Title VI Update

The Greater Cleveland Regional Transit Authority Board of Trustees

Operational Planning & Infrastructure Committee

January 7, 2020
Presentation Outline

What is Title VI?
What does this mean to RTA?
Who is responsible for Title VI?
Who implements Title VI?
What are the requirements for Title VI?
Title VI Civil Rights Act of 1964

“No person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal Financial Assistance...”
What does this mean to RTA?

• Prepare a Title VI Program Update every three years
• Comply with the FTA Circular 4702.1B
• Present Program Update to Board for approval
• Submit to Federal Transit Administration (FTA)
What does this mean to RTA?

- Our Vision is to serve all customers regardless of their protected class
- Benefits and services are available and equitably distributed
- Level and quality of transit services are sufficient to provide equal access
What does this mean to RTA?

• Ensure customer opportunities to participate in transit planning and decision-making processes

• Location of transit services and facilities are made consistent with the requirements of Title VI

• Corrective and remedial action taken when necessary to prevent discriminatory treatment
Who is Responsible?

- Board of Trustees
- General Manager/Chief Executive Officer (CEO)
- Chief Civil Rights Officer
- Management and all employees
Who Implements Title VI?

Title VI Team

- Customer Service
- Office of Equal Opportunity
- Marketing & Communication
- Programming & Planning
- Grants
- Service Management
What are the Requirements?

RTA must comply with two specific requirements:

• General requirements
• Transit provider requirements
Title VI General Requirements

Title VI Notice to the Public in English and Spanish

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

GCRTA operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with 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/voe/
  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 language call (216) 356-3085

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

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

Cualquier persona que crea que ha sido perjudicada por alguna práctica discriminatoria ilegal bajo el Título 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 trato a personas de todas las razas, mujeres, discapacitadas y veteranos. Cualquier persona que crea que ha sido discriminada en base a prácticas discriminatorias ilegales puede presentar una queja ante GCRTA.

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

- Llame al (216) 356-3085
- Página de internet a RideRTA.com/voe/
  y descargue el archivo de queja
  enviado por correo:
  GCRTA, 1240 West 6th Street,
  Cleveland, Ohio 44113-1302
  Atención: Oficina de
  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.
What happens when a complaint is filed with the OEO?

- **Report**
  - Complete Complaint Form
  - Complainant Interview

- **Investigate**
  - Interview Respondent and Witnesses
  - Gather all evidence

- **Decision**
  - Substantiated?
  - Recommend actions
  - Report out
Title VI General Requirements

- Community Advisory Committee
- Language Assistance Plan
- Public Participation Plan
Transit Provider Requirements

• Analyze proposals to increase/decrease total service miles by 10 percent or more
• Analyze all proposals to change fares
• Monitor/assess service every three years
• Include the assessment results in the next Title VI Program Update to FTA
Transit Provider Requirements

• GCRTA service monitoring/assessment report complies with and follows the organization of FTA Circular 4702.1B

• Comparisons are made to ensure that service levels on Minority/Low-Income ("MINLOW") routes are approximately the same as, or better than, on other ("NONMINLOW") routes
Example: Vehicle Assignment

• An average vehicle age for each category was calculated
• Eight dates selected randomly from the year analyzed (2018)
• As indicated in the following table, vehicles assigned to MINLOW routes, are newer, on average, than NONMINLOW routes
**TITLE VI**

**CHAPTER IV:**

E. Monitoring Procedures

1) Level of Service Methodology:

B. Vehicle Assignment

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<thead>
<tr>
<th>ROUTE CATEGORY</th>
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<tr>
<td>NONMINLOW</td>
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</table>
Example: Vehicle Headway

• 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
TITLE VI

CHAPTER IV:
E. Monitoring Procedures
1) Level of Service Methodology
C. Vehicle Headway

AVERAGE HEADWAY COMPARISONS

<table>
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<tr>
<th>Route Category</th>
<th>Headways</th>
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<tr>
<td>MINLOW</td>
<td></td>
<td>Peak</td>
<td>Midday</td>
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<tr>
<td></td>
<td>28</td>
<td>37</td>
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</tr>
<tr>
<td>NONMINLOW</td>
<td></td>
<td>33</td>
<td>50</td>
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</table>

Greater Cleveland Regional Transit Authority
Conclusion

- RTA is in compliance with Title VI in all areas considered for analysis
- All information presented today is included in the Title VI package previously provided
Recommendation

The Title VI Program Update will be forwarded to the Board of Trustees for approval at the next January 21, 2020 meeting.
Questions?