

Title VI Update

The Greater Cleveland Regional
Transit Authority Board of Trustees
Committee of the Whole
December 6, 2016

Presentation Outline

- What is Title VI?
- What do the Title VI requirements mean to RTA?
- What are the requirements for Title VI?
 - General Requirements
 - Transit Providers Requirements

Title VI Civil Rights Act of 1964

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

What does this mean to RTA?

Must comply with the FTA Circular 4702.1B

- Prepare a Title VI Program Update every 3 years
- Present Program Update to Board for Approval
- Submit to Federal Transit Administration

Title VI General Requirements

Title VI Notice to the Public

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

GCRTA operates its programs and services without regards to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with GCRTA's Office of Equal Opportunity.



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

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

- Call (216) 566-5060
- Go to RideRTA.com/oeo/
Download the complaint form
and mail it to:

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

- Come to our administrative
office located at
1240 West 6th Street,
Cleveland, Ohio 44113-1331
and request a complaint form.
- If information is needed in
another language contact
(216) 566-5060.



Title VI General Requirements

Complaint Procedure

- Person may file written complaint within 180 days of the alleged incident
- OEO conducts an investigation
- OEO determination is provided to the complainant
- Complaints can also be filed with FTA, EEOC and OCRC

Title VI General Requirements

- Non-Elected Committee
- Service and Fare Equity Analysis
- Board Meeting Documentation
- Language Assistance Plan

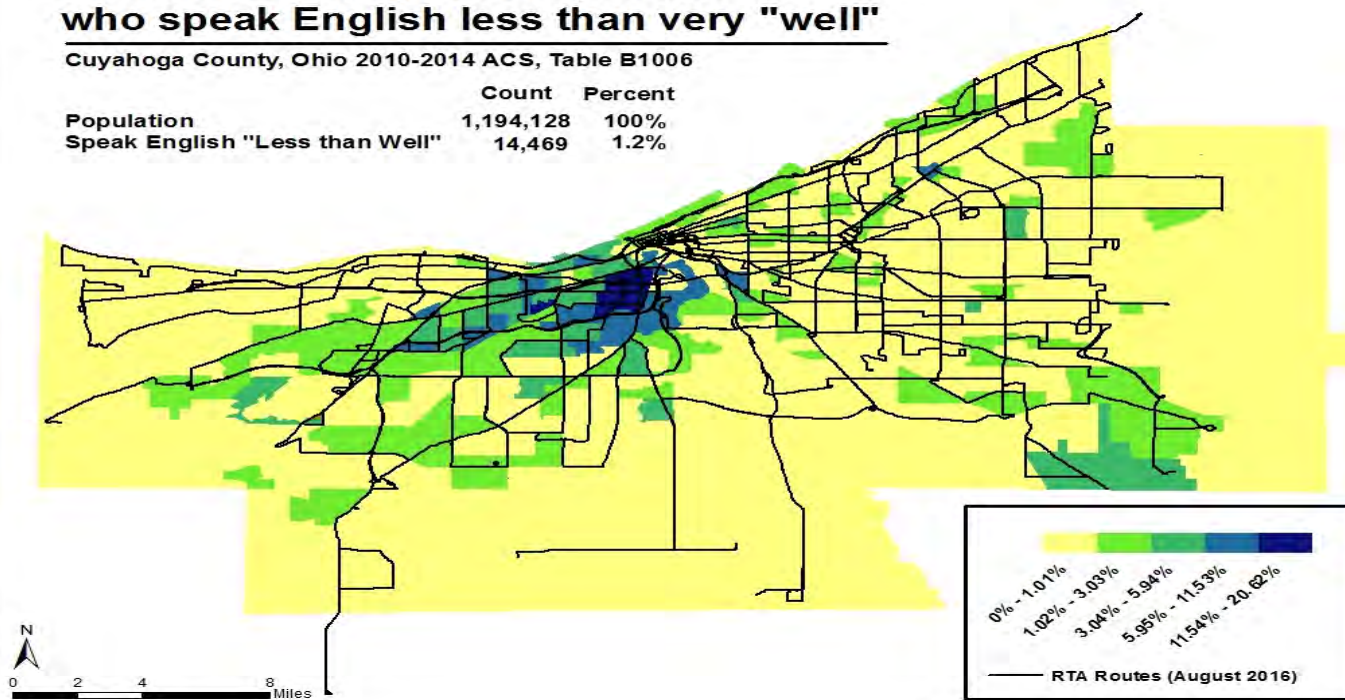
Title VI General Requirements

Language Assistance Plan

Distribution of Spanish Speakers who speak English less than very "well"

Cuyahoga County, Ohio 2010-2014 ACS, Table B1006

	Count	Percent
Population	1,194,128	100%
Speak English "Less than Well"	14,469	1.2%



Title VI General Requirements

Public Participation Plan



Greater Cleveland Regional Transit Authority



Title VI Fare Equity Analysis

- Must ensure compliance with RTA policies related to disparate impact (minority) and disproportionate burden (low-income)
- A fare equity analysis was presented to the Board before the Board voted on the 2016 fare increase

Title VI Compliance- August 2016 Fare Increase

Minority/Non-Minority Fare Comparison

Title VI- Non-Minority v. Minority

Disparate Impact

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

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

Current Non-Minority Weighted Average Fare \$2.00

Current Minority Weighted Average Fare \$1.98

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

Proposed Non-Minority Weighted Average Fare \$2.23

Proposed Minority Weighted Average Fare \$2.21

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

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

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

Greater Cleveland Regional Transit Authority



Title VI Compliance- August 2016 Fare Increase

Low Income/Non-Low Income Fare Comparison

Title VI- Non-Low Income v. Low Income

Disproportionate Burden

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

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

Current Non-Low Income Weighted Average Fare \$2.03

Current Low Income Weighted Average Fare \$1.97

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

Proposed Non-Low Income Weighted Average Fare \$2.28

Proposed Low Income Weighted Average Fare \$2.19

(A) Percent Change Non-Low Income 11.33%
 (B) Percent Change Low Income 11.45%
 Percentage Points by which B exceeds A 0.12

If greater than 5.0, GCRTA defines this as a disproportionate burden

If 5.0 or less than 5.0, GCRTA defines this as having NO disproportionate burden

Greater Cleveland Regional Transit Authority



Title VI Fare Equity Analysis

- Determine number and percent of users of each fare media proposed for increase
- Compare differences in fare increase impacts between
 - minority and non-minority
 - low income and non-low-income
- 2016 and 2018 fare increases will have NO disparate impact or disproportion burden.

Transit Provider Requirements

- Service Planning creates a report every three years.
- The report's organization follows the organization of FTA Circular 4702.1B.
- It also focuses on the revised service policies RTA provided for Board Resolution 2013-122 from December 2013.

Transit Provider Requirements

- Title VI compliance is a basic criteria of service development
- Title VI compliance is evaluated when service changes are made pursuant to RTA's Service Policy

Level of Service Methodology

- Service Planning analyzes service:
 - Vehicle Assignment
 - Vehicle Load
 - Vehicle Headway
 - Distribution of Transit Amenities
 - Levels of Service
 - Transit Access
 - Supervisory Zones

Vehicle Headway Analysis

- An average headway for each category was calculated.
- As indicated in the following table, minority and low income routes have shorter (i.e.better) average headways than other routes.
- This is true during peak and off-peak time periods.

TITLE VI

CHAPTER IV:

E. Monitoring Procedures

1) Level of Service Methodology

C. VEHICLE HEADWAY

AVERAGE HEADWAY COMPARISONS

MINLOW	24	38
NONMINLOW	36	54

Conclusion

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

Recommendation

The Title VI Program Update be forwarded to the Board of Trustees for approval at the December 20th meeting



Questions

Greater Cleveland Regional Transit Authority

