bus	4.5	<del>5.5</del>		
Heavy Rail	4.5	<del>5.5</del>		
Light Rail	4.5	<del>5.5</del>		
Bus Rapid Transit	4.5	<del>5.5</del>		

Table B

MAXIMUM-LOAD STANDARDS				
SERVICE TYPE	RUSH HOURS	NON-RUSH HOURS		
Park & Ride	<del>54-63</del>	49-57		
Regular Bus (40-ft.)	<del>5</del> 4	44		
Trolley (30-ft.)	<del>36</del>	<del>36</del>		
Heavy Rail (per car)	142	<del>117</del>		
Light Rail (per car)	<del>132</del>	108		
Articulated bus & RTV	80	<del>65</del>		

- (c) Adherence to allowable load standards is monitored as follows:
  - (1) Passenger load counts are taken at the point on the route where the majority of trips are carrying their greatest load (maximum load point).
  - (2) Average per-trip passenger loads are calculated for 30-minute intervals during rush hours and 60-minute intervals during other time periods.
  - (3) Average per-trip loads that exceed the standards shown in Table A above constitute an overload.
  - (4) Once identified, appropriate service adjustments should be made in order to alleviate the overload situation.
  - (5) If a single trip in a 30- or 60-minute interval carries a load above the standard in Table A above, that will not constitute an overload so long as the average load of the other trips in the interval is within the standard. (Res. 2003-068. Passed 5-20-03; Res. 2013-122. Passed 12-17-13.)

#### CHAPTER 1020

#### Service Utilization/Productivity/Efficiency

1020.01 Purpose.

1020.02 Scheduling efficiency.

1020.03 Service utilization; route productivity.

#### CROSS REFERENCES

Expenditure of funds in connection with acquisition of buses, bus equipment, or bus-related facilities - see 49 U.S.C.A. 1602(h)

Conversion of equipment and facilities loans to grants for public transportation facilities - see 49 U.S.C.A. 1602-1

Approval of projects for acquisition, construction, and improvement of facilities and equipment, and payment of operating expenses; terms and conditions; regulations—see 49 U.S.C.A. 1604(d)

Research, development and demonstration projects - see 49 U.S.C.A. 1605

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SERV. Ch. 1082

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Service outside County - see SERV. Ch. 1078

Service to activity centers - see SERV. Ch. 1080

Service to elderly and handicapped - see SERV. Ch. 1084

#### 1020.01 PURPOSE.

- (a) This chapter of the service policy deals with the following issues:
  - (1) How efficiently service resources (vehicles and labor) are utilized to produce transit service:
    - (2) How closely the service supply is being matched to the service demand; and
  - (3) What percentage of the costs of operating transit services is being recovered through passenger fares and related revenues.
- (b) The objectives are to ensure that:

- (1) Service resources are being used to produce the greatest amount of service possible.
- (2) Service is allocated among various routes based on demonstrated demand.

(Res. 2003-068. Passed 5-20-03.)

#### 1020.02 OPERATIONAL EFFICIENCY.

The policy objective is to ensure that service hours are utilized to the maximum extent possible in a revenue producing mode within the available service budget while complying with Authority/A.T.U. contract provisions and maintaining schedule reliability. (Res. 2003-068. Passed 5-20-03.)

#### 1020.03 SERVICE UTILIZATION; ROUTE PRODUCTIVITY.

- (a) <u>Intent.</u> The policy objective is to ensure that service levels are correlated to demonstrated passenger demands for each route or service. The intent is to provide a level of service which is attractive to the rider, yet not wasteful of service resources, as well as to ensure a minimum level of ridership on all routes.
  - (b) Procedure for Annual Bus Route Performance Evaluation.
    - (1) Each Authority bus service which has been in service for one full calendar year will be assigned to a service category (based on the primary market served) as follows:
      - A. Local radial bus; B.
      - Express/flyer bus;
      - C. Crosstown/feeder bus;
      - D. Community circulator bus; E.
      - Downtown loop; or
      - F. Seasonal/supplemental service.
    - (2) Using ridership for the previous year, the following unfactored ridership indicators will be calculated for each route/service:
      - A. Boardings per trip;
      - B. Boardings per vehicle mile; and
      - C. Boardings per vehicle hour.
      - The system-wide averages calculated for each service group become the system guidelines against which route-level productivity is to be measured until the next annual performance evaluation is performed.
    - (3) Authority services which are identified as not meeting performance criteria shall be prioritized for analysis and remedial action as follows:
      - A. <u>First priority</u>. Substandard the previous year, has shown no improvement, or is in a worsened condition;
      - B. Second priority. First-time deficiency;
      - C. <u>Third priority</u>. <u>Substandard the previous year, still substandard but improved performance</u>; and
      - D. <u>Fourth priority</u>. After those routes which are substandard have been dealt with, those routes which are not substandard but which have opportunities for improvement.
    - (4) Any individual route/service having any indicators falling below the systemwide average for its service group will be analyzed for possible causes of poor

productivity. Recommendations will be developed for remedial actions to be taken, which may include:

- A. Targeted route promotions to increase ridership; B.
- Realign the route in order to:
  - 1. Eliminate nonproductive route segments; and
  - 2. Reduce overall route mileage and/or increase speed. C.
- Realign to ensure that major activity centers are served;
- D. Coordinate schedules with shift times at major employment centers; E.
- Short turn trips, reducing frequency on outlying route segments where ridership is low;
- F. Increase headways and/or shorten service spans; and
- G. Eliminate service.
- (5) An annual report will be prepared. This report will highlight those routes which are performing below standard and recommend remedial actions.

## (e) Rail Station Utilization.

- (1) Rail stations will remain in service as long as their utilization is sufficient to justify their costs. Therefore, rail station performance will be evaluated as follows:
  - A. <u>Station boardings</u>. Based on passenger boardings per station, average and median station boardings volumes will be calculated within each category. Stations in the bottom quartile of their category warrant closer examination, including cost benefit analysis. Stations are categorized as follows; based on maintenance costs:
    - Stations with enclosed areas for passenger waiting;
    - 2. Stations without enclosed areas for passenger waiting but with one or more stairways; and
    - 3. Stations without enclosed areas for passenger waiting and without a stairway.
  - B. <u>Station spacing.</u> Appropriate station spacing will be based on convenient access and attractiveness for faster service. Wider spacing provides speedy long-haul trips. Typically, close station spacing causes slower trips with higher vehicle maintenance costs. As much as possible, bus services should provide the block-by-block service and rail service the long-haul faster service.
- (2) Remedial actions that maybe taken to correct substandard rail station productivity are:
  - A. Determine if any operational changes could increase station productivity;
  - B. Explore various alternative service options and possible marketing campaigns;
  - C. Before closing any rail station, management must first hold a public hearing, as required in Section 1022.04(b)(1) and (2), and must present a report on the rail station evaluation to the Board of Trustees. (Res. 2003-068. Passed 5-20-03.)

## CHAPTER 1022 Service Management

1022.01 Purpose.

1022.02 Management of existing services.

1022.03 Development of service proposals and annual service management plans.

1022.04 Trial periods for new and modified services.

#### CROSS REFERENCES

Expenditure of funds in connection with acquisition of buses, bus equipment, or busrelated facilities - see 49 U.S.C.A. 1602(h)

Conversion of equipment and facilities loans to grants for public transportation facilities – see 49 U.S.C.A. 1602-1

Approval of projects for acquisition, construction, and improvement of facilities and equipment, and payment of operating expenses; terms and conditions; regulations - see 49 U.S.C.A. 1604(d)

Research, development and demonstration projects - see 49 U.S.C.A. 1605

Regulation of operation of systems, rates, rentals, or other charges;

compliance with undertakings - see 49 U.S.C.A. 1608(d)

Charter service - see 49 C.F.R. Part 604

School bus operations - see 49 C.F.R. Part 605

Buy America requirements - see 49 C.F.R. Part 660

Buy America requirements - Surface Transportation Assistance Act of 1982 - see 49 C.F.R. Part 661

Transfer of commuter services - sec 49 C.F.R. Part 670

Service to auxiliary and reserve police - see VEH. & OP. 840.07;

SERV. Ch. 1082

Reward program for crimes involving Authority property - see VEH. & OP. Ch. 852

Modification in service - see SERV. 1022.05; Ch. 1050

Bus passenger shelter program policy - see SERV. Ch. 1062

Promotional activities - see SERV. Ch. 1066

Service outside County - see SERV. Ch. 1078

Service to activity centers - see SERV. Ch. 1080

Service to elderly and handicapped - see SERV. Ch. 1084

EDITOR'S NOTE: Some service changes require public involvement. See Chapter 214, Public Hearing Process.

#### 1022.01 PURPOSE.

- (a) This chapter of the service policy deals with the procedures by which existing services are monitored, evaluated, and modified when necessary to improve their performance, as well as the process by which service improvements and new services are conceived, evaluated and implemented.
  - (b) This chapter is intended to ensure that:

- (1) Existing service is periodically monitored and evaluated in order to determine compliance with those provisions of the service policy regarding service quality and service productivity.
- (2) Existing services are monitored, evaluated, and modified as needed in order to increase their market share.
- (3) New services are planned and implemented in order to service new transit markets and increase the transit's overall market share.
  (Res. 2003-068. Passed 5-20-03.)

#### 1022.02 MANAGEMENT OF EXISTING SERVICES.

- (a) Ongoing Service Monitoring.
  - (1) Ridership monitoring and headway adjustment. The Authority will collect ridership data, in order to determine peak vehicle loadings, compared to the appropriate loading standards. When overloads occur, frequencies will be adjusted in order to bring loading within the standards.
  - (2) Running time analysis. The Authority will collect information concerning proper running time. Schedules should be adjusted to ensure that the majority of trips operate "on-time" without requiring an operator to operate less than the normal traffic speed. Running times shall be set to allow operation within legal speed.
  - (3) Routine service adjustments. In order to improve the performance of substandard routes, minor service adjustments may be performed to better match the service supply to the demonstrated ridership demand.
- (b) <u>Annual Route Performance Evaluation.</u> An annual route performance evaluation will be conducted. (See Section 1020.03) (Res. 2003-068. Passed 5-20-03.)

## 1022.03 DEVELOPMENT OF SERVICE PROPOSALS AND ANNUAL SERVICE MANAGEMENT PLANS.

- (a) Service Proposals. Sources for service proposals will include:
  - (1) The annual route performance evaluation. This evaluation, described in Section 1020.03, will be carried out early in the preliminary planning process, using ridership data from the previous year. Those lines that are identified as substandard in productivity will be prioritized for analysis and remedial action based on their performance. Service proposals will be developed for these routes with the intent of improving their performance.
  - (2) Suggestions and/or recommendations from the following sources: A.
    - Authority patrons;
    - B. Authority employees;
    - C. Civic leaders, elected officials; and
    - D. Studies carried out by the Authority through consultant services and by outside agencies.
- (b) <u>Developing the Annual Service Management Plan.</u> Each year, as part of the development of the annual operating budget for the following year, staff will produce an annual Service Management Plan detailing the service changes to be implemented. Funding availability will dictate the nature of the service proposals to be considered in the Service

Management Plan. Regardless of whether the budget projects an increase or decrease, the emphasis should always be on improving the productivity of services. Staff should aggressively pursue service proposals, which improve productivity so that service resources may be reallocated for promising service improvements or new service.

- (1) To improve service productivity, some of the strategies to be considered are:
  - A. Achieving savings without adversely impacting riders; B.
  - Reducing service where service is duplicated;
  - C. Eliminating excessive service where transportation alternatives exist:
  - D. Remove service from an area, if necessary.
- (2) With resources saved by productivity improvements, the following service improvements for the public may be considered:
  - A. Relief of existing service quality deficiencies;
  - B. Expansion/improvement of service to growing existing service markets:
  - C. New service to unserved markets. (Res. 2003-068. Passed 5-20-03.)

#### 1022.04 TRIAL PERIODS FOR NEW AND MODIFIED SERVICES.

- (a) New routes or major modifications to existing service shall operate substantially as implemented for one year, at which time they are to be evaluated for productivity (boardings per vehicle hour, boardings per vehicle mile, and passengers per trip).
- (b) At this time, the following types of service adjustments can be made based upon ridership performance to date:
  - (1) Frequency changes warranted by passenger loading standards or customer comments;
  - (2) Minor service reductions;
  - (3) Minor route extensions or reroutes with the potential to improve overall ridership productivity for the route.
- (e) If route performance is below the system average for its service group at the end of one year, remedial action shall be taken as specified in Section 1020(b)(4).
- (d) After one year, the route will become part of the annual route performance review.

(Res. 2003-068. Passed 5-20-03.)

- Chapter 1024 begins on Page 371

# CHAPTER 1062 Bus Passenger Shelter Program Policy

1062.01 Transit amenities. 1062.02 Facilities

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#### 1062.01 TRANSIT AMENITIES.

- (a) RTA seeks to provide seating and shelter at bus stops and rail stations if sufficient space is available and fifty or more daily riders are expected to use the shelter. (RTA considers a canopy to be one form of passenger shelter.) RTA installs and services waste receptacles only on RTA property. Each municipality decides whether to install and service waste receptacles in the public right of way.
- (b) On Rail/BRT, printed and/or digital service information is attached to walls and shelters if they exist; digital displays are provided at busier stations. On bus routes, printed and/or digital service information is provided at transit centers and park-ride lots.
- (c) Elevators will be installed and maintained to the extent required by the Americans with Disabilities Act. Existing escalators will remain in service unless they become cost prohibitive to maintain.

(Res. 2013-122, Passed 12-17-13.)

#### 1062.02 FACILITIES.

- (a) When making decisions about facilities, RTA will:
  - (1) Comply with Title VI of the Civil Rights Act of 1964 and all other applicable laws and regulations.
  - (2) Comply with the National Environmental Protection Act 23, CFR Part 771 and with Section 4(f) 23 CFR Part 774.
  - (3) Comply with Section 106 of the National Historic Preservation Act, 36 CFR Part 800.
  - (4) Evaluate the impact of facilities per Environmental Justice Executive Order 12898 (1994), DOT Order 5610.2(a) (May 2012) and FTA Circular 4703.1
  - (5) Seek to avoid negative impacts on areas and neighborhoods near the facility.
- (b) Where impacts cannot be avoided, RTA will seek to mitigate negative impacts. (Res. 2013-122. Passed 12-17-13.)

# CHAPTER 1078 Service Outside County

1078.01 Adoption of policy.

1078.02 Delineation of policy.

#### CROSS REFERENCES

Regulation of operation of systems, rates, rentals or other charges; compliance with undertakings - see 49 U.S.C.A. 1608(d)

Prohibition on use of Federal financial assistance for transfer of land, etc., between public bodies in geographical proximity - see 49 U.S.C.A. 1608(e)

Formula grant program for areas other than urbanized areas - see 49 U.S.C.A. 1614

Regional transit authorities - see Ohio R.C. 306.30 et seq. Service to auxiliary and reserve police - see VEH. & OP. 840.07;

SERV. Ch. 1082

Fares for rides outside of County - see VEH. & OP. 840.09, 840.16(e), 842.07

Modification in service - see SERV. 1022.05; Ch. 1050

Service to activity centers - see SERV. Ch. 1080

Service to elderly and handicapped - see SERV. Ch. 1084

#### 1078.01 ADOPTION OF POLICY.

A policy governing transit service conducted by the Authority in areas outside the County, as set forth in this chapter, is hereby adopted. (Res. 1977-153. Passed 5-10-77.)

#### 1078.02 DELINEATION OF POLICY.

- (a) Route and/or route segments operating beyond the County shall generate sufficient revenue to cover expenses incurred by the Authority in the operation of those services.
- (b) If routes or route segments are not performing at a break-even level or better, Authority staff will develop a range of alternatives which will improve the operating position of the route.
- (c) Local decision makers appointed by non-County communities served by the Authority shall select alternatives which will best serve the needs of commuters and improve or maintain the operating position of the route.
- (d) In the event of deficit operation on non-County routes, communities may elect to subsidize such service from local funds. Any moneys pledged for this purpose may be supplemented by an equal amount from the individual county's Section 5 allocation up to that amount apportioned for each county.
- (e) Routes will be evaluated quarterly to determine if their performance is meeting the goal of generating sufficient revenues to cover expenses.

(f) Authority standards of service (loading standards, vehicle assignments, service frequencies, etc.) will apply to non-County routes in the absence of a local subsidy for operations. If non-County communities choose to subsidize these services, then service levels, fare and customer amenities may be mutually determined by the Authority in cooperation with designated local representatives, provided that the cost of providing such amenities and services does not exceed total revenues (farebox, Section 5 allocation and local subsidy) for the route.

(Res. 1977-153. Passed 5-10-77.)

#### RESOLUTION NO. 2018-31

AMENDING SECTION 1013.04, "SERVICE AVAILABILITY FOR EACH MODE" OF THE CODIFIED RULES AND REGULATIONS OF THE GREATER CLEVELAND REGIONAL TRANSIT AUTHORITY

WHEREAS, representatives of the Federal Transit Administration ("FTA") conducted a review of the Authority's compliance with Title VI of the Civil Rights Act of 1964; and

WHEREAS, the Authority was informed that its current service availability standard is not specific enough to comply with the FTA requirements promulgated in the most recent Title VI Circular; and

WHEREAS, the Authority staff consulted with FTA representatives to determine what level of specificity is required for compliance with Title VI; and

WHEREAS, the proposed revised standard was presented to the Board's Operational Planning & Infrastructure Committee for discussion on March 6, 2018; and

WHEREAS, the proposed revised standard was also presented to the Authority's Citizens Advisory Committee ("CAC") for discussion on March 8, 2018; and

WHEREAS, the language of the proposed revised standard was modified in response to the discussions with the Operational Planning & Infrastructure Committee and the CAC.

NOW, THEREFORE, BE IT RESOLVED by the Board of Trustees of the Greater Cleveland Regional Transit Authority, Cuyahoga County, Ohio:

Section 1. That Section 1013.04 is hereby amended to read as follows:

- (a) Transit service availability is critical for providing access to jobs, education, medical care and other activities and opportunities necessary for quality of life.
- (b) ADA-certified residents who live within ¾ mile of bus or rapid transit service can use complementary Paratransit service to access all other areas served by regular transit routes.
- (c) Ideally, 365-day bus or rapid transit service should be located near every Cuyahoga County resident.
- (d) Resource limitations and low-density settlement patterns currently preclude realization of the ideal.
- (e) The Authority will provide 365-day public transit service within ¾ mile of *at least* 60 percent of Cuyahoga County residents.

Section 2. That this resolution shall become effective immediately upon its adoption.

Adopted: March 27, 2018

P/resident

Attest:

CEO, General Manager/Secretary-Treasurer

Form 100-326 07-03-97



## Greater Cleveland Regional Transit Authority STAFF SUMMARY AND COMMENTS

TITLE/DESCRIPTION:	Resolution No.: 2018-31
AMENDING SECTION 1013.04, "SERVICE AVAILABILITY FOR EACH MODE" OF THE CODIFIED RULES AND REGULATIONS OF THE GREATER CLEVELAND REGIONAL TRANSIT AUTHORITY	Date: March 22, 2018
	Initiator: Service Management
ACTION REQUEST:  Action Review/Comment   Information Only   Other	

- 1.0 PURPOSE/SCOPE: This resolution will amend Section 1013.04 of the Codified Rules and Regulations ("Code") of the Greater Cleveland Regional Transit Authority.
- 2.0 DESCRIPTION/JUSTIFICATION: The Authority's Services Code contains only one requirement governing where and when transit service should be available. That requirement is: "Route coverage and spacing should be based on demonstrated need or potential demand (ridership)." In November 2017, during a review of the Authority's compliance with Title VI of the Civil Rights Act of 1964, the Federal Transit Administration ("FTA") noted that the current policy lacks specificity with respect to service availability, in that there is no clearly defined line between compliance and non-compliance. A more specific standard is required for compliance with the most recent Title VI Circular issued by FTA.

After further consultation with FTA, staff drafted a standard and presented it for discussion with the RTA Board's Operational Planning & Infrastructure Committee on March 6, 2018, and the RTA Citizens Advisory Committee ("CAC") on March 8, 2018. The Operational Planning & Infrastructure Committee asked why 60 percent was recommended as the standard. The staff explained that the Authority's 365-day routes serve about 67 percent of the Cuyahoga County population as reported in the 2010 census, but continued development of low-density housing in outer portions of the county between 2010 and 2020 will likely result in a lower percentage when 2020 census data is used. The intent is to establish a minimum standard below which we cannot go and still be in compliance with Board policy. The Board committee asked that 60 percent be identified as *only a minimum standard* and not as an ultimate goal. The CAC asked for more emphasis on access to all activities of daily living and acknowledgement of the relationship between access to regular routes and access to ADA Complementary Paratransit Service. The expanded language in the proposed amendment to the Code responds to the discussions with the Operational Planning & Infrastructure Committee and the CAC.

- 3.0 PROCUREMENT BACKGROUND: Does not apply.
- 4.0 AFFIRMATIVE ACTION/DBE BACKGROUND: Does not apply.
- 5.0 POLICY IMPACT: The resolution will replace a general Authority policy on service availability with a specific standard, as required by FTA. If the resolution is adopted, the RTA staff will have to continually ensure that the standard is met unless the Board of Trustees modifies the standard by resolution.
- 6.0 ECONOMIC IMPACT: Does not apply.

Staff Summary & Comments Service Availability Page 2

- 7.0 ALTERNATIVES: Not adopting this resolution. Not adopting this resolution would result in GCRTA's Service Availability Policy remaining out of compliance with FTA requirements.
- 8.0 RECOMMENDATION: This modification of the Authority's service availability standard was discussed at the March 6, 2018, Operational Planning & Infrastructure Committee meeting and subsequently revised. The staff recommends that the resolution be adopted.
- 9.0 ATTACHMENT: Redline copy of revisions to Section 1013.04 of the Code.

Recommended and certified as appropriate to the availability of funds, legal form and conformance with the Procurement requirements.

Rajan D. Santam, ACTING
FOR CEO, General Manager/Secretary-Treasurer

GCRTA 2017 Title VI Program Update Page 159

## **Attachment**

## 1013.04 Service Availability For Each Mode

- (a) Transit service availability is critical for providing access to jobs, education, medical care and other activities and opportunities necessary for quality of life.
- (b) ADA-certified residents who live within ¾ mile of bus or rapid transit service can use complementary Paratransit service to access all other areas served by regular transit routes.
- (c) Ideally, 365-day bus or rapid transit service should be located near every Cuyahoga County resident.
- (d) Resource limitations and low-density settlement patterns currently preclude realization of the ideal.
- (e) The Authority will provide 365-day public transit service within 3/4 mile of at least 60 percent of Cuyahoga County residents.
- (a) Route coverage and spacing should be based on demonstrated need or potential demand (ridership).

#### Attachment I - Resolution 2018-072

#### RESOLUTION NO. 2018-72

AMENDING SECTION 1013.04, "SERVICE AVAILABILITY" OF THE CODIFIED RULES AND REGULATIONS OF THE GREATER CLEVELAND REGIONAL TRANSIT AUTHORITY

WHEREAS, on March 27, 2018, the Authority amended its Services Code by Resolution No. 2018-31 in response to a request from the Federal Transit Administration ("FTA"); and

WHEREAS, FTA subsequently reviewed the amended code provision and requested an additional modification to provide more clarity; and

WHEREAS, the Authority has discussed with FTA the language that would provide the necessary clarification; and

WHEREAS, FTA has approved the proposed clarification.

NOW, THEREFORE, BE IT RESOLVED by the Board of Trustees of the Greater Cleveland Regional Transit Authority, Cuyahoga County, Ohio:

Section 1. That Section 1013.04 is hereby amended to read as follows:

- (a) Transit service availability is critical for providing access to jobs, education, medical care and other activities and opportunities necessary for quality of life.
- (b) ADA-certified residents who live within ¾ mile of bus or rapid transit service can use complementary Paratransit service to access all other areas served by regular transit routes.
- (c) Ideally, 365-day bus or rapid transit service should be located near every Cuyahoga County resident. Rapid transit service includes rail and bus rapid transit service.
- (d) Resource limitations and low-density settlement patterns currently preclude realization of the ideal.
- (e) The Authority will provide 365-day public transit service within ¾ mile of **at least** 60 percent of Cuyahoga County residents. Public transit service is any transit service open to the general public, including bus, rail, and bus rapid transit service.

Section 2. That this resolution shall become effective immediately upon its adoption.

Adopted: July 24, 2018

CEO, General Manager/Secretary-Treasurer

Nam M Clay

Attest:

Form 100-



## **Greater Cleveland Regional Transit Authority**

		07-03-97		STAFF SUN	MARY A	ND COMME	ENTS
	AM		<b>SECTION 1013.0</b>				Resolution No.: 2018-72
			RULES AND REG D REGIONAL TRA			EK	Date: July 19, 2018
							Initiator: Service Management
	Аст	ION REQUE	ST:				
	× A	Approval	☐ Review/Comr	ment 🗆 Inform	nation Only	□ Other	
1	.0		SE/SCOPE: This ons ("Code") of the				e Codified Rules and rity.
2	2.0	Code by Administ	PTION/JUSTIFIC/ Resolution No. 20 ration ("FTA"). FT d an additional mo	018-31 in respon FA subsequently	se to a reque reviewed the	est from the Fe e amended cod	
3	3.0	PROCUE	REMENT BACKG	ROUND: Does	not apply.		
4	1.0	AFFIRM	ATIVE ACTION/D	BE BACKGROU	IND: Does no	ot apply.	
5	5.0	to clarify	IMPACT: The rest the meaning of "ra of "public transit s	apid transit servi	ce" in Section	n 1013.04(c) ar	nd to clarify the

- 6.0 ECONOMIC IMPACT: Does not apply.
- 7.0 ALTERNATIVES: Not adopting this resolution. Not adopting this resolution would result in GCRTA's Service Availability Policy remaining out of compliance with FTA requirements.
- 8.0 RECOMMENDATION: The staff recommends that the resolution be adopted.
- 9.0 ATTACHMENT: A. Redline copy of revisions to Section 1013.04.

Recommended and certified as appropriate to the availability of funds, legal form and conformance with the Procurement requirements.

CEO, Genéral Manager/Secretary-Treasurer

## Attachment A

## 1013.04 Service Availability

- (a) Transit service availability is critical for providing access to jobs, education, medical care and other activities and opportunities necessary for quality of life.
- (b) ADA-certified residents who live within ¾ mile of bus or rapid transit service can use complementary Paratransit service to access all other areas served by regular transit routes.
- (c) Ideally, 365-day bus or rapid transit service should be located near every Cuyahoga County resident. Rapid transit service includes rail and bus rapid transit service.
- (d) Resource limitations and low-density settlement patterns currently preclude realization of the ideal.
- (e) The Authority will provide 365-day public transit service within 3/4 mile of *at least* 60 percent of Cuyahoga County residents. Public transit service is any transit service open to the general public, including bus, rail and bus rapid transit service.

## Attachment J - GCRTA Tracts ACS 2017

		_	_													
SortID Id 1	<b>Id2</b> 39035	<b>Geogra</b> Cuyaho		EstimateT 1257401	NonMino 791566		<b>PercentMin</b> 0.37047449	MIN_NON	<b>Total Lowinco</b> 5376 151991		PercentLowln 0.282710311	LOW_NON			<b>PerBelP</b> 0.18300	POV_NON
2	39035101			2075	759 759		0.63421686	NAINI	887 500	387	0.563697858	LOW		1008	0.51297	DOV.
3	39035101			4777	3203	1574	0.32949549		2538 590		0.232466509	NONLOW	4777			NONPOV
4	39035101			2425	1509	916	0.37773195		1520 1023	497	0.673026316	LOW	2425		0.36453	
5	39035101			2012	1033	979	0.48658051		954 411	543	0.43081761	LOW	1846		0.25243	POV
6	39035101			2138	1365	773		NONMIN	813 274	539	0.33702337	LOW	2098		0.27121	
7	39035101			2615	1356	1259	0.48145315		1020 517	503	0.506862745	LOW	2561		0.45060	
8	39035101			2892	1463	1429	0.49412171		954 425	529	0.445492662	LOW		1241	0.42970	
9	39035101			2708	1217	1491	0.55059084	MIN	1116 555	561	0.497311828	LOW		1015	0.37481	POV
10	39035101		1018	2454	1445	1009	0.41116544	MIN	924 589	335	0.637445887	LOW	2293	1245	0.54295	POV
11	39035101	Census	1019	1866	1192	674	0.36120042	NONMIN	594 186	408	0.313131313	LOW	1866	681	0.36495	POV
12	39035102	Census	1021	.2993	1979	1014	0.33879051	NONMIN	1273 458	815	0.359780047	LOW	2960	685	0.23141	POV
13	39035102	Census	1021	.2664	1504	1160	0.43543543	MIN	1070 450	620	0.420560748	LOW	2664	581	0.21809	POV
14	39035102	Census	1022	2622	1430	1192	0.45461479	MIN	1068 396	672	0.370786517	LOW	2622	516	0.19679	POV
15	39035102	Census	1023	2309	1484	825	0.35729753	NONMIN	837 295	542	0.352449223	LOW	2289	611	0.26692	POV
16	39035102	Census	1024	2183	1456	727	0.33302794	NONMIN	811 333	478	0.410604192	LOW	2183	912	0.41777	POV
17	39035102	Census	1024	3347	1972	1375	0.41081565	MIN	1079 434	645	0.402224282	LOW	3337	1237	0.37069	POV
18	39035102	Census	1027	3950	2611	1339	0.33898734	NONMIN	1412 643	769	0.455382436	LOW	3942	1699	0.43099	POV
19	39035102	Census	1028	2060	1117	943	0.45776699	MIN	642 400	242	0.62305296	LOW	2060	1322	0.64174	POV
20	39035102			1821	1177	644	0.35365184	NONMIN	656 339	317	0.516768293	LOW		752	0.41295	POV
21	39035103	Census		.1045	688	357	0.34162679	NONMIN	462 157	305	0.33982684	LOW	1044	392	0.37547	POV
22	39035103			2520	634	1886		MIN	1200 715	485	0.595833333	LOW		1546	0.61349	POV
23	39035103			2611	1741	870	0.33320566		1176 452	724	0.384353741	LOW		1001	0.38589	
24	39035103			1726	1330	396	0.22943221		851 233	618	0.273795535	NONLOW	1726			NONPOV
25	39035103			3092	2187	905	0.29269081		1779 636	1143	0.357504216	LOW	2832		0.25211	
26	39035103			1530	1092	438	0.28627451		663 314	349	0.473604827	LOW	1519		0.29493	POV
27	39035103			2200	1253	947	0.43045454		803 334	469	0.415940224	LOW	2157		0.39731	
28	39035104		1041		515	449	0.46576763	MIN	482 298	184	0.618257261	LOW	955	406	0.42513	POV
29	39035104			1196	641	555	0.46404682	MIN	660 214	446	0.324242424	LOW		397		POV
30	39035104	Census	1043	2059	1672	387	0.18795531	NONMIN	1078 144	934	0.133580705	NONLOW	2059	359	0.17435	NONPOV

31	39035104	Census	<b>1044</b> 1288	969	319	0.24767080	NONMIN	686 <b>2</b> 33	453	0.339650146	LOW	1288	425	0.32996	POV
32	39035104	Census	<b>1046</b> 1029	623	406	0.39455782	MIN	511 337	174	0.659491194	LOW	1029	507	0.49271	POV
33	39035104	Census	<b>1048</b> 1895	1170	725	0.38258575	MIN	710 295	415	0.415492958	LOW	1820	698	0.38351	POV
34	39035104	Census	<b>1049</b> 2470	1354	1116	0.45182186	MIN	840 386	454	0.45952381	LOW	2470	1072	0.43400	POV
35	39035105	Census	<b>1051</b> 4036	3128	908	0.22497522	NONMIN	1511 659	852	0.43613501	LOW	3933	1273	0.32367	POV
36	39035105	Census	<b>1053</b> 2904	1712	1192	0.41046832	MIN	1118 587	531	0.525044723	LOW	2904	1263	0.43491	POV
37	39035105	Census	<b>1054</b> 3464	2255	1209	0.34901847	NONMIN	1390 571	819	0.410791367	LOW	3403	1193	0.35057	POV
38	39035105	Census	<b>1055</b> 2100	1558	542	0.25809523	NONMIN	780 398	382	0.51025641	LOW	2100	657	0.31285	POV
39	39035105	Census	<b>1056</b> 2541	1089	1452	0.57142857	MIN	1034 587	447	0.567698259	LOW	2526	1094	0.43309	POV
40	39035105	Census	<b>1057</b> 4396	2950	1446	0.32893539	NONMIN	2219 1055	1164	0.475439387	LOW	4396	1237	0.28139	POV
41	39035105	Census	<b>1059</b> B045	2644	401	0.13169129	NONMIN	1384 470	914	0.339595376	LOW	3045	829	0.27224	POV
42	39035106	Census	<b>1061</b> B815	2848	967	0.25347313	NONMIN	1565 342	1223	0.218530351	NONLOW	3815	602	0.15779	NONPOV
43	39035106	Census	<b>1062</b> 4147	<b>2</b> 693	1454	0.35061490	NONMIN	1792 494	1298	0.275669643	NONLOW	4130	874	0.21162	POV
44	39035106	Census	<b>1063</b> 2835	2251	584	0.20599647	NONMIN	1151 409	742	0.35534318	LOW	2777	457	0.16456	NONPOV
45	39035106	Census	<b>1064</b> 1135	770	365	0.32158590	NONMIN	511 169	342	0.33072407	LOW	1135	256	0.22555	POV
46	39035106	Census	<b>1065</b> 2685	2040	645	0.24022346	NONMIN	1187 278	909	0.234203875	NONLOW	2685	395	0.14711	NONPOV
47	39035106	Census	<b>1066</b> 8494	2700	794	0.22724670	NONMIN	1440 400	1040	0.277777778	NONLOW	3494	782	0.22381	POV
48	39035106	Census	<b>1068</b> 2912	1824	1088	0.37362637	MIN	1281 688	593	0.537080406	LOW	2885	1054	0.36533	POV
49	39035106	Census	<b>1069</b> 8411	2871	540	0.15831134	NONMIN	1779 611	1168	0.343451377	LOW	3411	715	0.20961	POV
50	39035107	Census	<b>1070</b> 1683	1477	206	0.12240047	NONMIN	761 107	654	0.140604468	NONLOW	1679	137	0.08159	NONPOV
51	39035107	Census	<b>1071</b> 4610	2624	1986	0.43080260	MIN	1478 119	1359	0.080514208	NONLOW	2435	401	0.16468	NONPOV
52	39035107	Census	<b>1077</b> 2958	1816	1142	0.38607167	MIN	1933 534	1399	0.276254527	NONLOW	2940	911	0.30986	POV
53	39035107	Census	<b>1078</b> 4325	1931	2394	0.55352601	MIN	2334 1644	690	0.70437018	LOW	3896	2440	0.62628	
54	39035108	Census	<b>1082</b> 1527	897	630	0.41257367	MIN	806 363	443	0.450372208	LOW	1527	400	0.26195	
55	39035108	Census	<b>1083</b> 1447	397	1050	0.72563925	MIN	748 344	404	0.459893048	LOW	1447	397	0.27436	POV
56	39035108	Census	<b>1084</b> 1216	289	927	0.76233552	MIN	529 268	261	0.506616257	LOW	1216	525	0.43174	POV
57	39035108		<b>1087</b> 4587	191	4396	0.95836058	MIN	1627 1350	277	0.829748002	LOW	4580	3309	0.72248	POV
58	39035109	Census	<b>1093</b> 1070	99	971	0.90747663	MIN	588 411	177	0.698979592	LOW	1065	557	0.52300	POV
59	39035109	Census	<b>1097</b> 2406	364	2042	0.84871155	MIN	603 512	91	0.849087894	LOW	1819	1498	0.82352	POV
1400000US390351		Tract	01			4								941	
09701		1097.01													
		, Cuvaho													
60	39035109		<b>1098</b> 2222	34	2188	0.98469847	MIN	945 836	109	0.884656085	LOW	2222	1811	0.81503	POV

SortID Id	ld2	Geogra	Tract	EstimateT	NonMino	Minor	PercentMin	MIN_NON	Tot	Lowinco	NonL	PercentLowInc	LOW_NON	TotP	Below	PerBelP	POV_NON
61	39035110	Census	1105	768	290	478	0.62239583	MIN	324	210	114	0.648148148	LOW	749	358	0.47797	POV
62	39035110	Census	1108	1174	534	640	0.54514480	MIN	435	212	223	0.487356322	LOW	1161	404	0.34797	POV
63	39035110	Census	1109	2980	1341	1639	0.55	MIN	118	554	629	0.46830093	LOW	2980	1397	0.46879	POV
64	39035111	Census	1112	1057	335	722	0.68306527	MIN	530	249	281	0.469811321	LOW	1057	346	0.32734	POV
65	39035111	Census	1114	1275	0	1275	1	MIN	452	268	184	0.592920354	LOW	1275	593	0.46509	POV
66	39035111	Census	1115	945	273	672	0.71111111	MIN	466	264	202	0.566523605	LOW	945	497	0.52592	POV
67	39035111	Census	1116	826	177	649	0.78571428	MIN	345	259	86	0.750724638	LOW	826	500	0.60532	POV
68	39035111	Census	1117	1363	201	1162	0.85253118	MIN	535	336	199	0.628037383	LOW	1352	705	0.52144	POV
69	39035111	Census	1118	763	18	745	0.97640891	MIN	310	187	123	0.603225806	LOW	763	448	0.58715	POV
70	39035111	Census	1119	763	37	726	0.95150720	MIN	262	188	74	0.717557252	LOW	763	549	0.71952	POV
71	39035112	Census	1121	.1654	93	1561	0.94377267	MIN	773	652	121	0.843467012	LOW	1472	918	0.62364	POV
72	39035112	Census	1122	1054	30	1024	0.97153700	MIN	407	207	200	0.508599509	LOW	1035	376	0.36328	POV
73	39035112	Census	1123	1480	192	1288	0.87027027	MIN	475	297	178	0.625263158	LOW	1172	678	0.57849	POV
74	39035112	Census	1124	1093	12	1081	0.98902104	MIN	439	144	295	0.328018223	LOW	1093	188	0.17200	NONPOV
75	39035112	Census	1125	1285	54	1231	0.95797665	MIN	479	267	212	0.557411273	LOW	1178	552	0.46859	POV
76	39035112	Census	1126	939	17	922	0.98189563	MIN	427	326	101	0.763466042	LOW	939	513	0.54632	POV
77	39035112	Census	1128	838	31	807	0.96300716	MIN	498	400	98	0.803212851	LOW	838	471	0.56205	POV
78	39035113	Census	1131	.694	57	637	0.91786743	MIN	386	315	71	0.816062176	LOW	538	306	0.56877	POV
79	39035113	Census	1135	959	5	954	0.99478623	MIN	462	251	211	0.543290043	LOW	959	410	0.42752	
80	39035113	Census	1136	829	63	766	0.92400482	MIN	328	145	183	0.442073171	LOW	620	217	0.35	POV
81	39035113	Census	1138	1851	70	1781	0.96218260	MIN	668	502	166	0.751497006	LOW	1851	1102	0.59535	POV
82	39035114	Census	1141	.776	6	770	0.99226804	MIN	445	384	61	0.862921348	LOW	776	450	0.57989	POV
83	39035114	Census	1143	1702	0	1702	1	MIN	652	580	72	0.889570552	LOW	1702	1496	0.87896	POV
84	39035114	Census	1145	777	29	748	0.96267696	MIN	384	259	125	0.674479167	LOW	763	404	0.52948	POV
85	39035114	Census	1146	1241	521	720	0.58017727	MIN	452	217	235	0.480088496	LOW	1231	514	0.41754	POV
86	39035114	Census	1147	567	38	529	0.9329806	MIN	236	205	31	0.868644068	LOW	567	436	0.76895	POV
87	39035114	Census	1149	1833	692	1141	0.62247681	MIN	795	519	276	0.652830189	LOW	1833	1110	0.60556	POV
88	39035115	Census	1151	.1274	729	545	0.42778649	MIN	562	309	253	0.549822064	LOW	1274	610	0.47880	POV
89	39035115	Census	1152	1113	331	782	0.70260557	MIN	407	217	190	0.533169533	LOW	1113	565	0.50763	POV

90	39035115 Census	<b>1153</b> 858	150	708	0.82517482	MIN	348 17	77 171	0.50862069	LOW	813 408	0.50184	POV
91	39035115 Census	<b>1154</b> 1679	833	846	0.50387135	MIN	829 39	99 430	0.481302774	LOW	1679 586	0.34901	POV
92	39035115 Census	<b>1157</b> 1378	604	774	0.56168359	MIN	635 32	21 314	0.505511811	LOW	1378 505	0.36647	POV
93	39035115 Census	<b>1158</b> 3487	1655	1832	0.52537998	MIN	123 56	66 670	0.457928803	LOW	3330 1421	0.42672	POV
94	39035115 Census	<b>1159</b> 3987	1522	2465	0.61825934	MIN	157 70	00 873	0.445009536	LOW	3976 1147	0.28848	POV
95	39035116 Census	<b>1161</b> 846	12	834	0.98581560	MIN	382 22	23 159	0.583769634	LOW	846 391	0.46217	POV
96	39035116 Census	<b>1162</b> 870	7	863	0.99195402	MIN	372 13	31 241	0.352150538	LOW	870 278	0.31954	POV
97	39035116 Census	<b>1163</b> 1569	27	1542	0.98279158	MIN	657 37	77 280	0.573820396	LOW	1569 615	0.39196	POV
98	39035116 Census	<b>1164</b> 2860	65	2795	0.97727272	MIN	113 68	30 459	0.597014925	LOW	2828 1438	0.50848	POV
99	39035116 Census	<b>1165</b> 1802	1	1801	0.99944506	MIN	971 65	312	0.678681771	LOW	1793 731	0.40769	POV
100	39035116 Census	<b>1166</b> 2095	30	2065	0.98568019	MIN	901 44	456	0.493895671	LOW	2095 655	0.31264	POV
101	39035116 Census	<b>1167</b> 1645	2	1643	0.99878419	MIN	673 37	74 299	0.555720654	LOW	1645 708	0.43039	POV
102	39035116 Census	<b>1168</b> 2112	93	2019	0.95596590	MIN	101 53	30 481	0.524233432	LOW	2112 558	0.26420	POV
103	39035116 Census	<b>1169</b> 1221	13	1208	0.98935298	MIN	559 30	256	0.542039356	LOW	1221 599	0.49058	POV
104	39035117 Census	<b>1171</b> 2396	365	2031	0.84766277	MIN	107 40	05 665	0.378504673	LOW	2396 801	0.33430	POV
105	39035117 Census	<b>1171</b> 1310	21	1289	0.98396946	MIN	518 33	L3 205	0.604247104	LOW	1310 546	0.41679	POV
106	39035117 Census	<b>1172</b> B151	565	2586	0.82069184	MIN	213 16	586 449	0.78969555	LOW	3012 1824	0.60557	POV
107	39035117 Census	<b>1172</b> 1839	265	1574	0.85589994	MIN	887 40	00 487	0.450958286	LOW	1839 623	0.33877	POV
108	39035117 Census	<b>1173</b> 2420	275	2145	0.88636363	MIN	882 45	58 424	0.519274376	LOW	2387 1266	0.53037	POV
109	39035117 Census	<b>1174</b> 1516	144	1372	0.90501319	MIN	595 27	73 322	0.458823529	LOW	1476 582		POV
110	39035117 Census	<b>1175</b> 2889	479	2410	0.83419868	MIN	117 53	12 661	0.436487639	LOW	2889 644	0.22291	POV
111	39035117 Census	<b>1176</b> 8063	898	2165	0.70682337	MIN	145 45	995	0.314266023	LOW	3063 643		POV
112	39035117 Census	<b>1177</b> 5042	2522	2520	0.49980166	MIN	235 85			LOW	4868 1366		POV
113	39035117 Census	<b>1178</b> 2225	320	1905	0.85617977	MIN	993 45	55 538	0.458207452	LOW	2217 795	0.35859	POV
114	39035117 Census	<b>1179</b> 2273	65	2208	0.97140343	MIN	110 69	98 404	0.633393829	LOW	2273 896		POV
115	39035118 Census	<b>1181</b> 1960	95	1865	0.95153061	MIN	745 35		0.477852349	LOW	1960 720		POV
116	39035118 Census	<b>1182</b> 1785	25	1760	0.98599439	MIN	682 33	348	0.48973607	LOW	1781 730		POV
117	39035118 Census	<b>1183</b> 2492	145	2347	0.94181380	MIN	101 54	10 476	0.531496063	LOW	2492 997	0.40008	POV
118	39035118 Census	<b>1184</b> 1343	5	1338	0.99627699	MIN	650 33	314	0.516923077	LOW	1343 407		POV
119	39035118 Census	<b>1185</b> 924	50	874	0.94588744	MIN	364 18		0.494505495	LOW	924 301		POV
120	39035118 Census	<b>1186</b> 2037	75	1962	0.96318114	MIN	108 88	32 203	0.812903226	LOW	2037 1403	0.68875	POV

SortID Id	ld2	Geogra	TractEsti	mateT No	nMino Mi	nor	PercentMin	MIN_NON	Tot	Lowinco	NonL	PercentLowInc	LOW_NONL	TotP	Below	PerBelP	POV_NON
121	39035118(	Census	<b>1187</b> 898	6 233	32 16	54	0.41495233	MIN	746	473	273	0.634048257	LOW	1427	761	0.53328	POV
122	39035118(	Census	<b>1188</b> 270	5 183	34 87	1	0.32199630	NONMIN	150	866	635	0.576948701	LOW	2339	1127	0.48182	POV
123	39035118(	Census	<b>1189</b> 140	4 188	3 12	16	0.86609686	MIN	668	288	380	0.431137725	LOW	1404	555	0.39529	POV
124	39035119	Census	<b>1191</b> 142	66	76		0.53521126	MIN	57	11	46	0.192982456	NONLOW	119	35	0.29411	POV
125	39035119	Census	<b>1192</b> 100	2 317	7 68	5	0.68363273	MIN	447	252	195	0.563758389	LOW	661	265	0.40090	POV
126	39035119	Census	<b>1193</b> B73	2 95	363	37	0.97454448	MIN	165	1161	494	0.701510574	LOW	3732	2153	0.57690	POV
127	39035119	Census	<b>1194</b> 179	3 294	149	99	0.83602900	MIN	972	407	565	0.41872428	LOW	1793	357	0.19910	POV
128	39035119	Census	<b>1194</b> 179	4 30	17	64	0.98327759	MIN	796	441	355	0.554020101	LOW	1794	642	0.35785	POV
129	39035119	Census	<b>1195</b> 236	7 878	3 14	89	0.62906632	MIN	136	423	942	0.30989011	LOW	2357	385	0.16334	NONPOV
130	39035119		<b>1195</b> 181	.3 296	5 15	17	0.83673469	MIN	116	564	602	0.483704974	LOW		473	0.26089	POV
131	39035119		<b>1196</b> 157	9 44	15	35	0.97213426	MIN	868	429	439	0.494239631	LOW	1579	482	0.30525	POV
132	39035119	Census	<b>1197</b> 167	2 43	16	29	0.97428229	MIN	839	368	471	0.438617402	LOW	1672		0.31459	POV
133	39035119		<b>1197</b> 160		159		0.99189526	MIN		447	321	0.58203125	LOW	1604		0.52182	POV
134	39035119	Census	<b>1198</b> B05	3 4	304	49	0.99868981	MIN		674	604	0.527386541	LOW	3053	1128	0.36947	POV
135	39035119		<b>1199</b> 184		183		0.98645720	MIN		624	394	0.612966601	LOW	1846		0.30877	POV
136	39035120		<b>1202</b> 235		22		0.96098388	MIN	105		373	0.647780925	LOW	2358			POV
137	39035120		<b>1204</b> 214		20		0.97150864	MIN		571	346	0.622682661	LOW	2141		0.46099	POV
138	39035120		<b>1205</b> 229		22		0.98867595	MIN		508	423	0.545649839	LOW	2261		0.44847	POV
139	39035120		<b>1206</b> 238		23		0.99036447	MIN	100		482	0.518	LOW		799	0.33642	POV
140	39035120		<b>1207</b> 124				0.96776792	MIN	693		284	0.59018759	LOW	1241		0.32796	POV
141	39035120		<b>1207</b> 160		15	_	0.96943231	MIN	722		346	0.520775623	LOW	1591		0.40037	POV
142	39035120		<b>1208</b> 232		230		0.98969514	MIN		540	534	0.502793296	LOW	2329		0.29282	POV
143	39035120		<b>1208</b> 233		230		0.98842691	MIN	917		513	0.440567067	LOW	2333		0.39391	POV
144	39035121 (		<b>1211</b> 239		239		0.99916492	MIN		551	417	0.569214876	LOW	2395		0.43549	POV
145	39035121		<b>1212</b> 151		150		0.99735624	MIN		291	336	0.464114833	LOW	1508		0.23673	POV
146	39035121 (		<b>1213</b> 197		18		0.95329949	MIN		539	314	0.631887456	LOW	1970		0.40812	POV
147	39035121 (		<b>1214</b> 181		18:		1	MIN		399	314	0.559607293	LOW	1792		0.44308	POV
148	39035121 (		<b>1214</b> 230		22		0.98266897	MIN		545	469	0.537475345	LOW	2308		0.29549	POV
149	39035121	Census	<b>1215</b> 277	1 30	27	41	0.98917358	MIN	109	466	626	0.426739927	LOW	2771	576	0.20786	POV

150	39035121 Census	<b>1217</b> 4024	39	3985	0.99030815	MIN	177 586	1189	0.330140845	LOW	3933 898	0.22832	POV
151	39035121 Census	<b>1218</b> 1645	13	1632	0.99209726	MIN	754 195	559	0.25862069	NONLOW	1639 265	0.16168	NONPOV
152	39035121 Census	<b>1219</b> 1322	73	1249	0.94478063	MIN	534 245	289	0.458801498	LOW	1322 498	0.37670	POV
153	39035122 Census	<b>1221</b> B557	151	3406	0.95754849	MIN	136 487	879	0.356515373	LOW	3405 584	0.17151	NONPOV
154	39035122 Census	<b>1222</b> 1704	18	1686	0.98943662	MIN	811 373	438	0.459926017	LOW	1683 549	0.32620	POV
155	39035122 Census	<b>1223</b> 1637	61	1576	0.96273671	MIN	812 400	412	0.492610837	LOW	1637 532	0.32498	POV
156	39035123 Census	<b>1231</b> 2468	2272	196	0.07941653	NONMIN	115 170	981	0.147697654	NONLOW	2468 222	0.08995	NONPOV
157	39035123 Census	<b>1232</b> 2989	2635	354	0.11843425	NONMIN	145 202	1250	0.139118457	NONLOW	2965 286	0.09645	NONPOV
158	39035123 Census	<b>1234</b> B788	3347	441	0.11642027	NONMIN	173 465	1265	0.268786127	NONLOW	3754 418	0.11134	NONPOV
159	39035123 Census	<b>1235</b> 3602	2436	1166	0.32370905	NONMIN	146 536	933	0.364874064	LOW	3581 1165	0.32532	POV
160	39035123 Census	<b>1235</b> 2722	1857	865	0.31778104	NONMIN	132 445	884	0.334838224	LOW	2722 614	0.22556	POV
161	39035123 Census	<b>1236</b> B177	2609	568	0.17878501	NONMIN	131 239	1073	0.182164634	NONLOW	3177 335	0.10544	NONPOV
162	39035123 Census	<b>1236</b> 2818	2170	648	0.22995031	NONMIN	138 560	829	0.403167747	LOW	2704 478	0.17677	NONPOV
163	39035123 Census	<b>1236</b> B273	2810	463	0.14146043	NONMIN	157 350	1227	0.221940393	NONLOW	3248 413	0.12715	NONPOV
164	39035123 Census	<b>1237</b> 2727	2311	416	0.15254858	NONMIN	106 175	890	0.164319249	NONLOW	2638 120	0.04548	NONPOV
165	39035123 Census	<b>1238</b> 2509	965	1544	0.61538461	MIN	958 616	342	0.643006263	LOW	2504 1643	0.65615	POV
166	39035123 Census	<b>1239</b> 2963	2464	499	0.16841039	NONMIN	124 405	835	0.326612903	LOW	2899 684	0.23594	POV
167	39035124 Census	<b>1241</b> 5553	3375	2178	0.39222042	MIN	201 700	1317	0.347050074	LOW	5545 1434	0.25861	POV
168	39035124 Census	<b>1242</b> 2582	2043	539	0.20875290	NONMIN	117 235	941	0.199829932	NONLOW	2582 471	0.18241	NONPOV
169	39035124 Census	<b>1242</b> 1736	1243	493	0.28398617	NONMIN	756 273	483	0.361111111	LOW	1556 339	0.21786	POV
170	39035124 Census	<b>1243</b> 4404	2164	2240	0.50862852	MIN	167 514	1161	0.306865672	LOW	4308 1080	0.25069	POV
171	39035124 Census	<b>1245</b> B891	2837	1054	0.27088152	NONMIN	154 467	1076	0.302657161	LOW	3891 1157	0.29735	POV
172	39035124 Census	<b>1246</b> B754	2684	1070	0.28502930	NONMIN	172 667	1056	0.387115496	LOW	3754 909	0.24214	POV
173	39035126 Census	<b>1261</b> 2960	218	2742	0.92635135	MIN	146 653	808	0.446954141	LOW	2791 802	0.28735	POV
174	39035127 Census	<b>1275</b> B009	186	2823	0.93818544	MIN	115 564	594	0.487046632	LOW	2918 1023	0.35058	POV
175	39035130 Census	<b>1301</b> 4488	4326	162	0.03609625	NONMIN	168 100	1587	0.059276823	NONLOW	4370 60	0.01372	NONPOV
176	39035130 Census	<b>1301</b> 4131	3884	247	0.05979181	NONMIN	152 91	1438	0.059516024	NONLOW	4131 88	0.02130	NONPOV
177	39035130 Census	<b>1301</b> B440	3342	98	0.02848837	NONMIN	143 207	1231	0.14394993	NONLOW	3440 123	0.03575	NONPOV
178	39035130 Census	<b>1301</b> B367	3154	213	0.06326106	NONMIN	140 113	1295	0.080255682	NONLOW	3367 202	0.05999	NONPOV
179	39035131 Census	<b>1311</b> B214	1804	1410	0.43870566	MIN	125 134	1116	0.1072	NONLOW	2937 175	0.05958	NONPOV
180	39035131 Census	<b>1311</b> 4134	3659	475	0.11490082	NONMIN	135 103	1248	0.076239822	NONLOW	4134 109	0.02636	NONPOV

SortID Id	<b>Id2</b> 39035131	<b>Geogra</b> Census	Tract 1311	stimateT 1395	NonMino 3261			_	<b>Tot</b> 199	Lowinco 506	<b>NonL</b> 1491	PercentLowInc 0.25338007	LOW_NONL NONLOW	<b>TotP</b> 3735		<b>PerBelP</b> 0.04738	POV_NON NONFOV
182	39035132	Census	1321	1711	1609	3102	0.65845892	MIN	198	482	1502	0.242943548	NONLOW	4697	432	0.09197	NONPOV
183	39035132	Census	1322	2892	1440	1452	0.50207468	MIN	114	266	875	0.233128834	NONLOW	2892	276	0.09543	NONPOV
184	39035132	Census	1323	3379	1238	2141	0.63361941	MIN	178	399	1381	0.224157303	NONLOW	3379	321	0.09499	NONPOV
185	39035132	Census	1323	L784	992	792	0.44394618	MIN	893	255	638	0.285554311	LOW	1784	361	0.20235	POV
186	39035133	Census	1331	3497	562	2935	0.83929082	MIN	166	626	1040	0.3757503	LOW	3497	731	0.20903	POV
187	39035133	Census	1331	2566	833	1733	0.67537022	MIN	144	630	810	0.4375	LOW	2511	500	0.19912	POV
188	39035134	Census	1341	L397	1000	397	0.28418038	NONMIN	600	129	471	0.215	NONLOW	1251	100	0.07993	NONPOV
189	39035134	Census	1342	3425	3073	352	0.10277372	NONMIN	123	57	1180	0.046079224	NONLOW	3425	98	0.02861	NONFOV
190	39035134	Census	1342	1214	3843	371	0.08803986	NONMIN	189	640	1256	0.337552743	LOW	3826	829	0.21667	POV
191	39035134	Census	1342	2625	2433	192	0.07314285	NONMIN	109	150	948	0.136612022	NONLOW	2625	81	0.03085	NONPOV
192	39035134	Census	1342	3189	3005	184	0.05769833	NONMIN	127	185	1087	0.145440252	NONLOW	3174	358	0.11279	NONFOV
193	39035134	Census	1343	1084	3336	748	0.18315377	NONMIN	104	320	726	0.305927342	LOW	2186	381	0.17429	NONPOV
194	39035135	Census	1351	2055	1998	57	0.02773722	NONMIN	106	153	910	0.143932267	NONLOW	2055	43	0.02092	NONFOV
195	39035135	Census	1351	1212	3960	252	0.05982906	NONMIN	155	70	1481	0.045132173	NONLOW	4212		0.01400	NONPOV
196	39035135	Census	1351	5900	5393	507	0.08593220	NONMIN	228		1972	0.138111888	NONLOW	5822		0.08278	NONFOV
197	39035135		1351		1295	60	0.04428044	NONMIN	505		482	0.045544554	NONLOW	1355		0.00442	NONFOV
198	39035136		1361		5204	459	0.08105244	NONMIN	260		2229	0.145322086	NONLOW	5654		0.03837	NONFOV
199	39035136		1361		6229	1360	0.17920674	NONMIN	298		2839	0.048911223	NONLOW	7589		0.01713	NONFOV
200	39035136		1361		5527	483	0.08036605	NONMIN	196		1803	0.083841463	NONLOW	5845		0.02737	NONFOV
201	39035137		1371		1720	610	0.26180257	NONMIN	118		909	0.231614539	NONLOW	2330		0.17811	NONFOV
202	39035137		1371		3353	1120	0.25039123	NONMIN		533	1419	0.273053279	NONLOW	4426		0.16832	NONFOV
203	39035137		1371		3267	821	0.20083170	NONMIN	177	268	1511	0.150646431	NONLOW	4088		0.10616	NONFOV
204	39035138		1381		980	279	0.22160444	NONMIN	538		352	0.345724907	LOW		221	0.17553	NONPOV
205	39035138		1381		2954	456	0.13372434	NONMIN		269	990	0.213661636	NONLOW	3410		0.14545	NONFOV
206	39035138		1381		1692	260	0.13319672	NONMIN	775		589	0.24	NONLOW	1940		0.12061	NONFOV
207	39035138		1381		3740	172	0.04396728	NONMIN		281	1286	0.179323548	NONLOW		361	0.09242	NONFOV
208	39035138		1381		3615	428	0.10586198	NONMIN	183	358	1476	0.195201745	NONLOW	4043		0.11451	NONFOV
209	39035138	Census	1381	1231	3898	333	0.07870479	NONMIN	163	257	1381	0.156898657	NONLOW	4172	326	0.07813	NONPOV

210	39035140 Census	<b>1401</b> 1586	214	1372	0.86506935	MIN	612 142	470	0.232026144	NONLOW	1579 264	0.16719	NONPOV
211	39035140 Census	<b>1403</b> 2462	89	2373	0.96385052	MIN	863 304	559	0.35225956	LOW	2447 859	0.35104	POV
212	39035140 Census	<b>1403</b> 2133	773	1360	0.63759962	MIN	101 302	708	0.299009901	LOW	2122 360	0.16965	NONPOV
213	39035140 Census	<b>1404</b> 2616	785	1831	0.69992354	MIN	121 344	871	0.283127572	LOW	2616 493	0.18845	POV
214	39035140 Census	<b>1405</b> 3625	1156	2469	0.68110344	MIN	143 399	1032	0.278825996	NONLOW	3625 762	0.21020	POV
215	39035140 Census	<b>1406</b> 1046	536	510	0.48757170	MIN	390 54	336	0.138461538	NONLOW	1046 184	0.17590	NONPOV
216	39035140 Census	<b>1407</b> 2509	633	1876	0.74770825	MIN	951 336	615	0.353312303	LOW	2471 928	0.37555	POV
217	39035140 Census	<b>1407</b> 1839	522	1317	0.71615008	MIN	724 283	441	0.390883978	LOW	1818 458	0.25192	POV
218	39035140 Census	<b>1408</b> 3753	2284	1469	0.39142019	MIN	160 580	1022	0.362047441	LOW	3738 659	0.17629	NONPOV
219	39035140 Census	<b>1409</b> 1960	808	1152	0.58775510	MIN	721 148	573	0.205270458	NONLOW	1956 160	0.08179	NONPOV
220	39035141 Census	<b>1410</b> 924	281	643	0.69588744	MIN	446 182	264	0.408071749	LOW	924 409	0.44264	POV
221	39035141 Census	<b>1411</b> 4354	2873	1481	0.34014699	NONMIN	239 778	1621	0.324301792	LOW	4354 1199	0.27537	POV
222	39035141 Census	<b>1412</b> 3140	2300	840	0.26751592	NONMIN	152 251	1273	0.164698163	NONLOW	3140 421	0.13407	NONPOV
223	39035141 Census	<b>1413</b> 2879	2146	733	0.25460229	NONMIN	844 101	743	0.119668246	NONLOW	2202 310	0.14078	NONPOV
224	39035141 Census	<b>1414</b> 2467	2155	312	0.12646939	NONMIN	905 61	844	0.067403315	NONLOW	2339 100	0.04275	NONPOV
225	39035141 Census	<b>1415</b> 1630	1358	272	0.16687116	NONMIN	720 132	588	0.183333333	NONLOW	1630 164	0.10061	NONPOV
226	39035141 Census	<b>1416</b> 1606	1198	408	0.25404732	NONMIN	668 59	609	0.088323353	NONLOW	1606 86	0.05354	NONPOV
227	39035141 Census	<b>1416</b> 1450	477	973	0.67103448	MIN	595 139	456	0.233613445	NONLOW	1436 229	0.15947	NONPOV
228	39035141 Census	<b>1417</b> 1436	964	472	0.32869080	NONMIN	646 82	564	0.126934985	NONLOW	1419 54	0.03805	NONPOV
229	39035150 Census	<b>1501</b> 2196	81	2115	0.96311475	MIN	104 495	552	0.47277937	LOW	2106 694	0.32953	POV
230	39035150 Census	<b>1503</b> 1659	35	1624	0.97890295	MIN	722 318	404	0.440443213	LOW	1659 713	0.42977	POV
231	39035150 Census	<b>1504</b> 1826	23	1803	0.98740416	MIN	718 462	256	0.643454039	LOW	1826 906	0.49616	POV
232	39035151 Census	<b>1511</b> 1188	72	1116	0.93939393	MIN	646 428	218	0.6625387	LOW	1176 505	0.42942	POV
233	39035151 Census	<b>1512</b> 1605	57	1548	0.96448598	MIN	924 574	350	0.621212121	LOW	1570 759	0.48343	POV
234	39035151 Census	<b>1513</b> 2092	434	1658	0.79254302	MIN	126 796	467	0.630245447	LOW	1934 820	0.42399	POV
235	39035151 Census	<b>1514</b> 1201	87	1114	0.92756036	MIN	484 211	273	0.435950413	LOW	1150 202	0.17565	NONPOV
236	39035151 Census	<b>1515</b> 1168	63	1105	0.94606164	MIN	546 303	243	0.554945055	LOW	1085 391	0.36036	POV
237	39035151 Census	<b>1516</b> 1592	84	1508	0.94723618	MIN	723 354	369	0.489626556	LOW	1579 682	0.43191	POV
238	39035151 Census	<b>1517</b> 1077	110	967	0.89786443	MIN	431 230	201	0.533642691	LOW	1077 415	0.38532	POV
239	39035151 Census	<b>1518</b> 1771	9	1762	0.99491812	MIN	744 393	351	0.528225806	LOW	1750 757	0.43257	POV
240	39035152 Census	<b>1521</b> 2549	2059	490	0.19223224	NONMIN	107 48	1023	0.044817927	NONLOW	2549 183	0.07179	NONPOV

SortID Id	ld2	Geogra	TractE	stimateT	NonMino	Minor	PercentMin	MIN_NON	Tot	Lowinco	NonL	PercentLowInc	LOW_NONL	TotP	Below	PerBelP	POV_NON
241	39035152	Census	<b>1521</b> 4:	175	1827	2348	0.56239521	MIN	175	419	1334	0.239018825	NONLOW	4153	636	0.15314	NONPOV
242	39035152	Census	<b>1522</b> 29	956	762	2194	0.74221921	MIN	196	973	995	0.494410569	LOW	2945	730	0.24787	POV
243	39035152	Census	<b>1522</b> 4:	176	1702	2474	0.59243295	MIN	191	553	1362	0.288772846	LOW	4176	825	0.19755	POV
244	39035152	Census	<b>1523</b> 23	802	1234	1568	0.55960028	MIN	152	541	983	0.354986877	LOW	2802	432	0.15417	NONPOV
245	39035152	Census	<b>1523</b> 4	616	2222	2394	0.51863084	MIN	174	390	1355	0.223495702	NONLOW	4606	835	0.18128	NONPOV
246	39035152	Census	<b>1523</b> B	601	1838	1763	0.48958622	MIN	165	510	1148	0.307599517	LOW	3601	758	0.21049	POV
247	39035152	Census	<b>1524</b> 1	720	753	967	0.56220930	MIN	745	219	526	0.293959732	LOW	1720	407	0.23662	POV
248	39035152	Census	<b>1525</b> 3	546	1579	1967	0.55470953	MIN	153	432	1098	0.282352941	NONLOW	3436	710	0.20663	POV
249	39035152	Census	<b>1525</b> 23	201	725	1476	0.67060427	MIN	101	380	636	0.374015748	LOW	2139	610	0.28517	POV
250	39035152	Census	<b>1526</b> 1:	179	110	1069	0.90670059	MIN	496	195	301	0.393145161	LOW	1179	363	0.30788	POV
251	39035152	Census	<b>1526</b> B	797	1295	2502	0.65894126	MIN	220	1160	1044	0.526315789	LOW	3797		0.25335	POV
252	39035152	Census	<b>1527</b> 2:	<b>2</b> 66	129	2137	0.94307149	MIN	158	1084	504	0.682619647	LOW	2068	695	0.33607	POV
253	39035152		<b>1527</b> 2:	224	392	1832	0.82374100	MIN	954	170	784	0.178197065	NONLOW	2189	413	0.18867	POV
254	39035152	Census	<b>1527</b> 13		722	1163	0.61697612	MIN	789		692	0.122940431	NONLOW	1782			NONPOV
255	39035153		<b>1531</b> 2:		2300	74	0.03117101	NONMIN	102		885	0.134897361	NONLOW	2374		0.04717	NONPOV
256	39035153		<b>1531</b> B		2821	268	0.08675946	NONMIN	122		1082	0.118174409	NONLOW	3078		0.13710	NONPOV
257	39035153		<b>1531</b> B		3516	262	0.06934886	NONMIN	183		1477	0.193336974	NONLOW	3755		0.09826	NONPOV
258	39035153		<b>1531</b> B		3444	208	0.05695509	NONMIN	148		1251	0.159274194	NONLOW	3610		0.08919	NONPOV
259	39035153		<b>1531</b> B		3259	280	0.07911839	NONMIN	165		1227	0.256814052	NONLOW	3539		0.12065	NONPOV
260	39035154		<b>1541</b> 20		912	1109	0.54873824	MIN		226	548	0.291989664	LOW	1980		0.21313	POV
261	39035154		<b>1542</b> 13		791	524	0.39847908	MIN	599		347	0.420701169	LOW	1315		0.33764	
262	39035154		15431		21	1131	0.98177083	MIN	423	171	252	0.404255319	LOW	1152		0.23958	POV
263	39035154		<b>1544</b> 23		1264	1589	0.55695758	MIN		316	770	0.290976059	LOW	2853		0.24009	POV
264	39035154		<b>1545</b> 33		2154	1178		NONMIN	153		923	0.396732026	LOW	3178		0.25393	POV
265	39035154		<b>1545</b> 2		1608	1151	0.41718013	MIN	123		1022	0.171799028	NONLOW	2759			NONPOV
266	39035154		<b>1546</b> 4		2938	1827	0.38342077	MIN	182		1347	0.263531985	NONLOW	4553			NONPOV
267	39035154		<b>1546</b> B:		1819	1355	0.42690611	MIN		222	1062	0.172897196	NONLOW	3103			NONPOV
268	39035154		1546		2152	2021	0.48430385	MIN	168		1367	0.187277051	NONLOW	4151			NONPOV
269	39035154	Census	<b>1547</b> 2	578	58	2520	0.97750193	MIN	109	404	693	0.368277119	LOW	2578	839	0.32544	POV

270	39035155 Census	<b>1551</b> 5337	4268	1069	0.20029979	NONMIN	201 234	1778	0.116302187	NONLOW	5332 107	0.02006	NONPOV
271	39035155 Census	<b>1551</b> 8043	2946	97	0.03187643	NONMIN	115 102	1053	0.088311688	NONLOW	3043 107	0.03516	NONPOV
272	39035156 Census	<b>1561</b> 1371	1318	53	0.03865791	NONMIN	560 33	527	0.058928571	NONLOW	1371 35	0.02552	NONPOV
273	39035156 Census	<b>1561</b> 5761	5601	160	0.02777295	NONMIN	212 174	1951	0.081882353	NONLOW	5761 128	0.02221	NONPOV
274	39035160 Census	<b>1601</b> 1899	1818	81	0.04265402	NONMIN	697 24	673	0.034433286	NONLOW	1899 55	0.02896	NONPOV
275	39035160 Census	<b>1602</b> 2336	2007	329	0.14083904	NONMIN	111 166	951	0.148612355	NONLOW	2336 123	0.05265	NONPOV
276	39035160 Census	<b>1603</b> 1741	1611	130	0.07466973	NONMIN	779 136	643	0.174582798	NONLOW	1741 146	0.08385	NONPOV
277	39035160 Census	<b>1604</b> 3232	2975	257	0.07951732	NONMIN	145 270	1180	0.186206897	NONLOW	3232 438	0.13551	NONPOV
278	39035160 Census	<b>1605</b> 3938	3595	343	0.08710005	NONMIN	199 651	1347	0.325825826	LOW	3807 381	0.10007	NONPOV
279	39035160 Census	<b>1606</b> 4967	4160	807	0.16247231	NONMIN	349 1054	2445	0.301228923	LOW	4967 877	0.17656	NONPOV
280	39035160 Census	<b>1606</b> 2930	2056	874	0.29829351	NONMIN	149 542	955	0.362057448	LOW	2871 745	0.25949	POV
281	39035160 Census	<b>1607</b> 1474	1262	212	0.14382632	NONMIN	942 164	778	0.174097665	NONLOW	1461 206	0.14099	NONPOV
282	39035160 Census	<b>1608</b> 934	903	31	0.03319057	NONMIN	536 128	408	0.23880597	NONLOW	924 107	0.11580	NONPOV
283	39035160 Census	<b>1609</b> 8912	3678	234	0.05981595	NONMIN	174 272	1470	0.156142365	NONLOW	3893 419	0.10762	NONPOV
284	39035161 Census	<b>1610</b> 1769	1556	213	0.12040701	NONMIN	769 99	670	0.128738622	NONLOW	1769 186	0.10514	NONPOV
285	39035161 Census	<b>1611</b> 8713	3587	126	0.03393482	NONMIN	161 225	1394	0.138974676	NONLOW	3713 253	0.06813	NONPOV
286	39035161 Census	<b>1612</b> 2540	2307	233	0.09173228	NONMIN	115 248	903	0.215464813	NONLOW	2540 276	0.10866	NONPOV
287	39035161 Census	<b>1613</b> 2856	2499	357	0.125	NONMIN	129 365	928	0.28228925	NONLOW	2822 550	0.19489	POV
288	39035161 Census	<b>1614</b> B206	2802	404	0.12601372	NONMIN	137 234	1141	0.170181818	NONLOW	3206 276	0.08608	NONPOV
289	39035161 Census	<b>1615</b> 8826	3491	335	0.08755880	NONMIN	177 417	1357	0.235062007	NONLOW	3744 508	0.13568	NONPOV
290	39035161 Census	<b>1616</b> 2020	1576	444	0.21980198	NONMIN	880 342	538	0.388636364	LOW	2003 526	0.26260	POV
291	39035161 Census	<b>1617</b> 2134	1522	612	0.28678538	NONMIN	870 271	599	0.311494253	LOW	2134 725	0.33973	POV
292	39035161 Census	<b>1618</b> 1351	873	478	0.35381199	NONMIN	552 246	306	0.445652174	LOW	1351 542	0.40118	POV
293	39035170 Census	<b>1701</b> 2687	2055	632	0.23520655	NONMIN	129 132	1158	0.102325581	NONLOW	2687 83	0.03088	NONPOV
294	39035170 Census	<b>1701</b> 4975	4323	652	0.13105527	NONMIN	200 207	1802	0.103036336	NONLOW	4952 333	0.06724	NONPOV
295	39035170 Census	<b>1702</b> 2287	2008	279	0.12199387	NONMIN	116 122	1043	0.10472103	NONLOW	2287 55	0.02404	NONPOV
296	39035170 Census	<b>1702</b> 8729	3325	404	0.10834003	NONMIN	175 262	1496	0.149032992	NONLOW	3549 143	0.04029	NONPOV
297	39035171 Census	<b>1711</b> 4675	788	3887	0.83144385	MIN	190 409	1500	0.214248298	NONLOW	4652 564	0.12123	NONPOV
298	39035171 Census	<b>1711</b> 8906	664	3242	0.83000512	MIN	153 480	1051	0.313520575	LOW	3820 1130	0.29581	POV
299	39035171 Census	<b>1711</b> 4602	550	4052	0.88048674	MIN	167 553	1123	0.329952267	LOW	4602 1321	0.28704	POV
300	39035171 Census	<b>1712</b> 2828	1067	1761	0.62270155	MIN	112 267	862	0.236492471	NONLOW	2828 878	0.31046	POV

SortID Id	ld2	Geogra	Tract	EstimateT	NonMino	Minor	PercentMin	MIN NON	Tot	Lowinco	NonL	PercentLowInc	LOW NONL	TotP	Below	PerBelP	POV NON
301	39035171		1712		521	1281	0.71087680	MIN	744		567	0.237903226	NONLOW		494	0.27413	POV
302	39035171	Census	1712	2492	888	1604	0.64365971	MIN	125	329	929	0.261526232	NONLOW	2451	270	0.11015	NONPOV
303	39035171	Census	1712	2325	1197	1128	0.48516129	MIN	111	295	816	0.265526553	NONLOW	2325	319	0.13720	NONPOV
304	39035172	Census	1721	2496	2054	442	0.17708333	NONMIN	113	261	871	0.230565371	NONLOW	2496	283	0.11338	NONPOV
305	39035172	Census	1721	3527	3136	391	0.11085908	NONMIN	163	291	1342	0.178199633	NONLOW	3527	227	0.06436	NONPOV
306	39035172	Census	1721	4564	3279	1285	0.28155127	NONMIN	276	933	1830	0.337676439	LOW	4450	584	0.13123	NONPOV
307	39035172	Census	1722	3799	3354	445	0.11713608	NONMIN	151	338	1174	0.223544974	NONLOW	3792	233	0.06144	NONPOV
308	39035172	Census	1722	4455	3436	1019	0.22873176	NONMIN	230	527	1778	0.228633406	NONLOW	4438	521	0.11739	NONPOV
309	39035173	Census	1731	2746	2489	257	0.09359067	NONMIN	116	253	907	0.218103448	NONLOW	2671	86	0.03219	NONPOV
310	39035173	Census	1731	4357	4096	261	0.05990360	NONMIN	214	369	1775	0.172108209	NONLOW	4122	153	0.03711	NONPOV
311	39035173	Census	1731	2401	2327	74	0.03082049	NONMIN	899	83	816	0.092324805	NONLOW	2397	136	0.05673	NONPOV
312	39035173	Census	1731	3774	2229	1545	0.40937996	MIN	165	309	1347	0.186594203	NONLOW	3774	185	0.04901	NONPOV
313	39035173	Census	1731	2410	2342	68	0.02821576	NONMIN	993	105	888	0.105740181	NONLOW	2277	47	0.02064	NONPOV
314	39035174	Census	1741	3092	2873	219	0.07082794	NONMIN	121	305	909	0.251235585	NONLOW	3092	347	0.11222	NONPOV
315	39035174	Census	1741	2267	2144	123	0.05425672	NONMIN	822	80	742	0.097323601	NONLOW	2188	218	0.09963	NONPOV
316	39035174	Census	1741	2820	2604	216	0.07659574	NONMIN	105	89	961	0.084761905	NONLOW	2820	92	0.03262	NONPOV
317	39035174	Census	1741	2834	2548	286	0.10091743	NONMIN	135	165	1191	0.121681416	NONLOW	2816	171	0.06072	NONPOV
318	39035174	Census	1741	3684	3602	82	0.02225841	NONMIN	153	180	1353	0.11741683	NONLOW	3684	280	0.07600	NONPOV
319	39035174	Census	1742	3022	2680	342	0.11317008	NONMIN	118	105	1080	0.088607595	NONLOW	3022	149	0.04930	NONPOV
320	39035174	Census	1742	3850	3530	320	0.08311688	NONMIN	139	117	1280	0.083750895	NONLOW	3850	202	0.05246	NONPOV
321	39035174	Census	1742	4922	4450	472	0.09589597	NONMIN	229	421	1872	0.183602268	NONLOW	4922	447	0.09081	NONPOV
322	39035174	Census	1742	2319	1844	475	0.20482966	NONMIN	103	256	778	0.247582205	NONLOW	2313	290	0.12537	NONPOV
323	39035174	Census	1742	3197	2912	285	0.08914607	NONMIN	127	279	994	0.219167321	NONLOW	2940	174	0.05918	NONPOV
324	39035175		1751	7181	6316	865	0.12045676	NONMIN	325		2704	0.169788149	NONLOW	6960		0.04367	NONPOV
325	39035175	Census	1751	6190	5466	724	0.11696284	NONMIN	278	463	2322	0.166247756	NONLOW	6117	276	0.04512	NONPOV
326	39035175		1751		4326	244	0.05339168	NONMIN	169		1574	0.072480849	NONLOW	4562		0.03375	NONPOV
327	39035175	Census	1751	2974	2927	47	0.01580363	NONMIN	105	115	938	0.109211776	NONLOW	2974	144	0.04841	NONPOV
328	39035175		1752	6216	5855	361	0.05807593	NONMIN	265	259	2393	0.097662142	NONLOW	6216	355	0.05711	NONPOV
329	39035175	Census	1752	3194	3079	115	0.03600500	NONMIN	135	241	1113	0.177991137	NONLOW	3194	211	0.06606	NONPOV

330	39035176 Census	<b>1761</b> 2338	2301	37	0.01582549	NONMIN	932 112	820	0.120171674	NONLOW	2338 54	0.02309	NONPOV
331	39035176 Census	<b>1762</b> 5557	5304	253	0.04552816	NONMIN	252 319	2207	0.126286619	NONLOW	5524 193	0.03493	NONPOV
332	39035177 Census	<b>1771</b> 4123	3107	1016	0.24642250	NONMIN	194 431	1512	0.221821925	NONLOW	4109 728	0.17717	NONPOV
333	39035177 Census	<b>1771</b> 3824	3156	668	0.17468619	NONMIN	185 575	1282	0.309639203	LOW	3824 406	0.10617	NONPOV
334	39035177 Census	<b>1771</b> 3368	3210	158	0.04691211	NONMIN	136 316	1050	0.231332357	NONLOW	3333 483	0.14491	NONPOV
335	39035177 Census	<b>1772</b> 4084	3719	365	0.08937316	NONMIN	154 247	1293	0.16038961	NONLOW	4052 286	0.07058	NONPOV
336	39035177 Census	<b>1772</b> 3472	3156	316	0.09101382	NONMIN	129 279	1011	0.21627907	NONLOW	3472 357	0.10282	NONPOV
337	39035177 Census	<b>1773</b> 2412	2241	171	0.07089552	NONMIN	110 230	876	0.2079566	NONLOW	2412 132	0.05472	NONPOV
338	39035177 Census	<b>1773</b> 4621	4039	582	0.12594676	NONMIN	196 311	1651	0.158511723	NONLOW	4586 397	0.08656	NONPOV
339	39035177 Census	<b>1773</b> 3571	3005	566	0.15849902	NONMIN	149 379	1115	0.253681392	NONLOW	3124 507	0.16229	NONPOV
340	39035177 Census	<b>1774</b> 3223	2924	299	0.09277071	NONMIN	133 252	1087	0.188200149	NONLOW	3223 244	0.07570	NONPOV
341	39035177 Census	<b>1774</b> 2705	2490	215	0.07948244	NONMIN	111 141	969	0.127027027	NONLOW	2705 140	0.05175	NONPOV
342	39035177 Census	<b>1774</b> 4525	4345	180	0.03977900	NONMIN	189 228	1663	0.120571126	NONLOW	4525 213	0.04707	NONPOV
343	39035177 Census	<b>1774</b> 4158	3759	399	0.09595959	NONMIN	160 270	1337	0.168014935	NONLOW	4138 476	0.11503	NONPOV
344	39035177 Census	<b>1775</b> 4103	3830	273	0.06653668	NONMIN	181 500	1316	0.275330396	NONLOW	4103 605	0.14745	NONPOV
345	39035177 Census	<b>1775</b> 3415	3250	165	0.04831625	NONMIN	141 191	1222	0.13517339	NONLOW	3367 227	0.06741	NONPOV
346	39035177 Census	<b>1775</b> 4049	3833	216	0.05334650	NONMIN	163 289	1341	0.177300613	NONLOW	4049 489	0.12077	NONPOV
347	39035177 Census	<b>1775</b> 4518	4419	99	0.02191235	NONMIN	184 181	1664	0.098102981	NONLOW	4518 199	0.04404	NONPOV
348	39035177 Census	<b>1776</b> 2047	1991	56	0.02735710	NONMIN	831 124	707	0.14921781	NONLOW	2047 66	0.03224	NONPOV
349	39035177 Census	<b>1776</b> 2684	2532	152	0.05663189	NONMIN	113 173	964	0.152154793	NONLOW	2684 205	0.07637	NONPOV
350	39035177 Census	<b>1776</b> 3723	3392	331	0.08890679	NONMIN	156 275	1285	0.176282051	NONLOW	3514 275	0.07825	NONPOV
351	39035177 Census	<b>1776</b> 4127	3704	423	0.10249576	NONMIN	162 331	1294	0.203692308	NONLOW	3983 418	0.10494	NONPOV
352	39035177 Census	<b>1776</b> 5203	4930	273	0.05246972	NONMIN	232 556	1764	0.239655172	NONLOW	5138 392	0.07629	NONPOV
353	39035177 Census	<b>1776</b> 1916	1858	58	0.03027139	NONMIN	809 139	670	0.171817058	NONLOW	1761 51	0.02896	NONPOV
354	39035178 Census	<b>1781</b> 2782	2301	481	0.17289719	NONMIN	130 300	1000	0.230769231	NONLOW	2782 350	0.12580	NONPOV
355	39035178 Census	<b>1781</b> 4265	3632	633	0.14841735	NONMIN	194 319	1627	0.163926002	NONLOW	4265 376	0.08815	NONPOV
356	39035178 Census	<b>1782</b> 3319	3088	231	0.06959927	NONMIN	157 370	1206	0.234771574	NONLOW	3319 251	0.07562	NONPOV
357	39035178 Census	<b>1782</b> 4979	3929	1050	0.21088572	NONMIN	234 877	1470	0.373668513	LOW	4979 764	0.15344	NONPOV
358	39035178 Census	<b>1782</b> 2028	1822	206	0.10157790	NONMIN	779 121	658	0.155327343	NONLOW	1867 107	0.05731	NONPOV
359	39035178 Census	<b>1782</b> 2872	2689	183	0.06371866	NONMIN	117 196	980	0.166666667	NONLOW	2863 155	0.05413	NONPOV
360	39035179 Census	<b>1791</b> 3333	2878	455	0.13651365	NONMIN	117 94	1079	0.080136402	NONLOW	3119 311	0.09971	NONPOV

SortID Id 361	<b>Id2</b> 39035179	<b>Geogra</b> Census	Tract 1791	EstimateT 2880	NonMino 2461	Minor 419	PercentMin 0.14548611	_	<b>Tot</b> 999		<b>NonL</b> 975	PercentLowInc 0.024024024	LOW_NONL NONLOW	<b>TotP</b> 2816		<b>PerBelP</b>	POV_NON NONFOV
362	39035180	Census	1801	1007	2132	1875	0.46793112	MIN	177	349	1430	0.196177628	NONLOW	3965	390	0.09836	NONPOV
363	39035180	Census	1801	3682	1897	1785	0.48479087	MIN	147	211	1266	0.142857143	NONLOW	3673	262	0.07133	NONPOV
364	39035180	Census	1801	2767	807	1960	0.70834839	MIN	150	688	819	0.456536165	LOW	2592	637	0.24575	POV
365	39035181	Census	1811	5429	6202	227	0.03530875	NONMIN	258	191	2397	0.073802164	NONLOW	6281	210	0.03343	NONFOV
366	39035181	Census	1812	5679	5363	316	0.05564359	NONMIN	269	476	2221	0.176492399	NONLOW	5613	391	0.06965	NONFOV
367	39035181	Census	1812	3129	3018	111	0.03547459	NONMIN	133	127	1204	0.09541698	NONLOW	3116	169	0.05423	NONFOV
368	39035181	Census	1812	5036	4729	307	0.06096108	NONMIN	234	455	1894	0.193699447	NONLOW	5015	251	0.05004	NONFOV
369	39035182	Census	1821	2428	2403	25	0.01029654	NONMIN	112	163	957	0.145535714	NONLOW	2428	90	0.03706	NONPOV
370	39035182	Census	1821	2539	2422	117	0.04608113	NONMIN	109	124	973	0.113035552	NONLOW	2539	100	0.03938	NONPOV
371	39035182	Census	1821	3609	3340	269	0.07453588	NONMIN	141	99	1314	0.070063694	NONLOW	3600	109	0.03027	NONFOV
372	39035182	Census	1821	3118	3007	111	0.03559974	NONMIN	129	185	1112	0.142636854	NONLOW	3118	263	0.08434	NONFOV
373	39035183	Census	1831	2983	1843	1140	0.38216560	MIN	137	217	1161	0.157474601	NONLOW	2983	290	0.09721	NONPOV
374	39035183	Census	1832	2424	2072	352	0.14521452	NONMIN	887	57	830	0.064261556	NONLOW	2419	66	0.02728	NONPOV
375	39035183	Census	1833	1434	3713	721	0.16260712	NONMIN	153	89	1447	0.057942708	NONLOW	4372	50	0.01143	NONPOV
376	39035183	Census	1834	2176	1275	901	0.4140625	MIN	805	155	650	0.192546584	NONLOW	2172	274	0.12615	NONPOV
377	39035183	Census	1834	L449	294	1155	0.79710144	MIN	641	104	537	0.16224649	NONLOW	1449	108	0.07453	NONPOV
378	39035183	Census	1835	2993	1714	1279	0.42733043	MIN	152	253	1268	0.166337936	NONLOW	2993	200	0.06682	NONPOV
379	39035183	Census	1835	3542	2498	1044	0.29474873	NONMIN	142	235	1190	0.164912281	NONLOW	3533	229	0.06481	NONPOV
380	39035183	Census	1836	L410	75	1335	0.94680851	MIN	500	179	321	0.358	LOW	1410	483	0.34255	POV
381	39035183	Census	1836	2083	409	1674	0.80364858	MIN	789	130	659	0.164765526	NONLOW	2069	335	0.16191	NONPOV
382	39035183	Census	1836	2633	1121	1512	0.57424990	MIN	106	198	867	0.185915493	NONLOW	2580	98	0.03798	NONPOV
383	39035183	Census	1836	1622	678	944	0.58199753	MIN	633	118	515	0.186413902	NONLOW	1622	230		NONPOV
384	39035184	Census	1841	3813	3340	473	0.12404930	NONMIN	137	60	1314	0.043668122	NONLOW	3813	122	0.03199	NONPOV
385	39035184	Census	1841	1843	1295	548	0.29734129	NONMIN	719	120	599	0.16689847	NONLOW	1738	85	0.04890	NONPOV
386	39035184	Census	1841	1591	2917	1674	0.36462644	NONMIN	168	114	1570	0.067695962	NONLOW	4534	102	0.02249	NONFOV
387	39035184	Census	1841	2348	1730	618	0.26320272	NONMIN	874	146	728	0.167048055	NONLOW	2348	335	0.14267	NONFOV
388	39035184	Census	1841	7562	5479	2083	0.27545622	NONMIN	264	206	2439	0.077882798	NONLOW	7540	274	0.03633	NONPOV
389	39035185	Census	1851	2686	404	2282	0.84959046	MIN	105	156	901	0.147587512	NONLOW	2653	256	0.09649	NONPOV

390	39035185 Census	<b>1851</b> 2417	1400	1017	0.42076954	MIN	110 343	762	0.31040724	LOW	2417 351	0.14522	NONPOV
391	39035185 Census	<b>1851</b> 2270	1239	1031	0.45418502	MIN	906 163	743	0.1799117	NONLOW	2270 166	0.07312	NONPOV
392	39035185 Census	<b>1851</b> 4158	2309	1849	0.44468494	MIN	158 160	1426	0.100882724	NONLOW	4150 401	0.09662	NONPOV
393	39035185 Census	<b>1852</b> 1572	420	1152	0.73282442	MIN	766 208	558	0.27154047	NONLOW	1572 164	0.10432	NONPOV
394	39035185 Census	<b>1852</b> 4812	2130	2682	0.55735660	MIN	216 440	1725	0.203233256	NONLOW	4812 892	0.18536	POV
395	39035185 Census	<b>1852</b> 3877	2936	941	0.24271343	NONMIN	142 246	1176	0.172995781	NONLOW	3222 532	0.16511	NONPOV
396	39035186 Census	<b>1861</b> 4341	4073	268	0.06173692	NONMIN	179 140	1653	0.078081428	NONLOW	4341 141	0.03248	NONPOV
397	39035186 Census	<b>1861</b> 2633	2593	40	0.01519179	NONMIN	102 115	914	0.111758989	NONLOW	2633 246	0.09342	NONPOV
398	39035186 Census	<b>1861</b> 3780	3521	259	0.06851851	NONMIN	155 161	1389	0.103870968	NONLOW	3780 189	0.05	NONPOV
399	39035186 Census	<b>1861</b> 4793	4083	710	0.14813269	NONMIN	240 518	1891	0.215026982	NONLOW	4629 555	0.11989	NONPOV
400	39035186 Census	<b>1861</b> 6082	5758	324	0.05327195	NONMIN	241 216	2200	0.089403974	NONLOW	6057 187	0.03087	NONPOV
401	39035186 Census	<b>1862</b> 5902	5433	469	0.07946458	NONMIN	223 146	2090	0.06529517	NONLOW	5741 161	0.02804	NONPOV
402	39035186 Census	<b>1862</b> 4322	3816	506	0.11707542	NONMIN	170 153	1552	0.08973607	NONLOW	4310 129	0.02993	NONPOV
403	39035186 Census	<b>1862</b> 3573	3215	358	0.10019591	NONMIN	129 56	1242	0.043143297	NONLOW	3550 72	0.02028	NONPOV
404	39035186 Census	<b>1862</b> 5104	4741	363	0.07112069	NONMIN	200 141	1863	0.070359281	NONLOW	5104 148	0.02899	NONPOV
405	39035186 Census	<b>1862</b> 4181	3538	643	0.15379095	NONMIN	145 84	1366	0.057931034	NONLOW	4181 79	0.01889	NONPOV
406	39035187 Census	<b>1871</b> 2701	1281	1420	0.52573121	MIN	104 167	880	0.159503343	NONLOW	2694 319	0.11841	NONPOV
407	39035187 Census	<b>1871</b> 3196	2386	810	0.25344180	NONMIN	128 185	1095	0.14453125	NONLOW	3196 317	0.09918	NONPOV
408	39035187 Census	<b>1871</b> 3083	2496	587	0.19039896	NONMIN	773 183	590	0.236739974	NONLOW	1905 342	0.17952	NONPOV
409	39035187 Census	<b>1871</b> 4221	3560	661	0.15659796	NONMIN	128 260	1028	0.201863354	NONLOW	3671 558	0.15200	NONPOV
410	39035188 Census	<b>1881</b> 3331	145	3186	0.95646952	MIN	130 418	885	0.320798158	LOW	3296 727	0.22057	POV
411	39035188 Census	<b>1881</b> 1730	147	1583	0.91502890	MIN	852 226	626	0.265258216	NONLOW	1730 258	0.14913	NONPOV
412	39035188 Census	<b>1881</b> 3325	206	3119	0.93804511	MIN	165 778	873	0.471229558	LOW	3325 798	0.24	POV
413	39035188 Census	<b>1881</b> 2390	103	2287	0.95690376	MIN	973 190	783	0.195272354	NONLOW	2390 209	0.08744	NONPOV
414	39035188 Census	<b>1881</b> 2502	227	2275	0.90927258	MIN	114 376	768	0.328671329	LOW	2502 563	0.22501	POV
415	39035189 Census	<b>1891</b> 3828	3583	245	0.06400209	NONMIN	158 166	1416	0.104930468	NONLOW	3828 103	0.02690	NONPOV
416	39035189 Census	<b>1891</b> 4948	4509	439	0.08872271	NONMIN	200 334	1666	0.167	NONLOW	4841 460	0.09502	NONPOV
417	39035189 Census	<b>1891</b> 4970	4534	436	0.08772635	NONMIN	197 277	1693	0.140609137	NONLOW	4773 313	0.06557	NONPOV
418	39035189 Census	<b>1891</b> 3589	3368	221	0.06157704	NONMIN	162 259	1368	0.159188691	NONLOW	3538 132	0.03730	NONPOV
419	39035189 Census	<b>1891</b> 4282	3529	753	0.17585240	NONMIN	224 300	1949	0.133392619	NONLOW	4141 330	0.07969	NONPOV
420	39035189 Census	<b>1891</b> 5991	6090	901	0.12887998	NONMIN	296 322	2638	0.108783784	NONLOW	6777 246	0.03629	NONPOV

SortID Id	ld2	Geogra	Trac	EstimateT	NonMino	Minor	PercentMin	MIN NON	Tot	Lowingo	NonL	PercentLowIn	LOW_NON	TotP	Below	PerBelP	POV NON
421	39035189	_		3779	3306	473	0.12516538	_	13	119	1244	0.08730741	NONLOW	3762			NONPO/
422	39035190	Census	190	2019	1974	45	0.02228826	NONMIN	11	424	765	0.356602187	LOW	1929	271	0.14048	NONPOV
423	39035190	Census	190	1721	1517	204	0.11853573	NONMIN	61	41	573	0.066775244	NONLOW	1721	22	0.01278	NONPO
424	39035190	Census	190	10680	9999	681	0.06376404	NONMIN	39	354	3598	0.089574899	NONLOW	1068	326	0.03052	NONPO
425	39035192	Census	192	1664	1613	51	0.03064903	NONMIN	61	64	549	0.104404568	NONLOW	1664	70	0.04206	NONPO
426	39035192	Census	192	1281	1059	222	0.17330210	NONMIN	71	124	592	0.173184358	NONLOW	1281	110	0.08587	NONPO
427	39035192	Census	192	2051	1924	127	0.06192101	NONMIN	74	82	664	0.109919571	NONLOW	2051	120	0.05850	NONPO
428	39035193	Census	193	971	151	820	0.84449021	MIN	47	160	310	0.340425532	LOW	798	167	0.20927	POV
429	39035193	Census	193	943	194	749	0.79427359	MIN	28	138	143	0.491103203	LOW	622	188	0.30225	POV
430	39035194	Census	194	2217	1943	274	0.12359043	NONMIN	93	108	831	0.115015974	NONLOW	2073	69	0.03328	NONPOV
431	39035194	Census	194	3408	3076	332	0.09741784	NONMIN	14	142	1351	0.095110516	NONLOW	3398	80	0.02354	NONPO
432	39035194	Census	194	2269	2052	217	0.09563684	NONMIN	91	135	782	0.147219193	NONLOW	2269	220	0.09695	NONPO
433	39035194	Census	194	804	231	573	0.71268656	MIN	37	93	278	0.250673854	NONLOW	804	129	0.16044	NONPOV
434	39035194	Census	194	3280	2458	822	0.25060975	NONMIN	13	92	1234	0.069381599	NONLOW	3280	119	0.03628	NONPO
435	39035195	Census	195	4599	733	3866	0.84061752	MIN	21	330	1798	0.155075188	NONLOW	4599	246	0.05348	NONPOV
436	39035195	Census	195	4741	1815	2926	0.61716937	MIN	19	607	1317	0.315488565	LOW	4478	785		NONPOV
437	39035195	Census	195	3854	3230	624	0.16190970	NONMIN	14	121	1299	0.085211268	NONLOW	3835	114	0.02972	NONPOV
438	39035195	Census	195	4150	4055	95	0.02289156	NONMIN	18	180	1691	0.096205238	NONLOW	4089	71	0.01736	NONPOV
439	39035196		196	1609	599	1010	0.62771908	MIN	77	145	630	0.187096774	NONLOW	1609	127	0.07893	NONPOV
440	39035196		196	2472	1845	627	0.25364077	NONMIN	11	392	754	0.342059337	LOW	2472		0.20105	POV
441	39035196			4005	233	3772		MIN	17	1026	741	0.580645161	LOW	4005		0.41098	
442	39035196			3887	3555	332	0.08541291		15	106	1414	0.069736842	NONLOW	3869			NONPO
443	39035196			3220	778		0.75838509	MIN	13	728	584	0.554878049	LOW	3212		0.43929	
444	39035196		196	1501	11				61	298	313	0.487725041	LOW	1501		0.41905	
445	39035980		980		0	0	0	NONMIN	0	0	0	0	NONLOW	0	0	0	NONPO
446	39035980		980		0	0	0	NONMIN	0	0	0	0	NONLOW	0	0	0	NONPO
447	39035981		981		0	0	0	NONMIN	0		0	0	NONLOW	0	0	0	NONPO
448	39035990	Census	9900	00	0	0	0	NONMIN	0	0	0	0	NONLOW	0	0	0	NONPOV

Attachment K - GCRTA Vehicle Assignment by Ro	ute 2018

**GCRTA Vehicle Assignment by Route 2018** 

Row Labels	RTE_DESCR	CAT	GAR	AvgVehAge	CLASSIFICATION
1	#1 St Clair	H	н	7.29	MINLOW
2	#2 E79th	CF	T	14.69	MINLOW
3	#3 Superior	R	H	6.78	MINLOW
5	#5 Chagrin	R	н	7.70	MINLOW
6	HealthLine	R	н	11.99	MINLOW
7	#7 Monticello-Euclid Hts	OF.	н	6.04	MINLOW
8	#8 Cedar-E 116th	R	H	8.10	MINLOW
9	#9 Mayfield	OF:	н	8.00	MINLOW
10	#10 E 105th	Œ	н	7.15	MINLOW
11	#11 Quincy-Buckeye	R	н	7.37	MINLOW
14	#14 Kinsman	R	н	9.33	MINLOW
15	#15 Union-Harvard	R	н	6.80	MINLOW
16	#16 E 55th	CF .	T	13.80	MINLOW
19	#19 Broadway-Miles	R	н	8.33	MINLOW
22	#22 Lorain	R	T	8.51	MINLOW
25	#25 Madison-Detroit	CF.	Ť	11.88	NONMINLOW
26	#26 Detroit	R	T	8.62	MINLOW
28	#28 Euclid	CF.	н	7.13	MINLOW
30	#30 E 140th-Lakeshore	Œ	н	6.07	MINLOW
32	#32 Cedar	Œ	н	6.84	MINLOW
34	#34 E 200th-Green	Œ	н	8.25	MINLOW
37	#37 E 185th-Taylor	CF	н	8.61	MINLOW
38	#38 Hough	R	Н	8.19	MINLOW
39	#39 Lakeshore	R	н	5.54	MINLOW
40	#40 Lakeview-Lee	Œ	н	6.39	MINLOW
41	#41 Warrensville	Œ	н	7.48	MINLOW
45	#45 Ridge	R	T	13.21	MINLOW
48	#48 University Circle-E 131st	OF.	н	6.34	MINLOW
49	#49 Lorain-Center Ridge	Œ	T	12.18	NONMINLOW
51	#51 MetroHealth Line	R	T	2.86	MINLOW
53	#53F Broadview-N Royalton	R	T	14.60	NONMINLOW
54	#54 Brookpark	OF.	T	12.50	NONMINLOW
55	#55 Cleveland State Line	R	T	5.18	NONMINLOW
60	#60 Nine-Twelve Trolley	DL	T	6.50	MINLOW
61	#61 E-Line Trolley	DL	T	3.00	MINLOW
62	#62 B-Line Trolley	DL	T	3.00	MINLOW
75	#75 Lorain	Œ	T	11.61	NONMINLOW
76	#76 Broadway-Turney	R	н	7.73	MINLOW
77	#77F Brecksville	R	T	12.31	NONMINLOW
78	#78 W 117th-Puritas	CF	Ť	14.08	MINLOW
79	#79 Fulton	R	T	13.88	MINLOW
31	#81 Tremont-Storer	R	T	11.89	MINLOW
33	#83 Warren-W 130th	Œ	T	14.04	MINLOW
36	#86 Rocky River DrBagley	Œ	T	9.27	MINLOW
90	#90F Broadway-Libby	R	T	14.00	MINLOW
94	#94 E 260th-Richmond	OF:	н	6.38	MINLOW
246	#246 Westlake P-N-R	XF	T	12.15	NONMINLOW
251	#251 Strongsville P-N-R	XF	T	12.83	NONMINLOW
263	#263 North Olmsted P-N-R	XF	T	17.06	NONMINLOW

## Attachment L - GCRTA Vehicle Headway by Route 2018

## GCRTA Vehicle Headway by Route 2018<sup>1</sup>

	don't A venicle fied	uwa	y D,	Houte		,,,,	
DOLLTE*	ROUTE NAME	DEAV	DAGE	DISTRICT	CAT	Classification	SERVICE
HOUTE	1 - ST. CLAIR	10	20 20	HAYDEN	R	MINLOW	All Day
2	2- EAST 79TH	60	60	TRISKETT	CF	MINLOW	All Day
3	3- SUPERIOR	15	20	HAYDEN	R	MINLOW	All Day
5	5- CHAGRIN	30	60	HAYDEN	CF	MINLOW	All Day
6	6- HEALTHLINE	10	10	HAYDEN	R	MINLOW	All Day
7	7- MONTICELLO-EUCLID HTS.	40	45	HAYDEN	CF	MINLOW	All Day
8	8- CEDAR-EAST 116TH	60	60	HAYDEN	R	MINLOW	All Day
9	9- MAYFIELD	30	45	HAYDEN	CF	MIINLOW	All Day
10	10 - EAST 105TH	20	20	HAYDEN	CF	MINLOW	All Day
11	11 - QUINCY-BUCKEYE	20	35	HAYDEN	R	MINLOW	All Day
14	14 - KINSMAN	20	20	HAYDEN	B	MINLOW	All Day
15	15 - UNION-HARVARD	15	15	HAYDEN	B	MINLOW	All Day
16	16 - EAST 55TH	40	40	TRISKETT	CF	MINLOW	All Day
19	19 - BROADWAY-MILES	30	40	HAYDEN	R	MINLOW	All Day
22	22 - LORAIN	15	20	TRISKETT	R	MINLOW	All Day
25	25 - MADISON-DETROIT	60	60	TRISKETT	CF	NONMINLOW	All Day
26	26 - DETROIT	20	20	TRISKETT	R	MINLOW	All Day
28	28/28A - EUCLID	15	15	HAYDEN	CF	MINLOW	All Day
30	30 - EAST 140TH-LAKESHORE	15	30	HAYDEN	CF	MINLOW	All Day
32	32 - CEDAR	30	45	HAYDEN	CF	MINLOW	All Day
34	34 - EAST 200TH-GREEN	60	60	HAYDEN	CF	MINLOW	All Day
37	37 - EAST 185TH-TAYLOR	40	60	HAYDEN	CF	MINLOW	All Day
38	38 - HOUGH	40	60	HAYDEN	R	MINLOW	All Day
39		15	45		R	MINLOW	All Day
	39/39F - LAKESHORE		-	HAYDEN	CF	MINLOW	All Day
40	40 - LAKEVIEW-LEE	45	45	HAYDEN	CF	MINLOW	All Day
41	41/41F - WARRENSVILLE	15	30	HAYDEN	R	MINLOW	
45 48	45 - RIDGE 48/48A - UNIVERSITY CIRCLE-EAST 131ST	30 20	60 30	TRISKETT	CF	MINLOW	All Day All Day
49	49 - LORAIN-CENTER RIDGE	40	40	HAYDEN TRISKETT	CF	NONMINLOW	
49 51	51/A/B/C METROHEALTH LINE	10	10	TRISKETT	R		All Day
53	53F - BROADVIEW-N.ROYALTON	30	N/A		R	MINLOW	All Day Peak
54	54 - BROOKPARK	60	60	TRISKETT	CF	NONMINLOW	
55		10	40	TRISKETT	R	NONMINLOW	All Day
60	55/A/B/C - CLEVELAND STATE LINE NINE / TWELVE TROLLEY	15	N/A	TRISKETT	DL	MINLOW	All Day Peak
61	E LINE TROLLEY	11	11	TRISKETT	DL	MINLOW	All Day
62	B LINE TROLLEY	11	11	TRISKETT	DL	MINLOW	All Day
63	C LINE TROLLEY	N/A	12	TRISKETT	DL	MINLOW	Eve/Wkd
75	75 - LORAIN	40	40	TRISKETT	CF	NONMINLOW	All Day
76	76 - BROADWAY-TURNEY	30	45	HAYDEN	R	MINLOW	All Day
77	77F - BRECKSVILLE	30	60	TRISKETT	R	NONMINLOW	All Day
78	78- WEST 117TH-PURITAS	30	60	TRISKETT	CF	MINLOW	All Day
79	79/79A - FULTON	15	30	TRISKETT	R	MINLOW	All Day
81	81 - TREMONT-STORER	40	40	TRISKETT	R	MINLOW	All Day
83	83 -WARREN-W. 130TH	30	60	TRISKETT	CF	MINLOW	All Day
86	86 - ROCKY RIVER-BAGLEY	60	60	TRISKETT	CF		All Day
90	90F - BROADWAY-LIBBY	15	40	TRISKETT	R	MINLOW	All Day
90	94 - EAST 260TH-RICHMOND	16 60	60	HAYDEN	CF		
_						MINLOW	All Day
246	246 -WESTLAKE P-N-R	20	N/A	TRISKETT		NONMINLOW	Peak
251	251 - STRONGSVILLE P-N-R	18	N/A	TRISKETT	PNR	NONMINLOW NONMINLOW	Peak Peak
263	263 - N. OLMSTED P-N-R	20	N/A	TRISKETT	PINH	NONMINLOW	PORK

<sup>1</sup> Schedules effective August 2018

## **Attachment M - GCRTA On-Time Performance 2018**

3	3 - SUPERIOR	88.17%	84.43%	82,20%	83.00%	83.70%	82.64%	83,48%	80.73%	81.64%	84.73%	86,06%	86.48%	83.96%	MINLOW
5	5 - CHAGRIN	82.98%	84.28%	86.03%	86.98%	81.22%	83.59%	84.08%	86,09%	85,49%	85.66%	81.15%	83.85%	84.31%	MINLOW
6	6 - HEALTHLINE	85.39%	85,23%	84,21%	85.41%	81.19%	78,62%	81.86%	78.27%	78.68%	80.20%	80.16%	86.28%	82.18%	MINLOW
7	7 - MONTICELLO-EUCLID HTS.	84.49%	85.85%	87.55%	85.74%	32,47%	84.56%	85.71%	86,55%	86.92%	87.56%	87.45%	88.09%	86.07%	MINLOW
8	8 - CEDAR-EAST 116TH	84.34%	84.65%	81,74%	82.37%	77.46%	82.05%	84.81%	82,68%	82.57%	82,50%	85,91%	88.09%	83,33%	MINLOW
9	9 - MAYFIELD	85.17%	84.77%	83.17%	81.08%	77.71%	81.62%	82.36%	81.67%	83.68%	86.39%	83.76%	80.72%	82.62%	MINLOW
10	10 - EAST 105TH	79.32%	78.56%	77.58%	77.06%	75,44%	77.31%	79.60%	77.22%	77.80%	79.34%	81,00%	83.12%	78.65%	MINLOW
11	11 - QUINCY-BUCKEYE	86.20%	82.57%	81,37%	82 29%	80.64%	76,99%	77.07%	73.17%	74.47%	78.33%	80.95%	80.80%	79.83%	MINLOW
14	14 - KINSMAN	84.77%	80.69%	79.36%	78.20%	75.67%	75.69%	77.47%	74.83%	76.11%	84.02%	82.65%	84,36%	79.62%	MINLOW
15	15 - UNION-HARVARD	78.57%	78.24%	77,78%	77.83%	75,46%	75.38%	75.93%	74.50%	73.12%	78.26%	77.45%	81.16%	76,99%	MINLOW
16	16 - EAST SSTH	80.72%	81.50%	81,44%	79.35%	74.13%	76.18%	83,16%	78,98%	71.32%	68.57%	78,02%	84.13%	78.35%	MINLOW
19	19 - BROADWAY-MILES	85.17%	85,73%	77.16%	75.09%	74.07%	74,40%	73.73%	71.89%	73.01%	72.54%	74.19%	77.20%	76,70%	MINLOW
22	22 - LORAIN	82.02%	80.27%	80.56%	79.57%	72.78%	70.49%	71.96%	67.90%	67.53%	78.13%	80.51%	81.65%	76.17%	MINLOW
25	25 - MADISON-DETROIT	65.31%	65.07%	59.96%	62.88%	61.24%	74.07%	61.95%	61.09%	59.41%	65.85%	66,95%	76.23%	64.83%	NONMINLOW
26	26 - DETROIT	74.26%	72.32%	71.97%	67.91%	61.14%	64.98%	69.21%	68.08%	64.56%	70.24%	71.89%	73.24%	69.31%	MINLOW
28	28/28A - EUCUD	92.16%	89.39%	91,73%	93.82%	92.14%	91.32%	91.59%	92,06%	91,79%	91,23%	91,94%	92.90%	91.89%	MINLOW
30	30 - EAST 140TH-LAKESHORE	85.41%	86.54%	87.97%	86 12%	84.22%	84.17%	87,47%	87.91%	87.50%	88.06%	89.35%	89.01%	87.03%	MINLOW
32	32 - CEDAR	89.48%	90.19%	88,73%	88.58%	84,72%	84,50%	25,16%	85,40%	86.99%	86,73%	88 12%	88.96%	87.31%	MINLOW
34	34 - EAST 200TH-GREEN	84.06%	80.16%	82,16%	81.42%	80.05%	79.24%	78.80%	78.40%	77.70%	81.16%	79.10%	83.50%	80.48%	MINLOW
37	37 - EAST 185TH-TAYLOR	87.23%	83.93%	87,19%	88.34%	86,55%	86,46%	85,79%	85.28%	87.52%	88.91%	88.15%	88.79%	87.11%	MINLOW
38	38 - HOUGH	81,25%	79.32%	82,02%	80.25%	78.63%	78,02%	79.28%	79,39%	82.53%	84.41%	87.34%	84.54%	81.47%	MINLOW
39	39/39F - LAKESHORE	86.70%	87.23%	88,09%	86.17%	84.24%	83.11%	83.31%	81,38%	82 52%	83,70%	84,74%	86,40%	84.76%	MINLOW
40	40 - LAKEVIEW-LEE	87.03%	89.41%	87.24%	87.49%	83,78%	84.25%	86.85%	84.28%	85.12%	89.37%	89.76%	90.95%	87.06%	MINLOW
41	41/41F - WARRENSVILLE	79.03%	78.94%	82,34%	83,59%	79,19%	77.75%	78.80%	77.29%	79.92%	81.57%	80.97%	82 54%	80.19%	MINLOW
45	45 - RIDGE	75.26%	75.65%	74,15%	71.63%	60.97%	65.99%	65,47%	66,42%	67.62%	72.53%	75.16%	77.41%	70.85%	MINLOW
48	48/48A - UNIVERSITY CIRCLE-EAST 131ST	83.23%	80.39%	79.62%	78.22%	76.18%	75.41%	78.71%	78.26%	79.37%	80.38%	79,47%	80.69%	79.21%	MINLOW
49	49 - LORAIN-CENTER RIDGE	77.27%	80.56%	76.04%	77.72%	68,72%	75.37%	75,39%	72.22%	70.14%	81,35%	83,58%	79.59%	76,79%	NONMINLOW
51	51/A/B/C METROHEALTH LINE	78.81%	79.85%	80.74%	81.24%	76.07%	72.58%	74.05%	70.60%	70.62%	72,42%	76,09%	77.54%	75.71%	MINLOW
531	53F - BROADVIEW-N.ROYALTON	70.73%	70.15%	72.06%	74.00%	69.20%	74.16%	70,75%	70.98%	70.43%	71.56%	70.01%	74.29%	71.47%	NONMINLOW
54	54 - BROCKPARK	91.16%	91.01%	89.53%	85.58%	86.51%	87.79%	91.89%	95.31%	96,49%	93,05%	95,56%	91.75%	91.53%	NONMINLOW
55	55/A/B/C - CLEVELAND STATE LINE	78.66%	79.92%	78,93%	77.78%	73.73%	71.08%	68.37%	71,15%	71.07%	74.46%	80.86%	82 68%	75.66%	NONMINLOW
60	NINE / TWELVE TROLLEY	92,59%	95,04%	93,29%	94.14%	90.03%	93.67%	89.81%	88,80%	89.25%	92.69%	95,37%	96.33%	92,49%	MINLOW
61	E LINE TROLLEY	84.36%	69.27%	76.61%	82.60%	81.25%	80.56%	79.87%	80,60%	79.55%	85,89%	83.06%	83 53%	80.71%	MINLOW
62	B LINE TROLLEY	80.87%	76.49%	86,98%	87.75%	88.58%	87.89%	87.46%	89.05%	88.24%	93,20%	94,63%	83,48%	87.18%	MINLOW
63	CLINE TROLLEY	79.93%	81.44%	78.10%	78.50%	72.53%	75.33%	75.48%	69,63%	76.73%	77.55%	72,25%	74.21%	75,70%	MINLOW
66	66 - RED LINE	78.88%	87.02%	91,44%	91.02%	88.33%	89,29%	84.77%	81.89%	83.34%	80.28%	80.35%	89.50%	85,66%	MINLOW
67	67 - BLUE/GREEN LINE	82.23%	92.40%	90.33%	93.05%	88.37%	87.30%	85,80%	85.24%	82.93%	78.99%	78,78%	85.10%	85,83%	MINLOW
75	75 - LORAIN	76.07%	73.67%	73.68%	74.27%	71.06%	70.63%	70.20%	68.14%	63.84%	76.46%	79,13%	72.92%	72.58%	NONMINLOW
76	76 - BROADWAY-TURNEY	76.95%	77.14%	68,60%	72.46%	66.88%	76.22%	76.80%	67.66%	68.39%	69.88%	70.83%	76.57%	72.24%	MINLOW
771	77F - BRECKSVILLE	76.84%	78.62%	79.32%	78.80%	75.87%	71.14%	70.91%	69.87%	71.64%	72.56%	74,29%	80.51%	75.12%	NONMINLOW
78	78- WEST 117TH-PURITAS	84.81%	82.29%	78,86%	78.65%	77.74%	83.31%	78,10%	73,69%	79.70%	76.08%	76.14%	81.73%	79.35%	MINLOW
79	79/79A - FULTON	85.13%	84.31%	85,77%	84.09%	79,11%	75,69%	78.76%	77.65%	80.68%	82,46%	84,57%	86.81%	82.06%	MINLOW
81	81 - TREMONT-STORER	71.37%	72.64%	73,89%	73.80%	66,65%	69.13%	69.01%	64.38%	67.86%	68.83%	75,50%	72.17%	70.56%	MINLOW
83	83 -WARREN-W. 130TH	82.50%	77,78%	75.83%	75.37%	71.85%	79.51%	79.60%	79,19%	75.50%	77.37%	79.84%	76.66%	77.65%	MINLOW
86	86 - ROCKY RIVER-BAGLEY	68.52%	63.87%	71.34%	68.58%	62.48%	66.23%	62 90%	66.24%	67,44%	65.89%	71,77%	76.49%	67,73%	MINLOW
90f	90F - BROADWAY-LIBBY	71.33%	73.66%	72,92%	74.06%	68.93%	71.04%	71.11%	66,17%	69.66%	71.72%	74,23%	73,42%	71.54%	MINLOW
94	94 - EAST 260TH-RICHMOND	77.87%	80.56%	83,55%	83.89%	79.02%	78,52%	77.64%	79,43%	75.13%	83,32%	83.67%	81.71%	80,44%	MINLOW
246	246 -WESTLAKE P-N-R	83.37%	78.21%	83.17%	83.50%	80.88%	87.84%	84.11%	79.53%	76.17%	80.17%	81,27%	87.41%	82.11%	NONMINLOW
251	251 - STRONGSVILLE P-N-R	83,48%	83.44%	77.45%	78.42%	76.99%	83.08%	76.34%	72.90%	72.26%	75.15%	75.51%	81.84%	78.07%	NONMINLOW
263	263 - N. OLMSTED P-N-R	87.81%	88.92%	86.56N	90.61%	88.68%	87.74%	82 33%	81.44%	84.92%	88.85%	85,31%	88.11%	86.70%	NONMINLOW
											-				

GCRTA On-Time Performance 2018 1 GCRTA Service Plannin

## **Attachment N - GCRTA LEP Pamphlets**

## SAFTETY FIRST

In communities across the United States, a key link between Citizen Corps and Transit Watch is safety and security awareness.

Making public fransit as safe and secure as it can possibly be depends on everyone working together, transit personnel, local authorities and the riding public.

Citizer Corps communities harness the power of the individual through education, training, and volunteer services to make communities safer, stronger and better prepared for many kinds of public hazards. It makes sense that individuals committed to safe communities take part in supporting safe transit through "ransit Watch."

Transit Watch was conceived and developed in the wake of the 9-11 terrorist attacks in an effort to provide awareness regarding critical safety and security issues for transit passengers and transit employees alike.

Public transit is a safe and affordable way for millions of people across the country to travel. Police emergencies, natural disasters, fires, and collisions are among various situations that require quick thinking and adian in order to avoid potential dangers. Under various types of dangerous circumstances, an informed public can be a critical response chement.

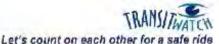
## PREPAREDNESS TIPS:

- Create an advanced plan for maintaining contact with family members if separated as a result of an emergency
- Keep a record of all contact & emergency information and update it regularly as needed
- Select a location outside your home as a family moeting point should your home need to be evacuated
- Identify alternate routes and means of reaching your meeting point in the event that typical routes and means are unavailable.
- Keep maps of your local transit system and local area handy for reference

For more information visit the Transit Watch website at:

www.riderta.com or visit http://ja.cuyahogacounty.us/es/emergency.htm





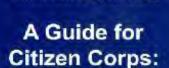












A SAFETY & SECURITY

AWARENSS CAMPAIGN

Linking Transit Watch Initiatives with Citizen Corps Activities

Let's count on each other for a safe ride







# BE INFORMED

Get to know the "ins and outs" of your ransit Watch is to inform the public ocal transit system. A key goal of before an emergency occurs.

# On a Red Line train:

- Listen to announcements. Remain calm. Follow instructions from GCRTA employees and emergency personnel.
- that is not possible, and no announcements have Evacuation through the front end of the train, If been made, exit the train using the Front and Back side doors.
- Side Door Exit Instructions are located above the front and back-side doors of each car.
  - · Warning, be aware of trains operating on the other tracks.
    - Watch for steep drops.
- assistance. Evacuate to the area between the On elevated structures, use caution, wait for

## On a Bus or RTV:

tracks

- Be familiar with all emergency exits.
- Depending on the vehicle, emergency exits may include windows & ceiling hatches. Exit the vehicle as instructed.
- Warning, be aware of other vehicles operating on the street.

## On a Light Rail Train:

- Listen to announcements. Remain calm. Follow instructions from GCRTA employees and emer-
- Exit the train as instructed. gency personnel
- If no announcements have been made, exit through the doors.
- On bridges, use caution, wait for assistance. Evacuate to the area between the tracks.
- Warning, be aware of trains operating on the

Get to know transit personnel. Advise others to cials everyday & in the event of an emergency. listen to instructions provided by transit offi-

## ALERT

Transit Watch depends on your eyes report it to 216-575-EYES (3937)

# Transit Evacuation:

is an effective first line of defense against potential When transit passengers are prepared, the result accidents and hazards including natural or manmade disasters. Transit evacuation is rare and should take place only when directed by transit officials

## If ordered to evacuate, follow these simple steps and remember:









EAVE

- LISTEN to announcements. Remain calm. Follow instructions from GCRTA employees and emergency personnel.
- exit the transit vehicle or facility in order to avoid stances and the surrounding area (For bridges, LISTEN and LOOK around as you prepare to hazards, such as smoke, debris, unusual suboncoming traffic).
  - individuals may require help from others during LOOK for others who may need help and offer assistance. Children, the elderly and disabled an evacuation.
- front and back-side doors. On Buses and RTV's, it may be an emergency door, hatch, or window. LOOK for the nearest accessible exit. On Red Line Trains, evacuate through the front end of the train, if thats not possible, exit through the On Light Rail Trains, exit through the doors.
  - is not possible through normal doors, use emer-LEAVE through the nearest exit (if evacuation gency doors or windows to exit safely).
    - LEAVE behind large or awkward objects like suitcases, strollers and heavy items

thing suspicious, trust your instincts & & ears. If you hear, see or smell some-

evacuation. Take the time to be prepared.

various emergencies including transit

Transit Watch aims to prepare riders for

BE PREPARED

# Suspicious Items:

Unattended items simply may be lost or left behind. Look for the following characteristics to report suspicious items to transit officials or police officers:

- Placement in an out-of-the-way location
- Matches something described in a threat or has a Attached batteries, wires, tanks, bottles or bags that might contain chemicals or explosives
  - threatening note attached
- Smoke, mist, gas, vapor, odor, or fluid seeping from a package or bag
  - Individuals nearby showing signs of illness or

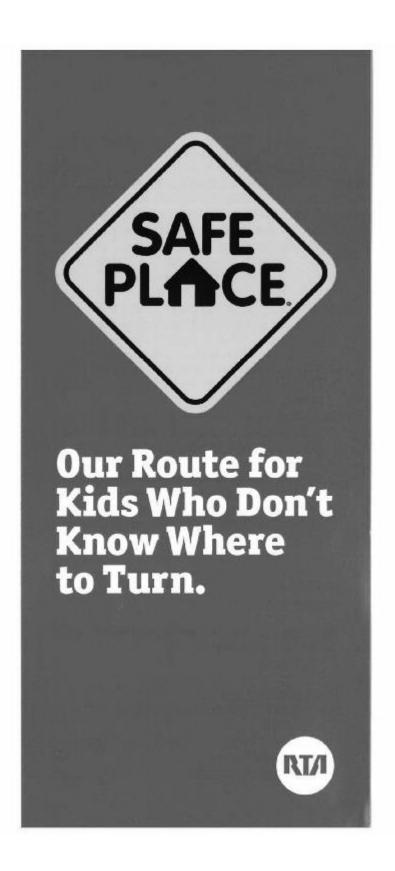
# RECOMMENDED COURSE OF ACTION:

transit employee, police officer or call 911. Do not touch suspicious items or confront someone with suspicious behavior! Tell a

# Suspicious Activity:

Suspicious activity relates to circumstances, timing and behavior NOT race, color, ethnicity or gender. Familiarize yourself with the following signs of suspicious activity and report people who are:

- In an unauthorized or restricted area
- Loitering, staring or watching employees and passengers
- Pacing, nervous or jumpy
- Abandoning items and quickly departing
- Acting in a disorderly manner or disturbing others Photographing equipment or secure areas
  - Carrying a weapon or appearing to have a weapon
- Wearing clothing that is extremely inappropriate for the weather (e.g. heavy coat on a hot day)



## Safe Place is the first step in helping kids in crisis.

This national outreach initiative provides youth immediate access to a network of safety and support services such as food, shelter, and family counseling. RTA buses and trains are designated connection points to Safe Place locations in Cuyahoga County. Interior transit cards and other advertising materials instruct kids in need to approach RTA operators for help. The procedure below outlines what you need to do when a youth is looking for a Safe Place.

## SAFE PLACE PROCEDURE:

- 1. Youth approaches operator for help.
- While continuing along the route, operator tells youth to take a seat while he/she radios for assistance.
- Operator should call ICC (Internal Communications Center) and report a youth in need of assistance, providing location, direction, and coach/train number.
- Operator should not detain the youth if he/she changes his/her mind.
- ICC Supervisor will make arrangements with either Transit Police or a Zone Supervisor to intercept operator's route to transport youth to Safe Place location.
- ICC Supervisor notifies one of the designated Safe Place agencies (either Next Step or Bellefaire) that a youth is being transported to its location.
- 7. Upon drop off, Transit Police or Zone Supervisor notifies ICC that youth has been taken to the appropriate agency.
- 8. ICC documents Safe Place incident.

For additional information about services available from our partnering Safe Place agencies, contact:

Bellefaire JCB Homeless & Missing Youth Program www.bellefairejcb.org 216.570.8010

Next Step Youth Shelter

www.lutheranmetro.org/next-step.html 216.941.0062



# Let's count on each other for a safe ride

Keep alert. If you see a suspicious package or a suspicious individual engaged in questionable activity,

# Call (216) 575-EYES (3937)

in an emergency

.

## Call 911

RTAnswerline......(216) 621-9500

TDD Service......(216) 781-4271
Monday-Friday, 6:30 a.m.- 6:30 p.m.;
Saturday, 8 a.m.-4:30 p.m.

RTA Main Office ......(216) 566-5100 1240 West 6th Street Cleveland, Ohio 44113-1331 On the Web @.....nideRTA.com

Riding Safely



# RAPID TRANSIT SAFETY RULES

- Stay clear and off of the tracks at all times. Always stand behind the yellow platform cdge tiles.
- Always walk to the train, never run. No pushing or shoving allowed.
   When traveling with small children, hold on to
- When boarding or exiting, be aware of the gap between the train and the platform. Always stand clear of the doors.

them as they enter or leave the train.

- Do not try to force open the train doors.
- Sit in your seat with your feet and legs out of the aisle. Always be considerate of other passengers.
- Never walk between cars while the train is moving.
- If you have a safety or security concern, inform your train operator by using the Passenger Emergency Intercom located behind the operator's cab.
- No food or beverages are permitted. Smoking is not permitted. Earphones must be used when listening to your personal radio or CD player.

# Introducing the Free iWatchRTA SmartphoneApp.

If You See Something, Say Something



Text a tip

· Send a Video

Send a Photo

 Call in non-urgent items

All Anonymously

# Don't Have a Smart Phone?

You can still call or text your tip to RTA Transit Police at 216-575-3937

# In An Emergency:

Call Transit Police 24/7 At 216-566-5163 or Call 911





# SECURIDAD PRIMERO

En las comunidades alrededor ce clave entre los ciudadanos y de los Estados Unidos, un enlaconocimiento de la seguri la vigilancia de tránsito es el

El hacer del transporte poblico más seguro se debe trabajar en unidad, personal de tránsito, las autoridades locales y la cominidad de pasajeros.

servicio voluntario para comunidades más Hace sentido que personas comprometidas con la seguidad de sus comunidades aposeguras, más fuerte y mejores preparadas para muchas clases de peligros públicos La comunidad tiene la oportunidad de a través de la educación, entrenamiento, y yen is acquirided del tránsito a través del programs "Transit Watch".

segmidat pura increasions del transporte "Trunşit Wutch" nació y se desarrolló luago de les ataques terroristas del 9-11 ataquis en un esfuerzo de hacer conclencia sobre to arguridad y lus cuestiones de público como para sus empleados.

Emergencias policiaca, dosastros naturales , incandios, y accidentes son algunas de las pelignos. Bajo estas riccunstancias un públi-Signaciones que requierren ponsamiento y segura y econômica para viajar de mi-El transporte público tránsito se mansera acción rápida con el fin de a evitar otres liones de personas a través de el puls. co informado puede ser la diferencia.

## CONSEJOS PARA ESTAR PREPARADOS

- Preparar un plan con asticipación que contenga los familiares a consectar en caso de emergencia
- Mantener un registro de todos los contactos e informa cion de emergencia y actualizar regularmente.
- samilia reunirse en caso de que necesiten ser evacuados Seleceidaer una ubicación que no sea su casa para la
- en caso de que las ruras acosrumbradas no estra dispon-Identificar rutss abernas para llegar al punto de reunión
- Magnener mapas de su sistema de tránsito y areas locales a la manol.

## Watch" (vigilancia de tránsito): Para más información visite la página de "Transit

http://ja.cuyahogacounty.us/es/emergency.htm





Contemos unos con otros para un viaje













CAMPAÑA DE CONCIENCIACIÓN DE SEGURIDAD & PROTECCIÓN

## Ciudadanos: Guia Para

"Transit Watch" (vigilancia de tran sito) con las actividades de los ciu-Enlazando las iniciativas de dadanos Confernos umos con ofros para un viale seguro









# VUOLITICATE STREET

del sistema de trâncito local. La mets de 'Transil Watch' es a in-Connoc les "liegedes y selides" formar al público antes que uno

# MANTENTE ALERTA

tus intentos & informato al a 216-575-EYES (3937) Transit Watch" depende de tus ojos & oido. Si escuchas, vez o hueles algo sospochoso, confla en

porte publicó. Toma el tiempo para prepaparar a sus pasajeros para emergencias notuyendo la evacuación de algún trans-Transit Watch, tiene como objetivo pre-

MANIEN E PREPARADO

# En el tren "Red Line train":

Articules desatendides. Buscer para las signientes caracraristicas para informar elementos sospechoses a los fun-

Sospechoso elementos:

Deteries, cables, tanques, hotellas o holsas que podr-

Posforos. Cualquier cosa que se pueda describir como

una amenaza o contenga una nota de amenaza.

ian contener productes químicos e explosivos

Un articulo colocado en un paso fuera de la ubicación

clonarios de tránsiso u oficiales policiacos:

- Escuche los anuncios. Mantén la calma. Sigue las instrucciones de los empleados de GCRTA y el parsonal de emergencia.
- De eso no ser posible, y anuncios han sido hecho, Evacuación por la de al frente del final del de tren. utiliza la salida de al frente y la de atrás.
  - aspuertas laterales están localizados en la perte Instrucciones de cómo utilizar las puertas de ADVEKTENCIA, estor consiente de trenes de arriba de ceda ferrocerril.

Humo, niebla, gas, vapor, olor, o liquido que se hitra

Individuos que muestran señales de angladad.

de un paquete o bolsa.

- que están funcionamiento en otras vias.
- Ten proceución en bajadas empinadas.
- PRECAUCIÓN En uso de estructuras alavadas'espere hacer asistido. Evanuer a la

No toque elementos sospechosos o se enfrente a alguien con comportamiento sospechoso! Comuniquelo al empleados de tránsito,

RECOMENDACIONES DE COMO ACTUAR.

- aona entre las zonas de las vias. On a Bus or RTV:
- Este familiarizado con todas las salidas de emer-
- Evacue el vehículo siguitendo las instrucciones.
- emergencia sale puede incluya ventanas y techo. Según en el vehículo puede ser que las salidas de
  - ADVERTENCIA, mantente alerta de otres vehícohis fonctionamiento en el calle.

género. Familiaritzace con la siguiente signos de activi-

dad sospechosa e informe personas que:

tlempo y comportamiento NO raza, color, etnia o

Estén en lugares no autorizados o área restringida

That basura, que se quede viendo a empleados

y/o pasajeros de manera extraña.

Le activided sospechose se reliere a circunstancias,

Actividad Sospechosa:

oficial de o llamar 911.

# En una luz en la via del tren:

- Escucha a anuncios. Mantén le calma. Siga las instrucciones de los empleados de CCNTA y el personal de emergencia
  - Sigue les instrucciones para evacuar el tren.
    - Si no se han hecho evacua por las puertas.

Acción en on desordenada o forma perturbadora para

Abandono elementos y rápido calida

Nerviceo o inquieto

- PRECAUCIÓN En los puentes, esperar por ayuda. Evacuar a la zona entre las vias
- ADVERTENCIA, mantente alerta de otros trenes otros o seguir las instrucciones de los oficiales Conoce el personal de transito. Aconseje a februarento,

de transito en un evento de una emergancia.

para la tiempo (e.g. pasado capa en un callente día)

Usando rapa que es completament inadecuado

En posesión de algún arma o que lo aparente

Que fotografie equipos o áreas de seguridad

otros

## evacuación del un transporte publico es rara y debe tomar lugar sólo cuando es dirigido por funciocontra posibles accidentes y riesgos incluyendo desestres naturales o creados por el hombre. La resultado es uno efectivo como linea de defensa Evacuación del Transporte Publico: Cuando tránsito pasajeros están preparados, el narios de tránsito.

## SE LE ORDENA EVACUAR EL TRANSPURTE 201107

- ESCUCHA a anumetos. Manten calma. Signi las instrucciones de empleados y personal
- ESCUCHA y BUSCA on lo que te preparas para hrns, sustancias linesuales posiciones y la zona Evecuar el transporte público o instalaciones para evitar riesgos, cal como humo, escomque rodes (puentes, los tráfico).
  - BUSCAR per atros que puedan necesitar ayu personas con discapacidad puede requieren day ofrecer asistencia. Niños, ancianos y syuder durante una evacuación.
- RTV, puede ser un puerta de emergencia se la BUSCAR por la salida disponible mas cercana. por of frente y parte trasers. En autohuses y frente final del tren, si no es posible, salida En linea roja trenes, evacuar a través de la puerta, ventana o techo.
- de emergencia: puertas, ventanas para una salies no posible por la misma puertas, use salidas SALIR por la puerta de salida (si evacuación da segura).
  - DEJA detrás objetos grande como maletas, coches y pesado elementos.

## ¿No tiene un teléfono inteligente?

Ausda llamar o enviar un monsaje de texto a RTA Plicia de transito al:

285-575-8837

En casa de emargencia;

Ulame a la Politola de transito 24/7 el 216-566-5163 o puede Namar al 911



## situaciones que no son Haz una llamada cu Textes un aviso Envis un video Envis uns foto de emergencia

## Gratis para tu teléfono Applicación

# **IWatchRTA**

Si vez algo, di algo



# RECLAS DE SEGURIDAD

- Manténgase en la asegurado en la perada hasta que el antobús se detenga por completo.
  - Siempre camine hacia el autobús, Numea corra en las escaloras del autobús ya sea para abordar or salir del mismo. No se permits empujar.
- Mientras este sentado mantenga sus pies fuera del pasillo del autobús,
- Cuando aborde o salga del autobús siempre lieve su bolsas, paquotes y mochillas delante de usted, pum que no queden strapados en la puerta.
- Nunca sague sus brazos o cualquer otra parte del cuerpo pas las ventanas del
- Hade el cordon pera que el cluder sepa que ha llegado a su parada.
- No se permite comides o bebidas. Furnar esta prohibido. Debe utilizar andifonos cusudo este escuchando el radio o CDs.

Form 100-326 07-03-97



## Greater Cleveland Regional Transit Authority STAFF SUMMARY AND COMMENTS

TITLE/DESCRIPTION:	Resolution No.: 2020-12
APPROVING THE 2020 TITLE VI PROGRAM UPDATE FOR SUBMISSION TO THE FEDERAL TRANSIT ADMINISTRATION	Date: January 16, 2020
	Initiator: Legal/Office of Equal Opportunity
ACTION REQUEST:	
☐ Approval ☐ Review/Comment ☐ Information Only ☐ Other	er

- 1.0 PURPOSE/SCOPE: This action will approve the 2020 Title VI Program Update for submission to the Federal Transit Administration ("FTA"), as required by Title VI of the Civil Rights Act of 1964.
- 2.0 DESCRIPTION/JUSTIFICATION: Every three years, the GCRTA staff prepares a Title VI Program Update and submits it to the FTA. GCRTA's current Title VI Program expires in February 2020, and therefore the attached 2020 Title VI Program Update needs to be submitted to the FTA in late January 2020.

Since October 2012, the FTA has required each Title VI Program Update to be reviewed and approved by the transit agency's governing body before it is submitted to the FTA, under FTA Circular 4702.1B. Accordingly, the staff is requesting a resolution from the Board of Trustees indicating that the Board has reviewed and approved the 2020 Title VI Program Update to be submitted to FTA.

- 3.0 PROCUREMENT BACKGROUND: Does not apply.
- 4.0 DBE/AFFIRMATIVE ACTION BACKGROUND: Does not apply.
- 5.0 POLICY IMPACT: Adoption of the resolution will enable GCRTA to comply with Federal guidelines implementing Title VI of the Civil Rights Act of 1964.
- 6.0 ECONOMIC IMPACT: Failure to adopt the resolution may result in a finding by FTA of non-compliance with FTA Circular 4702.1B, and the imposition of sanctions, including a refusal by the FTA to approve grants.
- 7.0 ALTERNATIVES: Not adopting the resolution would impact and delay the approval of Federal grants.
- 8.0 RECOMMENDATION: On January 7, 2020, the Operational Planning & Infrastructure Committee reviewed and discussed the 2020 Title VI Program Update, and referred it to the full Board. It is recommended that the resolution be approved, authorizing the General Manager, Chief Executive Officer, to submit the 2020 Title VI Program Update to the FTA.

Recommended and certified as appropriate to the availability of funds, legal form and conformance with the Procurement requirements.

General Manager, Chief Executive Officer