











### Title VI Program Update

Operational Planning & Infrastructure Committee

January 10, 2023

### **Presentation Outline**

- What is Title VI?
- What are the provisions of Title VI?
- What does this mean to GCRTA?
- Who is responsible for 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..."



### Title VI Provisions

- As a federal grant recipient, GCRTA must comply with the FTA Circular 4702.1B and prepare a Title VI Program Update every three years.
- The Title VI Update must be presented and approved by the Board of Trustees.
- Failure to adopt the resolution may result in a finding by FTA which could impact and delay the approval of Federal Grants.



### What does this mean to GCRTA?

- Our Vision is to service 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 GCRTA?

- Ensure customers have opportunities to participate in transit planning and decision-making process
- Decisions on the location of transit services and facilities are made consistent with the requirements of Title VI
- Corrective action is 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

- Office of Equal Opportunity, ADA & DEI
- Marketing & Communications
- Programming & Planning
- Service Management



# What are the Requirements?

Title VI Requirements consist of:

- 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 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 unlearful 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 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 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:

- · Llame 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.



# What happens when a complaint is filed with the OEO?





# Title VI General Requirements

- Community Advisory Committee (CAC)
- 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 period analyzed (2<sup>nd</sup> half of 2021).
- 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 Sevice Methodology:
- B. Vehicle Assignment

ROUTE CATEGORY	<b>AVERAGE AGE</b>
MINLOW	6.70
NONMINLOW	11.19



# 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**

Route	Headways	
Category	Peak	Midday
MINLOW	31.82	32.81
NONMINLOW	37.50	45.00



### Recommendation

The Title VI Program Update will be forwarded to the Board of Trustees for approval at the next January 31, 2023 meeting.



### Questions

