

2023 TITLE VI PROGRAM UPDATE



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Chapter 1 INTRODUCTION

The U.S. Department of Transportation, Federal Transit Administration has implemented guidelines governing applicants, recipients and subrecipients of federal assistance regarding Title VI of the Civil Rights Act of 1964. Specifically, these requirements dictate that the Greater Cleveland Regional Transit Authority (hereinafter the Authority or GCRTA) 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.

GCRTA 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. GCRTA 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 2020 Title VI Program Update. The approval expires on February 17, 2023. 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. Regarding 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.
- 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 Sr. Manager of OEO, ADA & DEI of the Office of Equal Opportunity, ADA & DEI is responsible for the day-to-day operation of the program as it relates to complaints and coordinating efforts. The Sr. Manager of OEO, ADA & DEI 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:

- Felicia Brooks-Williams, Office of Equal Opportunity, ADA & DEI
- Joel Freilich, Director of Service Management
- Sharon Jenkins, Director of Marketing & Communications
- Maribeth Feke, Director of Programming & Planning

To ensure that the Authority continues to comply with all the requirements set forth in Circular 4702.1B, effective date October 12, 2012, the Sr. Manager of OEO, ADA & DEI of the OEO will report quarterly to the Civil Rights (CR) Committee. The CR Committee serves as an opportunity to update the GM and Executive Team of all the civil rights functions. The Sr. Manager provides an update on Title VI, Title VII, ADA, and DEI. In addition, the GM receives updates on Disadvantaged Business Enterprise (DBE), Human Resources (HR) Recruitment and Training efforts, ADA, and legal matters. The agenda includes formal and informal personnel practices to ensure equal treatment; making recommendations to the GM for modifications of GCRTA's policies and practices 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.

Chapter 2 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. Language Assistance Plan
6. Public Participation 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 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 based on 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 based on 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 Sr. Manager of OEO, ADA & DEI of OEO, ADA & DEI or Specialist may be utilized for resolutions. The Sr. Manager of OEO, ADA & DEI will notify the Chief Civil Rights Officer of all the Title VI complaints and 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 Sr. Manager of OEO, ADA & DEI or OEO Designee 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 Sr. Manager of OEO, ADA & DEI of OEO 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 Sr. Manager of OEO, ADA & DEI of OEO will prepare an investigative report for the file. The report shall include a narrative description of the incident, identification of persons interviewed, findings and recommendations for disposition.
8. The Sr. Manager of OEO, ADA & DEI of OEO will decide 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 Sr. Manager of OEO, ADA & DEI of OEO 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 based on 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, ADA & DEI: Sr. Manager of Office of Equal Opportunity, 1240 West Sixth Street, Cleveland, OH 44113-1331.

Section I:

Today's Date: _____

Your Name:	
Home Address:	
City, State & Zip Code:	
Telephone No.:	Email Address:

Accessible Format Requirements? Large Print Audio Tape Braille TDD Other

Section II:

Law prohibits discrimination based on the categories shown below. Check those categories, which you feel apply 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
- Race Belonging to a GCRTA in race or because of GCRTA in characteristics associated with race
- Religion Religious/Spiritual beliefs
- Retaliation Retaliation **for filing a discrimination complaint** or for opposing illegal discriminatory practices
- Sexual Harassment. Unsolicited and/or unwelcome sexual advances, requests for sexual favors and other verbal or physical harassment of a sexual nature
- Sexual Orientation.... Perceived by others to be in or identified with heterosexuality, homosexuality, bisexuality, etc.
- Veteran Status Service in the Armed Forces

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 Service Other

If "Other," please specify:

Section VI:

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 GCRTA 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:
Address:	Telephone Number:
City, State & Zip Code:	

Have you previously filed a Title VI complaint with GCRTA? No Yes

If yes, please describe the complaint.

Please attach any written material or other information that you think is relevant to your complaint.

I affirm that the information contained in this document is true and accurate to the best of my knowledge, information and belief.

Complainant's Signature: _____ Date: _____

Please mail this form to:

GCRTA Office of Equal Opportunity
Sr. Manager of the Office of Equal Opportunity
1240 West 6th Street
Cleveland, Ohio 44113-1331

Chapter 3 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 entities other than FTA, including lawsuits and complaints that allege discrimination based on 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.

Please see the attached list of complaints from 2019- 2023.

Title VI Complaints 2019-2023

Title VI Complaints 2019 -2023							
Claim Number	Regarding	Date Complaint Received	Allegation(s)	In-House Counsel / Assigned Investigator	Current Status/ Disposition	Other Detail	Date Resolved/Closed
19-03-02	Customer Complaint	3/18/2019	Racial discrimination	BA	Unsubstantiated	Closed	6/19/2019
19-11-02	Customer Complaint	11/5/2019	National origin and race discrimination and retaliation	FBW	Closed	Referred to Tower City Security	12/16/2019
2020-11-09	Customer Complaint	11/30/2020	Racial discrimination	AJ	Closed	Lack of cooperation	2/1/2021
2021-06-01	Customer Complaint	6/4/2021	Discrimination based on race	FBW	Closed	Statute of limitations	7/19/2020
2022-09-01	Customer Complaint	9/7/2022	Age, disability, sex, national origin, and race discrimination	AJ	Unsubstantiated	Closed	9/30/2022
2022-01-01	Customer Complaint	1/14/2022	Age, color, disability, sex, national origin, race, religion, retaliation, sexual harassment, and sexual orientation discrimination	FBW	Closed	Lack of cooperation	2/25/2022

Title VI External Complaints 2019-2023			
Agency	Claims Number	Allegation	Disposition
OCRC	CLEG4(45519)10112019	Disability and public accommodation	Settled
OCRC	CLEG4(45550)10282019	Race Discrimination and Public Accommodation	Settled
OCRC	CLEG4(45870)05292020	Race Discrimination and Public Accommodation	Dismissed
OCRC	CLEG4(46077)10282020	Race, Sex, Disability, Age, Religion, and National Origin Discrimination; and Retaliation	Dismissed
OCRC	CLEG4(46205)01212021	ADEA and ADA – Race, Gender, Religion, National Origin, Age, and Disability Discrimination	Dismissed
OCRC	CLEG4(46313)02152021	Disability Discrimination	Dismissed
OCRC	CLEG4(46369)04282021	Disability Discrimination	Dismissed
OCRC	CLEG4(46747)10192021	Race, Gender, Sex, and Age Discrimination	Dismissed
OCRC	CLEG4(47645)07272022	Race and Disability discrimination	Pending
OCRC	CLEG4(47567)07052022	Discrimination	Dismissed
OCRC	CLEG4(47958)10142022	Race, sex and religion, and retaliation	Pending

Language Assistance Plan

This Limited English Proficiency Plan has been prepared to address the Greater Regional Transit Authority (GCRTA) 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 based on 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 GCRTA departments receiving federal grant funds.

The GCRTA 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 2020. 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.

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 the percent of various populations who speak English less than very well over 10 years. Cuyahoga County is the GCRTA service area.

Table A: Population that speaks English less than “very well”

Percent of Population 5 years or older				
Speak English Less than Very Well	2000	2010	2017	2020
United States	8.10%	8.70%	8.50%	8.20%
Ohio	2.20%	2.30%	2.40%	2.50%
Cuyahoga County	3.20%	4.10%	4.20%	4.30%

Source: DP02, 2020: ACS 5-Year Estimate

Within Cuyahoga County, 4.3% 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 2016-2020 ACS 5-Year Estimates, Cuyahoga County’s population 5 years or older is 1,170,634. Of that, 12.2% speak a language other than English, and 4.3% 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 2016 -2020 ACS 5-Year Estimates		
	Total	Percent
Population 5 years and over	1,170,634	
English only	1,028,266	87.8%
Language other than English	142,368	12.2%
Speak English less than "very well"	49,815	4.3%
Spanish	50,772	4.3%
Speak English less than "very well"	17,328	1.5%
Other Indo-European languages	52,318	4.5%
Speak English less than "very well"	17,938	1.5%
Asian and Pacific Islander languages	20,582	1.8%
Speak English less than "very well"	8,499	0.7%
Other languages	18,696	1.6%
Speak English less than "very well"	6,050	0.5%

Table C – Cuyahoga County Change in LEP Individuals

Cuyahoga County, Ohio 2016 -2020 ACS 5-Year Estimates			Cuyahoga County, 2013-2017 ACS		Percent Change
	Total	Percent	Total	Percent	
Population 5 years and over	1,170,634		1,184,832		-1.2%
English only	1,028,266	87.8%	1,048,766	88.5%	-1.95%
Language other than English	142,368	12.2%	136,066	11.5%	4.63%
Speak English less than "very well"	49,815	4.3%	50,220	4.2%	-0.81%
Spanish	50,772	4.3%	46,773	3.9%	8.55%
Speak English less than "very well"	17,328	1.5%	16,239	1.4%	6.71%
Other Indo-European languages	52,318	4.5%	52,283	4.4%	0.07%
Speak English less than "very well"	17,938	1.5%	19,098	1.6%	-6.07%
Asian and Pacific Islander languages	20,582	1.8%	19,169	1.6%	7.37%
Speak English less than "very well"	8,499	0.7%	8,818	0.7%	-3.62%
Other languages	18,696	1.6%	17,841	1.5%	4.79%
Speak English less than "very well"	6,050	0.5%	6,065	0.5%	-0.25%

Source: US Census, 2016-2020 American Community Survey, DP02

English only speakers have lost population within the three-year ACS data comparison. Spanish and other languages have gained population, increasing the overall number of individuals who speak English less than “very well” even if slightly decreasing the percentage. Cuyahoga County total population has decreased by 1.2%.

Table D: Population and Percent of LEP by language

Cuyahoga County, Total Population = 1,198,600			
Language	Estimated LEP Population	% of LEP Population	% of Total Population
Spanish	14300	29.3%	1.2%
Chinese	4700	9.6%	0.4%
Other Slavic Languages	3400	7.0%	0.3%
Russian	3400	7.0%	0.3%
Other Indo-European Languages	3400	7.0%	0.3%
Arabic	3300	6.8%	0.3%
Serbo-Croatian	2200	4.5%	0.2%
Italian	1800	3.7%	0.2%
Polish	1400	2.9%	0.1%
German	1300	2.7%	0.1%
Vietnamese	900	1.8%	0.1%
Other Asian Languages	900	1.8%	0.1%
Korean	800	1.6%	0.1%
Hungarian	800	1.6%	0.1%
French	700	1.4%	0.1%
African Languages	600	1.2%	0.1%
Tagalog	600	1.2%	0.1%
Greek	600	1.2%	0.1%

Source: MPI Data Hub, "Ohio: Languages Spoken by Limited English Proficient (LEP) Individuals Statewide and by County: Number and Share of Total State/County Population"

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 2016 and 2020 5-year estimates. The 5-year ACS data is an ongoing survey that provides vital information on a yearly basis about individuals. 2020 ACS data is the most recent complete dataset that we can obtain. A map has been created for the following language groups:

1. All Limited English Proficiency Speakers
2. Spanish Language Speakers Less than Very Well
3. Indo-European Language Speakers, Less than Very Well
4. Asian Language Speakers, Less than Very Well
5. Other Language Speakers, Less than Very Well

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

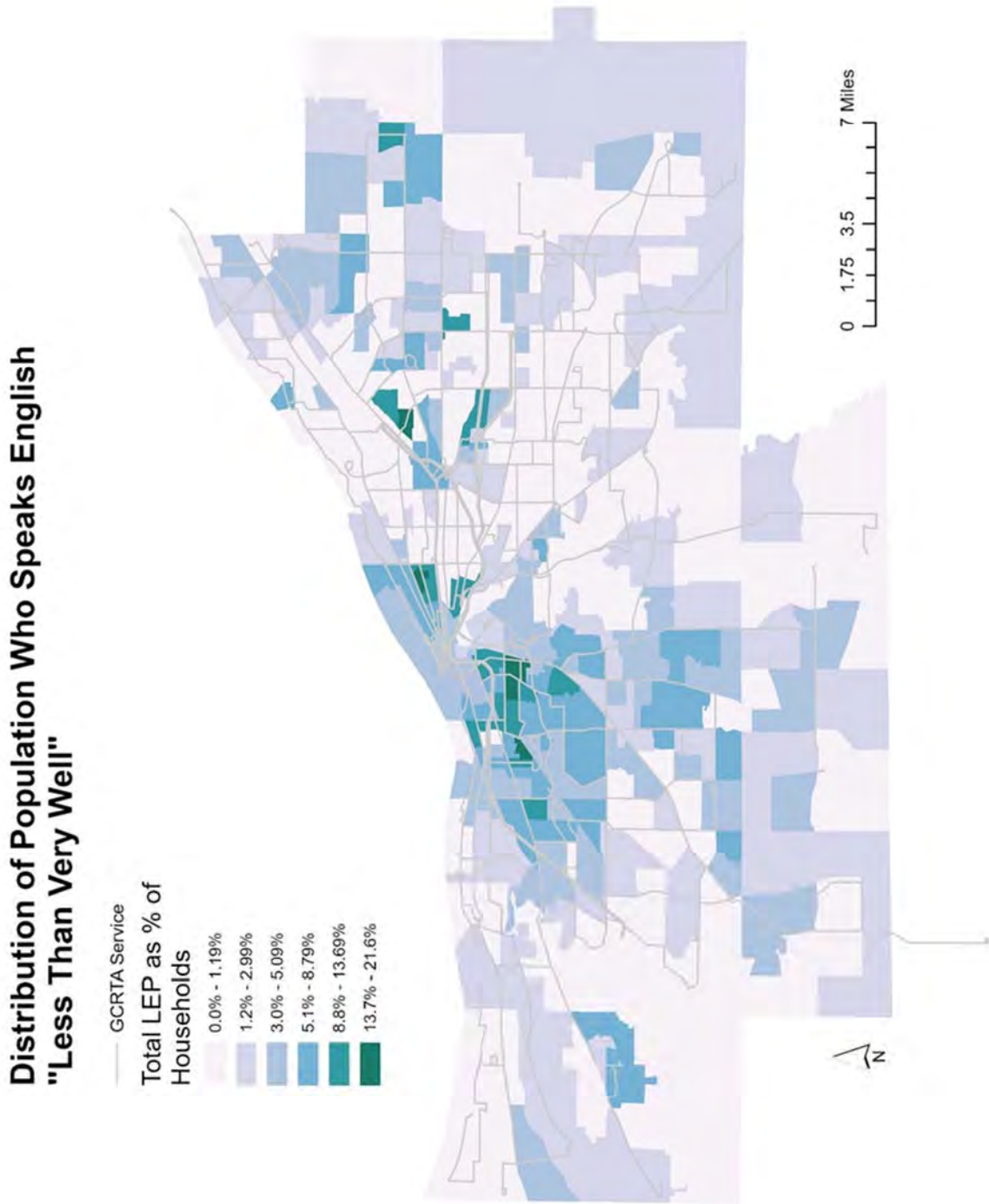
Asian Speakers include:

- 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



Distribution of Spanish Language Speakers Who Speak English "Less Than Very Well"

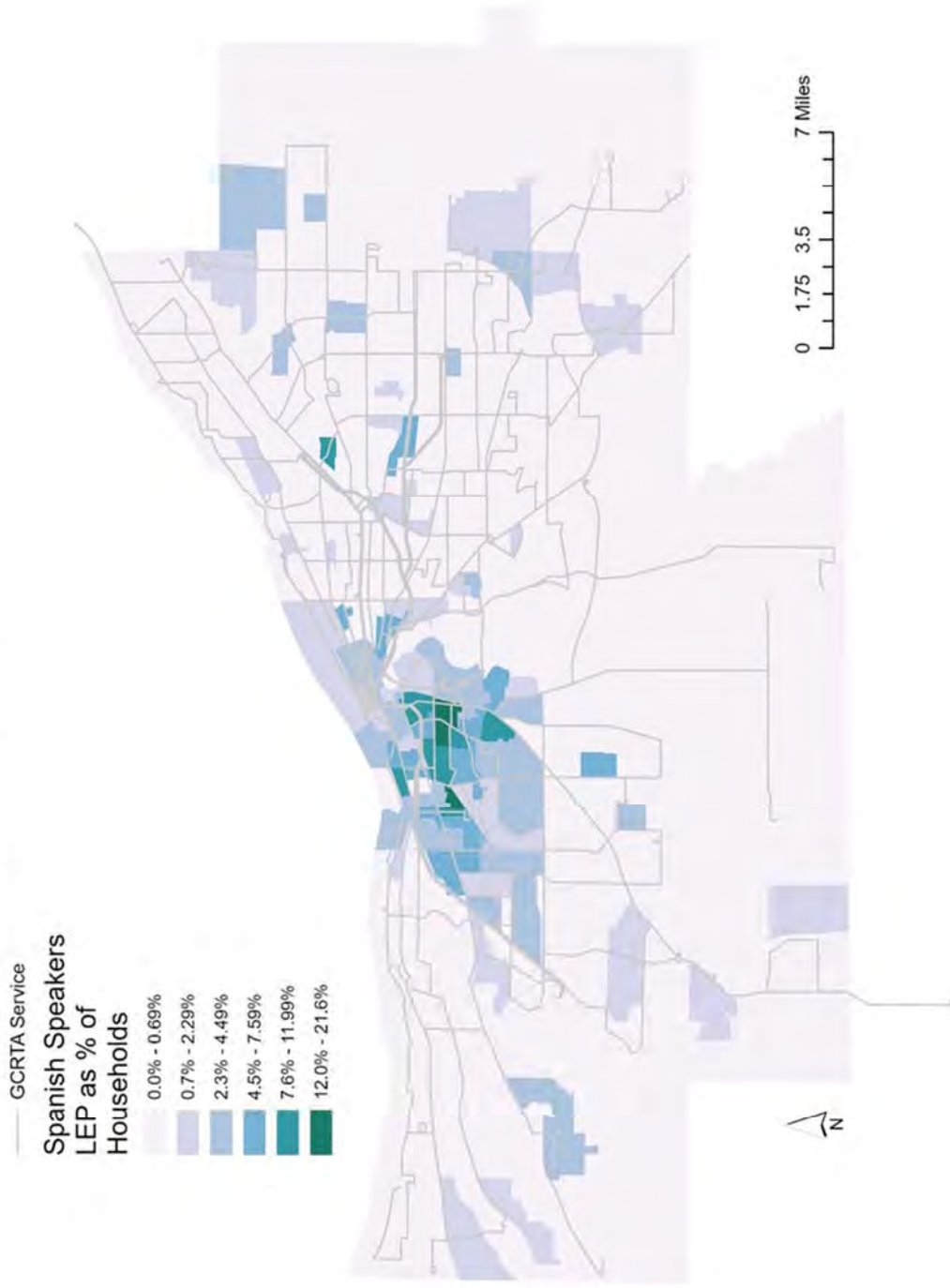


Figure 2

Distribution of Indo-European Language Speakers Who Speak English "Less Than Very Well"

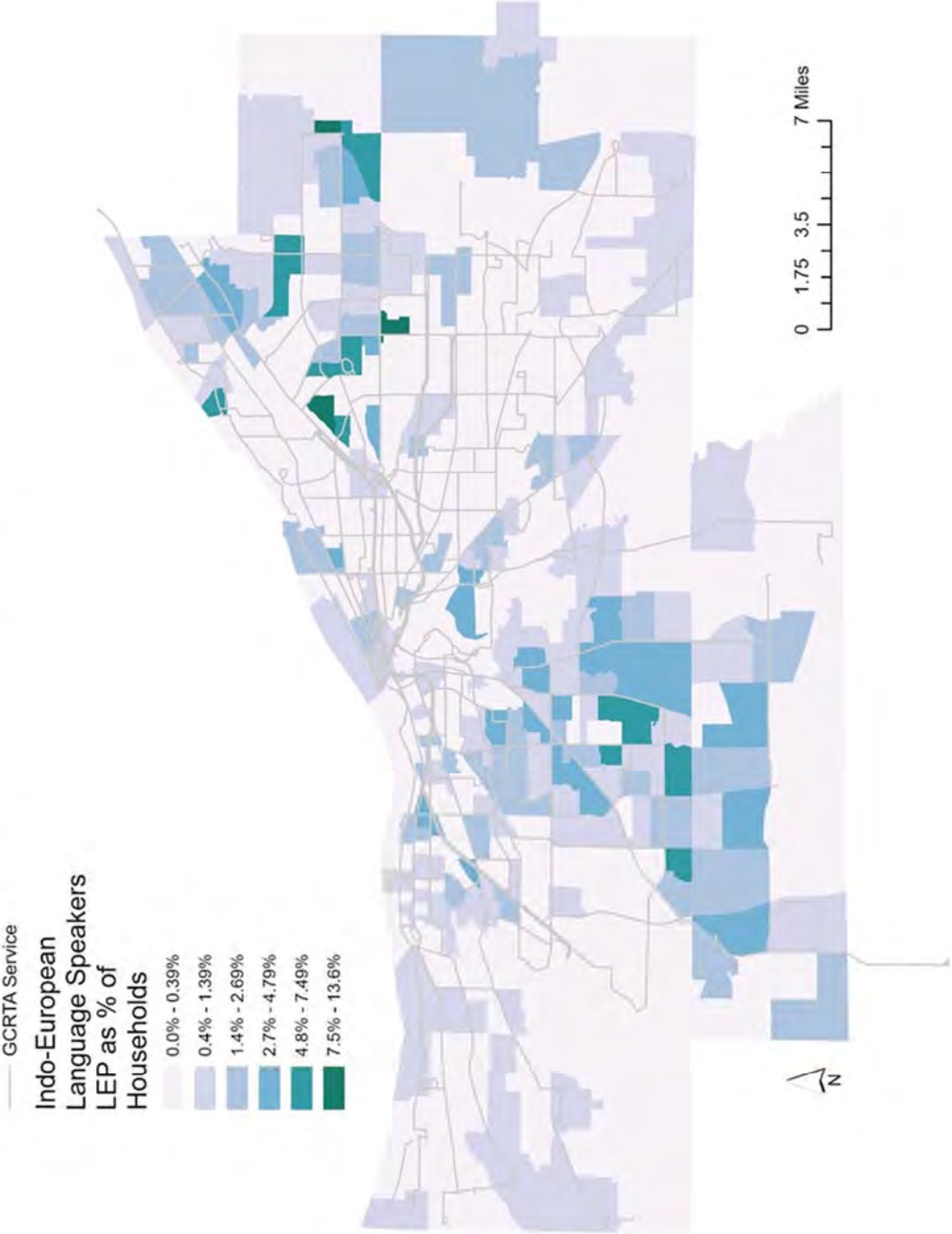


Figure 3

Distribution of Asian Language Speakers Who Speak English "Less Than Very Well"

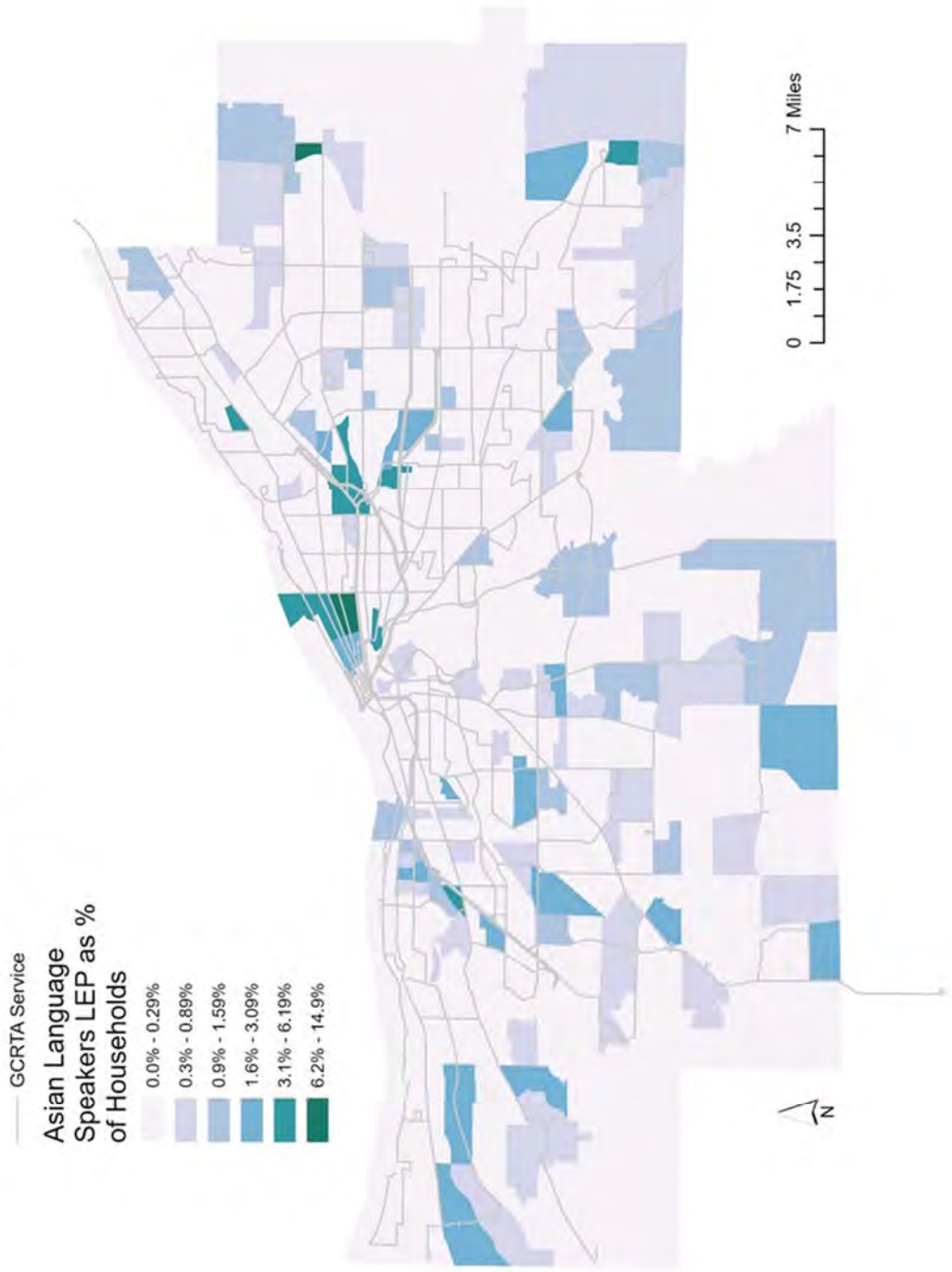


Figure 4

Distribution of Other Language Speakers Who Speak English "Less Than Very Well"

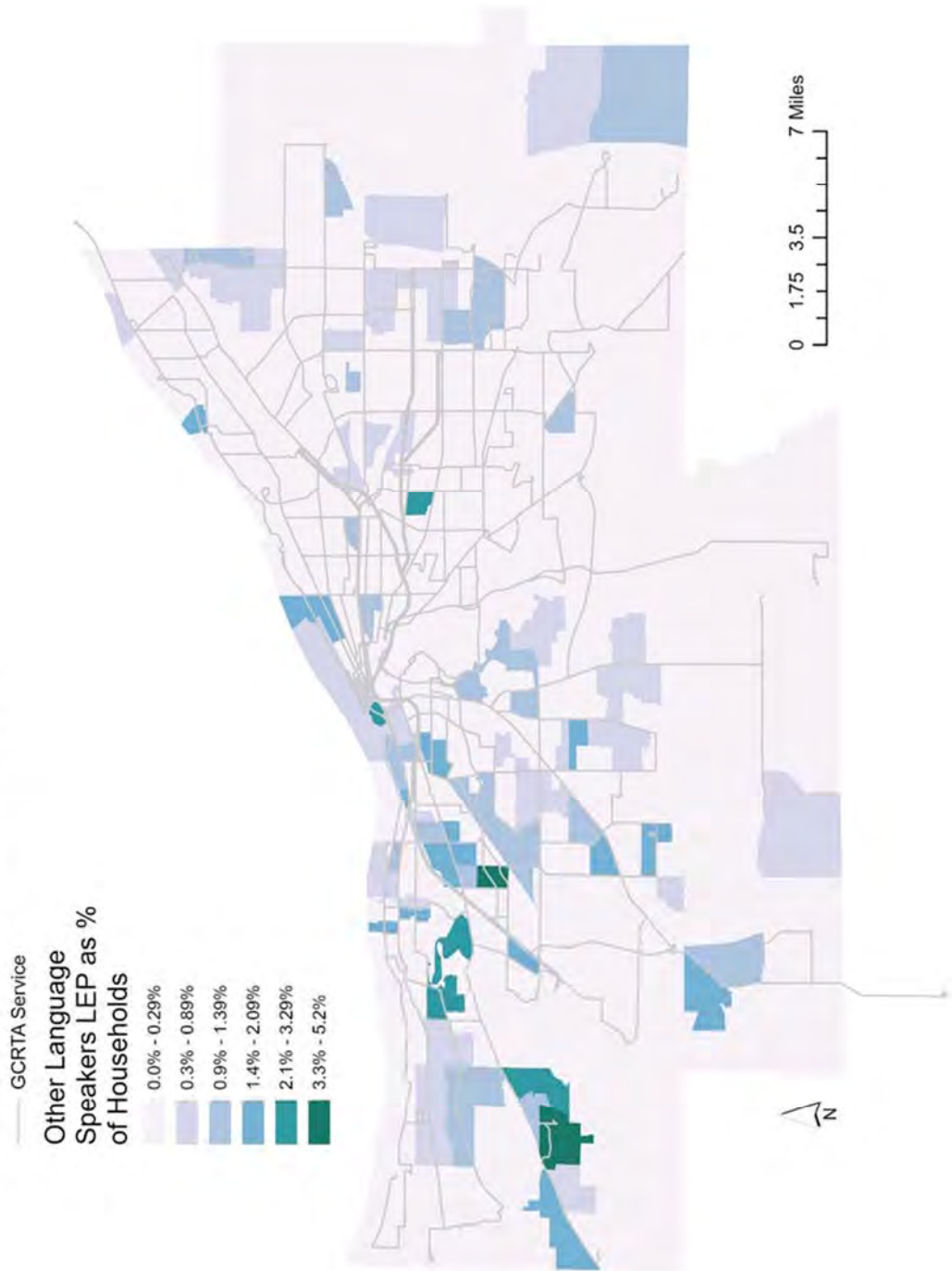


Figure 5

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 2020 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 4.3% of the population use public transit as a means of transportation to work and 3.8% 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)

	Total	Car, truck, or van -- drove alone	Car, truck, or van -- carpooled	Public transportation (excluding taxicab)
Label	Estimate	Estimate	Estimate	Estimate
Workers 16 years and over	582,120	449,872	43,877	24,844
Speak language other than English	12.1%	11.6%	18.7%	9.8%
Speak English less than "very well"	3.8%	3.4%	7.9%	3.6%

Source: US Census, 2020 American Community Survey 5-Year Estimates, S0802

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 (RTAanswerline) 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. Two of the customer service center personnel are bi-lingual in Spanish. The call center records approximately 30 calls per month requiring Spanish translation which is .2 % of the calls received by the Center.

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. Transit Police have three (3) officers who are fluent in the Spanish Language.

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.

2.1.6.1 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.

2.1.6.2 Human Resource -CMSD Outreach

The Department of Education, along with (OCR) determined CMSD needed to provide ESL/Bilingual students with information on how to safely use public transportation. The student’s grade levels ranged from K-12 representing over thirty-seven (37) languages. GCRTA Outreach Sessions were held at the following schools.

- Buhrer Dual Language Academy
- Clark
- Joseph M. Gallagher
- Luis Munoz Marin
- Scranton
- Thomas Jefferson International Newcomers Academy
- James Ford Rhodes
- Lincoln West
- Max Hayes
-

GCRTA literature was translated by CMSD Staff and was provided to students and parents. The literature and presentation focused on the following:

- Bus & Rail Safe Riding Tips (Grade Crossing, Emergency Phone Use)
- Safe Place Program
- Transit Police App (Safe Watch)
- How to use your fare card/planning your trip
- Go RTA App
- What to expect your first time
-

2.1.7 Office of Small Business

The Office of Small Business participates in the Northeast Ohio Hispanic Chamber of Commerce (NEOHCC)Construction Opportunity Fair. This is an annual event which provides GCRTA an opportunity to highlight contracting opportunities and provide instruction on how to become certified with GCRTA as

a minority or woman owned business. Translation services for required forms and documents is also provided.

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. It 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

GCRTA provides translations of its vital documents in Spanish online. Those Vital Documents include:

- Complaint Form
- Complaint Process

- Notice of Your Rights -Title VI Signage
- Paratransit Application
- Paratransit Booklet

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.
- Bi-Lingual public meetings on 25Connects project and translation of Executive Summary in Spanish.

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 are solicited in several 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, Twitter and Instagram
- 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 media sources most consumed by individuals residing in affected service areas, such as the Cleveland Plain Dealer, and the Call and Post (weekly publication serving 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 potentially be impacted by the proposed changes. The meeting would begin with GCRTA staff providing 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 communicate with this audience more effectively. To better address the needs of those individuals with language barriers, Spanish-speaking staff members are present to provide those translation services. 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.

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 shares 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 into full consideration comments received

through the public involvement process. GCRTA staff is committed to faithfully representing all comments received, positive as well as negative, when presenting the results. Recommendations endorsed by the Executive Management team are presented 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 digital 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, scheduling hearing and/or language 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 GCRTA had fare and service changes since the last Title VI submittal. The changes were of the following:

- 1) Fare Reduction – based on a fare equity study, the All-Day Passes fare were decreased.
 - a. Updated all time timetables
 - b. During the 2021 Public Image campaign promoted the reduction in fare rates
 - c. Presented at board meeting
 - d. Updated website, signage at Tower City and other areas (not sure where all location are at)
 - e. Leveraged our social channels to advise of the change
 - f. Printed banners hung at various locations
 - g. Paladin
 - h. Fare box price change sticker

- 2) NEXT GEN Bus System Redesign-engaged with customers to learn that customers prioritized rides for employment, education, and health care with emphasis on providing more frequency, more direct and accessible transportation. Online surveys as well as public engagement sessions were held to facilitate feedback. See attachment B for System Redesign Public Participation Summary and Schedule.

Monitoring Sub-Recipient

At this time, GCRTA has no sub-recipients.

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 quarterly to discuss relevant issues about the operations of the Authority. The Board of Trustees has appointed (7) members directly, and four (4) members have been selected through the application process. CAC members work to increase citizens' participation in community activities and involve the public in transit decision-making.

CITIZENS ADVISORY BOARD	
MEMBER COMPOSITION: SEX/ETHNICITY	
African American Male	3
African American Female	2
Hispanic Female	1
White Male	4
White Female	1
Total Members	11

Board Meeting Policy Decision Documentation

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

- **The Title VI Board Presentation**
- **Resolution No. 2023-7 ; Approving the 2023 Title VI Program Update**
- **Staff Summary & Comments: Approving the 2020 Title VI Program Update**
- **Board Meeting Minutes**

Chapter 4 ASSESSMENT AND MONITORING

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):

1. Map of Interstate Highways, Arterials, and Major Streets
2. Map of Cuyahoga County Census Tracts
3. Map of 2021 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
13. 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 2020)
14. Greater Cleveland Regional Transit Authority Title VI Analysis_04-12-2020

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 2023.

- 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 2022 Service Management Plan Revised February 17, 2022 is attached. It calls for no significant service changes in 2022. RTA performed one major service change in the reporting period, April 12, 2020; that service change was a result of the COVID-19 pandemic.

Though not required to do so, RTA performed a Title VI analysis on this service change. For more detail see "Greater Cleveland Regional Transit Authority Title VI Analysis_04-12-2020" file attached to this report. Other service changes in the reporting period did not require a Title VI analysis.

This Title VI Monitoring Report was performed on the RTA service that was in operation in the second half of the year in 2021. All maps and documents reflect the network that was in operation as of December 31, 2021.

Information Dissemination

Methods used to inform minority, low-income and LEP (Limited English Proficiency) 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 5 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 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 2021 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 second half of 2021.

Customer Complaints regarding Overcrowding in second half of 2021

Overcrowding		
Row		Value
1	All complaints, 7/1/2021 - 12/31/2021	2,368
2	Complaints excluding Web Spam / Advertising	2,357
3	Overcrowded Vehicle complaints	7
4	Overcrowded Vehicle complaint percentage	0.30%
5	System total ridership, 7/1/2021 - 12/31/2021	8,714,659
6	One Overcrowded Vehicle complaint for every ____ rides	1,244,951
7	Overcrowded Vehicle complaints per 100,000 rides	0.08
8	MINLOW Max Load - NTD Sample Avg	11.94
9	MINLOW Max Load Below 20	88%
10	Non-MINLOW Max Load - NTD Sample Avg	6.83
11	Non-MINLOW Max Load Below 20	93%

Items	
Overcrowding	7
Total Complaints	2,357
Overcrowding Complaints as a Percentage of Total Complaints	0.30%
Ridership	8,714,659
One Overcrowding complaint for every ___ rides	1,244,951

On average RTA receives one overcrowding complaint for every 1,244,951 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 12 passengers. These low averages are consistent with the absence of an overcrowding problem on MINLOW routes.

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. Coincidentally, 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 the second half of 2021, as shown in the following table:

Randomly Selected Dates

Date	Day	Quarter
July 18, 2021	Sunday	3
August 19, 2021	Thursday	3
September 8, 2021	Wednesday	3
October 3, 2021	Sunday	4
October 13, 2021	Wednesday	4
October 16, 2021	Saturday	4
November 2, 2021	Tuesday	4
December 2, 2021	Thursday	4

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	6.70
NONMINLOW	11.19

For more detail, see Attachment J: GCRTA Vehicle Assignment by Route 2021.

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 Category	Headways	
	Peak	Midday
MINLOW	31.82	32.81
NONMINLOW	37.5	45.00

Schedules effective second half of 2021 (HASTUS Booking 2106)

For more detail, see Attachment K: GCRTA Vehicle Headway by Route 2021

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.

2021 Second Half On-time Performance

Route Category	Percent On-time
MINLOW	81.15%
NONMINLOW	80.32%
All GCRTA	81.03%

For more detail, see Attachment L: GCRTA On-Time Performance 2021

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 $\frac{3}{4}$ mile radius around each transit stop. As shown, an insignificant fraction of MINLOW areas are not within $\frac{3}{4}$ mile of a stop, while a significant fraction of NONMINLOW areas are more than $\frac{3}{4}$ mile from a stop.

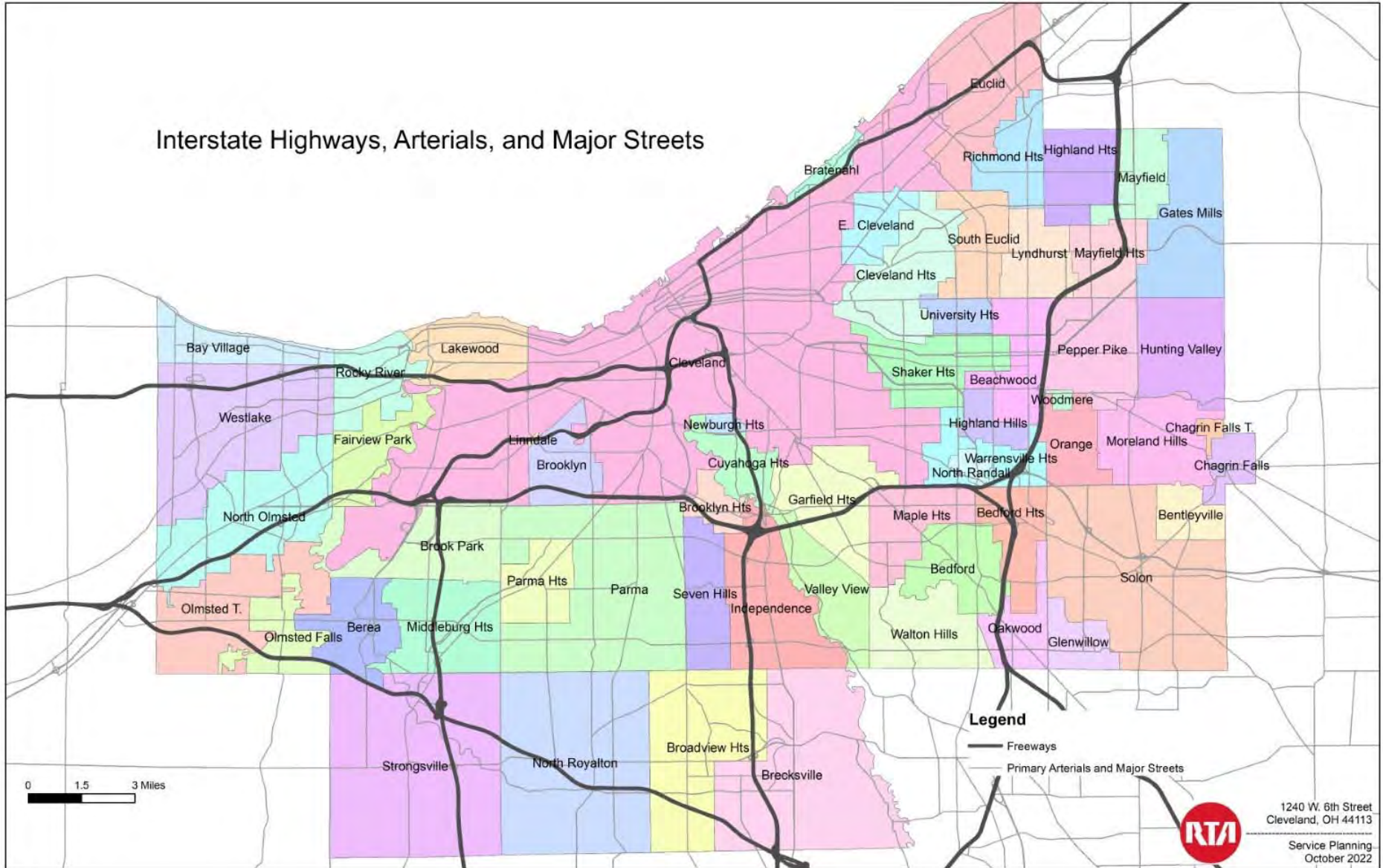
Service Quality Supervisory Work Zones

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

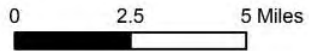
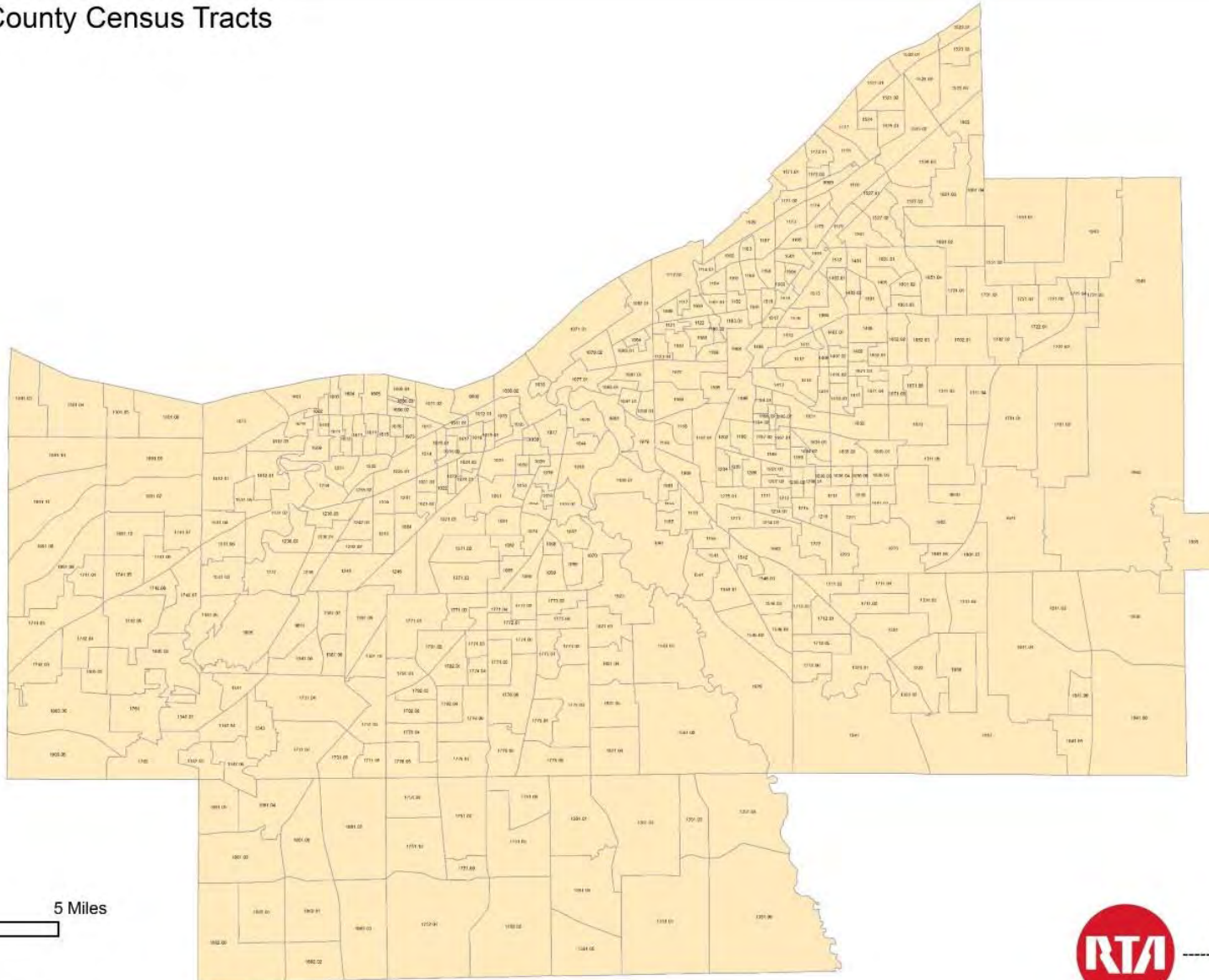
Attached Transit and Service Maps

1. Map of Interstate Highways, Arterials, and Major Streets
2. Map of Cuyahoga County Census Tracts
3. GCRTA Levels of Service as of December 30, 2021
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
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12. Map of Service Quality Supervisory Work Zones

Interstate Highways, Arterials, and Major Streets



Cuyahoga County Census Tracts



1240 W. 6th Street
Cleveland, OH 44113

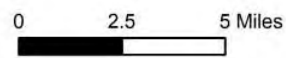
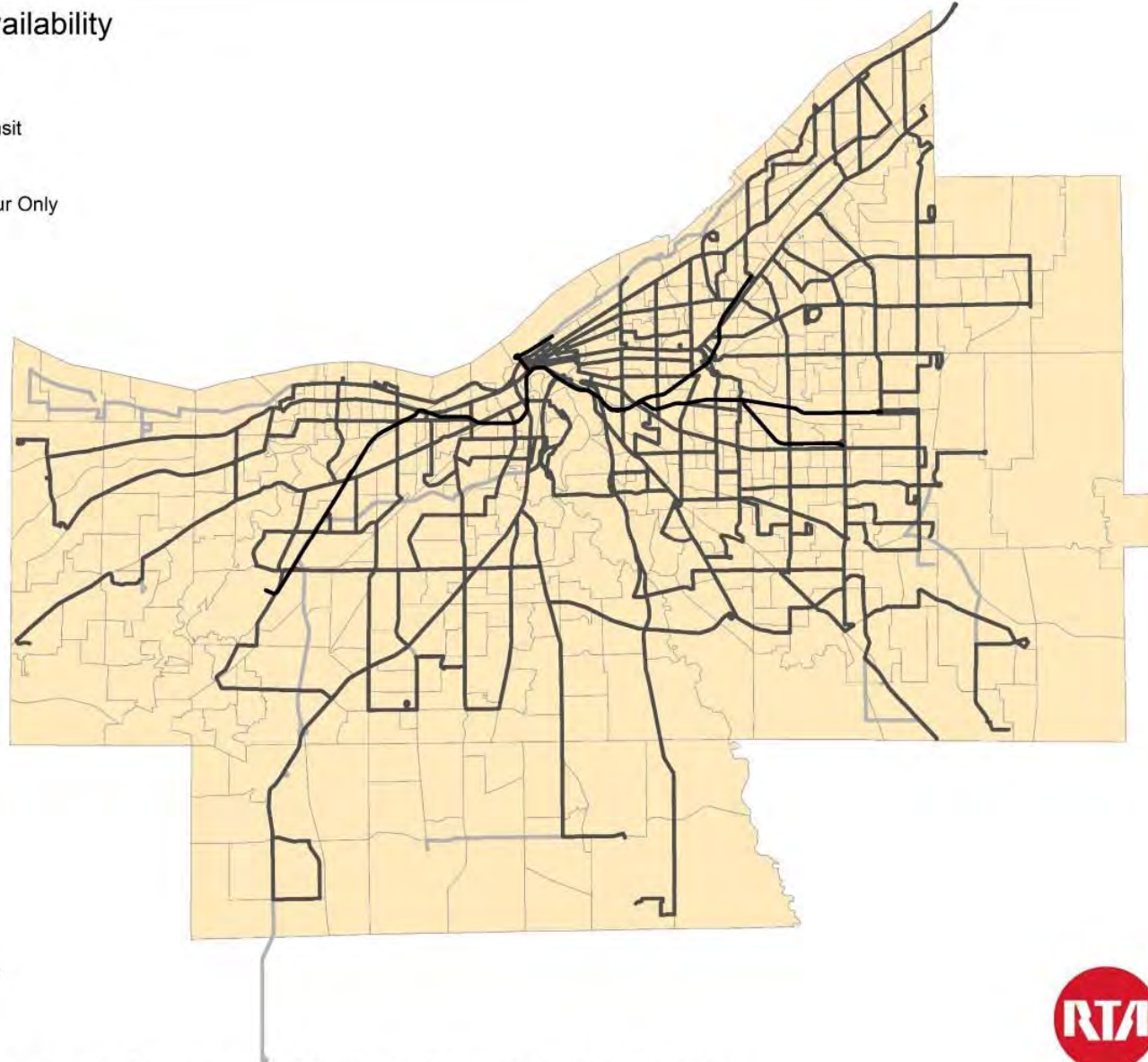
Service Planning
May 2022

Data Source: U.S. Census Bureau, American Community Survey, 2021: Greater Cleveland Regional Transit Authority

GCRTA Service Availability

Legend

- RTA Rail Rapid Transit
- RTA Bus
- RTA Bus - Rush Hour Only
- Census Tracts



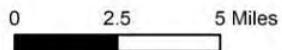
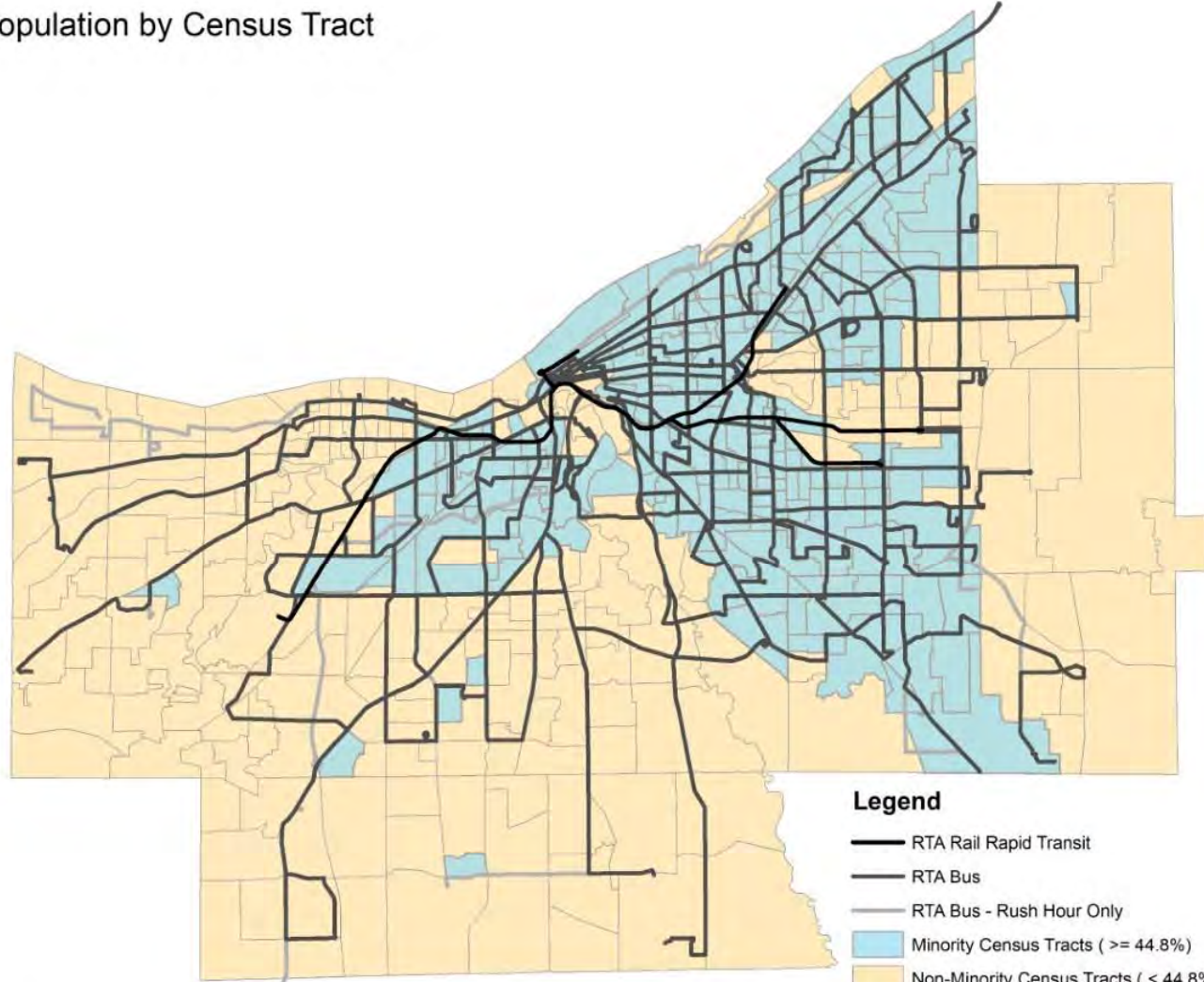
Data Source: U.S. Census Bureau, American Community Survey, 2021: Greater Cleveland Regional Transit Authority



1240 W. 6th Street
Cleveland, OH 44113

Service Planning
October 2022

Percent Minority Population by Census Tract



Legend

- RTA Rail Rapid Transit
- RTA Bus
- RTA Bus - Rush Hour Only
- Minority Census Tracts ($\geq 44.8\%$)
- Non-Minority Census Tracts ($< 44.8\%$ Low Income)

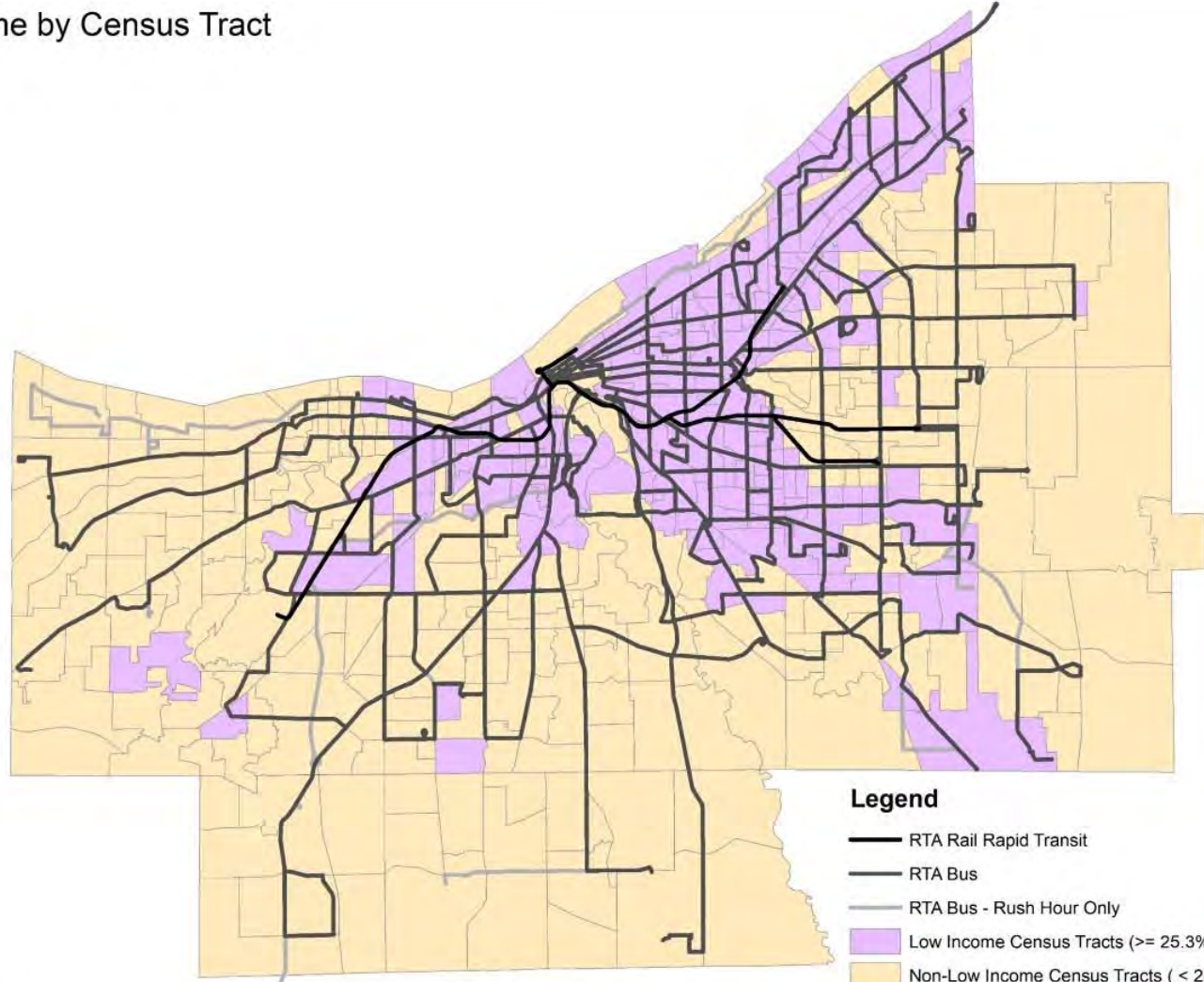


1240 W. 6th Street
Cleveland, OH 44113

Service Planning
May 2022

Data Source: U.S. Census Bureau, American Community Survey, 2021: Greater Cleveland Regional Transit Authority

Percent Low Income by Census Tract



0 2.5 5 Miles

Legend

- RTA Rail Rapid Transit
- RTA Bus
- RTA Bus - Rush Hour Only
- Low Income Census Tracts ($\geq 25.3\%$)
- Non-Low Income Census Tracts ($< 25.3\%$ Low Income)

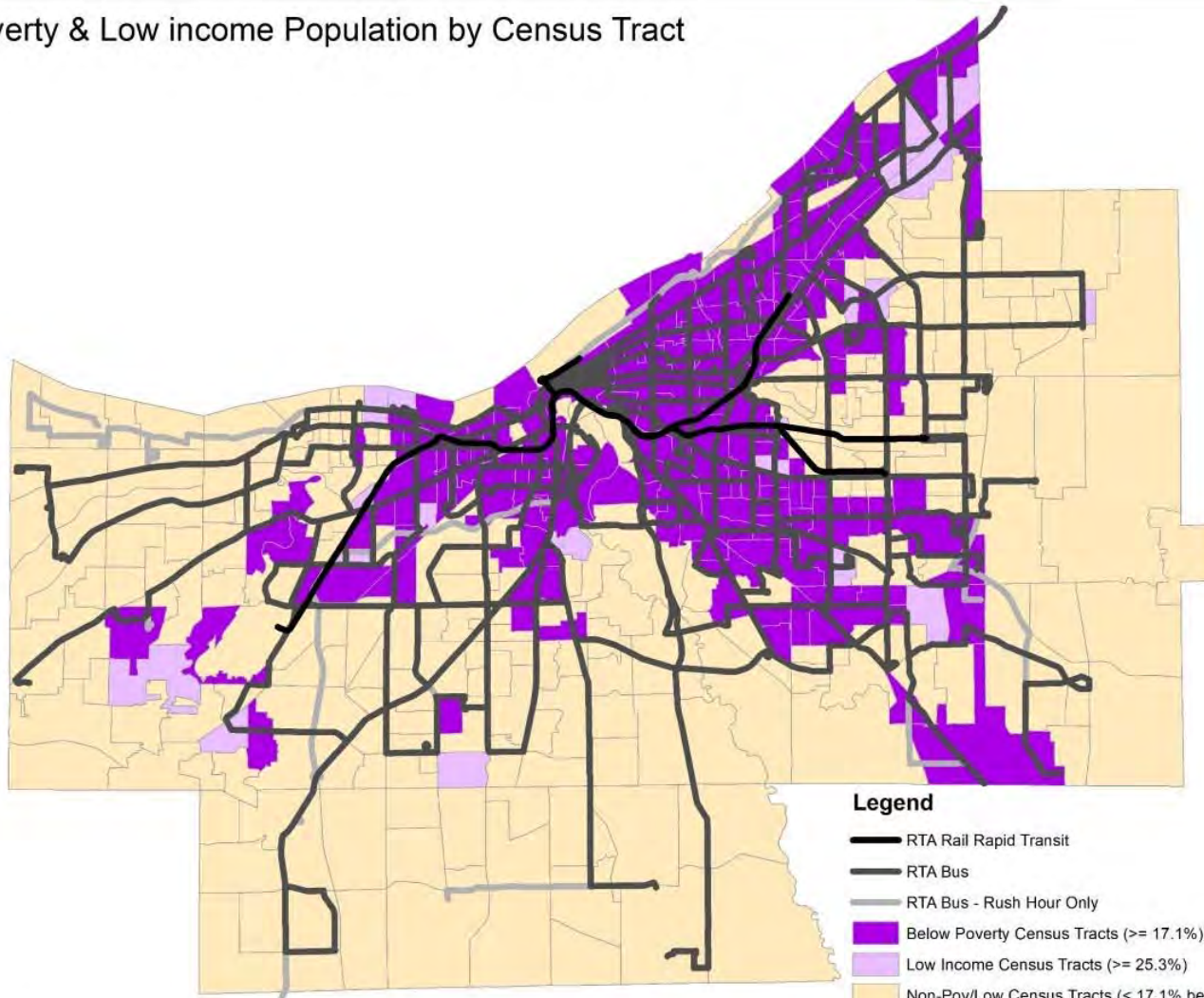


1240 W. 6th Street
Cleveland, OH 44113

Service Planning
May 2022

Data Source: U.S. Census Bureau, American Community Survey, 2021: Greater Cleveland Regional Transit Authority

Percent Below Poverty & Low income Population by Census Tract



Legend

- RTA Rail Rapid Transit
- RTA Bus
- RTA Bus - Rush Hour Only
- Below Poverty Census Tracts ($\geq 17.1\%$)
- Low Income Census Tracts ($\geq 25.3\%$)
- Non-Pov/Low Census Tracts ($< 17.1\%$ below poverty & $< 25.3\%$ Low Income)

0 2.5 5 Miles











1240 W. 6th Street
Cleveland, OH 44113

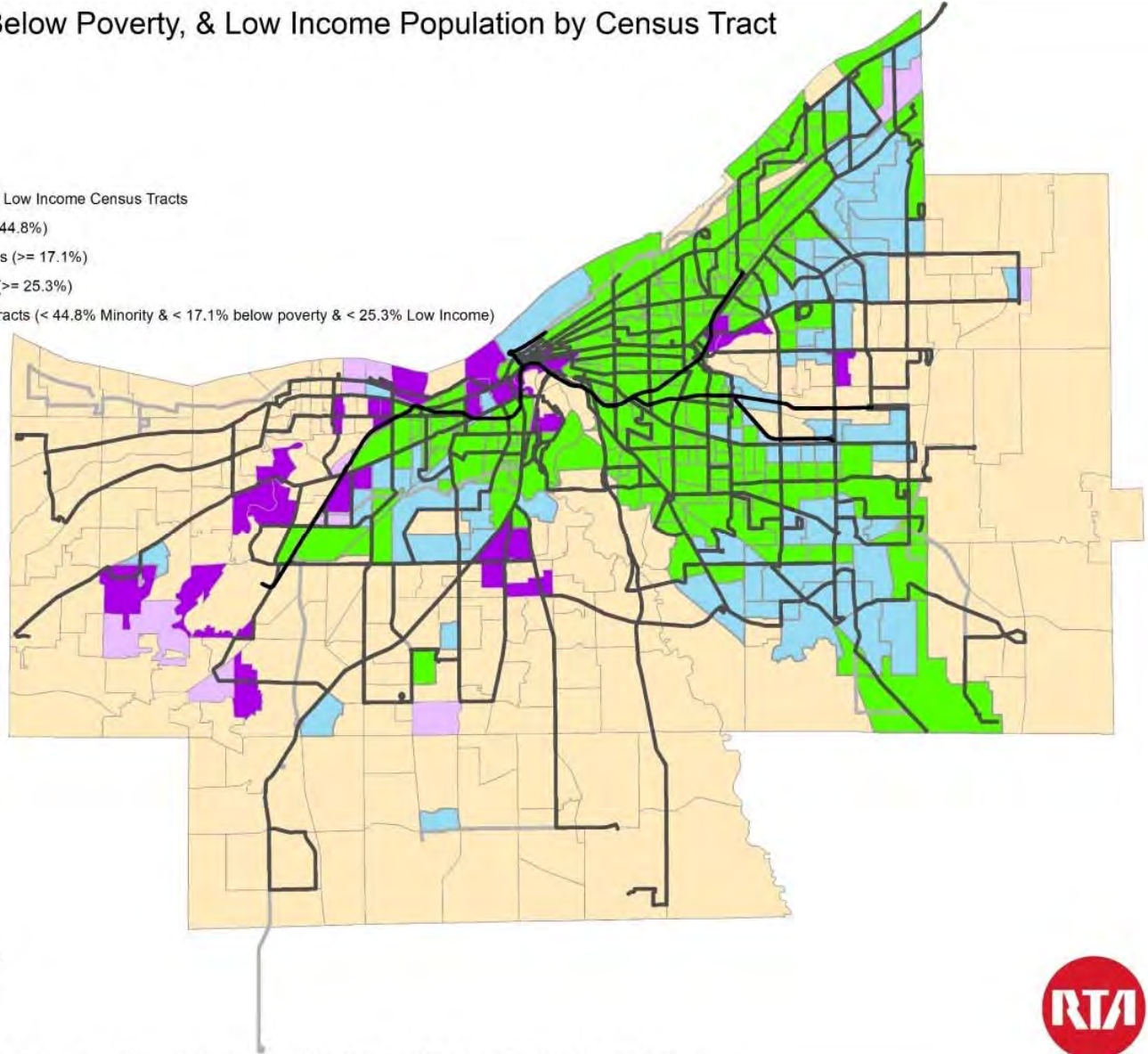
Service Planning
May 2022

Data Source: U.S. Census Bureau, American Community Survey, 2021: Greater Cleveland Regional Transit Authority


Percent Minority, Below Poverty, & Low Income Population by Census Tract

Legend

-  RTA Rail Rapid Transit
-  RTA Bus
-  RTA Bus - Rush Hour Only
-  Minority, Below Poverty, and Low Income Census Tracts
-  Minority Census Tracts ($\geq 44.8\%$)
-  Below Poverty Census Tracts ($\geq 17.1\%$)
-  Low Income Census Tracts ($\geq 25.3\%$)
-  Non-Min/Pov/Low Census Tracts ($< 44.8\%$ Minority & $< 17.1\%$ below poverty & $< 25.3\%$ Low Income)



0 2.5 5 Miles



Data Source: U.S. Census Bureau, American Community Survey, 2021: Greater Cleveland Regional Transit Authority












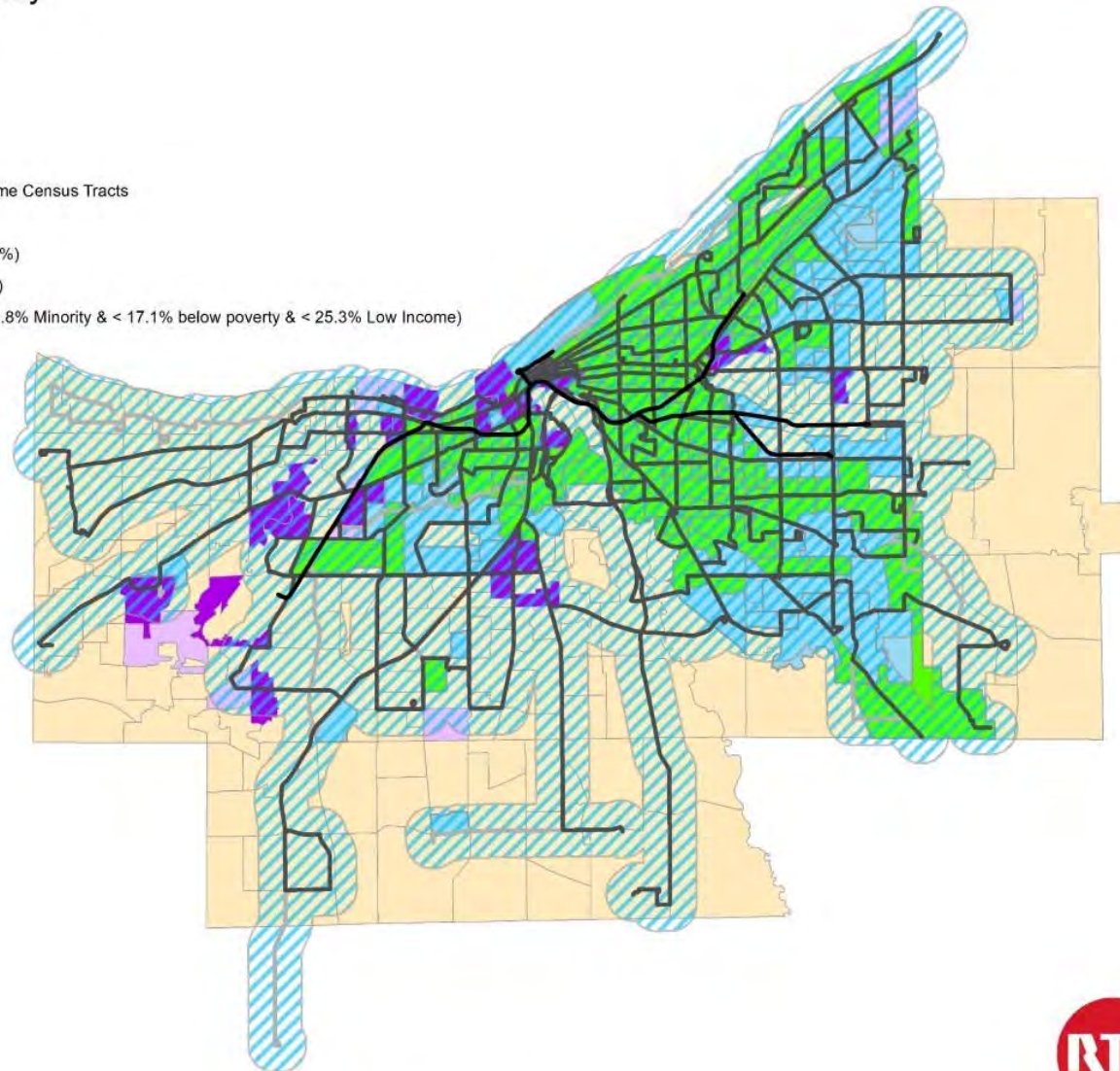
1240 W. 6th Street
Cleveland, OH 44113

Service Planning
May 2022


GCRTA Service Availability

Legend

-  RTA Rail Rapid Transit
-  RTA Bus
-  RTA Bus - Rush Hour Only
-  Served by Transit - 3/4 Mile
-  Minority, Below Poverty, and Low Income Census Tracts
-  Minority Census Tracts ($\geq 44.8\%$)
-  Below Poverty Census Tracts ($\geq 17.1\%$)
-  Low Income Census Tracts ($\geq 25.3\%$)
-  Non-Min/Pov/Low Census Tracts ($< 44.8\%$ Minority & $< 17.1\%$ below poverty & $< 25.3\%$ Low Income)



0 2.5 5 Miles



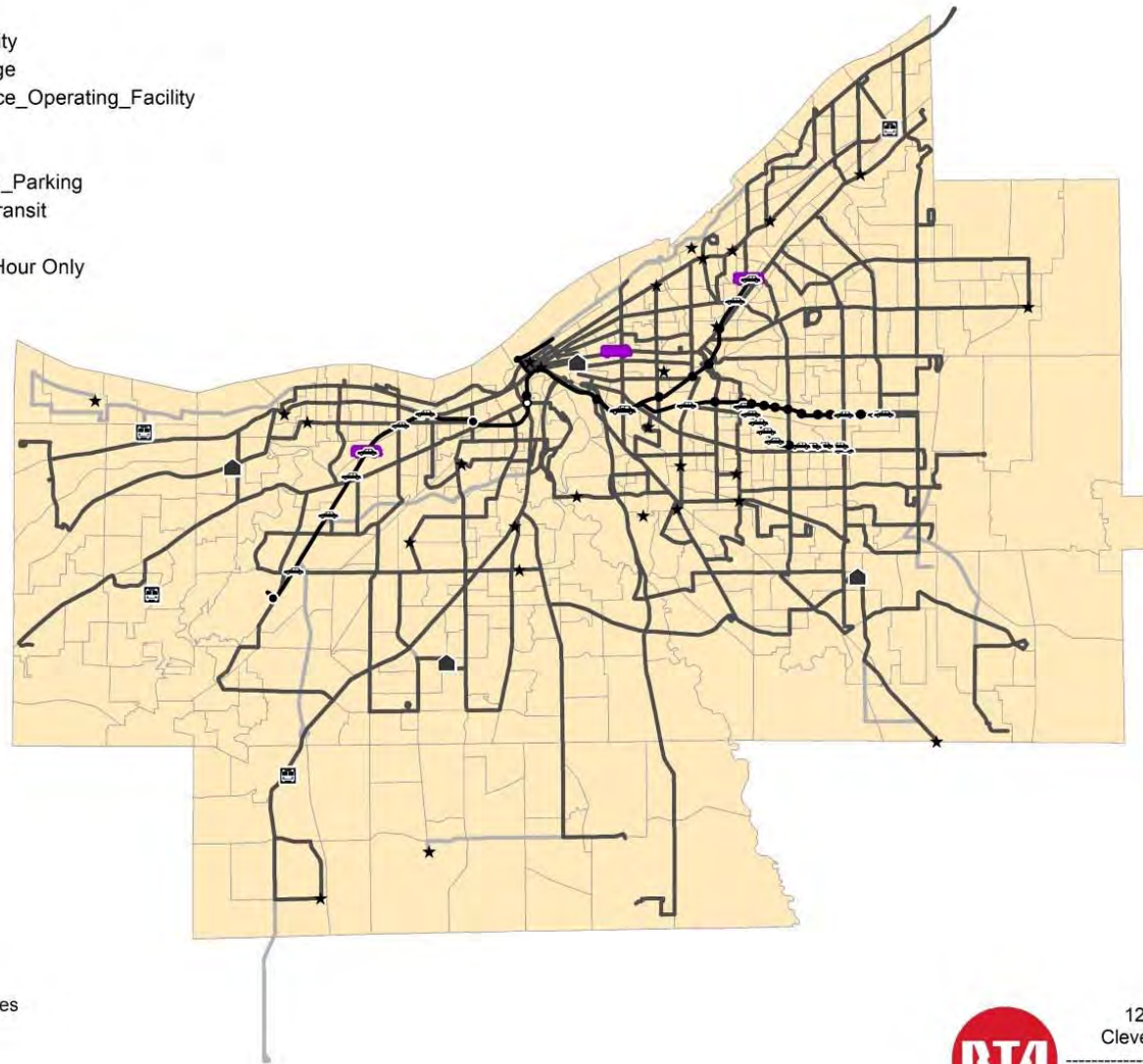

1240 W. 6th Street
Cleveland, OH 44113

Service Planning
October 2022

Data Source: U.S. Census Bureau, American Community Survey, 2021: Greater Cleveland Regional Transit Authority

GCRTA Transit Facilities

- ★ Loops
- ★ Other_RTAFacility
- Operating_Garage
- ★ Rail_Maintenance_Operating_Facility
- Bus_PNR
- Transit_Centers
- Rail_Station_with_Parking
- RTA Rail Rapid Transit
- RTA Bus
- RTA Bus - Rush Hour Only
- Census Tracts



0 1.25 2.5 5 Miles

Data Source: Greater Cleveland Regional Transit Authority



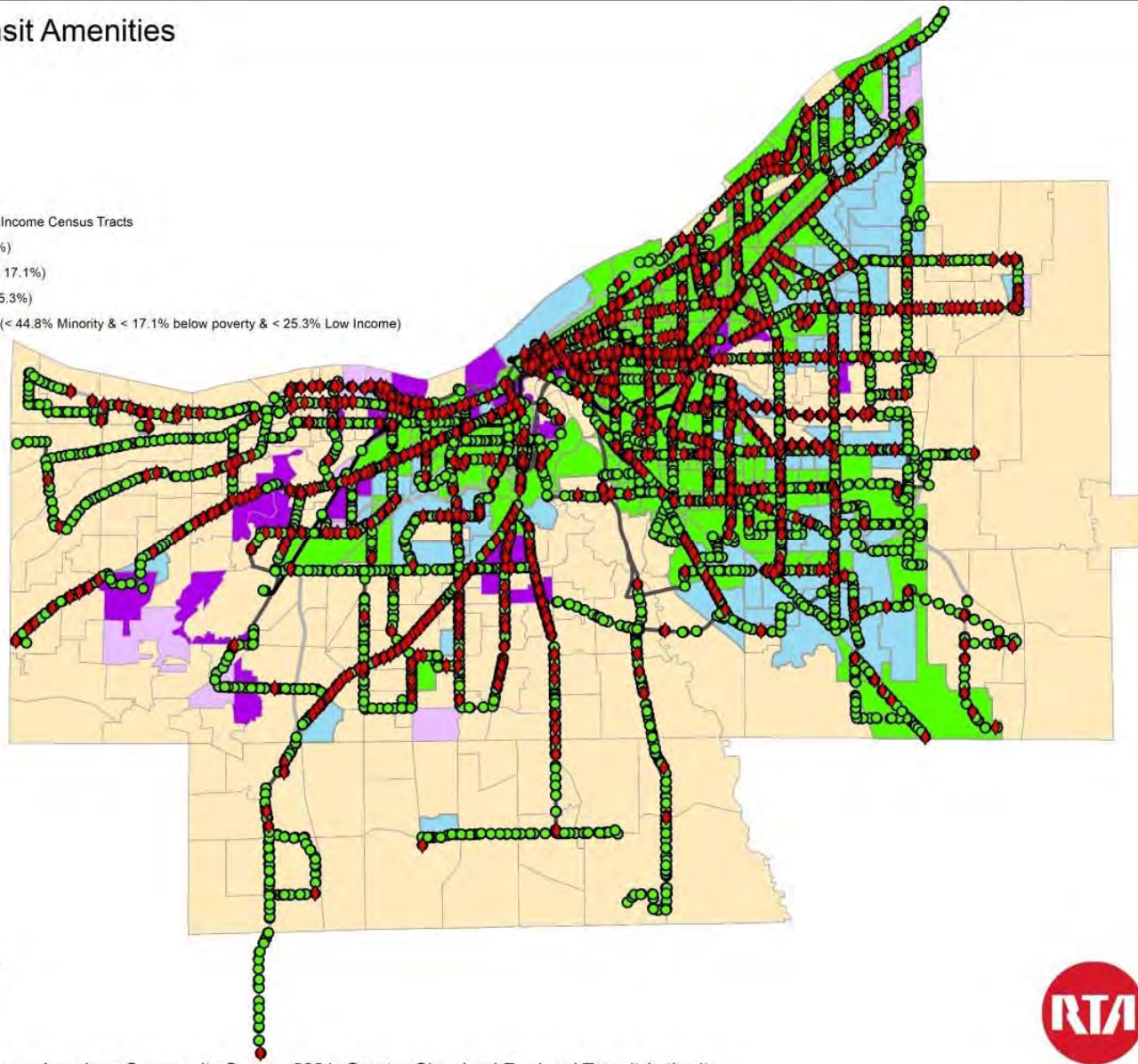
1240 W. 6th Street
Cleveland, OH 44113

Service Planning
October 2022

Distribution of Transit Amenities

Legend

- Bus Stop, No Shelter
- ◆ Bus Stop with Shelter
- RTA Rail Rapid Transit
- RTA Bus
- RTA Bus - Rush Hour Only
- Minority, Below Poverty, and Low Income Census Tracts
- Minority Census Tracts (>= 44.8%)
- Below Poverty Census Tracts (>= 17.1%)
- Low Income Census Tracts (>= 25.3%)
- Non-Min/Pov/Low Census Tracts (< 44.8% Minority & < 17.1% below poverty & < 25.3% Low Income)



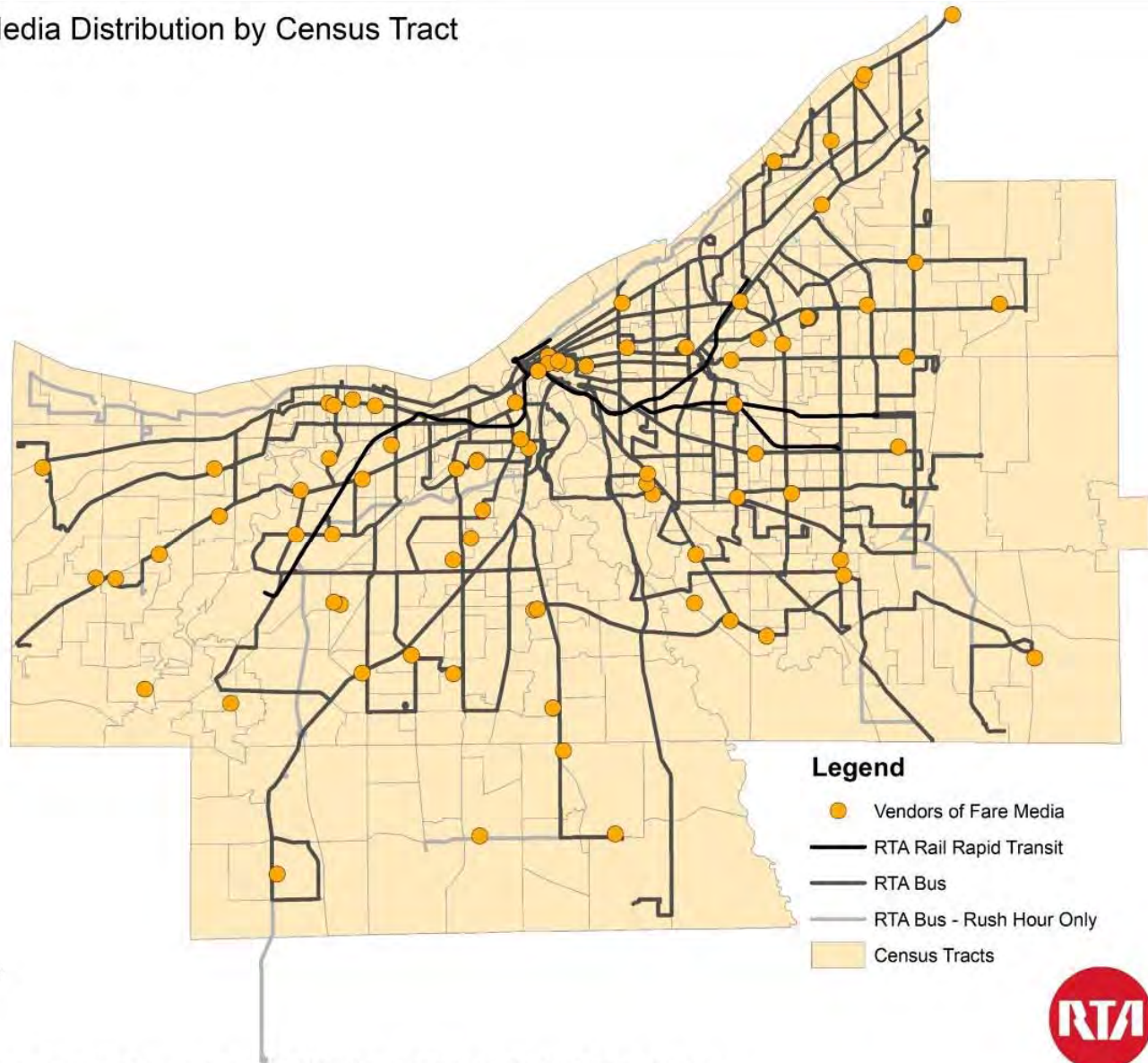
Data Source: U.S. Census Bureau, American Community Survey, 2021: Greater Cleveland Regional Transit Authority



1240 W. 6th Street
Cleveland, OH 44113

Service Planning
October 2022

Location of Fare Media Distribution by Census Tract



0 2.5 5 Miles

Data Source: U.S. Census Bureau, American Community Survey, 2021: Greater Cleveland Regional Transit Authority



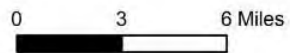
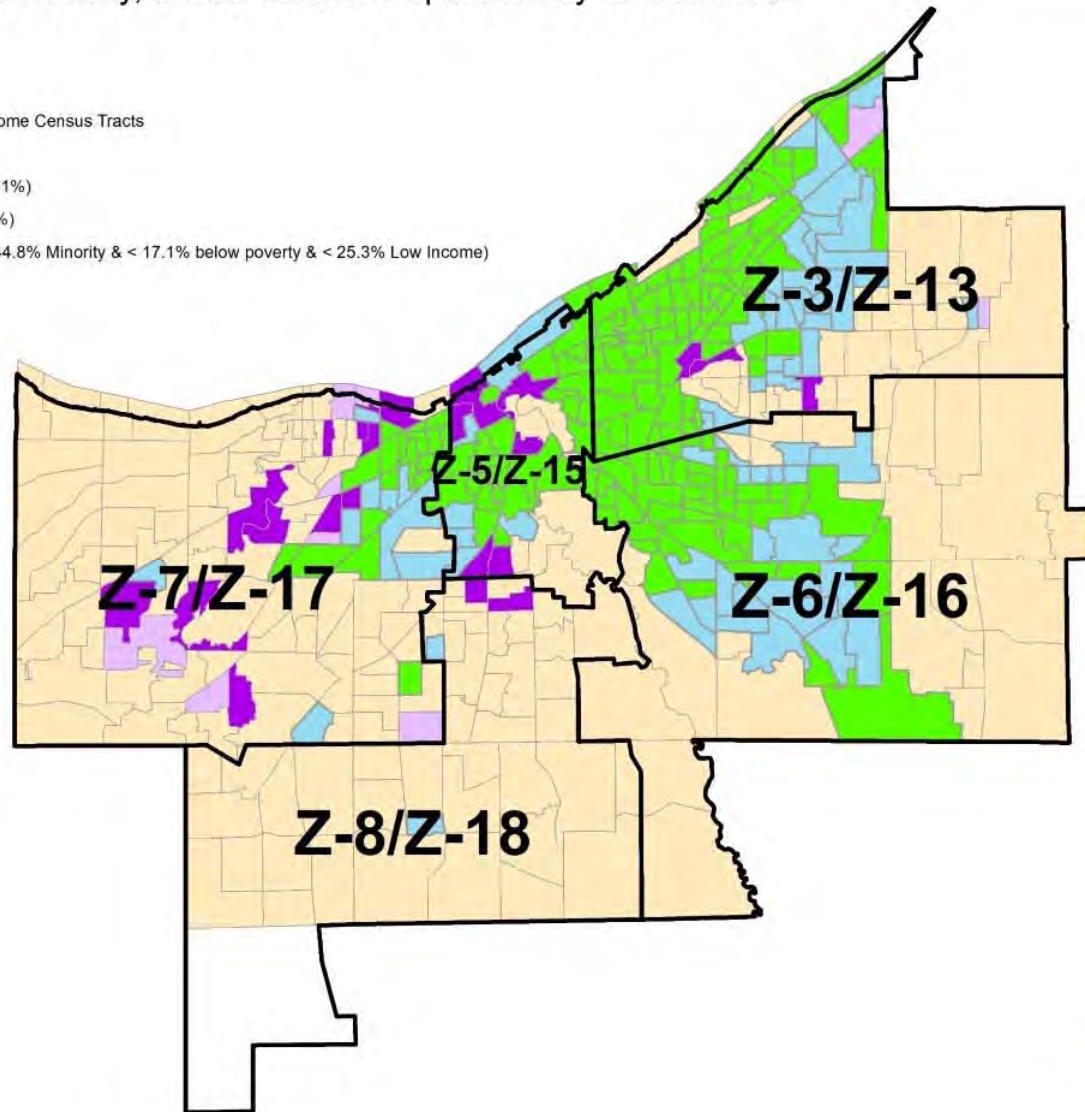
1240 W. 6th Street
Cleveland, OH 44113

Service Planning
May 2022

Percent Minority, Below Poverty, & Low Income Population by Census Tract

Legend

- Supervisory Work Zones
- Minority, Below Poverty, and Low Income Census Tracts
- Minority Census Tracts ($\geq 44.8\%$)
- Below Poverty Census Tracts ($\geq 17.1\%$)
- Low Income Census Tracts ($\geq 25.3\%$)
- Non-Min/Pov/Low Census Tracts ($< 44.8\%$ Minority & $< 17.1\%$ below poverty & $< 25.3\%$ Low Income)



1240 W. 6th Street
Cleveland, OH 44113

Service Planning
October 2022

Data Source: U.S. Census Bureau, American Community Survey, 2021: Greater Cleveland Regional Transit Authority

Chapter 6 ATTACHMENTS

Attachment A: Notice to the Public in English and Spanish – Title VI Signage

Rights Under Title VI

Greater Cleveland Regional Transit Authority (GCRTA)

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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.

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Derechos bajo Título VI

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- Go to RideRTA.com/oeo/
Download the complaint form and mail it to:

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Cleveland, Ohio 44113-1331
Attn: Office of Equal Opportunity*

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

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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 envíelo 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: NEXT GEN RTA System Redesign Public Participation Summary and Schedule

NEXT GEN RTA System Redesign Public Participation Summary and Schedule

GCRTA utilized a multi-prong strategy to inform the community of the NEXT GEN, proposals and to solicit feedback. The multi-prong strategy is consistent with our Public Participation Plan.

GCRTA partnered with Jarrett Walker & Associates to engage with our customers to what they value and prioritize in terms of transit service. From this first engagement, we learned that customers prioritized rides for employment, education, and health care, with emphasis on:

- Providing more frequent service all day on weekdays
- Providing more frequent service on Saturdays and Sundays
- Providing more direct transportation, less transfers on trips between city and suburbs
- Keeping all areas accessible by transit (maintain “coverage”)

In the next engagement of the public, we presented service proposals for comment.

In response to public comments, before implementing the NEXT GEN RTA System Redesign, the following changes were made specifically to routes 15, 48A and 50:

Changes in the Cleveland Ward 1 neighborhood served by Route 15

Original plan: Move the six daily #15 bus trips that miss the Lee-Harvard shopping center (these trips were sometimes informally called #15A or “#15 via Walden”) to the main #15 route so that all trips serve the Lee-Harvard shopping center.

Revised plan: Adjust the six daily #15 trips as stated above, but also improve the frequency of #15 service to/from the Cuyahoga Community College Eastern Campus, and improve Saturday and Sunday service frequency on the Lee Road route (#40) that crosses Walden.

Changes in the neighborhood formerly served by Route 48A and now served by Route 50

Original plan: Discontinue the 48A branch. Serve stops on that branch with a route (54) that, **unlike 48A, does not serve** University Circle, a major center for jobs, education, and health care.

Revised plan: Discontinue #48A branch. Serve stops on that branch with a route (50) that, **like 48A, does serve** University Circle, a major center for jobs, education, and health care.

Also, following implementation of NEXT GEN in June 2021, questions were raised for four bus routes in three Wards in the City of Cleveland. See routes and actions below:

Bus Number	Ward	Community Meeting	Action/Outcome
15, 15A 48A, 50	Ward 1	Meeting held on July 1, 2021, at the Harvard Community Center. Meeting was organized by the Ward 1 Councilman. Approximately 12 people attended.	GCRTA considered the comments received. Then GCRTA confirmed the routes as implemented in NEXT GEN provided transit access consistent with what the community wanted: employment, education, and health care with increased frequency. GCRTA staff shared this analysis with our Board. GCRTA staff later returned to present the analysis to area residents (see meeting below).
		Meeting held April 12, 2022, at Canaan Baptist Church, with City Council member and community leaders.	GCRTA presented the analysis (see Attachment 3) to the community.
38	Wards 9 & 10	Met with City Council members, community leaders, and community on August 18, 2021. The meeting was held in the community at Patrick Henry Elementary/Middle School.	After review, GCRTA confirmed access was impacted. As a result, GCRTA created a new route (#35) based on data to support the revision. Feedback on this resolution was positive.

Public Participation Schedule

GCRTA conducted 58 meetings/opportunities for public engagement, 12 surveys, and 138 social media posts for the NextGen system redesign/service change (detailed below).

2019 Meetings:

Facility Name	Facility Address	Date	Time	Meeting Purpose
Cleveland Public Library, Main Auditorium	525 Superior Ave., Cleveland, OH 44114	Monday, May 6	11:00 a.m., 5:30 p.m.	System Redesign/ Fare Equity
Cedar Extension Hi-Rise (CMHA)	2320 E. 30th St., Cleveland, OH 44115	Tuesday, May 7	10:00 a.m.	System Redesign/ Fare Equity
Murtis Taylor Multi-Services Center	13422 Kinsman Rd., Cleveland, OH 44120	Tuesday, May 7	3:00 p.m., 5:30 p.m.	System Redesign/ Fare Equity
Gunning Rec Center	16700 Puritas Ave., Cleveland, OH 44135	Weds., May 8	4:00 p.m., 6:00 p.m.	System Redesign/ Fare Equity
Maple Heights Library	5225 Library Ln., Maple Hts., OH 44137	Thursday, May 9	5:30 p.m.	System Redesign/ Fare Equity
Lakeview Towers (CMHA)	2700 Washington Ave., Cleveland, OH 44113	Monday, May 13	10:00 a.m.	System Redesign/ Fare Equity
Collinwood Rec Center	16300 Lakeshore Blvd., Cleveland, OH 44110	Monday, May 13	5:30 p.m.	System Redesign/ Fare Equity
Cleveland Public Library, South Branch	3096 Scranton Rd., Cleveland, OH 44113	Tuesday, May 14	10:00 a.m.	System Redesign/ Fare Equity
Cleveland Heights Community Center	1 Monticello Blvd., Cleveland Hts., OH 44118	Tuesday, May 14	5:30 p.m.	System Redesign/ Fare Equity
La Sagrada Familia	7719 Detroit Ave., Cleveland, OH 44102	Weds., May 15	5:30 p.m.	System Redesign/ Fare Equity
Bellaire Gardens (CMHA)	12555 Bellaire Rd., Cleveland, OH 44135	Monday, May 20	10:00 a.m.	System Redesign/ Fare Equity
Parma Library	6996 Powers Blvd., Parma, OH 44129	Monday, May 20	5:30 p.m.	System Redesign/ Fare Equity

Public Participation Schedule

Rocky River Don Umerely Civic Center, Memorial Hall	21012 Hilliard Blvd., Rocky River, OH 44116	Weds., May 22	5:30 p.m.	System Redesign/ Fare Equity
Independence Library	6361 Selig Dr., Independence, OH 44131	Tuesday, May 28	5:30 p.m.	System Redesign/ Fare Equity
Cleveland Public Library, Main, Learning Commons	525 Superior Ave., Cleveland, OH 44114	Tuesday, Sept. 24	11:00 a.m.	System Redesign/ Fare Equity
Cleveland State University, BH134	2121 Euclid Ave., Cleveland, OH 44115	Tuesday, Sept. 24	5:30 p.m.	System Redesign/ Fare Equity
RTA Main Office Board Room	1240 W. 6th St., Cleveland, OH 44113	Weds., Sept. 25	10:00 a.m., 3:00 p.m.	System Redesign/ Fare Equity
Independence Library	6361 Selig Dr., Independence, OH 44131	Thursday, Sept. 26	5:30 p.m.	System Redesign/ Fare Equity
Cedar Extension Hi-Rise (CMHA)	2320 E. 30th St., Cleveland, OH 44115	Monday, Sept. 30	10:00 a.m.	System Redesign/ Fare Equity
Parma Library	6996 Powers Blvd., Parma, OH 44129	Monday, Sept. 30	5:30 p.m.	System Redesign/ Fare Equity
Cuyahoga Community College- Eastern Campus	4250 Richmond Rd., Highland Hills, OH 44122	Tuesday, Oct. 1	11:30 a.m., 2:00 p.m.	System Redesign/ Fare Equity
Beachwood Library	25501 Shaker Blvd., Beachwood, OH 44122	Weds., Oct. 2	5:30 p.m.	System Redesign/ Fare Equity
Windermere Rapid Station	14232 Euclid Ave., East Cleveland, OH 44112	Thursday, Oct. 3	10:00 a.m.	System Redesign/ Fare Equity
Cuyahoga Community College- Western Campus	11000 W. Pleasant Valley Rd., Parma, OH 44130	Thursday, Oct. 3	3:00 p.m., 5:30 p.m.	System Redesign/ Fare Equity
Tower City Rapid Station	50 Public Square, Cleveland, OH 44113	Monday, Oct. 7	2:00 p.m.	System Redesign/ Fare Equity
Maple Heights Library	5225 Library Ln., Maple Hts., OH 44137	Monday, Oct. 7	6:00 p.m.	System Redesign/ Fare Equity

Public Participation Schedule

Collinwood Rec Center	16300 Lakeshore Blvd., Cleveland, OH 44110	Tuesday, Oct. 8	5:00 p.m.	System Redesign/ Fare Equity
Gunning Rec Center	16700 Puritas Ave., Cleveland, OH 44135	Weds., Oct. 9	5:30 p.m.	System Redesign/ Fare Equity
Michael J. Zone Rec Center	6301 Lorain Ave., Cleveland, OH 44102	Saturday, Oct. 12	10:30 a.m.	System Redesign/ Fare Equity
Southgate Transit Center	5491 Warrensville Center Rd., Maple Hts., OH 44137	Weds., Oct. 16	10:00 a.m.	System Redesign/ Fare Equity
Rocky River Don Umerely Civic Center, Memorial Hall	21012 Hilliard Blvd., Rocky River, OH 44116	Weds., Oct. 16	5:30 p.m.	System Redesign/ Fare Equity
Cleveland Heights Community Center	1 Monticello Blvd., Cleveland Hts., OH 44118	Monday, Oct. 21	5:30 p.m.	System Redesign/ Fare Equity
Cleveland Public Library- South Brooklyn Branch	4303 Pearl Rd., Cleveland, OH 44109	Tuesday, Oct. 22	5:00 p.m.	System Redesign/ Fare Equity
Lakewood Library- Madison Branch	13229 Madison Ave., Lakewood, OH 44107	Weds., Oct. 23	5:30 p.m.	System Redesign/ Fare Equity
Alpha Education Center	2820 E. 116th St., Cleveland, OH 44120	Thursday, Oct. 24	5:30 p.m.	System Redesign/ Fare Equity
Paratransit District		Monday, Oct. 28	3:00 p.m.	System Redesign/ Fare Equity
Hayden District		Monday, Oct. 28	5:00 p.m.	System Redesign/ Fare Equity
Rail District		Tuesday, Oct. 29	10:30 a.m.	System Redesign/ Fare Equity
Triskett District		Tuesday, Oct. 29	5:00 p.m.	System Redesign/ Fare Equity
CBM District		Weds., Oct. 30	11:30 a.m.	System Redesign/ Fare Equity

Public Participation Schedule

2020 Meetings:

Facility Name	Date	Time	Meeting Purpose
Cuyahoga County Suburban Mayors and Managers Association	9/24/2020		NEXT GEN RTA
Cleveland City Council Transportation Committee	9/30/2020		NEXT GEN RTA
RTA Community Advisory Committee	10/8/2020		NEXT GEN RTA
Cleveland Ward 15 Councilman Matt Zone	10/21/2020		NEXT GEN RTA
Virtual Community Engagement-Facebook Live (Northeast Zone)	10/26/2020	11:30 a.m.	NEXT GEN RTA
Mayor of Brooklyn, K. Gallagher	10/27/2020		NEXT GEN RTA
Cleveland Hts. Transportation Committee	10/28/2020		NEXT GEN RTA
Virtual Community Engagement-Facebook Live (Northwest Zone)	10/29/2020	5:00 p.m.	NEXT GEN RTA
Shaker Heights Mayor & Planning Director	11/3/2020		NEXT GEN RTA
Downtown Cleveland Alliance	11/5/2020		NEXT GEN RTA
Virtual Community Engagement-Facebook Live (Downtown Zone)	11/5/2020	11:30 a.m.	NEXT GEN RTA
Virtual Community Engagement-Facebook Live (Southeast Zone)	11/8/2020	4:00 p.m.	NEXT GEN RTA
Virtual Community Engagement-Facebook Live (Southwest Zone)	11/10/2020	11:30 a.m.	NEXT GEN RTA
Fairview Park City Staff	11/12/2020		NEXT GEN RTA
Cleveland City Planning Staff	11/12/2020		NEXT GEN RTA
Clevelanders for Public Transit	11/16/2020		NEXT GEN RTA
University Heights Mayor and Staff	11/16/2020		NEXT GEN RTA
Cleveland Councilman Hairston and Polensek and staff	11/24/2020		NEXT GEN RTA

Attachment C: The Title VI Board Presentation



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

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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 (2nd 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 Service Methodology:

B. Vehicle Assignment

ROUTE CATEGORY	AVERAGE AGE
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 Category	Headways	
	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

Greater Cleveland Regional Transit Authority



Attachment D: GCRTA Board Resolution 2023-7

Attachment E: Staff Summary & Comments

Attachment F: Board Meeting Minutes

Minutes

RTA Operational Planning & Infrastructure Committee

9:20 a.m. January 10, 2023

Committee Members: Welch (Chair), Moss (Vice)

Other Board Members: Koomar, Lucas, Weiss **Not present:** Biasiotta, Joyce, McCall, Pellot

Staff: Birdsong Terry, Bober, Brooks-Williams, Burney, Caver, Dangelo, Davidson, Feke, Fields, Fleig, Garofoli, Gautam, Jenkins, Johnson, Kirkland, Laule, Macko, McGervey, Miller, Mothes, Schipper, Talley, Tarka, Walker-Minor

Public: Embrescia, Gallagher, Gibbons, Jackson, Loh

The meeting was called to order at 9:20 a.m. Three (3) committee members were present. Mayor Weiss was appointed to the committee to establish a quorum.

Title VI Program

Presenters included Felicia Brooks Williams, Senior Manager of OEO, ADA & DEI and Jeffrey Macko, Planning Team Leader.

With the approval of this committee, a resolution will be presented to the Board at the Jan. 31, 2023 meeting. This will enable GCRTA to comply with the latest federal guidelines implementing Title VI of the Civil Rights Act of 1964.

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 states that "No person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal Financial Assistance..."

The intent of Title VI is to remove barriers and conditions that prevent minority, low income and persons with limited English proficiency from access to public goods and services. It promotes fairness and equity in federally assisted programs and activities. The Board received a copy of the Program Update. It consists of our policy, practice and analysis that illustrates how GCRTA ensures compliance with Title VI.

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
- 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

General requirements

One of the Title VI general requirements is to inform customers of their rights. This notice is posted on the GCRTA website at riderta.com/oeo and displayed on RTA vehicles and facilities. The Title VI Notice to the Public is in English and Spanish. Another requirement is to establish a complaint process. Any person who believes they have been discriminated against based on any protective class may file a complaint in the OEO within 180 days of the alleged incident. The complaint form is available at the Main Office and on the website.

The Community Advisory Committee (CAC) is also a general requirement. It serves as a non-elected committee. The CAC is comprised of representatives selected from public and private agencies, consumer groups, interested individuals and users of the transit system. They meet quarterly to discuss relevant issues pertaining to the transit operations and they work to increase citizens participation in the community.

A Language Assistance Plan (LAP) is another general requirement. It is managed by Marketing & Communications and Programming & Planning. The plan is to identify reasonable steps for providing language assistance to persons with limited English proficiency. The Plan also assist persons who use English as a second language. We provide assistance at Public Meetings, through telephone information and translate printed materials. The plan is reviewed every three years through a four-factor analysis. The analysis looks at the number of LAP individuals that GCRTA will encounter, the frequency, the importance and the resources available to assist them.

The last general requirement is for RTA to have a Public Participation Plan. The plan has been established to ensure no one is precluded from participating in the service plan and development process. The plan is managed by Marketing & Communications.

Transit Providers 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.
- 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 (2nd 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 Service Methodology:

B. Vehicle Assignment

ROUTE CATEGORY	AVERAGE AGE
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 Category	Headways	
	Peak	Midday
MINLOW	31.82	32.91
NONMINLOW	37.50	45.00

The Title VI Program Update will be forwarded to the Board of Trustees for approval at the January 31, 2023 meeting. Mayor Koomar asked how CAC members are solicited and if they have terms. Dr. Caver said in the past the CAC members submitted an application that was reviewed by the CEO and a member of the Board who would then make member recommendations to the Board. That process

is being updated. There will be an application online with recommendations being made to the Board. President Lucas added that Ms. McCall agreed to be the Board liaison for the CAC. Albert Johnson is the new staff liaison. Mr. Johnson looks forward to working with the community and revamping the committee. Dr. Walker Minor added that Jose Feliciano was the previous staff liaison. They are excited about the work and energy the new liaison will bring to the committee. President Lucas said in 1964 he and his wife testified in favor of the Civil Rights Act of 1964. Ms. Birdsong Terry said the new plan will be rolled out to the Board shortly for approval.

Ms. Moss said she was happy to see that RTA's program exceeds the Title VI federal requirements which includes women and Vietnam veterans. It was moved by Ms. Moss, seconded by Mayor Weiss to move this to the full Board.

IFB Procurement for Light Rail Trunk Line from East 79th Station to Shaker Square

Presenters included Kathleen McGervey, Resident Engineer/Architect and Jonathan Laule, Program Contract Manager. This is part of an overarching program focusing on rejuvenating the rail system. Elements include the rail car purchase, reconstruction of track, catenary replacement and signal system replacement. This is the first project from the signal system replacement program.

Project Overview

The existing system was built in the 1920's. This project will replace this system. The equipment is old and impossible to obtain replacements and difficult to refurbish.

- Project Limits: East 79th Street to Shaker Square
- Service Impacts – 6-week shutdown concurrent with East 75th Street Interlocking.
- The Engineer's Estimate was \$4,440,000.
- Branch lines to be Rehabilitated in Future Projects

This new project will replicate the existing 3 aspect signaling.

- New system will be compliant with modern requirements.
- Replace existing system with new system which replicates existing single direction running, 3 aspect signaling.
- Audio frequency track circuits will be used for train detection.
- A total of 7 new signal houses (6x6) will be required.

Procurement Overview

The Invitation for Bid (IFB) was issued October 24, 2022. It was accessed on the GCRTA website by 13 interested parties. Two (2) firms submitted a bid. The lowest responsive and responsible vendor is Clark Transportation Consulting & Services, LLC DBA Bison Rail Systems, Flemington, New Jersey. A 17% DBE participation goal was assigned to this project. Clark Transportation Consulting & Services, LLC DBA Bison Rail Systems is a certified DBE firm.

Firm Experience:

- Clark Transportation Consulting & Services, LLC DBA Bison Rail Systems has successfully completed projects for Amtrak, WMATA, and NYMTA, among others.
- Clark Transportation Consulting & Services, LLC DBA Bison Rail Systems is currently working various projects, including but not limited to, signal construction, positive train control testing, systems integration, and signal testing.

Staff requests that the Operational Planning and Infrastructure Committee recommend award to Clark Transportation Consulting & Services, LLC DBA Bison Rail Systems for the Trunk Line Signal System. The contract is in an amount not to exceed \$4,464,789.20.

Ms. Moss liked the competitiveness of this project. Ms. Birdsong Terry said these projects are part of our long-term Capital Plan. Mr. Schipper added that the rejuvenation of the rail system is important, and money is allocated to it. We are pursuing grants to do the work. We have programmatic items like the Light Rail Reconstruction. The signal system program will be a series of programs and projects over several years along with overhead and rail cars. Replacement will benefit safe operation on the rail system. Dr. Caver added that these projects take a lot of planning. Our teams work together to keep the system running.

Mr. Embrescia with IBEW Local 38 in Cleveland asked if the recommended vendor has the correct certifications to complete the work and if they have a list of subcontractors. Ms. McGervey said they expect to receive the subcontractor list and that all the contractor's references checked out. Ms. Birdsong Terry asks that additional questions be addressed offline and reported back to the Board. Ms. Schipper confirmed they will submit their subcontractor list. Ms. Dangelo said her staff performed their due diligence on all requirements. They are a certified DBE firm. Ms. Moss asked why the union is questioning the firm. Mr. Embrescia said the firm is not certified in construction. He requested the subcontractors list when available. Mayor Weiss asked for a visual update as to where the signal system has been replaced to date. Mr. Schipper said he would provide that information.

It was moved by Ms. Moss, seconded by Mayor Weiss and approved to move this to the full Board with the understanding that more information will be provided to the Board before the vote.

IFB Procurement for Bungalow Foundations for Light Rail Trunk Line Signaling Project

Presenters included Kathleen McGervey, Resident Engineer/Architect and Jonathan Laule, Program Contract Manager. This project will be in conjunction with the previous project. It will provide the bungalow foundations, excavations and other work.

Project Overview

- Project Limits: East 79th Street to Shaker Square
- This project provides signal bungalow foundations in support of Project 12D – Trunk Line Resignaling
- Service Impacts – 3-week shutdown in 2023 concurrent with East 75th Street Interlocking
- The Engineer's Estimate was \$360,000

Procurement Overview

This Invitation for Bid (IFB) was issued October 24, 2022 and was accessed on the GCRTA website by 12 interested parties. Three (3) firms submitted a bid. The lowest responsive and responsible vendor is Northeast Ohio Trenching Service, Inc., Cleveland, Ohio. A 23% DBE participation goal was assigned to this procurement by the Office of Business Development. Northeast Ohio Trenching Service, Inc. will achieve a 10.18% DBE participation and has completed the good faith efforts process, as required under CFR 49 Part 26.

Firm Experience:

- Northeast Ohio Trenching Service, Inc. has successfully completed projects for GCRTA, Geauga County Engineers, City of Elyria Engineers, among others.
- Northeast Ohio Trenching Service, Inc. is currently working on the Airport Tunnel & Sump Pump Station Repairs for the RTA.

Staff requests that the Operational Planning and Infrastructure Committee recommend award to Northeast Ohio Trenching Service, Inc. for the Bungalow Foundations for the Trunk Line Resignaling. The contract is in an amount not to exceed \$347,000.00. Mayor Weiss asked what the bungalow is. Ms. McGervey said it is the underline support.

It was moved by Ms. Moss, seconded by Mayor Weiss and approved to move to the full Board.

The meeting was adjourned at 10:00 a.m.



Rajan D. Gautam
Secretary/Treasurer



Theresa A. Burrage
Executive Assistant

Attachment G: GCRTA Services Code (December 2018)

CODIFIED RULES AND REGULATIONS
OF THE
GREATER CLEVELAND REGIONAL TRANSIT AUTHORITY

PART TEN - SERVICES CODE

TITLE TWO - Service Policy

- Chap. 1010. General Provisions and Definitions.
- Chap. 1011. Route Network Design.
- Chap. 1012. Service Management.
- Chap. 1013. Service Standards.
- Chap. 1014. Service Policies.
- Chap. 1024. Service Development/Approval/Implementation Process.
(Repealed)

2018 Replacement

CHAPTER 1010
General Provisions and Definitions

1010.01 Purpose.

1010.02 Definitions.

PURPOSE.

The purposes of this service policy are:

- (a) To establish guidance for public transit service operation including network design, implementation, and monitoring; and
- (b) To ensure resources are utilized efficiently and produce the greatest value for the service area.

(Res. 2017-58. Passed 7-18-17.)

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 ten percent 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.

2018 Replacement

- (a) “Public hearing.” A community meeting that meets all requirements of Chapter 214, Public Hearing Process.

- (b) "Route deviation." A scheduled exception to the normal fixed route of a bus line in order to serve a specific activity center.
- (c) "Span of service." Number of hours and days when service operates.
(Res. 2017-58. Passed 7-18-17.)

2018 Replacement

CHAPTER 1011
Route Network Design

1011.01 Objectives.

1011.02 Bus Stop Policy.

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.
 - A. Benefits of such deviations must outweigh disadvantages to passengers.
 - B. Factors to be considered include percentage of passengers benefitting 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.
(Res. 2017-58. Passed 7-18-17.)

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.

2018 Replacement

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

(b) The CEO, General Manager/Secretary-Treasurer shall implement and publicize specific standards and guidelines for bus stops to implement this policy. (Res. 2017-58. Passed 7-18-17.)

2018 Replacement

CHAPTER 1012
Service Management

1012.01 Monitoring of service utilization and productivity.
1012.02 Service Management Plan.

1012.03 Public involvement requirements for service changes.

MONITORING OF SERVICE UTILIZATION AND 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.

(Res. 2017-58. Passed 7-18-17.)

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:
 - A. Current Plans for service;
 - B. Bus Route Performance Summary by Route Category;
 - C. 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;

2018 Replacement

- (3) Alignment changes;
 - (4) Route discontinuance or consolidation with another route;
 - (5) Seeking outside funding opportunities.
- (Res. 2017-58. Passed 7-18-17.)

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 Section 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 two hours.
- (2) Either a public hearing or a community meeting shall be conducted if the time period is longer than one 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 two hours and the road segment is longer than one mile.
- (2) Either a public hearing or a community meeting shall be conducted if the time period is longer than one hour and the road segment is longer than one-half 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 thirteen 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:

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- (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.
(Res. 2017-58. Passed 7-18-17.)

CHAPTER 1013
Service Standards

- | | |
|--|---|
| 1013.01 Vehicle load for each mode. | 1013.03 On-time performance. |
| 1013.02 Vehicle headway for each mode. | 1013.04 Service availability for each mode. |

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 thirty-minute intervals during rush hours and sixty-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

(Res. 2017-58. Passed 7-18-17.)

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:

2018 Replacement

	<u>5 a.m. - 10 p.m.</u>	<u>Other</u>
<u>Times</u> Rail *	2	1
Bus *	1	1

* = Does not apply to minor branches and special services

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.

(Res. 2017-58. Passed 7-18-17.)

ON-TIME PERFORMANCE.

- (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 above.

(b) The long-term goal is 100 percent "on time"; the near-term goal is eighty percent on-time.

(Res. 2017-58. Passed 7-18-17.)

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 3/4 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 miles 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. (Res. 2017-58. Passed 7-18-17; Res. 2018-31. Passed 3-27-18; Res. 2018-72. Passed 7-24-18.)

CHAPTER 1014
Service Policies

Transit amenities.
Vehicle assignment.
Disparate impact.

Disproportionate burden.
Facilities.

TRANSIT AMENITIES.

(a) The Authority 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. 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.
(Res. 2017-58. Passed 7-18-17.)

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.

2018 Replacement

- (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 (nondiscrimination) regulations.

(Res. 2017-58. Passed 7-18-17.)

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 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 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:

- (1) The Authority has a substantial legitimate justification for the proposed fare and/or service change, and
- (2) 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.

(Res. 2017-58. Passed 7-18-17.)

DISPROPORTIONATE BURDEN.

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

2018 Replacement

- (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 twenty-five thousand dollars (\$25,000).
- (2) The Authority will periodically reconsider the twenty-five thousand dollar (\$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 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 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.

(Res. 2017-58. Passed 7-18-17.)

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.

(Res. 2017-58. Passed 7-18-17.)

2018 Replacement

CHAPTER 1024

Service Development, Approval, Implementation Process (Repealed)

EDITOR'S NOTE: Chapter 1024 was repealed by Resolution 2003-068, passed May 20, 2003.

2004 Replacement

**Greater Cleveland
Regional Transit Authority**

**Fiscal Year 2022
Service Management Plan**

**Originally Distributed: November 16, 2021
REVISED: February 17, 2022**

**Operations Division
Service Management Department**

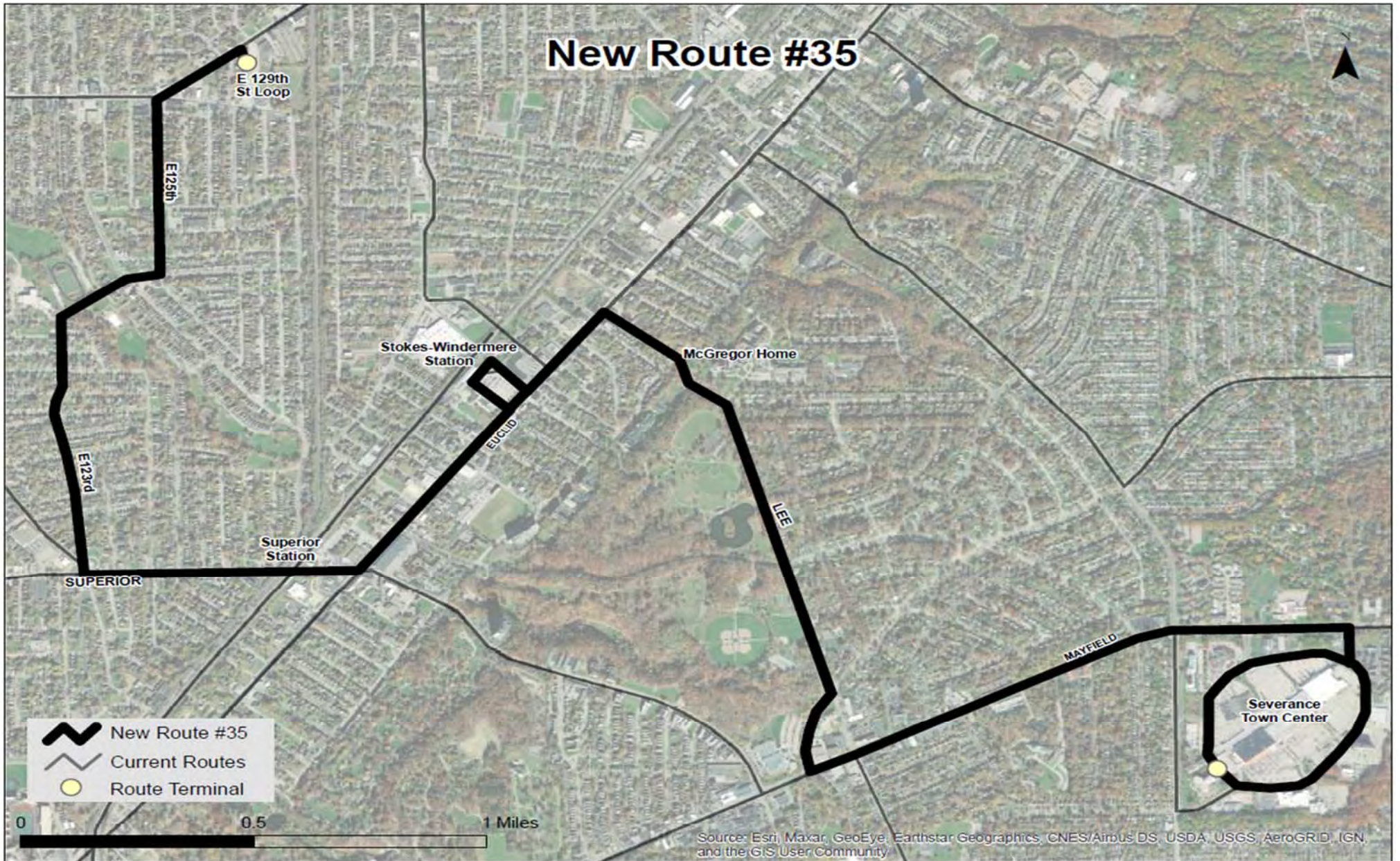


Section 2: Plans for 2022

RTA implemented the NEXT GEN RTA bus system redesign on June 13th, 2021. In December 2021, a new weekday daytime route (#35) was established, restoring the link between the MetroHealth Hospital at Severance Town Center and the Windermere Rapid Station and bus hub. The addition of Route #35 re-activated bus stops on E 123, Arlington, and E 125. (See route map "New Route #35" on next page)

Throughout 2022, staff will continue to monitor the NEXT GEN RTA system performance. In addition, staff will continue to make routine service adjustments as needed. For example:

1. Service resources will be reallocated to offset detours and delays due to road and bridge construction projects.
2. Adjustments will be made to accommodate major building construction projects including the new Sherwin-Williams headquarters.
3. Temporary service will be operated to support rail construction projects and major special events.
4. Staff will continue to adjust bus stops to improve safety and informational signs.
5. Staff will continue working to improve transit waiting environments, especially along priority corridors designated in the Strategic Plan.
6. Efforts to improve systemwide service reliability will continue.



Section 4: Bus Routes in the Bottom Quartile of Their Route Category

By policy, RTA staff must identify every route whose utilization, measured in boardings per scheduled revenue vehicle hour (B/VH), is low in relation to other routes in its route category. Routes in the bottom quartile of each route category are listed below. The number in parentheses next to each route is the number of boardings per "scheduled revenue vehicle hour" (i.e., scheduled in-service vehicle hour) for the route. Detailed route performance statistics are included in the Appendix.

Radial (Category Average = 13)

- #53/53A MetroHealth - Broadview (9)
- #25 Madison - Clark (8)
- #90 Broadway - Libby (7)
- #71 Pearl - Tiedeman (7)
- #77 Brecksville (5)

Crosstown/Feeder (Category Avg. = 11)

- #86 Rocky River Dr - Bagley (6)
- #83 Warren - W. 130 (6)
- #54 Brookpark - Rockside (5)
- #7/7A Monticello (5)
- #34 E. 200 - Green (5)

Appendix - Route Performance Tables

2nd Half 2021 Route Performance: Sorted By Boarding Per Revenue Vehicle Hour in Descending Order

1. Radial ROUTE	Ridership by Route		Vehicle Statistics					Route Performance Indicators				
	Boardings	% Contribution	Revenue			Total		Revenue			Total	
			Trips	Hours	Miles	Hours	Miles	B/VT	B/VH	B/VM	B/VH	B/VM
HealthLine	758,158	16%	30,912	23,963	211,670	24,249	213,351	25	32	3.58	31	3.55
3 Superior	286,025	6%	22,656	16,586	155,038	16,752	156,001	13	17	1.84	17	1.83
1 St. Clair	271,550	6%	22,047	16,077	170,702	16,520	176,698	12	17	1.59	16	1.54
22 Lorain	387,483	8%	22,275	23,515	266,614	24,548	284,547	17	16	1.45	16	1.36
51/51A MetroHealth Line	382,942	8%	23,682	24,564	314,214	26,012	341,797	16	16	1.22	15	1.12
14/14A Kinsman	383,207	8%	23,488	27,931	355,165	29,581	393,321	16	14	1.08	13	0.97
26/26A Detroit	341,174	7%	22,174	27,096	330,613	27,981	346,960	15	13	1.03	12	0.98
11 Quincy - Cedar	198,240	4%	13,843	16,365	181,724	17,162	196,222	14	12	1.09	12	1.01
19/19A/19B Broadway	326,110	7%	23,203	27,276	352,961	29,250	407,300	14	12	0.92	11	0.80
9 Mayfield - Hough	228,355	5%	14,162	19,752	231,843	20,663	255,392	16	12	0.98	11	0.89
55/55B/55C Cleveland State Line	193,804	4%	12,694	17,907	267,121	20,064	320,040	15	11	0.73	10	0.61
15 Union - Harvard	273,114	6%	20,702	25,356	298,843	26,921	347,663	13	11	0.91	10	0.79
45 Ridge - Fulton	135,616	3%	12,779	14,133	158,645	14,776	171,916	11	10	0.85	9	0.79
39 Lakeshore	35,475	1%	3,302	3,756	56,961	4,863	81,195	11	9	0.62	7	0.44
8 Cedar - Buckeye	51,756	1%	5,774	5,623	46,328	5,907	51,677	9	9	1.12	9	1.00
53/53A MetroHealth - Broadview	70,161	1%	8,249	8,092	130,933	9,112	158,513	9	9	0.54	8	0.44
25 Madison - Clark	145,578	3%	13,699	18,411	210,899	18,959	220,136	11	8	0.69	8	0.66
90 Broadway - Libby	91,244	2%	10,815	13,134	229,946	13,988	252,803	8	7	0.40	7	0.36
71 Pearl - Tiedeman	95,007	2%	9,363	13,694	188,371	14,729	210,862	10	7	0.50	6	0.45
77 Brecksville	36,609	1%	8,174	8,077	158,985	8,732	175,866	4	5	0.23	4	0.21
	4,691,608	100%	323,993	351,306	4,317,576	370,771	4,762,260	14	13	1.09	13	0.99

B/VT Boardings per vehicle trip
B/VH Boardings per vehicle hour
B/VM Boardings per vehicle mile
Revenue Includes in-service and layover stats only.
Total Includes dead-head and other pull out/in stats.
% Contribution Category specific contribution – not system-wide.

Appendix - Route Performance Tables

2nd Half 2021 Route Performance: Sorted By Boarding Per Revenue Vehicle Hour in Descending Order

2. Crosstown/Feeder ROUTE	Ridership by Route		Vehicle Statistics					Route Performance Indicators				
	Boardings	% Contribution	Revenue			Total		Revenue			Total	
			Trips	Hours	Miles	Hours	Miles	B/VT	B/VH	B/VM	B/VH	B/VM
41/41F Warrensville	405,844	19%	17,518	24,510	338,850	25,808	376,060	23	17	1.20	16	1.08
28/28A Euclid	263,823	13%	24,180	16,988	172,733	17,222	175,833	11	16	1.53	15	1.50
16 E.55	57,910	3%	4,341	4,195	46,965	4,563	57,629	13	14	1.23	13	1.00
10 E.105 - Lakeshore	413,801	20%	23,755	32,082	389,502	33,614	415,320	17	13	1.06	12	1.00
31 St. Clair - Babbitt	132,157	6%	14,516	10,829	122,913	10,887	123,241	9	12	1.08	12	1.07
40 Lakeview - Lee	137,499	7%	11,678	13,537	162,949	14,017	177,295	12	10	0.84	10	0.78
48 E.131	142,394	7%	14,518	14,175	132,113	15,007	143,568	10	10	1.08	9	0.99
78 W.117 - Puritas	109,425	5%	12,906	12,734	147,451	13,221	153,464	8	9	0.74	8	0.71
37 Hayden - E.185	68,403	3%	10,828	8,047	89,104	8,094	89,383	6	9	0.77	8	0.77
2 E.79	30,969	1%	3,810	3,757	46,173	3,943	51,660	8	8	0.67	8	0.60
94 E.260 - Richmond	48,427	2%	5,827	6,993	95,796	7,365	103,109	8	7	0.51	7	0.47
50 E.116	35,902	2%	5,406	5,341	53,558	5,533	55,653	7	7	0.67	6	0.65
18 W.98 - Garfield	66,664	3%	7,176	10,306	121,044	10,609	127,620	9	6	0.55	6	0.52
86 Rocky River Dr - Bagley	32,159	2%	5,520	5,471	85,924	5,732	91,228	6	6	0.37	6	0.35
83 Warren - W.130	71,730	3%	11,872	12,215	164,021	12,860	174,374	6	6	0.44	6	0.41
54 Brookpark - Rockside	30,305	1%	5,888	5,798	78,108	6,172	85,806	5	5	0.39	5	0.35
77A Monticello	36,604	2%	10,447	7,561	90,651	7,755	93,584	4	5	0.40	5	0.39
34 E.200 - Green	20,817	1%	3,937	4,329	55,243	4,509	58,692	5	5	0.38	5	0.35
	2,104,833	100%	194,123	198,867	2,393,098	206,913	2,553,519	11	11	0.88	10	0.82

- B/VT** Boardings per vehicle trip
- B/VH** Boardings per vehicle hour
- B/VM** Boardings per vehicle mile
- Revenue** Includes in-service and layover stats only.
- Total** Includes dead-head and other pull out/in stats.
- % Contribution** Category specific contribution – not system-wide.

Appendix - Route Performance Tables

2nd Half 2021 Route Performance

Bus System			Revenue					Total		Revenue			Total	
	Boardings	% Contribution	Revenue			Total		B/VT	B/VH	B/VM	B/VH	B/VM		
			Trips	Hours	Miles	Hours	Miles							
All Radial	4,691,608	67.12%	323,993	351,306	4,317,576	370,771	4,762,260	14	13	1.09	13	0.99		
All Crosstown/Feeder	2,104,833	30.11%	194,123	198,867	2,393,098	206,913	2,553,519	11	11	0.88	10	0.82		
251 Strongsville Park-n-Ride	20,702	0.30%	1,524	1,495	35,038	2,754	71,531	14	14	0.59	8	0.29		
B-Line Trolley	52,703	0.75%	12,827	3,167	17,642	3,355	21,306	4	17	2.99	16	2.47		
Uncategorized and Misc.	119,526	1.71%	10,406	6,876	77,234	7,358	86,929	N/A	N/A	N/A	N/A	N/A		
	6,989,372	100%	542,873	561,711	6,840,588	591,151	7,495,545	13	12	1.02	12	0.93		

B/VT Boardings per vehicle trip
B/VH Boardings per vehicle hour
B/VM Boardings per vehicle mile
Revenue Includes in-service and layover stats only.
Total Includes dead-head and other pull out/in stats.
% Contribution Category specific contribution -- not system-wide.

Attachment I: GCRTA Tracts ACS 2020

Attachment J: GCRTA Vehicle Assignment by Route 2021

GCRTA Vehicle Assignment by Route 2021

MINLOW_Status	fixed_Route	Vehicle_Assigned?		Values		No Vehicle Data
		TRUE	Average of Fleet_Age	TRUE	FALSE	
			Count of Fleet_Age	Count of Fleet_Age		
MINLOW	1	4.53	898	35	4%	
MINLOW	2	15.50	150	0	0%	
MINLOW	3	4.05	933	25	3%	
MINLOW	6	13.66	1,156	188	14%	
MINLOW	7	4.73	437	0	0%	
MINLOW	8	4.67	250	0	0%	
MINLOW	9	4.78	608	0	0%	
MINLOW	10	4.48	1,001	0	0%	
MINLOW	11	4.70	597	0	0%	
MINLOW	14	4.06	973	13	1%	
MINLOW	15	4.68	856	13	1%	
MINLOW	16	13.50	175	0	0%	
MINLOW	18	14.40	260	52	17%	
MINLOW	19	4.68	978	0	0%	
MINLOW	22	10.67	788	155	16%	
MINLOW	25	14.12	505	88	15%	
MINLOW	28	4.67	1,003	17	2%	
MINLOW	31	4.26	624	0	0%	
MINLOW	34	4.88	150	5	3%	
MINLOW	37	4.36	450	0	0%	
MINLOW	39	4.58	130	0	0%	
MINLOW	40	3.86	490	0	0%	
MINLOW	41	4.29	753	0	0%	
MINLOW	45	14.21	483	70	13%	
MINLOW	48	4.02	626	0	0%	
MINLOW	50	4.75	234	0	0%	
MINLOW	51	4.06	916	86	9%	
MINLOW	62	5.00	505	0	0%	
MINLOW	71	12.70	358	40	10%	
MINLOW	78	13.83	476	82	15%	
MINLOW	90	12.61	405	48	11%	
MINLOW	94	4.58	242	6	2%	
MINLOW Total		6.70	18,410	923	5%	
NONMINLOW	26	13.40	837	101	11%	
NONMINLOW	53	4.00	315	40	11%	
NONMINLOW	54	15.71	224	32	13%	
NONMINLOW	55	7.69	490	38	7%	
NONMINLOW	77	10.19	314	32	9%	
NONMINLOW	83	14.69	407	105	21%	
NONMINLOW	86	13.86	210	30	13%	
NONMINLOW	251	2.00	60	0	0%	
NONMINLOW Total		11.19	2,857	378	12%	

Attachment K: GCRTA Vehicle Headway by Route 2021

GCRTA Vehicle Headway by Route 2021¹

ROUTE#	ROUTE NAME	PEAK	BASE	DISTRICT	CAT	CLASSIFICATION	SERVICE TIME
1	1 - ST. CLAIR	15	15	HAYDEN	R	MINLOW	All Day
2	2 - EAST 79TH	60	60	TRISKETT	CF	MINLOW	All Day
3	3 - SUPERIOR	15	15	HAYDEN	R	MINLOW	All Day
6	6 - HEALTHLINE	15	15	HAYDEN	R	MINLOW	All Day
7	7/7A - MONTICELLO	30	30	HAYDEN	CF	MINLOW	All Day
8	8 - CEDAR-BUCKEYE	60	60	HAYDEN	R	MINLOW	All Day
9	9 - MAYFIELD-HOUGH	30	30	HAYDEN	R	MINLOW	All Day
10	10 - EAST 105TH-LAKESHORE	15	15	HAYDEN	CF	MINLOW	All Day
11	11 - QUINCY-CEDAR	30	30	HAYDEN	R	MINLOW	All Day
14	14/14A - KINSMAN	15	15	HAYDEN	R	MINLOW	All Day
15	15 - UNION-HARVARD	15	15	HAYDEN	R	MINLOW	All Day
16	16 - EAST 55TH	60	60	TRISKETT	CF	MINLOW	All Day
18	WEST 98TH-GARFIELD	60	60	TRISKETT	CF	MINLOW	All Day
19	19/19A/19B - BROADWAY	15	15	HAYDEN	R	MINLOW	All Day
22	22 - LORAIN	15	15	TRISKETT	R	MINLOW	All Day
25	25 - MADISON-CLARK	30	30	TRISKETT	R	MINLOW	All Day
26	26/26A - DETROIT	15	15	TRISKETT	R	NONMINLOW	All Day
28	28/28A - EUCLID	15	15	HAYDEN	CF	MINLOW	All Day
31	31 - ST. CLAIR-BABBITT	30	30	HAYDEN	CF	MINLOW	All Day
34	34 - EAST 200TH-GREEN	60	60	HAYDEN	CF	MINLOW	All Day
35	35 - LEE BLVD-EAST 123RD	45	45	HAYDEN	CF	MINLOW	All Day
37	37 - HAYDEN-EAST 185TH	30	30	HAYDEN	CF	MINLOW	All Day
39	39 - LAKESHORE	30	N/A	HAYDEN	R	MINLOW	Peak
40	40 - LAKEVIEW-LEE	30	30	HAYDEN	CF	MINLOW	All Day
41	41/41F - WARRENSVILLE	30	30	HAYDEN	CF	MINLOW	All Day
45	45 - RIDGE-FULTON	30	30	TRISKETT	R	MINLOW	All Day
48	48 - EAST 131ST	30	30	HAYDEN	CF	MINLOW	All Day
50	50 - EAST 116TH	60	60	HAYDEN	CF	MINLOW	All Day
51	51/51A - METROHEALTH LINE	15	15	TRISKETT	R	MINLOW	All Day
53	53/53A - METROHEALTH LINE-BROADVIEW	30	60	TRISKETT	R	NONMINLOW	All Day
54	54 - BROOKPARK-ROCKSIDE	60	60	TRISKETT	CF	NONMINLOW	All Day
55	55/B/C - CLEVELAND STATE LINE	15	30	TRISKETT	R	NONMINLOW	All Day
62	B LINE TROLLEY	15	15	TRISKETT	DL	MINLOW	All Day
71	71 - PEARL-TIEDEMAN	30	60	TRISKETT	R	MINLOW	All Day
77	77 - BRECKSVILLE	60	60	TRISKETT	R	NONMINLOW	All Day
78	78- WEST 117TH-PURITAS	30	30	TRISKETT	CF	MINLOW	All Day
83	83 -WARREN-W. 130TH	30	30	TRISKETT	CF	NONMINLOW	All Day
86	86 - ROCKY RIVER DR-BAGLEY	60	60	TRISKETT	CF	NONMINLOW	All Day
90	90 - BROADWAY-LIBBY	30	30	TRISKETT	R	MINLOW	All Day
94	94 - EAST 260TH-RICHMOND	60	60	HAYDEN	CF	MINLOW	All Day
251	251 - STRONGSVILLE P-N-R	30	N/A	TRISKETT	PNR	NONMINLOW	Peak

1 Schedules effective June 2021

Attachment L: GCRTA On-Time Performance 2021

GCRTA On-Time Performance by Route 2021

Sum of On_Time_Performance		Report_Month							On Time Performance - Fixed Route Bus Service
MINLOW_Status	Route	Route_Name	July 2021	August 2021	September 2021	October 2021	November 2021	December 2021	
MINLOW	1	1 St. Clair	85.14%	85.63%	88.33%	92.01%	92.40%	87.66%	88.46%
MINLOW	2	2 E.79	80.30%	84.23%	84.20%	84.27%	84.62%	83.75%	83.59%
MINLOW	3	3 Superior	92.26%	90.48%	83.88%	86.89%	87.64%	86.38%	88.01%
MINLOW	6	6 HealthLine	88.31%	85.71%	87.10%	89.07%	89.40%	90.17%	88.40%
MINLOW	7	7 7A Monticello	90.70%	89.32%	88.42%	88.53%	89.19%	88.97%	89.19%
MINLOW	8	8 Cedar - Buckeye	82.69%	79.54%	80.55%	85.53%	89.32%	87.95%	84.66%
MINLOW	9	9 Mayfield - Hough	81.16%	80.31%	80.83%	79.89%	78.94%	77.72%	79.82%
MINLOW	10	10 E.105 - Lakeshore	88.25%	87.77%	86.74%	87.30%	88.38%	89.58%	88.03%
MINLOW	11	11 Quincy - Cedar	71.86%	69.47%	65.87%	64.35%	66.46%	70.63%	68.17%
MINLOW	14	14/14A Kinsman	68.45%	64.36%	61.00%	54.65%	59.18%	63.79%	61.98%
MINLOW	15	15 Union - Harvard	63.61%	66.38%	61.09%	69.26%	74.08%	76.11%	68.64%
MINLOW	16	16 E.55	89.75%	90.44%	90.15%	86.53%	91.21%	89.67%	89.68%
MINLOW	18	18 W.98 - Garfield	85.50%	84.77%	84.81%	87.26%	87.13%	86.59%	86.03%
MINLOW	19	19/19A/19B Broadway	81.36%	80.23%	79.81%	82.18%	83.17%	83.18%	81.68%
MINLOW	22	22 Lorain	72.67%	70.90%	75.08%	75.18%	79.69%	78.97%	75.36%
MINLOW	25	25 Madison - Clark	80.06%	78.88%	80.92%	78.03%	80.92%	81.16%	79.99%
MINLOW	28	28/28A Euclid	93.59%	93.95%	93.73%	86.37%	86.40%	86.78%	90.27%
MINLOW	31	31 St. Clair - Babbitt	86.87%	86.20%	90.72%	92.01%	88.55%	90.79%	89.14%
MINLOW	34	34 E.200 - Green	79.72%	86.12%	88.75%	85.13%	87.29%	87.10%	85.74%
MINLOW	35	35 Lee - E.123						90.26%	90.26%
MINLOW	37	37 Hayden - E.185	83.29%	83.00%	91.10%	92.23%	92.98%	91.04%	89.14%
MINLOW	39	39 Lakeshore	94.26%	93.72%	92.56%	92.47%	95.90%	91.52%	93.42%
MINLOW	40	40 Lakeview - Lee	90.24%	87.91%	85.03%	86.48%	85.79%	89.09%	87.51%
MINLOW	41	41/41F Warrensville	82.54%	81.88%	79.50%	82.92%	87.10%	88.79%	84.07%
MINLOW	45	45 Ridge - Fulton	77.59%	80.84%	84.66%	84.74%	85.66%	85.70%	83.31%
MINLOW	48	48 E.131	90.44%	87.50%	86.13%	84.18%	86.63%	87.94%	87.17%
MINLOW	50	50 E.116	88.70%	88.55%	85.48%	93.56%	93.92%	92.26%	90.38%
MINLOW	51	51/51A MetroHealth Line	71.77%	70.47%	73.34%	74.72%	79.90%	80.57%	75.07%
MINLOW	62	62 B-Line Trolley	84.83%	81.48%	79.99%	79.90%	80.33%	79.07%	80.96%
MINLOW	71	71 Pearl - Tiedeman	87.23%	85.03%	83.15%	82.70%	83.43%	81.83%	83.82%
MINLOW	78	78 W.117 - Puritas	91.17%	89.37%	87.67%	84.33%	85.03%	86.97%	87.37%
MINLOW	90	90 Broadway - Libby	80.28%	77.00%	73.67%	75.72%	80.68%	83.71%	78.46%
MINLOW	94	94 E.260 - Richmond	83.52%	82.35%	83.59%	84.32%	87.39%	84.57%	84.33%
On Time Performance - MINLOW Routes			81.46%	80.23%	79.83%	80.26%	82.15%	82.86%	81.15%
NONMINLOW	26	26/26A Detroit	68.71%	67.55%	72.72%	73.63%	73.68%	76.97%	72.33%
NONMINLOW	53	53/53A MetroHealth - Broadview	84.77%	84.37%	82.34%	83.26%	84.36%	86.42%	84.24%
NONMINLOW	54	54 Brookpark - Rockside	92.41%	91.89%	90.14%	84.14%	83.38%	83.88%	87.41%
NONMINLOW	55	55/55B/55C Cleveland State Line	82.28%	78.77%	77.65%	75.34%	79.62%	81.72%	79.19%
NONMINLOW	77	77 Brecksville	86.52%	87.06%	84.12%	84.97%	83.99%	82.18%	84.79%
NONMINLOW	83	83 Warren - W.130	86.87%	88.08%	86.06%	87.06%	88.44%	86.46%	87.13%
NONMINLOW	86	86 Rocky River Dr - Bagley	83.27%	86.01%	85.28%	83.95%	85.47%	79.88%	83.97%
NONMINLOW	251	251 Strongsville Park-n-Ride	89.97%	86.18%	81.54%	80.00%	86.46%	86.92%	85.34%
On Time Performance - NONMINLOW Routes			80.63%	79.59%	79.92%	79.67%	80.64%	81.48%	80.32%
On Time Performance - Fixed Route Bus Service			81.35%	80.14%	79.84%	80.17%	81.93%	82.66%	81.03%

Attachment M: GCRTA Title VI Analysis 4.12.2020

To: Joel Freilich, Director, Service Management Dept.

From: Jeffrey Macko, Planning Team Leader, Service Planning Section

Subject: GCRTA April 12 Service Reduction - Title VI Analysis

Date: April 24, 2020

Effective April 12, 2020, the Greater Cleveland Regional Transit Authority (GCRTA) implemented a major service reduction in response to the COVID-19 pandemic. Since the duration of the reduced service was not known, the GCRTA Service Planning staff performed a Title VI equity analysis prior to implementing the service reduction.

Analysis of the service reduction showed that no service area residents would experience a change in transit service availability as defined in the GCRTA transit availability standard approved by the Federal Transit Administration and set forth in the GCRTA Service Code Section 1013.04. Therefore, the analysis concluded that no disparate impact and no disproportionate burden would occur with respect to transit service availability.

Review of all the other service standards and policies showed that three of them (i.e., on-time performance, service amenities, and vehicle assignment) were likewise unaffected by the service reduction, and therefore had no potential for disparate impact and/or disproportionate burden.

The potential for disparate impact and disproportionate burden was limited to two closely related standards - vehicle load and vehicle headway – because service frequencies were changed on many routes, effective April 12. Therefore a route-by-route analysis was conducted to determine, first, whether either standard would be violated by the service change, and second, whether the service change would cause a disparate impact or a disproportionate burden

The first analysis showed that neither standard would be violated. Vehicle loads and vehicle headways were expected to remain compliant with the applicable standards. Monitoring will be conducted on a short-term and long-term basis to detect and correct any violation of the applicable standards.

The second analysis was conducted by separating all the routes into the categories previously established by the GCRTA Title VI service monitoring system. In this monitoring system, a GCRTA route is classified as a "MINLOW" route if it serves



Minority/Low-Income areas as defined in the most recent FTA Title VI Circular. All routes not classified as "MINLOW" are classified as "NONMINLOW." Adverse changes to vehicle loads and vehicle headways can be quantified by calculating the percentage reduction of in-service vehicle-hours per week operated on each route. The analysis results are presented in Table 1, below.

Table 1: Analysis Results

	Pre April 12 In-Service Vehicle Hours	Post April 12 In-Service Vehicle Hours	Percent Change
MINLOW ROUTES*	21,512.50	18,891.48	-12%
NONMINLOW*	1,789.02	1,380.02	-23%

* As defined in the preceding paragraph

As shown in Table 1, the adverse effects are actually *less significant* on the "MINLOW" routes than on the other ("NONMINLOW") routes. In conclusion, the analysis showed that the April 12 service change does not have a disparate impact or a disproportionate burden as defined in the GCRTA Title VI policies.

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