

THE CENTRAL NEW YORK REGIONAL TRANSPORTATION AUTHORITY
(and its Subsidiaries)
200 CORTLAND AVENUE, SYRACUSE, NEW YORK
MINUTES OF THE JUNE 20, 2025, BOARD MEETING

MEMBERS PRESENT:

NICHOLAS LAINO, Chair
 ANTHONY DAVIS, Vice Chair
 DARLENE LATTIMORE, Secretary
 TINA FITZGERALD, Treasurer
 NEIL BURKE
 ROBERT CUCULICH
 JULIUS LAWRENCE
 LOUELLA WILLIAMS

MEMBERS ABSENT:

FRANK SAYA, Non-Voting Member

STAFF PRESENT:

CHRISTOPHER TUFF, Chief Executive Officer
 JACQUELYN MUSENGO, VP of Human Resources
 GEOFF HOFF, VP of Fleet and Facilities
 STEVE KOEGEL, VP of Communication and Business Planning
 BRUCE FONG, VP of Information Technologies
 MELISSA BRIM, VP of Finance
 BREN DAISS, Sr Director of Service Planning & Special Projects
 CAITLIN MACCOLLUM, Senior Director of Procurement
 JOE DEGRAY, Administrative Advisor
 TARA SPRAKER, Director of Capital Programs
 DEREK SHERMAN, Director of Accounting
 CHRISTOPHER KING, Procurement Manager
 PAULA CUTRONE, Sr Manager of Transit Data and Equity
 JASON SMITH, Sr Procurement Analyst
 SUZANN HENSLEY, Internal Control Manager
 JEANNINE JOHNSON, Executive Assistant

PUBLIC PRESENT:

BRAD HUNT, Legal Counsel
 MARIO COLONE
 JOE CALABRESE

CALL TO ORDER At 10:03 A.M. Chairman Laino called the meeting to order.

- Chairman Laino and the Board Members recited the Pledge of Allegiance
- Chairman Laino noted a quorum was present

UPCOMING MEETINGS

- Chairman Laino announced the following meetings for July 25, 2025:
 - Pension Meeting – 9:00 AM
 - Audit and Finance Meeting – 9:30 AM
 - Board Meeting – 10:00 AM

APPROVAL OF THE MAY 30, 2025, BOARD MEETING MINUTES - MOTION NO. 2774

Motion – Julius Lawrence

Seconded – Tina Fitzgerald

Carried Unanimously

DEPUTY CHIEF EXECUTIVE OFFICER’S REPORT – Mr. Tuff

In addition to Mr. Tuff’s written report, attached to these Minutes, he discussed the following:

HARBOR POINT OPENING

On June 5th, the City of Utica opened the Harbor Point area after their revitalization project. Mayor Galime asked Centro to provide a shuttle service from the parking lots of the Nexus Center to the Harbor Point area. The shuttle allowed residents and visitors to attend the grand opening celebration without worrying about parking in the area. Thank you to the Utica team for providing this service, the Mayor was very appreciative of our help.

JUNETEENTH PARADE

On Saturday, June 14th, I, along with several staff and their family members, walked in the Juneteenth parade. It was a great walk, and the participation in the parade continues to grow. I want to thank the marketing team who continue to plan these community engagement events.

SENIOR STAFF REPORTS

BUSINESS DEVELOPMENT AND CORPORATE COMMUNICATIONS REPORT – Mr. Koegel

Mr. Koegel reported that ridership continues to increase in all properties, with significant growth in Rome where ridership is up more than 30% in the fiscal year. He also reported that service enhancements will be introduced in Cortland on June 30th that will include new service to Greek Peak and the town of Virgil.

Mr. Koegel invited Mrs. Cutrone to the meeting to provide an update on the Authority’s Language Assistance Plan for Limited English Proficient Persons and Public Participation Plan.

Mrs. Cutrone provided an explanation of the proposed changes to the plans and answered questions and suggestions from Board Members. A motion was made to except the changes to the plans.

PUBLIC PARTICIPATION PLAN– MOTION NO. 2776

A Motion to approve changes to the Public Participation Plan was raised.

Motion – Tina Fitzgerald
 Seconded – Anthony Davis
 Carried Unanimously

LANGUAGE ASSISTANCE PLAN FOR LIMITED ENGLISH PERSONS – MOTION NO. 2777

A Motion to approve changes to the Language Assistance Plan for Limited English persons was raised.

Motion – Neil Burke
 Seconded – Anthony Davis
 Carried Unanimously

INFORMATION TECHNOLOGIES REPORT – Mr. Fong

EXECUTIVE SUMMARY

The IT department reports significant progress on several key initiatives, including the successful operational launch of the new Cortland County location, major upgrades to core infrastructure, and strategic cybersecurity enhancements. The team is managing multiple concurrent projects effectively and has a clear plan for upcoming requirements.

CORTLAND COUNTY EXPANSION

The IT team has successfully established operations for Cortland County, overcoming initial challenges and is now building out the permanent infrastructure.

- **Initial Operational Setup:** To meet a tight deadline unmet by our ISP, the team implemented an innovative and secure 5G cellular network solution, enabling operations to begin on schedule out of the highway department. This involved a cross-departmental effort to manage cabling, equipment procurement, website integration, and critical system integrations (Trapeze, MC, PDS).
- **Permanent Location Progress:** Work on the permanent facility is well underway.
 - Network cabling is nearly complete.
 - The new fiber internet circuit is scheduled to be operational by mid-July.
 - Security camera and door access equipment have been procured, with installation being scheduled.

KEY INFRASTRUCTURE AND KEY UPGRADES

Several ongoing projects to modernize and secure our systems are nearing completion.

- **Active Directory (AD) Upgrade:** After resolving network configuration hurdles, this critical upgrade project is back on track and in the final stages of implementation with the vendor.
- **Fleetwatch Cloud Migration:** Our fuel management system has been successfully migrated to the cloud, significantly enhancing system resiliency and data security.
- **Windows 11 Upgrade:** The company-wide upgrade is **74% complete**. With a deadline of October 14, 2024, the team is on pace to upgrade the remaining 71 systems at a target rate of one per day.
- **Multi-Function Device (MFD) Replacement:** Four key MFDs have been replaced. Notably, the new device in Service Development provides advanced capabilities, allowing more production work to be done in-house, improving both quality and cost-efficiency.

CYBERSECURITY INITIATIVES

- **Network Segmentation:** A successful Proof of Concept (POC) for our network segmentation initiative has been completed with a vendor partner. Based on the positive results, we are officially moving forward with the procurement process for full implementation.

ON THE HORIZON

- **Clever Devices Refresh:** After extensive deliberation, a decision has been made to perform an on-premise technology refresh for our Clever Devices systems, as the current hardware is reaching its End-of-Life. This is anticipated to be a complex, large-scale project that will require close collaboration with the vendor. More details will be shared as the project plan develops.

HUMAN RESOURCES REPORT – Ms. Musengo

The Company and the ATU 582 (Rome) reached a tentative agreement on the Collective Bargaining Unit Contract for April 1, 2025 - March 31, 2028. The union staff passed the union contract on June 16, 2025. The negotiated agreement resulted in an overall 5.3% average increase over the 3-year contract. The wages were brought more in line with industry standards at \$30.00 per hour for bus operators.

CONTRACT HIGHLIGHTS:

- Wage increase of 16.5% over 3 years

	Operators	Custodian
9.5%	\$30.00/hr.	\$27.08/hr.
3.5%	\$31.05/hr.	\$28.03/hr.
3.5%	\$32.14/hr.	\$29.01/hr.

- Medical co-pays reimbursement were deleted.
- Medical contribution for employees increased from 15% to 16%, then next year 16% to 17%. All new hires will pay 18%.
- Uniform credit increased \$50 per year for operators.
- A weekend premium of \$1.00 per hour was added.
- Added new spare board language to the contract.
- Retiree medical premium increased from 25% to 30% (10-15 yrs) and 10% to 15% (>15 yrs) anyone hired after July 1st.

The Company will need a motion to approve the ATU 582 agreement effective April 1, 2025, from the Board of Members.

ATU 582 COLLECTIVE BARGAINING AGREEMENT – MOTION NO. 2775

Ms. Musengo presented a Motion to approve the ATU 582 Collective Bargaining Agreement.

A Motion to approve the ATU 582 Collective Bargaining Agreement, was raised

Motion – Robert Cuculich
 Seconded – Tina Fitzgerald
 Carried Unanimously

AUDIT AND FINANCE COMMITTEE REPORT

DRAFT FINANCIAL STATEMENTS AND SUPPLEMENTAL REPORTS AS OF MARCH 31, 2025 – MOTION NO. 2778

Mr. Greg Evans of The Bonadio Group presented a Motion to approve the Draft Financial Statements and Supplemental Reports as of March 31, 2025. A copy of the Report and Motion are attached to these Minutes.

A Motion to approve the Draft Financial Statements and Supplemental Reports as of March 31, was raised.

Motion – Neil Burke
 Seconded – Robert Cuculich
 Carried Unanimously

SUMMARY FINANCIAL INFORMATION – PUBLIC AUTHORITIES LAW (PAL) 2800 ANNUAL REPORT – MOTION NO. 2779

Ms. Brim presented a Motion to approve the Summary Financial Information – Public Authorities Law (PAL) 2800 Annual Report. A copy of the Report and Motion are attached to these Minutes.

A Motion to approve the Summary Financial Information – Public Authorities Law (PAL) 2800 Annual Report, was raised.

Motion – Julius Lawrence
 Seconded – Anthony Davis
 Carried Unanimously

ANNUAL INVESTMENT REPORT PAL 2925 AND INVESTMENT GUIDELINES – MOTION NO. 2780

Ms. Brim presented a Motion to approve the Annual Investment Report PAL 2925 and Investment Guidelines. A copy of the Report and Motion are attached to these Minutes.

A Motion to approve the Annual Investment PAL 2925 and Investment Guidelines, was raised.

Motion – Neil Burke
 Seconded – Darlene Lattimore
 Carried Unanimously

GUIDELINES FOR DISPOSITION OF PROPERTY – MOTION NO. 2781

Ms. Brim presented a Motion to approve the Guidelines for Disposition of Property. A copy of the Motion is attached to these Minutes.

A Motion to approve the Guidelines for Disposition of Property was raised.

Motion – Neil Burke
 Seconded – Darlene Lattimore
 Carried Unanimously

ANNUAL PROCUREMENT REPORT – PUBLIC AUTHORITIES LAW 2879 AND 2824€ – MOTION NO. 2782

Ms. MacCollum presented a Motion to approve the Annual Procurement – Public Authorities Law 2879 and 2824€. A copy of the Motion is attached to these Minutes.

A Motion to approve the Annual Procurement – Public Authorities Law 2879 and 2824€, was raised.

Motion – Julius Lawrence
 Seconded – Tina Fitzgerald
 Carried Unanimously

CNYRTA PROCUREMENT MANUAL UPDATES – MOTION NO.2783

Ms. MacCollum presented a Motion to approve the CNYRTA Procurement Manual Updates. A copy of the Motion is attached to these Minutes.

A Motion to approve the CNYRTA Procurement Manual Updates, was raised.

Motion – Darlene Lattimore
 Seconded – Anthony Davis
 Carried Unanimously

SUBSTANCE ABUSE POLICY – MOTION NO. 2784

Ms. Musengo presented a Motion to approve the Substance Abuse Policy. A copy of the Motion is attached to these Minutes.

A Motion to approve the Substance Abuse Policy, was raised

Motion – Julius Lawrence
 Seconded – Neil Burke
 Carried Unanimously

ANNUAL SUBSIDY PAYMENTS - RESOLUTION NO. 2660

Ms. Brim presented a Resolution to approve Annual Subsidy Payments. A copy of the Resolution is attached to these Minutes.

A Resolution to approve Annual Subsidy Payments, as recommended by the Audit and Finance Committee, was raised.

Motion – Tina Fitzgerald
 Seconded – Robert Cuculich
 Carried Unanimously

PDS SOFTWARE RENEWAL AND MAINTENANCE – RESOLUTION NO. 2661

Mr. King presented a Resolution to authorize a contract award to PDS for a (5) year maintenance agreement from August 21, 2025, to August 20, 2030. A copy of the Resolution is attached to these Minutes.

A Motion to authorize a contract award to PDS for a (5) year maintenance agreement from August 21, 2025, to August 20, 2030, was raised.

Motion – Julius Lawrence
 Seconded – Tina Fitzgerald
 Carried Unanimously

OLD BUSINESS

Mr. Julius Lawrence expressed his delight at having appointed a new CEO. Chairman Laino congratulated Mr. Lawrence on turning 80 years old and led the Board meeting in singing Happy Birthday to him.

FUTURE BUSINESS

Vice-Chair Davis informed the Board of potential move of students attending Dr. King Elementary and that there may be a need for Bus route changes as a result.

Ms. Fitzgerald relayed her concerns about the training of drivers on the VIA system. Mr. Tuff informed everyone that Centro is currently working on additional training.

MANAGEMENT REPORT ON INTERNAL CONTROL

Mr. Tuff presented at the Governance Committee meeting the Management and Measurement Report on Internal Control for Fiscal Year ending March 31, 2025, along with the Strategic Planning Update. Committee Members received the reports prior to today's meeting. The Authority is required to submit the reports annually, certifying that it followed a review process to assess the adequacy and effectiveness of its internal control system.

EXECUTIVE SESSION – MOTION NO. 2785

A Motion to move the meeting into Executive Session to obtain advice from counsel was raised.

Motion – Robert Cuculich
 Seconded – Tina Fitzgerald
 Carried Unanimously

No action was taken in Executive Session.

ADJOURNED

There being no further business to come before the Board, the CNYRTA and its Subsidiaries Board meeting was adjourned.


 Chairman

ATTEST:

 Secretary

THE CENTRAL NEW YORK REGIONAL TRANSPORTATION AUTHORITY
AUDIT AND FINANCE COMMITTEE
200 CORTLAND AVENUE, SYRACUSE, NEW YORK
MINUTES OF THE JUNE 20, 2025, AUDIT AND FINANCE COMMITTEE MEETING

MEMBERS PRESENT: NICHOLAS LAINO, Chair
 ANTHONY DAVIS, Vice Chair
 DARLENE LATTIMORE, Secretary
 TINA FITZGERALD, Treasurer
 NEIL BURKE
 ROBERT CUCULICH
 JULIUS LAWRENCE
 LOUELLA WILLIAMS

MEMBERS ABSENT: FRANK SAYA, Non-Voting Member

STAFF PRESENT: CHRISTOPHER TUFF, Chief Executive Officer
 JACQUELYN MUSENGO, VP of Human Resources
 GEOFF HOFF, VP of Fleet and Facilities
 MELISSA BRIM, VP of Finance
 CAITLIN MACCOLLUM, Sr Director of Procurement
 BREN DAISS, Sr Director of Service Planning & Special Projects
 TARA SPRAKER, Director of Capital Programs
 CHRIS MORRALE, Director of Human Resources
 CHRISTOPHER KING, Procurement Manager
 JASON SMITH, Sr Procurement Analyst
 DEREK SHERMAN, Director of Accounting
 JOE DEGRAY, Administrative Advisor
 SUZANN HENSLEY, Internal Control Manager
 JEANNINE JOHNSON, Executive Assistant

PUBLIC PRESENT: BRAD HUNT, Legal Counsel
 MARIO COLONE
 JOE CALABRESE

CALL TO ORDER At 9:25 A.M. Chairman Laino called the meeting to order.

- Chairman Laino noted a quorum was present
- The next Committee meeting will be on July 25, 2025

DRAFT FINANCIAL STATEMENTS AND SUPPLEMENTAL REPORTS AS OF MARCH 31, 2025

Mr. Greg Evans of The Bonadio Group presented a Motion to approve the Draft Financial Statements and Supplemental Reports as of March 31, 2025. A copy of the Report and Motion are attached to these Minutes.

A Motion to approve the Draft Financial Statements and Supplemental Reports as of March 31, 2025, as recommended by the Audit and Finance Committee, was raised and forwarded to the Board for approval.

Motion – Tina Fitzgerald

Seconded – Darlene Lattimore

Carried Unanimously to the Board with a recommendation of approval.

SUMMARY FINANCIAL INFORMATION – PUBLIC AUTHORITIES LAW (PAL) 2800 ANNUAL REPORT

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A Motion to approve the Summary Financial Information – Public Authorities Law (PAL) 2800 Annual Report, as recommended by the Audit and Finance Committee, was raised and forwarded to the Board for approval.

Motion – Tina Fitzgerald

Seconded – Neil Burke

Carried Unanimously to the Board with a recommendation of approval.

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A Motion to approve the Annual Investment PAL 2925 and Investment Guidelines, as recommended by the Audit and Finance Committee, was raised and forwarded to the Board for approval.

Motion – Julius Lawrence

Seconded – Neil Burke

Carried Unanimously to the Board with a recommendation of approval.

GUIDELINES FOR DISPOSITION OF PROPERTY

Ms. Brim presented a Motion to approve the Guidelines for Disposition of Property. A copy of the Motion is attached to these Minutes.

A Motion to approve the Guidelines for Disposition of Property, as recommended by the Audit and Finance Committee, was raised and forwarded to the Board for approval.

Motion – Neil Burke

Seconded – Robert Cuculich

Carried Unanimously to the Board with a recommendation of approval.

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A Motion to approve the Annual Procurement – Public Authorities Law 2879 and 2824€, as recommended by the Audit and Finance Committee, was raised and forwarded to the Board for approval.

Motion – Louella Williams

Seconded – Neil Burke

Carried Unanimously to the Board with a recommendation of approval.

CNYRTA PROCUREMENT MANUAL UPDATES

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A Motion to approve the CNYRTA Procurement Manual Updates, as recommended by the Audit and Finance Committee, was raised and forwarded to the Board for approval.

Motion – Darlene Lattimore

Seconded – Louella Williams

Carried Unanimously to the Board with a recommendation of approval.

SUBSTANCE ABUSE POLICY

Ms. Musengo presented a Motion to approve the Substance Abuse Policy. A copy of the Motion is attached to these Minutes.

A Motion to approve the Substance Abuse Policy, as recommended by the Audit and Finance Committee, was raised and forwarded to the Board for approval.

Motion – Neil Burke

Seconded – Julius Lawrence

Carried Unanimously to the Board with a recommendation of approval.

ANNUAL SUBSIDY PAYMENTS

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A Resolution to approve Annual Subsidy Payments, as recommended by the Audit and Finance Committee, was raised and forwarded to the Board for approval.

Motion – Anthony Davis

Seconded – Darlene Lattimore

Carried Unanimously to the Board with a recommendation of approval.

PDS SOFTWARE RENEWAL AND MAINTAENANCE

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A Motion to authorize a contract award to PDS for a (5) year maintenance agreement from August 21, 2025 to August 20, 2030, was raised and forwarded to the Board for approval.

Motion – Julius Lawrence

Seconded – Darlene Lattimore

Carried Unanimously to the Board with a recommendation of approval.

ADJOURNED

There being no further business to come before the Committee, the Audit and Finance Committee Meeting was adjourned.


Chairman

ATTEST:

Secretary

**THE CENTRAL NEW YORK REGIONAL TRANSPORTATION AUTHORITY
GOVERNANCE COMMITTEE
200 CORTLAND AVENUE, SYRACUSE, NEW YORK
MINUTES OF THE JUNE 20, 2025, GOVERNANCE COMMITTEE MEETING**

MEMBERS PRESENT:

NICHOLAS LAINO, Chair
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 DARLENE LATTIMORE, Secretary
 TINA FITZGERALD, Treasurer
 NEIL BURKE
 ROBERT CUCULICH
 JULIUS LAWRENCE
 LOUELLA WILLIAMS

MEMBERS ABSENT:

FRANK SAYA, Non-Voting Member

STAFF PRESENT:

CHRISTOPHER TUFF, Chief Executive Officer
 STEVEN KOEGEL, VP of Business Develop. and Corp. Comm.
 JACKIE MUSENGO, VP of Human Resources
 GEOFFREY HOFF, VP of Fleet and Facilities
 RAHMIN AZRIA, VP of Operations
 MELISSA BRIM, VP of Finance
 CAITLIN MACCOLLUM, Senior Director of Procurement
 BREN DAISS, Sr Director of Service Planning & Special Projects
 TARA SPRAKER, Director of Capital Programs
 CHRISTOPHER KING, Procurement Manager
 JASON SMITH, Sr Procurement Analyst
 SUZANN HENSLEY, Internal Control Manager
 JOSEPH DEGRAY, Administrative Advisor
 EJ MOSES, Director of Facilities and Grants
 DEREK SHERMAN, Director of Accounting
 JEANNINE JOHNSON, Executive Assistant

PUBLIC PRESENT:

MARIO COLONE

CALL TO ORDER At 9:10 A.M. Chairman Laino called the meeting to order, noting that a quorum was present.

INTERNAL CONTROL REPORT

Secretary Lattimore called upon Mr. Tuff to provide an update on the various Internal Control Program Activities.

Mr. Tuff presented the following information:

MANAGEMENT REPORT ON INTERNAL CONTROL

Public Authorities Law §2931(1)-(2) requires the CNYRTA to annually certify that it followed a method of review over its system of internal control in line with accepted internal control standards. CNYRTA Internal Control Program activities support this certification. For FYE 2025, no material deficiencies were noted. Several opportunities for increased operational efficiencies and reduction of risk were discovered during the year, and action plans are in progress.

ANNUAL PERFORMANCE MEASURES REPORT

The attached Performance Measures report includes the FYE 2025 measurements of ridership, service efficiency and operating performance. This report is required under PAL §2824-a. This report is posted to the CNYRTA public facing website and submitted to the Public Authorities Reporting & Information System (PARIS) annually.

Variances:

- Oneida County ridership in Oneida County is up 12% over last year. Additionally, their passengers per revenue hour have increased by 14% (from 9.44 to 10.84). Both of these increases can be attributed to the redesign of the system in Rome.
- Cortland County was added to the report. Their numbers reflect one day of service (March 31, 2025)

All other FYE 2025 performance measurements and variations from prior year appear reasonable and in line with expectations.

STRATEGIC PLANNING UPDATE

The Strategic Planning Team has completed the Mission, Vision & Values project, which the Board of Members approved in August 2024. Following the adoption of the Mission, Vision and Values, the Strategic Planning Team began the task of putting those Core Components into action and updating the Strategic Plan. This process involves several activities, including assessing organizational strategies, prioritizing goals and initiatives, and defining milestones, targets, and performance measures.

ADJOURNED

There being no further business to come before the Committee, the Governance Committee Meeting was adjourned.


Chairman

ATTEST:

Secretary

Governance Committee Agenda

Presented by Christopher Tuff, CEO June 20, 2025

Board Actions Motions and Resolutions

REVIEW:

Annual Management's Report on Internal Control

Annual Performance Measures Report

SUPPLEMENTAL INFORMATION:

Strategic Plan Update

Governance Report

TO: CNYRTA Board of Members
FROM: Christopher Tuff, Chief Executive Officer
RE: June Governance Report (June 20, 2025)
DATE: June 11, 2025

MANAGEMENT REPORT ON INTERNAL CONTROL

Public Authorities Law §2931(1)-(2) requires the CNYRTA to annually certify that it followed a method of review over its system of internal control in line with accepted internal control standards. CNYRTA Internal Control Program activities support this certification. For FYE 2025, no material deficiencies were noted. Several opportunities for increased operational efficiencies and reduction of risk were discovered during the year, and action plans are in progress.

ANNUAL PERFORMANCE MEASURES REPORT

The attached Performance Measures report includes the FYE 2025 measurements of **ridership**, **service efficiency** and **operating performance**. This report is required under PAL §2824-a. This report is posted to the CNYRTA public facing website and submitted to the Public Authorities Reporting & Information System (PARIS) annually. All measurements were in line with expectations, with no unexplained variances over prior year.

STRATEGIC PLANNING UPDATE

The Strategic Planning Team has completed the Mission, Vision & Values project, which the Board of Members approved in August 2024. Following the adoption of the Mission, Vision and Values, the Strategic Planning Team began the task of putting those Core Components into action and updating the Strategic Plan. This process involves several activities, including assessing organizational strategies, prioritizing goals and initiatives, and defining milestones, targets, and performance measures.

The Central New York Regional Transportation Authority

Management Report on Internal Control Fiscal Year Ending March 31, 2025



June 20, 2025

Consistent with New York State Public Authorities Law §2931, the Central New York Regional Transportation Authority (CNYRTA) has established a system of internal control and ongoing management that is in line with the *Standards for Internal Control in New York State Government (2016)* issued by the New York State Office of the Comptroller, and the *COSO Internal Control – Integrated Framework (2013)* issued by the Committee of Sponsoring Organizations of the Treadway Commission.

The CNYRTA Internal Control Program of review consists of activities designed to evaluate internal control for effectiveness and efficiencies in line with the applicable standards. The design of the program is continuously monitored by the Internal Control Officer to ensure activities are appropriate and effective. Internal Control Program activities may include but are not limited to:

- *Strategic planning*
- *Control testing*
- *Risk assessments*
- *Control design and development*
- *Management advisory and special projects*
- *Policy development and document control*

The Director of Internal Control continuously considers levels of inherent and residual risk across business objectives to determine the type and frequency of any assessments, control testing and other program activities to be performed. Internal Control Review plan activities are subject to modification at any time based on available resources and risks identified during the regular course of business or program activities.

FY 2024-25 Internal Control Certification

This report serves as management’s assessment of the effectiveness of the CNYRTA system of internal control across as required by New York State Public Authorities Law §2800(1)(a)(9) for FYE 2025.

Control Environment

Based on observations, questionnaires, and management interviews performed during FYE 2024-25, the CNYRTA control environment appears in line with internal control standards on integrity, ethics, accountability, transparency, performance, and qualified Board oversight. Management continues to consider various avenues for training and skill building to provide to staff, further developing workforce competencies and planning for future growth. In addition, the organization continues to evaluate its accountability measures and enhance its incentive and performance programs.

Risk Assessment

In addition to risk assessments performed by management during the normal course of business, risk is evaluated by the Internal Control Department as part activities within the Internal Control Program. These risk assessments consider various types of risks - including fraud risk - across all identified organizational objectives. Risk levels established by the Internal Control department, and risks identified by management directly are considered in the development of review activities and business process design.

Control Activities

Control activities are reviewed by management during the regular course of business and by the Internal Control Department through control testing. Control testing includes but is not limited to activities such as inspection of records, document review, tests of details, management interviews, and unannounced and planned observations. Tests performed vary by function and risk level. No material exceptions were noted in any control testing performed in FYE 2025. Policy and

procedure documentation and management continues to improve through the ongoing application of Internal Control Program activities. Management continues to participate in any ongoing action plans addressing non-material exceptions and opportunities for increased efficiency.

Information & Communication

Management continues to focus on improving the usefulness of available data and information including accessibility and communication methods. Enhancements to internal communications continue with expanded email and Intranet access. Research into additional enhanced technology solutions in data analytics and information access for employees continues. Information typically flows freely and transparently to external parties, including the public, regulators, and vendors, and all community stakeholders.

Monitoring

In addition to conducting internal ongoing separate evaluations across all functions, the Internal Control Department serves as a resource to assist management in properly monitoring internal control as part of everyday business. Management routinely discusses potential opportunities for improvements in internal control outside of scheduled separate evaluations, indicating an understanding of internal control responsibility across management staff.

In addition to in-house internal control monitoring, various members of the CNYRTA management team actively participated in five additional audits performed by external agencies including the NYS Public Transportation Safety Board, the Federal Transit Administration, and New York State – with no material findings. Any non-material findings or recommendations discovered were promptly addressed.

Supporting Activities – Strategic Plan

Due to the supporting relationship between strategic planning and internal control; active management of the Strategic Plan occurs as an activity within the Internal Control Program. The Strategic Planning Team is responsible for developing and selecting strategy, reliable performance metrics and specific measurable initiatives. During FYE 2025, the Team made significant progress on updating the organization's Mission, Vision, and Values and continued to review plan strategies, goals, and performance measures – effectively supporting the system of Internal Control.

Supporting Activities - Internal Audit

The CNYRTA is not required to and does not have an independent Internal Audit function; however, certain Internal Control Program review and testing activities are performed using Internal Audit techniques. In the event a change in legislation or an internal identification of need occurs requiring the establishment of Internal Audit, the Internal Control Program will be reevaluated to ensure functions are not duplicated and all applicable Institute of Internal Auditors (IIA) Standards for Internal Audit are met.

Certification

This statement certifies that the CNYRTA followed a process that assessed and documented the adequacy of its internal control structure and policies for the year ending March 31, 2025.

To the extent that exceptions were identified, the Authority has developed corrective action plans to reduce any corresponding risk. No material exceptions were noted during the year under any program activity. All internal control framework components, principles and focus points reviewed were determined to be present, functioning and operating together indicating an adequate and effective system of internal control.

The Central New York Regional Transportation Authority

Measurement Report Fiscal Year Ending March 31, 2025



June 20, 2025

Performance Measurement Requirements

Public Authorities Law §2824-a, and corresponding Authorities Budget Office (ABO) policy guidance 10-02, define the responsibilities of Public Authorities regarding mission statements and performance measurements.

Authorities are required to adopt a mission statement in line with their legislated purpose and develop performance measures to assist the Authority in achieving said mission statement. The Board of Members must review these performance measures and results annually.

CNYRTA Mission Statement

The legislated purpose of the CNYRTA is - “the continuance, further development and improvement of transportation and other services related thereto within the transportation district.” The current CNYRTA mission and vision statements - originally developed in 2024, and affirmed by unanimous Board Motion on August 23, 2024 – states:

Mission

“To be a driving force moving communities forward.”

CNYRTA Performance Measurements FYE 2025

To assess performance in line with its current mission statement, the CNYRTA evaluates measurements within three primary categories: **ridership**, **service efficiency**, and **operating performance**.

When applicable, measurements are calculated individually per company; CNY Centro, Centro Oswego, Centro Cayuga, Centro Oneida and for CNYRTA’s paratransit service Call-A-Bus. Results are also calculated on a fixed route consolidated basis and consolidated with paratransit services. Measurements are calculated using data provided from required departments at the CNYRTA. Financial data is prepared using current cost data from unaudited financial statements.

	Consolidated	CNY Centro	Oneida	Oswego	Cayuga	Fixed Consolidated	Call-A-Bus
Total Ridership	7,724,994	5,996,557	786,933	308,176	181,868	7,273,818	225,588
1. Passengers Per Revenue Hour	16.16	28.21	10.84	10.99	7.42	21.54	1.78
2. Operating Costs Per Revenue Vehicle Hour	\$182.18	\$242.59	\$171.22	\$154.07	\$144.22	\$213.27	\$99.10
3. Operating Costs Per Passenger	\$11.28	\$8.60	\$15.79	\$14.02	\$19.43	\$9.90	\$55.52
4. Average Fare Per Passenger	\$1.63	\$1.62	\$0.98	\$1.92	\$0.95	\$1.54	\$2.14
5. Subsidy Per Passenger	\$9.65	\$6.98	\$14.81	\$12.09	\$18.48	\$8.36	\$53.38
6. Farebox Recovery Ratio	14.4%	18.8%	6.2%	13.7%	4.9%	15.6%	3.9%
7. Complaints Per 1,000 Rides	0.05						
8. Pull Outs Met	99.8%						
9. Scheduled to Unscheduled Maintenance	91.2%						
10. Distance Between Service Interruptions	26,174.99						
11. Preventable Accidents Per 100K miles	3.38						
12. Non-Preventable Accidents Per 100K miles	3.18						
13. Paratransit Ride Denials	2						
14. Paratransit Call Waiting Time	71.42%						

Measurement Definitions

Service Efficiency	
1. Passengers Per Revenue Hour	Average number of passengers per revenue hour.
2. Operating Cost per Revenue Hour	Cost per passenger/revenue hour - includes all costs less depreciation and GASB 68 pension entries.
3. Operating Cost per Passenger	
4. Average Fare Per Passenger	Average revenue collected per passenger -- includes contracts, fares, and directly generated revenues.
5. Subsidy per Passenger	Average subsidy needed per passenger.
6. Farebox Recovery Ratio	Percentage of total operating cost that is recovered through directly generated revenues (contracts, fares, advertising).
Operating Performance	
7. Complaints per 1,000 Rides	Number of valid customer complaints received every 1,000 rides.
8. Pull-Outs Met Percentage	Operating performance - percent of pull-outs made vs. scheduled.
9. Scheduled v. Unscheduled Maint.	Percentage of preventative to unscheduled maintenance costs.
10. Service Interruptions	Average distance in miles between major service interruptions due to a mechanical or component failure.
11. Accidents per 100,000 Miles (prev.)	Average preventable and non-preventable accidents (per PTSB and NTD definitions) occurring every 100,000 miles in revenue service.
12. Accidents Per 100,000 Miles (non)	
13. Ride Denials	Number of denied paratransit rides.
14. Call Waiting Time < 2 minutes	Percent of paratransit calls answered within 2 minutes.

Oneida County:

Ridership in Oneida County is up 12% over last year. Additionally, their passengers per revenue hour have increased by 14% (from 9.44 to 10.84). Both of these increases can be attributed to the redesign of the system in Rome.

Cortland County:

Operations during this period for Cortland County was only one day (March 31, 2025). The measurements for Cortland are included in the consolidated calculations.

All other FYE 2025 performance measurements and variations from prior year appear reasonable and in line with expectations.

Audit and Finance Committee Agenda

Presented by Melissa Brim, Associate Vice President of Finance, June 20, 2024

Board Actions Motions and Resolutions

MOTIONS

Draft Financial Statements and Supplemental Reports as of March 31, 2025 – G. Evans, Bonadio
Summary Financial Information – Public Authorities Law (PAL) §2800 Annual Report – M. Brim
Annual Investment Report – PAL §2925 and Investment Guidelines – M. Brim
Guidelines for the Disposition of Property– M. Brim
Annual Procurement Report – Public Authorities Law §2879 and §2824(e) – C. MacCollum
CNYRTA Procurement Manual Updates – C. MacCollum
Substance Abuse Policy – J. Musengo

RESOLUTIONS

Annual Subsidy Payments – M. Brim
PDS Vista Software Renewal and Maintenance – C. King

SUPPLEMENTAL INFORMATION

Procurement Summary
Grant Summary

ITEMS REQUIRING FUTURE BOARD ACTION:

2025-26 First Quarter Financial Statements & Supplemental Information (July)
July 31, 2025, Statement of Revenues & Expenditures (August)



AUDIT & FINANCE SUMMARY

Draft Financial Statements and Supplemental Reports as of March 31, 2025

Gregg Evans, Partner at The Bonadio Group, will present the audited Financial Statements for the fiscal year ended March 31, 2025, along with the related supplemental reports. These audited statements require formal approval by the Board of Members prior to submission to the Public Authorities Reporting Information System (PARIS) and inclusion in the New York State Comprehensive Annual Financial Report (CAFR).

Summary Financial Information – Public Authorities Law (PAL) §2800 Annual Report

Following Board approval of the audited financial statements, the financial data will be translated into the required format for the Public Authorities Law §2800 report and submitted via PARIS. As part of this process, the Authority must certify that the information was reviewed and approved by the Board. By including this item as part of the current agenda and motion, the required Board approval is deemed to be granted.

Annual Investment Report – Public Authorities Law (PAL) §2925 Investment Guidelines

In accordance with Public Authorities Law §2925, the Annual Investment Report summarizes the Authority's interest-bearing accounts and other investment vehicles utilized during the fiscal year. Attached are the Annual Investment Summary Statement and the current CNYRTA Investment Guidelines for review.

Guidelines for the Disposition of Property – Public Authorities Law (PAL) §2896(1) and §2896(2)

In accordance with New York State Public Authorities Law §2896(1), the Central New York Regional Transportation Authority (CNYRTA) is required, was previously adopted, by Board resolution, comprehensive guidelines detailing the Authority's policies and procedures for the disposition of property. Pursuant to §2896(2), these guidelines must be reviewed and approved by the Board on an annual basis. A copy of the approved guidelines must be filed with the Office of the State Comptroller, the Director of the Budget, the Commissioner of General Services, and the Legislature. The guidelines also include a provision requiring that the disposal of property be conducted through public advertisement for bids, except under certain limited circumstances as permitted by law.

Annual Procurement Report – Public Authorities Law (PAL) §2879 and §2824(e)

In accordance with Public Authorities Law §2879(6), the Annual Procurement Report provides a detailed listing of all procurement contracts entered into, modified, or paid by the Central New York Regional Transportation Authority (CNYRTA) during the fiscal year where the contract amount exceeds \$5,000. The report includes required information such as the contract purpose, dollar amount, procurement method, and contractor details.

To fulfill this reporting requirement, the contract data is compiled, entered into a standardized spreadsheet, and submitted through the Public Authorities Reporting Information System (PARIS). Due to the volume and level of detail involved, much of the data preparation and review is completed manually. Pursuant to the Board's oversight responsibilities under Public Authorities Law §2824(e), formal Board approval is required prior to the submission of this report.



CNYRTA Procurement Manual Updates – Public Authorities Law §2879

In accordance with Public Authorities Law §2879, the CNYRTA Procurement Manual must be reviewed, approved by the Board, and submitted through the Public Authorities Reporting Information System (PARIS) annually. The following updates have been made to the Procurement Manual:

1. Procurement Thresholds of Authorization - Addition:
 - a. Senior Manager of Cortland at \$2,500

Subsidy Payments

The subsidy payments are based strictly on the approved budget operating deficit excluding operating assistance and Mortgage Recording Tax (MRT). The purpose is to reinforce the legal separation between the Authority and its subsidiaries.



PROCUREMENT

ACTIVE PROCUREMENTS

The following open contracts actively moving through the process:

- Real Time Signage
- Bus Shelter and Parking Lot Janitorial Services
- Specialized Transportation- Minivan Services A
- Network Segmentation
- TPA for Prescription Services
- Public Relations
- Exhaust Extraction System Installation
- Term Design and Engineering
- Gasoline- Bulk Delivery

FUTURE PROCUREMENTS

Items requiring future board action:

Within 2 months:

- Specialized Transportation- Minivan Services A
- Exhaust Extraction System Installation
- TPA for Prescription Services

Within 6 months:

- Real Time Signage
- Bus Shelter and Parking Lot Janitorial Services
- Network Segmentation
- Public Relations
- Term Design and Engineering

REVENUE SERVICE CONTRACTS

- SUNY Oswego Student Association
- Cayuga Community College- Auburn and Fulton Campuses

LEASE REVENUE CONTRACTS

RTC Unoccupied Space Agreement (Previously Dunkin Donuts)

LEASE AGREEMENTS



CAPITAL PROGRAMS

FEDERAL GRANT FUNDING

PENDING APPLICATIONS

Section 5307 and 5339 Grant Programs Applications: The federal fiscal year 2025 draft applications are being developed. They include capital assistance for various projects totaling approximately \$16 million in federal funds.

STATE GRANT FUNDING

NEW OPPORTUNITIES

Transit Infrastructure Grant Funding Request, Senator Gillibrand is accepting Congressionally Directed Spending Requests. An application has been submitted in the amount of \$30 million for the Centro of Oneida Consolidated Garage and Office Facility. Applications are under review.

Zero-Emission Transit Transition Program (ZETT) Application, \$17.5 million of funding to be administered by New York State DOT. Applications are under review.

PENDING APPLICATIONS

Section 5311 Grant Program Applications: New York State's 2024-2025 solicitation for projects to be funded via FTA Section 5311 Formula Grants for Rural Areas are underway. Applications are under review.

Supplemental Funds for the Innovative Mobility Initiative: \$9.1 million of state-dedicated funds from the federal Carbon Reduction Program (CRP) for *capital expenditures* to support innovative On-Demand transit services. Plans are under review.

AWARDED APPLICATIONS

No new awards at this time.

CAPITAL PLANNING

The Central New York Regional Transportation Authority's (CNYRTA) Capital Planning Committee continues to meet regularly to evaluate the Authority's capital needs and to plan for both short and long-term improvements in alignment with the Capital Improvement Plan (CIP).

Below are highlights of key projects currently in the execution phase:

- Bus Rapid Transit (BRT) Planning
- Compressed Natural Gas (CNG) Electrical Service Upgrade
- CNG Facility Upgrades
- Oneida Facility Consolidation Planning
- Various Building Improvements and Technology Upgrades



CENTRAL NEW YORK REGIONAL TRANSPORTATION AUTHORITY 2024-25 ANNUAL INVESTMENT SUMMARY STATEMENT

Money Market and Interest Bearing Checking

<u>Account Classification</u>	<u>Institution</u>	<u>Account Balance Range</u>	<u>Fees</u>	<u>Earned</u>	<u>Balance 3/31/2025</u>
Unrestricted - Operating Funds					
Municipal Checking - General Fund	M&T Bank	\$599,597 - \$7,953,372	\$ 15,597	\$ 22,014	\$ 2,480,398
Municipal Money Market - General Fund	M&T Bank	\$2,710,492 - \$21,905,438	\$ -	\$ 428,820	\$ 14,348,647
Board Designated - Funded Reserves					
Municipal Money Market - Insurance Reserve	M&T Bank	\$,2756 - \$2,834	\$ -	\$ 86	\$ 2,834
Municipal Money Market - Health Ins. Reserve	M&T Bank	\$3,108,114 - \$3,195,689	\$ -	\$ 96,503	\$ 3,195,689
Commercial Checking - Capital Reserve	JP Morgan	\$796,751 - \$11,165,349	\$ -	\$ 28,410	\$ 1,008,305
Commercial Checking - Paratransit Reserve	JP Morgan	\$88,992 - \$90,541	\$ -	\$ 4,436	\$ 90,541

US Treasury Bill Investments

<u>Account Classification</u>	<u>Institution</u>	<u>Investment Range</u>	<u>Account Yield Range</u>	<u>Earned</u>
Operating Funds				
US Treasury Bill - Operating Funds	JP Morgan	\$4,999,075 - \$7,499,874	5.18% - 4.15%	\$ 152,905
Board Designated - Funded Reserves				
US Treasury Bill - Capital Reserve	JP Morgan	\$4,999,666 - \$5,172,249	5.16% - 4.15%	\$ 245,725
US Treasury Bill - Paratransit Reserve	JP Morgan	\$3,299,015 - \$5,140,518	5.18% - 4.16%	\$ 237,339
US Treasury Bill - Insurance Reserve	JP Morgan	\$4,027,273 - \$4,219,505	5.19% - 4.16%	\$ 185,900

US Treasury Bill Current Investments

<u>Account Classification</u>	<u>Institution</u>	<u>Term</u>	<u>Yield</u>	<u>Cost Basis</u>	<u>Value</u>	<u>Gain/Loss 3/31/2025</u>
Operating Funds						
US Treasury Bill - Operating Funds	JP Morgan	1 mo.	4.15%	\$ 7,499,574	\$7,505,435	\$ 5,861
Board Designated - Funded Reserves						
US Treasury Bill - Capital Reserve	JP Morgan	1 mo.	4.15%	\$ 5,172,249	\$5,187,713	\$ 15,464
US Treasury Bill - Paratransit Reserve	JP Morgan	2 mo.	4.16%	\$ 5,140,518	\$5,156,959	\$ 16,441
US Treasury Bill - Insurance Reserve	JP Morgan	2 mo.	4.16%	\$ 4,219,505	\$4,228,510	\$ 9,005





CNYRTA INVESTMENT GUIDELINES

Board Approved Policy

Version: 4.2
Effective: 6/21/2024

Approved By:
Audit & Finance Committee
& Full Board June 2025

Owner: Finance

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current versions go to the intranet → Policies or visit
www.centro.org

1. Policy Statement

These guidelines shall be known as “Guidelines for Investment by the Central New York Regional Transportation Authority”, or as the “Investment Guidelines.”

2. Reason for Policy

The purpose of the Investment Guidelines is to detail the operative policy and instructions to officers and staff of the Central New York Regional Transportation Authority (“Authority”) regarding the investing, monitoring, and reporting of funds of the Authority and its subsidiary corporations. Its purposes are to comply with Title VII of the Public Authorities Law as enacted by Section 25 of Chapter 838 of the 1983 Laws of the State of New York, and to create a reasonable rate of return to the Authority in accordance with sound investment practices.

3. Applicability

The Investment Guidelines applies to all authority funds available for investment and all CNYRTA employees with the ability to invest funds on behalf of the Authority.

4. Resources & Related Procedures

CNYRTA Annual Investment Report
CNYRTA Cash Management Procedures

5. Definitions

Authority: The Central New York Regional Transportation Authority (CNYRTA) as enacted by Sections 1325, et seq. of the Public Authorities Law, and each subsidiary corporation thereof.

Funds: All moneys and other financial resources available for investment by the Authority on its own behalf or on the behalf of any other entity or individual. Funds shall not be defined to include Pension Funds which are separately administered pursuant to New York State and Federal Law.

Vice President of Finance: The highest-level financial person in the organization reporting directly to the Chief Executive Officer, regardless of actual position title. If the Vice President of Finance is not available to perform the duties and responsibilities elicited in this policy, those duties and responsibilities shall be performed by the Chief Executive Officer’s designee, recommended to be the second highest level financial person in the organization, regardless of actual position title.

6. Policy Detail

I. ANNUAL REVIEW & APPROVAL

- A. These Investment Guidelines shall be annually reviewed and approved by the Board of Members (the “Board”) of the Authority.



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II. PERMITTED INVESTMENTS

- A. The following are permitted investments of the Authority, all of which are consistent with the appropriate provisions of law relating to the Authority and any additional requirements pursuant to any contract with bonds and note holders:
1. Permitted Bonds and Notes;
 2. Bank Certificates;
 3. Obligations of the State of New York or the United States government;
 4. Obligations the principal and interest of which are guaranteed by the State of New York or the United States government;
 5. Certificates of deposit or other interest-bearing depository accounts in banks or trust companies in the State of New York if the certificate or account is secured by obligations of the United States or of the State of New York of a market value at all times equal to or greater than the amount of the deposit;
 6. Any repurchase agreement with any bank or trust company organized under the laws of any state or the United States of America or any national banking association or government bond dealer reporting to, trading with, and recognized as a primary dealer by the Federal Reserve Bank of New York (included in the then current "List of the Government Securities Dealers Reporting to the Market Reports Division of the Federal Reserve Bank of New York"), which agreement is secured by any one or more of the securities described in clauses (3) or (4) above.

III. SECURITY OF INVESTMENTS

- A. Investments must be in obligations of the State of New York or the United States government or must be guaranteed or insured by the State of New York or the United States government, or in the case of a certificate of deposit or other interest-bearing account or repurchase agreement, be collateralized by securities of the same, or be a security otherwise permitted for direct investment. The amount of collateral required may be adjusted by the amount of FDIC or similar federal insurance applicable to the deposits of the Authority at the institution, provided that the total of collateral and insurance equals or exceeds the total deposit.
- B. Investments of the Authority may be less than fully secured in the event of:
1. Emergencies
 2. Unforeseen circumstances
 3. Investments of less than \$25,000.00
 4. Investments for less than 1 week duration, or
 5. Investments which are considered reasonable or necessary by the Authority.

IV. WRITTEN CONTRACTS

- A. The Authority shall enter into written contracts pursuant to which investments are made except if the Authority Board, by majority vote, shall by resolution determine:
1. That a written contract is not practical; or



CNYRTA INVESTMENT GUIDELINES

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2. There is not a regular business practice of written contract with respect to a specific investment or transaction.
3. In the case of Section IV(A)(1) or (2) of these Investment Guidelines, the Authority's financial interest in an investment or transaction must be adequately secured and the security shall be evident.

V. COLLATERAL, INSURANCE & VALUATION OF COLLATERAL

- A. The use, type and amount of collateral or insurance for each investment shall equal or exceed the amount of such investment except upon resolution by the Authority Board.
- B. Collateral held on the Authority's behalf shall be such that it can be valued daily by an independent source. The evaluation of such collateral shall be monitored on a regular basis, as determined by the Vice President of Finance of the Authority.
- C. All investments and collateral shall be controlled and managed by the Vice President of Finance of the Authority and shall, if practicable, be deposited and secured in fireproof or other safe locations.
- D. In the event of a repurchase agreement, all obligations purchased shall be physically delivered for retention to the Authority or its agent (which shall not be an agent of the party with whom the corporation enters into such repurchasing agreement), unless such obligations are issued in book entry form, in which case the Authority shall take such other action as may be necessary to obtain title to or a perfected security interest in such obligations.

VI. STANDARDS FOR DIVERSIFICATION OF INVESTMENTS

- A. Investments of the Authority shall be reasonably diversified, as shall firms with which the Authority transacts business. This section shall not be construed to mandate absolute diversification if the Authority Board on advice of the Vice President of Finance, considers, in a certain instance, that diversification is not in the best interest of the Authority.
- B. Competition in the placing of investments must be fostered. If a telephone quote is the standard method of placing a form of investment, a complete and continuous record of all such quotes, solicited and received, must be maintained. Timeliness of response is critical. A minimum of three separate solicitations will be made on each direct purchase or sale of a security or repurchase agreement and shall be awarded to the dealers offering the highest yields.

VII. STANDARDS FOR THE QUALIFICATION OF INVESTMENT BANKERS, BROKERS, AGENTS, DEALERS AND OTHER INVESTMENT ADVISORS AND AGENTS TRANSACTING BUSINESS WITH THE AUTHORITY, & CONFLICTS OF INTEREST



CNYRTA INVESTMENT GUIDELINES

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Audit & Finance Committee
& Full Board June 2025

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A. The Authority shall transact business only with qualified, certified or licensed investment bankers, brokers, agents, dealers and other investment advisors and agents. The Authority staff, on the advice and consent of the Authority Board, shall consider the quality, reliability, experience, capitalization, size and any other factors which in the judgment of the Authority make an individual or firm qualified to transact business with the Authority. Specifically, but without limitation, the following are considered qualified:

1. Brokers, agents, dealers and bank or trust company organized under the laws of any state of the United States or America or any national banking association or government bond dealer reporting to, trading with, and recognized as a primary dealer by the Federal Reserve Bank of New York (included in the then current "List of Government Securities Dealers Reporting to the Market Reports Division of the Federal Reserve Bank of New York").
2. Investment advisors – Any bank or trust company organized under the laws of any State of the United States of America or any national banking association, and any firm or person which is:
 - i. Registered with the Securities & Exchange Commission under the Investment Advisor Act of 1940, and
 - ii. Registered with the New York State Secretary of State as an Investment Advisor, and is a
 - iii. Member in good standing with the Investment Counsel Association of America
 - iv. Investments for less than 1 week duration, or
 - v. Investments which are considered reasonable or necessary by the Authority.
3. Custodian – any bank or trust company organized under the laws of any state of the United States of Americas or any national banking association.

VIII. INDEPENDENT AUDIT REPORT

A. The Authority shall annually report on its investments which shall be the subject of an annual independent audit. The results of such audit shall be available to the Board at the time that the annual review and approval of the Investment Guidelines is conducted by the Authority. The Authority's financial statements should contain note disclosures on deposits with financial institutions and investments, as required by Government Accounting Standards Board Statements No. 3, effective for financial statements for periods ending after December 15, 1986.

IX. MANAGEMENT REPORTING

A. The quarterly reports or reports covering such other period as may be approved by the Board shall be filed by the Vice President of Finance regarding any new investments, the inventory of existing investments and the selection of investment bankers, brokers, agents, dealers, or auditors since the last quarterly report.



CNYRTA INVESTMENT GUIDELINES

Board Approved Policy

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Audit & Finance Committee
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1. If during the specified period, the Authority has made no new investments, the Quarterly Report will not be required, but a statement to such effect shall be given to the Board.
- B. The Authority shall annually prepare and approve an Annual Investment Report which shall include the Investment Guidelines as then currently amended, amendments to the Investment Guidelines since the last investment report, an explanation of the Investment Guidelines as amended, the results of the annual independent audit, the investment income records of the Authority and a list of the total fees, commissions or other charges paid to each investment banker, broker, agent, dealer and advisor rendering investment associated services to the corporation since the last investment report. Such Annual Investment Report may be a part of any other annual report that the Authority is required to make.
- C. The Annual Report shall be submitted to the Division of the Budget and copies thereof shall be filed in the Office of the State Comptroller, the New York State Senate Finance Committee, and the Ways and Means Committee of the New York State Assembly. In addition, by June 30 of each year, the Report shall be submitted through the Public Authorities Reporting Information System (PARIS) as required by Section 2925 of Public Authorities Law. In addition, a copy of the Report shall be placed in an easily accessed area on the CNYRTA's website in an appropriate "Document & Forms" section. Each Report shall be made available to the public upon reasonable request therefor.

X. OPERATING PROCEDURES

- A. The Vice President of Finance of the Authority shall develop and maintain operating procedures to implement these guidelines.

XI. CHANGES, MODIFICATIONS & EFFECTIVE DATES

- A. The Authority shall have the power from time to time to amend the Investment Guidelines in accordance with the provisions of Title VII of the Public Authorities Law.
- B. The Investment Guidelines shall be effective as of the 1st day of January 1984.
- C. Major Revisions – including items affecting policy intent - were made by Board Action as follows:
 1. Version 2 – February 21, 1992
 2. Version 3 – June 22, 2001
 3. Version 4 – June 25, 2010
- D. Minor Revisions – including items that do **not** affect policy intent (such as minor language formatting and title changes), were approved by Board Action as follows:
 1. Version 4.1 – June 9, 2021
 2. Version 4.2 – June 21, 2024



CNYRTA Disposition of Property Guidelines

Board Approved Policy

Version: 2.1

Effective: 6/20/2025

Approved By: Audit & Finance
Committee; Full Board June 2025

Owner: Finance

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1. Policy Statement

These guidelines shall be known as “Guidelines Regarding the Disposition of Property by the Central New York Regional Transportation Authority”, or as the “Property Disposal Guidelines.”

2. Reason for Policy

The purpose of these Guidelines is to detail the operative policy and instructions to officers and staff of the Central New York Regional Transportation Authority (“CNYRTA”) regarding the disposal of property in accordance with the PAAA of 2005, the Authorities Budget Office and the FTA.

3. Applicability

These guidelines apply to all CNYRTA property and all CNYRTA employees with the ability to dispose of property on behalf of the Authority.

4. Resources & Related Procedures

Public Authorities Law – Article 9, Title 1 – Title 5-A (Sections § 2800-2897)

FTA Circular 5010.1F

CNYRTA Property Disposal Procedures

5. Definitions

Board: Board of Members of the CNYRTA.

“CNYRTA” or “Authority”: The Central New York Regional Transportation Authority and any subsidiary corporation thereof.

Contracting Officer: CNYRTA employee designated by the Board to ensure internal compliance with these guidelines and to ensure all necessary reporting is completed.

FMV: Fair market value of a piece of property.

FTA Circular 5010.1F: Federal Transit Administration of the United States Department of Transportation circular policy regarding disposition of any federally funded personal or real property.

Legislature: Chairman and Ranking Minority Member of the New York State Assembly Ways and Means Committee and Chairman and Ranking Minority Member of the New York State Senate Finance Committee.

PAAA: Public Authorities Accountability Act of 2005, as amended from time to time.

Personal Property: Property other than real property. It may be tangible if it has a physical existence or intangible if it does not have a physical existence.

Real Property: Land, including affixed land improvements, structures, and appurtenances and property leases. This does not include movable machinery and equipment.

6. Policy Detail



CNYRTA Disposition of Property Guidelines

Board Approved Policy

Version: 2.1
Effective: 6/20/2025

Approved By: Audit & Finance
Committee; Full Board June 2025

Owner: Finance

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I. DUTIES OF THE CNYRTA AND/OR BOARD

- A. **Adoption of Guidelines:** The Board has adopted by Resolution, these comprehensive Guidelines detailing an operative policy for the CNYRTA regarding the use, awarding, monitoring, and reporting of contracts for the disposal of CNYRTA property.
- B. **Contracting Officer:** The Board shall designate one or more individuals to serve as the Contracting Officer(s) for purposes of disposing of CNYRTA property. The Contracting Officer(s) may but need not be the same individual(s) for each instance where the CNYRTA purports to dispose of certain of its property.
- C. **Review & Updating of Guidelines:** The Board shall meet at intervals of not less than one (1) year from the date of adoption of the most recent set of Guidelines for purposed of reviewing and, if necessary, revising the Guidelines.
- D. **Filing of Guidelines:** The CNYRTA shall submit annually within PARIS a copy of its most recently adopted Guidelines to the Comptroller of the State of New York.
- E. **Posting of Guidelines:** A full and complete copy of the most recently adopted Guidelines shall be posted on the CNYRTA website. Said website shall be updated no less than annually for purposes of ensuring that the Guidelines posted thereon reflect the most recently adopted Guidelines of the CNYRTA.
- F. **Inventory Controls & Accountability:** The CNYRTA shall maintain adequate inventory controls and accountability for all CNYRTA property. For purposes of these Guidelines, the phrase "adequate inventory controls and accountability" shall mean steps and procedures to secure, monitor and protect such property including a periodic physical inventory not less than every two years with reconciliation to the previous inventory listing.
- G. **Periodic Review:** The CNYRTA shall periodically inventory property to determine what property, both real and personal, may be disposed of in accordance with the terms of these Guidelines.
- H. **Report of Periodic Review:** Upon completion of each periodic review as outlined above, the CNYRTA shall cause a report to be completed, outlining if any of the CNYRTA properties may be disposed of in accordance with these Guidelines.
- I. **Transfer of Properties:** Upon entering into an agreement for the transfer or disposal of any of its properties, CNYRTA shall take all necessary actions to arrange for the prompt transfer or disposal of the subject property.

II. METHODS OF DISPOSITION

- A. **General:** Any disposal of property by the CNYRTA, whether real or personal, shall be in accordance with the procedures contained in this Article II and in accordance with all other applicable provisions of these Guidelines.
- B. **Methods of Disposition:** The CNYRTA may dispose of assets determined to be at the end of their useful life by public auction, sale, exchange, lease, transfer, donation or other terms and conditions deemed appropriate by the responsible executive of the asset(s) in question.



CNYRTA Disposition of Property Guidelines

Board Approved Policy

Version: 2.1

Effective: 6/20/2025

Approved By: Audit & Finance
Committee; Full Board June 2025

Owner: Finance

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1. In the event the CNYRTA must dispose of an asset prior to the end of its useful life, whether by transfer, damage, or other loss, the CNYRTA will follow the policy and procedures as defined in the FTA Circular 5010.1F regarding such instances.
- C. **Appraisal of Assets:** CNYRTA will not dispose of any assets without an Appraisal of the asset FMV. The method of determining FMV will vary depending on the asset and type of disposal method including, but not limited to scrap value, public auction, third party appraisal, etc.
- D. **Limitations on Disposals:** The CNYRTA does not dispose of personal or real property for less than the fair market value of the subject properties (the "FMV"), except in the following circumstances:
 1. **Government & Public Entities:** The transferee is a government or other public entity, and the terms and conditions of the transfer require that the ownership and use of the asset will remain with the government or any other public entity.
 2. **Mission & Purpose:** The purpose of the transfer is within the purpose, mission, or governing statute of the CNYRTA.
 3. **Other:** If the disposal is not to a governmental other public entity, or not within the purpose, mission or governing statute of CNYRTA, the CNYRTA provides written notification thereof to the governor, the speaker of the assembly, and the temporary president of the senate, and such proposed transfer is either approved, or no action is taken for sixty days after delivering notification of the proposed transfer during the months of January through June, provided that if such notification is received during the months of July through December, within sixty days of January first of the following year.

Note: In the event there is a transfer of assets as described in items 1-3 above, the CNYRTA will follow all FTA guidelines for transferring assets with a FMV greater than \$5,000 for less than fair market value as noted in the FTA Circular 5010.1F. If the property is worth less than \$5,000 and at the end of its useful life, it may be treated as a donation.
 4. **Donations:** In certain circumstances, the CNYRTA may consider requests to donate property. Property will only be eligible to be considered for donation, if the fair market value is less than \$5,000 and it has reached the end of its useful life; If property is eligible to be donated, the following must be documented and presented to the Chief Executive Officer for final donation approval. The documentation must include:
 - i. A full description of the asset, or assets being donated.
 - ii. Documented value/appraisal of the asset; with the appraisal method determined on a case-by-case basis.
 - iii. Description of the purpose of the transfer and a reasonable statement of the kind and amount of benefit to the public of such a donation
 - iv. Names of any private parties participating in the transfer
 - v. List of any other offers and their value made for the property (if any)
 5. **Real Property:** In certain negotiated disposals of real property, CNYRTA may dispose of real property for less than its determined FMV. The explanations of such shall be reported in detail on an Explanatory Statement for Negotiated Disposals as noted in Article III.C.



CNYRTA Disposition of Property Guidelines

Board Approved Policy

Version: 2.1
Effective: 6/20/2025

Approved By: Audit & Finance
Committee; Full Board June 2025

Owner: Finance

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E. Disposal by Commission of General Services: The CNYRTA may, in connection with the disposal of any of its properties, and in its sole discretion (unless otherwise required by any applicable laws), enter into an agreement with the Commissioner of General Services to dispose of certain of the Authority's properties.

F. Bids & Advertising for Disposal:

1. Advertising – Except as set forth in Article II(g) below, any disposal made or authorized by the CNYRTA Contracting Officer may only be made after first publicly advertising for bids in accordance with applicable New York State laws and internal Authority procedures.
2. Timing and Method of Advertisements - Any advertisements for bids made by the Authority in connection with the disposition of any of its properties shall be made at such time, through such methods, and with terms and conditions as shall permit full and free competition consistent with the value and nature of the property.
3. Opening of Bids - All bids received by the CNYRTA on or prior to the deadline for submitting such bids, as set forth in the advertisements made in connection therewith, will be opened publicly as stated in such advertisements.
4. Awarding of Contract - The CNYRTA shall award the contract subject to a particular advertisement for bids with reasonable promptness. Such award shall be made by providing notice to the responsible bidder whose bid: (A) conformed to the invitation to bid; and (B) will be most advantageous to the CNYRTA based on price and other factors. The CNYRTA reserves the right to reject any and/or all bids when the CNYRTA determines, in its sole discretion that it is in the public interest to do so.

G. Negotiated Disposals or Disposal by Public Auction: The CNYRTA may dispose of its properties by means of negotiation or public auction, without having advertised for bids in connection therewith and subject to obtaining such competition as is feasible under the circumstance, if:

1. any personal property involved is such that if same were disposed of by public bid, such disposition would adversely affect the state or local market for such property, and the estimated FMV of such property, along with other terms satisfactory to the Authority, can be obtained by negotiation;
2. the FMV of the subject property does not exceed \$15,000;
3. the bid prices for all or some of the subject property, if any, received by the Authority after advertising are not reasonable or have not been independently arrived at in open competition;
4. the purchasing or acquiring party is the state or any political subdivision thereof, and the estimated FMV of the subject property, as well as all other terms, are obtained by negotiation;
5. the property may be disposed of for less than FMV if the terms of such disposal are obtained by public auction or negotiation, the disposal is intended to further the public health, safety or welfare or an economic development interest of the state or political



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subdivision thereof (i.e., preventing or remediating a substantial threat to public health or safety, creating or retaining a substantial number of job opportunities, or creating or retaining a substantial source or revenues) and if the purpose and terms of such disposal are documented in writing and approved by the Board, or where such action is otherwise authorized in law; or

6. the transaction is for health, safety, or economic development purposes.

III. DISPOSAL REPORTING

- A. **FTA Reporting:** Transactions and/or information relating to personal and/or real property disposals for which the FTA retains an interest, and net proceeds exceeding \$10,000, must be reported to the FTA. The CNYRTA will calculate the cost of the sale and residual net proceeds which are typically used to offset future grants.
- B. **Annual Reporting Requirements:** Annually by June 30, the CNYRTA will publish a report of all real property owned at the time thereof, as well as a listing and full description of all real property exceeding \$15,000 and/or personal property exceeding \$5,000 disposed of by the CNYRTA during the reporting period – including the amount received and the name of the purchaser of each piece of property. This report must be posted to the CNYRTA website and submitted in the NYS Public Authority Reporting & Information System (PARIS).
- C. **Public Authorities Law §2897(6)(d) Explanatory Statements Required for Certain Negotiated Disposals:**
 1. **Applicability:** The CNYRTA shall prepare explanatory statements of the terms and circumstances of any disposal resulting from **negotiations**, if any of the following are true:
 - i. The property being disposed of includes personal property that has an estimated FMV in excess of \$15,000;
 - ii. The property being disposed of includes real property that has an estimated FMV in excess of \$100,000;
 - iii. The transaction includes the disposal of real property by lease, if the estimated annual rent over the term of the lease is in excess of fifteen thousand dollars;
 - iv. The transaction involves the disposal of any real property or related personal property by means of exchange, or the disposal of any property, the consideration for which includes real property.
 2. **Requirements:** The explanatory statement made in accordance with this Article II(f) shall include:
 - i. Description of the parties involved in the transaction
 - ii. Justification for disposing of the property by negotiation
 - iii. Identification of property, including its location
 - iv. Estimated fair market value of the property
 - v. Proposed sale price of the property
 - vi. Size of the property
 - vii. Expected date of sale



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3. **Reporting:** Such explanatory statement made in accordance with this Article II(f) must be delivered to the following parties no less than 90 days prior to the scheduled date of transaction:
- i. Authorities Budget Office (ABO)
 - ii. NYS Comptroller
 - iii. Director of Budget
 - iv. Commissioner of General Services & the Legislature

IV. OPERATIVE INSTRUCTIONS TO CNYRTA STAFF

- A. Unless otherwise indicated in writing, the Vice President of Finance for the CNYRTA shall be the Contracting Officer for the purposes of these Guidelines.
- B. CNYRTA departments and the employees thereof shall promptly report, in writing, to the CNYRTA Contracting Officer with respect to any properties deemed by such department to be ready for disposal. In making such reports, all FTA Guidelines for minimum useful life, if determined, should, when desirable for disposition purposes, be followed for any properties that were procured using federal grant funds. The Contracting Officer shall consult with appropriate CNYRTA personnel regarding the nature of funding (grant or non-grant) for any properties deemed by a department of the Authority as ready for disposal, to determine that its useful life under FTA regulation has been reached. For properties not procured with federal funds, or properties for which the federal government does not prescribe a minimum useful life, a normal business estimated useful life used for calculating depreciation shall be used as the minimum useful life.
- C. The Contracting Officer shall, in conducting the disposal process, proceed in accordance with the requirements of the PAAA, the FTA and as such requirements are amended from time to time.
- D. The CNYRTA staff, in conjunction with the Contracting Officer, shall ensure that all reporting and control responsibilities required of the Authority under applicable NYS and Federal guidelines, are met.

Amended CNYRTA Substance Abuse Policy

An independent consulting company (RLS & Associates Inc.) was hired by the New York State Department of Transportation (NYSDOT) to conduct drug and alcohol reviews for NYSDOT FTA sub-recipients. CNYRTA (Centro) qualifies as a sub-recipient under NYSDOT because we receive state funding. One aspect of the audit was for the independent consultant to review Centro's substance policy for regulatory updates to be compliant with the Federal Transit Administration (FTA) Drug and Alcohol Testing Regulations 49 CFR Part 40.

The consultant proposed some minor modifications to Centro's substance abuse policy. The substantial changes were adding our new location, Centro of Cortland Inc and removing "urine" drug test and referring to it as "drug" test or "urine" sample as "specimen". The generalization for tests and/or samples is due to possible future testing changes being approved under the FTA. Other recommended modifications were clarifications to Centro's substance abuse policy under the FTA guidelines.

The amended CNYRTA Substance Abuse policy which complies with FTA regulations is attached. The changes are highlighted for the board of members' review.

We will need a motion from the Board of Members to adopt the revised Centro Substance Abuse policy.

**CENTRAL NEW YORK REGIONAL
TRANSPORTATION AUTHORITY**

**CNY CENTRO, INC.
CENTRO OF OSWEGO, INC.
CENTRO OF CAYUGA, INC.
CENTRO OF ONEIDA, INC. (Rome)
CENTRO OF ONEIDA, INC. (Utica)
WM F. WALSH INTERMODAL TRANSPORTATION CENTER, INC.
CENTRO OF CORTLAND, INC.**

(“CENTRO”)

SUBSTANCE ABUSE POLICY

AND

**Guidance Regarding Over the Counter (OTC) and
Prescription Drug Utilization**

SUBSTANCE ABUSE POLICY
and
**Guidance Regarding Over the Counter (OTC)/
Prescription Drug Utilization**

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SUBSTANCE ABUSE POLICY

This substance abuse policy, as revised, was adopted by the Board of Members of the Central New York Regional Transportation Authority ("CNYRTA") on January 24, 2003. For the purpose of this policy, "Centro" refers to CNYRTA and its operating subsidiary corporations, including CNY Centro, Inc., Centro of Oswego, Centro of Cayuga, **Centro of Cortland, Inc.**, Centro Parking, and Centro of Oneida, Rome & Utica Division.

1.0 POLICY

Centro is dedicated to providing safe, dependable, and economical transportation services to our passengers. We also recognize that our employees are our most valuable resource, and it is our goal to provide a healthy, satisfying working environment which promotes personal opportunities for growth. In meeting these goals, it is our policy to (1) assure that employees are not impaired in their ability to perform assigned duties in safe, productive, and healthy manner; (2) assure that employees are fit for duty; (3) create a workplace environment free from the adverse effects of drug and alcohol use; (4) prohibit the unlawful manufacture, distribution, dispensing, possession, or use of controlled substances; and, (5) make an employee assistance program available to employees whose personal problems, including alcohol or drug dependency, adversely affect their ability to perform their duties. Participation in the drug and alcohol program is a term and condition of initial and continued employment for all employees who are designated as holding safety sensitive positions as well as all other employees of Centro.

2.0 PURPOSE

The purpose of this policy is to assure worker fitness for duty and to protect our employees, passengers, and the public from the risks posed by the use of alcohol and prohibited drugs. This policy is also intended to comply with all applicable regulations governing anti-drug use in the workplace, specifically the regulations of the U.S. Department of Transportation in 49 CFR Parts 40 and 655 promulgated and amended under the Omnibus Transportation Employee Testing Act of 1991. These regulations are incorporated by reference into this policy and copies will be made available for review by employees when requested. This policy will be kept current to comply with any applicable new or revised federal regulations. This policy requires drug and alcohol testing for employees responsible for safety-sensitive functions and prevents performance of safety-sensitive functions when there is a positive test result, or refusal to test. In addition, the Drug-Free Workplace Act of 1988 requires the establishment of drug-free workplace policies and the reporting of certain drug related offenses to the Company. This policy incorporates those requirements for safety-sensitive employees and all other employees of Centro.

Those elements of this policy which are not mandated by the DOT regulations, but which are required by Centro policy, have been identified as such.

Every covered employee will receive a copy of this policy and will have ready access to the corresponding federal regulations including 49 CFR Parts 655 and 40 as amended. In addition, all covered employees will undergo a minimum of 60 minutes of training on the signs and symptoms of drug use including the effects and consequences of drug use on personal health, safety, and the work environment. The training also includes manifestations and behavioral cues that may indicate prohibited drug use.

3.0 APPLICABILITY

This policy applies to all Centro employees, both Full and Part-time employees, and contractors when they are on Centro property or, when performing transit related business off-site. Under the sole authority of Centro, this policy also applies when employees are in uniform. This policy applies to off-site lunch periods or breaks when an employee is scheduled to return to work. Employees and contractor employees will not be permitted to conduct transit business if found to be in violation of this policy.

Where designated, this policy applies to those personnel who operate, maintain, and control the movement of revenue service equipment, maintain revenue service equipment, and commercial driver's licenses (CDL) holders who operate non-revenue service vehicles.

The testing of employees with safety-sensitive job functions, as defined by the DOT regulations, is required by the DOT regulations as well as by this policy. Testing of other employees is required by this policy including employees under the age of 18. Parental or guardian consent is required for all testing of minor employees.

4.0 DEFINITIONS - PROHIBITED SUBSTANCES

The following categories of prohibited substances are addressed by this policy:

- Illegally Used Controlled Substances or Drugs under the Drug-Free Workplace Act of 1988 any drug or any substance identified in Schedules I through V of Section 202 of the Controlled Substances Act (21 U.S.C. 812); and as further defined by 21 CFR 1308.11 through 1308.15 is prohibited at all times in the workplace unless a legal prescription has been written for the substance. This includes, but is not limited to marijuana, amphetamines, opioids, phencyclidine (PCP), and cocaine, as well as any drug not approved for medical use by the U.S. Drug Enforcement Administration or the U.S. Food and Drug Administration. For purposes of this policy, illegal use includes use of any illegal drug, misuse of legally prescribed drugs, and use of illegally obtained prescription drugs. It is important to note that the use of marijuana in any circumstances remains completely prohibited for any safety-sensitive employee subject to drug testing under USDOT regulations. The use of marijuana in any circumstance (including under state recreational and/or medical marijuana laws) by a safety-sensitive employee is a violation of this policy and a violation of the USDOT regulation 49 CFR Part 40, as amended.

Federal Transit Administration drug testing regulations (49 CFR Part 655) require that all employees covered under FTA authority be tested for marijuana, cocaine,

amphetamines, opioids, and phencyclidine. Illegal use of these five drugs is prohibited at all times and thus, covered employees may be tested for these drugs anytime that they are on duty.

- Legal Drugs - The appropriate use of legally prescribed drugs and non-prescription medications is not prohibited. However, under the sole authority of Centro, the use of any substance which carries a warning label that indicates that mental functioning, motor skills or judgment may be adversely affected must be reported to supervisory personnel and medical advice should be sought, as appropriate, before performing work-related duties.
- Alcohol - The use of alcohol-containing beverages or substances such that alcohol is present in the body while performing transit business is prohibited. Presence is defined under DOT regulations 49 CFR Part 40 as an alcohol concentration of 0.02 or greater. Centro shall prohibit a covered employee, while having an alcohol concentration of 0.04 or greater, from performing or continuing to perform a safety-sensitive function as defined by 49 CFR Section 655.31(b).

4.1 DEFINITIONS - SAFETY-SENSITIVE FUNCTIONS

As defined by the FTA the following employees are considered to have safety-sensitive job functions:
:

- * operators of revenue service vehicles whether in or out of service
- * personnel who control the dispatch or movement of revenue service vehicles
- * personnel who maintain revenue service vehicles or equipment
- * commercial drivers license (CDL) holders who operate non- revenue service vehicle
- * persons who carry firearms for security purposes

Centro reviewed duties performed by all employees to determine safety-sensitive positions. A list of job titles which have been identified as safety-sensitive under the DOT regulations, and additional job titles which are considered to be covered under Centro policy, is attached as Appendix "A." Any new job titles will be analyzed to determine if they have safety-sensitive duties.

Any employees who are not considered to be safety-sensitive, as defined by USDOT-FTA, under this policy will be tested using a non-DOT form and will be placed in a separate non-DOT random testing pool, unless their positions require them, at times, to perform safety-sensitive duties as defined by the FTA (e.g., fill in when safety-sensitive employees that they supervise are absent).

Volunteers are not covered by this policy, unless they drive a vehicle which requires that they have a CDL and/or perform a safety-sensitive function and receive remuneration in excess of their actual expenses.

5.0 MANUFACTURE, TRAFFICKING, POSSESSION, AND USE

Any employee engaging in the manufacture, distribution, dispensing, possession, or use of prohibited substances (controlled substances or illegal drugs or alcohol) on Centro premises, in transit vehicles, or while on Centro business will be terminated. Law enforcement shall be notified, as appropriate, where criminal activity is suspected.

These consequences are not mandated by the DOT, but they are required by this policy.

5.1 ALCOHOL USE

The use of alcohol containing beverages or substances is specifically prohibited in the following instances:

- * 4 hours prior to performing a safety-sensitive function
- * while performing a safety-sensitive function
- * while scheduled for on-call duty for a safety-sensitive function
- * for 8 hours following an accident or until a post accident alcohol test is administered

Those elements of this policy which are not mandated by the DOT regulations, but which are required by Centro policy, have been identified as such.

5.2 INTOXICATION/UNDER THE INFLUENCE

Any employee who is reasonably suspected of being intoxicated, impaired, or under the influence of a prohibited substance, having a prohibited substance in the body shall be suspended from job duties pending an investigation and verification of condition. Employees who fail to pass a drug or alcohol test shall be subject to disciplinary action, up to and including termination.

These consequences are not mandated by the DOT, but they are required by this policy.

5.3 COMPLIANCE WITH TESTING REQUIREMENTS

To maintain a drug and alcohol-free workplace, all employees will be subject to drug and alcohol testing. Any employee who refuses to take a drug or alcohol test, as defined below shall be subjected to the same consequences as a verified positive test result.

A "Refusal to Test" is a rule violation and is equivalent to a verified positive test result in the following situations:

1. Fails to appear for any test (excluding pre-employment) within a reasonable time, as determined by the employer.

2. Fails to remain at the testing site until the testing process is complete. An employee who leaves the testing site before the testing process commences for a pre-employment test has not refused to test.
3. Fails to attempt to provide a specimen. An employee who does not provide a specimen because he or she has left the testing site before the testing process commenced for a pre-employment test has not refused to test.
4. In the case of a directly observed or monitored urine drug collection, fail to permit the observation or monitoring of your provision of a specimen.
5. Fails to provide a sufficient quantity of specimen without a valid medical explanation.
6. Fails or declines to take a second test as directed by the employer or collector for drug testing.
7. Fails to undergo a medical evaluation, as required by the MRO or the employer's Designated Employer Representative (DER).
8. Fails to cooperate with any part of the testing process.
9. If the MRO reports that, there is verified adulterated or substituted test result.
10. Failure to follow an observer's instructions to raise and lower clothing and turn around during a directly observed test.
11. Possess or wear a prosthetic or other device used to tamper with the collection process.
12. Admit to the collector or MRO that you adulterated or substituted the specimen.
13. Refuse to sign the certification at Step 2 of the Alcohol Testing Form (ATF).
14. Fail to remain readily available following an accident.

There may be consequences under this policy, even though there are no consequences under DOT agency regulations, for having a verified positive result on, or for failing or refusing to take, a non-DOT test that is required by this policy.

5.4 NOTIFYING CENTRO OF CRIMINAL DRUG CONVICTION

Consistent with the Drug Free Workplace Act of 1998, all employees are required to notify Centro of any criminal drug statute conviction for a violation occurring in the workplace within than five days after such conviction. Failure to comply with this provision shall result in disciplinary action, up to and including termination.

The Company will notify the FTA of the conviction within ten days of receiving notification from the employee and will impose appropriate personnel sanctions on the employee within 30 days of the notification. These consequences are not mandated by the DOT, but they are required by this policy.

5.5 PROPER APPLICATION OF THE POLICY

Centro is dedicated to assuring fair and equitable application of this substance abuse policy. Therefore, under the sole authority of Centro, supervisors/managers are required to use and apply all aspects of this policy in an unbiased and impartial manner. Any supervisor/manager who knowingly disregards the requirements of this policy, or who if found to

deliberately misuse the policy about subordinates, shall be subject to disciplinary action, up to and including termination.

These consequences are not mandated by the DOT, but they are required by this policy.

6.0 DRUG TESTING

Analytical testing of either urine or blood will be conducted when circumstances warrant and as required by federal regulations. (The testing of blood is not currently required by DOT regulations. Any such testing would be pursuant to this policy.)

Testing shall be conducted in a manner to assure a high degree of accuracy and reliability, using techniques and laboratory facilities, which have been approved by the U.S. Department of Health and Human Services (DHHS). The integrity of the process is ensured through photographic identification of the employee, a Custody and Control Form with a unique specimen identification number completed by a trained site collection person who ensures that the form is completed correctly and signed and certified by the employee, and by collection of split sample specimens that are sealed and initialed by the employee.

The drugs for which tests will be conducted are:

- *Marijuana
- *Cocaine
- *Phencyclidine
- *Opioids
- *Amphetamines

The cutoff levels for these drugs will conform to those promulgated by the rules of the Department of Transportation, 49 CFR Part 40 as amended. Drug testing is conducted to comply with all conditions of CFR49 Part 40. In some instances, where stated, drug testing and the consequences of such testing are conducted specifically under Centro policy.

The split specimen method of testing will be utilized, providing one sample for preliminary screening and initial confirmation, and a second sample for a second confirmation test if needed at a later date. Employees do not have access to a test of their split specimen following an invalid test.

A Medical Review Officer (MRO), who is a licensed physician with detailed knowledge of substance abuse disorders and drug testing. The MRO will review the test results to ensure the scientific validity of the test and to determine whether there is a legitimate medical explanation for a confirmed positive, substitute, or adulterated test result. The MRO will attempt to contact the employee to notify the employee of the non-negative laboratory result and provide the employee with an opportunity to explain the confirmed laboratory test result. The MRO will subsequently review the employee's medical history/medical records as appropriate to determine whether there is a legitimate medical explanation for a non-negative laboratory result. If no

legitimate medical explanation is found, the test will be verified positive or refusal to test and reported to CENTRO. If a legitimate explanation is found, the MRO will report the test result as negative. For an in-depth explanation of collection and drug testing procedures, please refer to 49 CFR Parts 40 and 655, which are incorporated by reference into this policy. Copies will be made available for review by employees when requested.

Following a negative dilute the employee will be required to undergo another test. Should this second test result in a negative dilute result, the test will be considered a negative and no additional testing will be required unless directed to do so by the MRO.

Drugs may be tested for anytime an employee is on duty. Safety sensitive employees will be tested under the authority of the FTA while non-safety sensitive employees will be tested under the authority of Centro policy. A reasonable suspicion, random, or follow-up alcohol test can only be performed just before, during, or after the performance of a safety-sensitive job function.

If the MRO reports that the split specimen is not able to be analyzed, or if the results of the split specimen are not scientifically adequate, the original test will be canceled.

Safety Sensitive employees will be subject to observed collections if any of the following situations occur:

- The laboratory reported to the MRO that the specimen was negative-dilute with a creatinine concentration greater than or equal to 2 mg/dL but less than or equal to 5 mg/dL, and the MRO reported the specimen as negative-dilute and that a second collection must take place under direct observation (see §40.197(b)(1)).
- The laboratory reports to the MRO that a specimen is invalid, and the MRO reports to CENTRO that there was not an adequate medical explanation for the result.
- The MRO reports to CENTRO that the original positive, adulterated, or substituted test result had to be cancelled because the test of the split specimen could not be performed.
- The temperature on the original specimen was out of range.
- The collector observes materials brought to the collection site or the employee's conduct clearly indicates an attempt to tamper with a specimen.
- Anytime the employee is directed to provide another specimen because the original specimen appeared to have been tampered with (See §40.65(c)(1)).
- All DOT Return-to Duty or Follow-Up drug tests.

Employees having observed collections will be instructed to raise clothing, just above the navel; lower clothing, to mid-thigh; then turn around to show the same gender observers they do not have prosthetic devices that are designed tamper with or otherwise interfere with the accuracy of the drug test results. If no device is detected, the employee is permitted to return clothing to its proper observed-collection position. Then the observed collection will take place.

6.1 ALCOHOL TESTING

Tests for breath alcohol concentration will be conducted utilizing a National Highway Traffic Safety Administration (NHTSA)-approved Evidential Breath Testing device (EBT) operated by a trained Breath Alcohol Technician (BAT). A list of approved EBTs can be found on ODAPC's

Web page for “Approved Evidential Breath Measurement Devices”. Alcohol screening tests may be performed using a non-evidential testing device (alcohol screening device (ASD)) which is also approved by NHTSA. A list of approved ASDs can be found on ODAPC’s Web page for “Approved Screening Devices to Measure Alcohol in Bodily Fluids”. If the initial test indicates an alcohol concentration of 0.02 or greater, a second test will be performed to confirm the results of the initial test. The confirmatory test must occur on an EBT. The confirmatory test will be conducted no sooner than fifteen minutes after the completion of the initial test. The confirmatory test will be performed using a NHTSA-approved EBT operated by a trained BAT. The EBT will identify each test by a unique sequential identification number. This number, time, and unit identifier will be provided on each EBT printout. The EBT printout, along with an approved alcohol testing form, will be used to document the test, the subsequent results, and to attribute the test to the correct employee. The test will be performed in a private, confidential manner as required by 49 CFR Part 40, as amended. The procedure will be followed as prescribed to protect the employee and to maintain the integrity of the alcohol testing procedures and validity of the test result. Safety-sensitive employees may be tested just before, during or just after the performance of a safety-sensitive function. Non-safety sensitive employees will be tested under Centro policy and may be alcohol tested anytime they are working.

For an in-depth explanation of the alcohol testing procedures, please refer to DOT regulations 49 CFR Parts 40 and FTA 49 CFR Part 655, which are incorporated by reference into this policy. Copies will be made available for review by employees when requested.

Following a positive drug or alcohol (BAC at or above 0.04) test result or test refusal, the employee will be immediately removed from safety-sensitive duty and provided with contact information for Substance Abuse Professionals (SAPs).

Even though an employee who has a confirmed alcohol concentration of 0.02 to 0.039 is not considered positive, the employee may not perform their duties for at least 8 hours or until a BAC test registers below 0.02, whichever occurs first, and will be subject to disciplinary action as defined in section 10 under Centro policy. As stated in FTA 49 CFR Section 655.31(b) Centro shall prohibit a covered employee, while having an alcohol concentration of 0.04 or greater, from performing or continuing to perform a safety-sensitive function. An employee who has a confirmed alcohol test result with an alcohol concentration of 0.04 or greater will be removed immediately from duty and will be evaluated by a substance abuse professional as required by DOT regulations. An employee who refuses to submit to a test under this policy shall be considered to have a verified positive test result and will be subject to the disciplinary action as defined in section 10 under Centro policy.

7.0 TYPES OF TESTING

All employees shall be subject to testing prior to performing safety-sensitive duty, for reasonable suspicion, following an accident, random as defined in section 7.4 of this policy and return to duty/follow-up.

INFORMATION DISCLOSURE

1) Drug/alcohol testing records shall be maintained by the CENTRO Drug and Alcohol Program Manager and, except as provided below or by law, the results of any drug/alcohol test shall not be disclosed without express written consent of the tested employee.

- 2) The employee, upon written request, is entitled to obtain copies of any records pertaining to their use of prohibited drugs or misuse of alcohol including any drug or alcohol testing records. Covered employees have the right to gain access to any pertinent records such as equipment calibration records, and records of laboratory certifications. Employees may not have access to SAP follow-up testing plans.
- 3) Records of a verified positive drug/alcohol test result shall be released to the Drug and Alcohol Program Manager, and other transit system management personnel on a need to know basis.
- 4) Records will be released to a subsequent employer only upon receipt of a written request from the employee.
- 5) Records of an employee's drug/alcohol tests shall be released to the adjudicator in a grievance, lawsuit, or other proceeding initiated by or on behalf of the tested individual arising from the results of the drug/alcohol test. The records will be released to the decision maker in the proceeding.
- 6) Records will be released to the National Transportation Safety Board during an accident investigation.
- 7) Information will be released in a criminal or civil action resulting from an employee's performance of safety-sensitive duties, in which a court of competent jurisdiction determines that the drug or alcohol test information is relevant to the case and issues an order to the employer to release the information. The employer will release the information to the decision maker in the proceeding with a binding stipulation that it will only be released to parties of the proceeding.
- 8) Records will be released to the DOT or any DOT agency with regulatory authority over the employer or any of its employees.
- 9) Records will be released if requested by a Federal, state, or local safety agency with regulatory authority over CENTRO or the employee.
- 10) If a party seeks a court order to release a specimen or part of a specimen contrary to any provision of Part 40 as amended, necessary legal steps to contest the issuance of the order will be taken
- 11) In cases of a contractor or sub-recipient of a state department of transportation, records will be released when requested by such agencies that must certify compliance with the regulation to the FTA.

7.1 PRE-EMPLOYMENT TESTING

All applicants shall undergo drug testing after a conditional offer of employment. Under the authority of Centro, failure of a drug test will result in a revocation of the conditional offer of

employment. An individual may not perform safety-sensitive functions unless he or she takes the test and obtains a verified negative result. Also, an existing employee who applies for promotion or transfer to a safety-sensitive position is required to pass a DOT pre-employment drug test prior to being awarded the position. If a test is cancelled, the applicant/employee will be required to re-test with a negative test result. A negative dilute test result on a pre-employment test will require a re-test. If the second test returns with a negative dilute result, the test will be viewed as negative, and the employee can begin work.

Any employee who has not worked for 30 consecutive calendar days and has not remained in Centro's random selection pool during that time must take a non-DOT return to work drug test with a verified negative result before resuming duty. DOT Regulations establish a 90-calendar day period. Our policy however is the 30-day period referenced herein. (See also Section 7.5 below). If a safety-sensitive employee does not perform a safety-sensitive function for 90 days or more and has not remained in the random selection pool during that time, a DOT pre-employment drug test with a negative result is required.

If otherwise qualified, an individual with a permanent or long-term disability that prevents the employee from providing a sufficient amount of specimen during a pre-employment drug test may be permitted to perform duties, if the MRO finds no clinical evidence of drug use. The MRO will determine long-term inability to provide specimen by medical examination and consultation with the employee's physician.

Applicants are required (even if ultimately not hired) to provide CENTRO with signed written releases requesting USDOT drug and alcohol records from all previous, USDOT-covered, employers that the applicant has worked for within the last two years. Under the sole authority of Centro, failure to do so will result in the employment offer being rescinded. CENTRO is required to ask all applicants (even if ultimately not hired) if they have tested positive or refused to test on a pre-employment test for a USDOT covered employer within the last two years. If the applicant has tested positive or refused to test on a pre-employment test for a USDOT covered employer, the applicant must provide CENTRO proof of having successfully completed a referral, evaluation and treatment plan as described in section 655.62 of subpart G.

The information obtained from a previous employer includes any drug or alcohol test information obtained from previous employers under this section or other applicable DOT agency regulations.

If feasible, Centro will obtain and review this information before the employee first performs safety-sensitive functions. If this is not feasible, Centro will obtain and review the information as soon as possible. However, Centro will not permit any individual to perform safety-sensitive functions longer than 30 days after the date on which he or she first performed safety-sensitive functions, unless Centro has obtained or made and documented a good-faith effort to obtain this information.

Centro will also ask the employee whether he or she has tested positive, or refused to test, on any pre-employment drug or alcohol test administered by an employer to which the employee applied for, but did not obtain, safety-sensitive transportation work covered by DOT agency drug and alcohol testing rules during the previous two years. If the employee admits that he or she had a positive test or a refusal to test, Centro will not use the employee to perform safety-sensitive functions, until and unless the employee documents successful completion of the return-to-duty process.

7.2 REASONABLE SUSPICION TESTING

Employees may be subject to a fitness for duty evaluation, to include drug and/or alcohol testing, when there is reason to believe that drug or alcohol use is adversely affecting job performance. (The testing of blood is not allowed by the DOT regulations. Any such testing would be pursuant to this policy and a NON-DOT test.) A reasonable suspicion shall mean that there is objective evidence, based upon specific, contemporaneous, articulable observations of the employee's appearance, behavior, speech or body odor that are consistent with possible drug use and/or alcohol misuse.

Reasonable suspicion referrals must be made by a supervisor who has been trained to detect the signs and symptoms of drug and alcohol use, in accordance with the DOT regulations, and who reasonably concludes that an employee may be adversely affected or impaired in his/her work performance due to drug use and/or alcohol misuse. A written record of the observations which led to a drug/alcohol test based on reasonable suspicion shall be prepared and signed by the supervisor making the observation. This written record shall be submitted to the DAPM.

All supervisory personnel or company officials who are in a position to determine employee fitness for duty will receive 60 minutes of reasonable suspicion training on the physical, behavioral, and performance indicators of probable drug use and 60 minutes of additional reasonable suspicion training on the physical, behavioral, speech, and performance indicators of probable alcohol misuse.

Reasonable suspicion alcohol tests for safety-sensitive employees may only be conducted just before, during, or just after the performance of safety-sensitive functions. Employees covered under the sole authority of Centro (not USDOT) may be tested at any time they are on duty.

Employees who are safety-sensitive under DOT guidelines may be tested under FTA authority or Centro policy. Non- safety-sensitive employees will be tested under Centro policy.

Under Centro authority, if there is reasonable suspicion that an employee may be impaired due to drug use and/or alcohol misuse, and testing is conducted, the employee will be removed from service until the results are received. If there is a positive finding, the employee will be terminated and referred to a substance abuse professional or a counselor with EAP.

7.3 POST-ACCIDENT TESTING

1) **FATAL ACCIDENTS** – A covered employee will be required to undergo drug and alcohol testing if they are involved in an accident with a transit vehicle, whether or not the vehicle is in revenue service at the time of the accident, that results in a fatality. This includes all surviving covered employees that are operating the vehicle at the time of the accident and any other whose performance could have contributed to the accident, as determined by the employer using the best information available at the time of the decision.

2) NON-FATAL ACCIDENTS - A post-accident test of the employee operating the public transportation vehicle will be conducted if an accident occurs and at least one of the following conditions is met:

a. The accident results in injuries requiring immediate medical treatment away from the scene unless the covered employee can be completely discounted as a contributing factor to the accident.

b. One or more vehicles incurs disabling damage as a result of the occurrence and must be transported away from the scene, unless the covered employee can be completely discounted as a contributing factor to the accident

In addition, any other covered employee whose performance could have contributed to the accident, as determined by the employer using the best information available at the time of the decision, will be tested.

Safety-sensitive employees will be tested under the authority of FTA when applicable. Non-safety sensitive employees will be tested under Centro policy. If criteria for testing does not meet FTA guidelines, NON-DOT testing can be conducted under Centro policy at the discretion of the company.

(The testing of blood is not authorized by the DOT regulations. Any such testing would be pursuant to this policy on NON-DOT forms.)

An employee who is subject to post-accident testing who fails to remain readily available for such testing, including notifying Centro of his or her location if he or she leaves the scene of the accident prior to submission to such test, may be deemed to have refused to submit to testing. (Testing may be delayed for a period of time which is reasonably necessary for an employee to obtain assistance in responding to the accident or to obtain necessary emergency medical care.)

When there is a fatal accident, all surviving covered employees operating the public transportation vehicle at the time of the accident must be given drug and alcohol tests. When there is a nonfatal accident, all covered employees operating the public transportation vehicle at the time of the accident must be tested, unless Centro determines, using the best information available at the time of the decision, that an employee's performance can be completely discounted as a contributing factor to the accident. (The reasons for discounting the employee must be documented.) Any other employees whose performance could have contributed to the accident must also be tested.

Post-accident drug testing will take place as soon as practicable, but no longer than 32 hours after the accident. Post-accident alcohol testing will take place within 2 hours after the accident. If alcohol testing is not administered within 2 hours, a report documenting the reasons will be prepared and maintained on file. Attempts to complete the alcohol testing should continue for up to 8 hours. If drug testing is not completed within 32 hours or alcohol testing is not completed within 8 hours, the report will be updated with the reasons for not completing testing.

If Centro is unable to perform a post-accident test within the required period, the results of a blood, urine, or breath test for drugs or alcohol conducted by Federal, State, or local officials will be considered to meet the requirements of this section. (For this exception to apply, such a

test must conform to the applicable Federal, State, or local testing requirements, and the test results must be obtained by Centro.)

7.4 RANDOM TESTING

All employees will be subject to random, unannounced alcohol and drug testing. The covered employee who is notified of selection for random drug or random alcohol testing is required to proceed to the test site immediately. Selection of employees will be by a method employing a scientifically valid random number generation method and objective, neutral criteria which ensure that every such employee has a substantially equal statistical chance of being selected within a specific time frame. The method will not permit subjective factors to play a role in selection, i.e., no employee will be selected as the result of the exercise of discretion by any Centro employee. The selection method shall be capable of verification with respect to the randomness of the selection process.

The dates for administering random tests will be spread reasonably throughout the calendar year. A random alcohol and/or drug test may be conducted at all days and all hours when safety-sensitive functions are performed. All sampling will be done with replacement, which means that employees randomly tested will remain in the pool, even after the employee has been tested. The drug testing frequency level is designed to ensure that the number of drug tests conducted will equal at least fifty percent of the number of such safety sensitive employees in the pool during each calendar year. The number of alcohol tests conducted will equal at least ten percent of the number of such safety sensitive employees in the pool during each calendar year. A lower percentage may be tested if permitted under the random testing rates published by the FTA. (The current annual rates can be viewed online at <https://www.transportation.gov/odapc/random-testing-rates>) A random pool will be established for safety-sensitive employees in accordance with the FTA regulations. A separate random pool for non-safety sensitive employees will be established under the company policy. A lower percentage under the FTA testing rates published for random drug and alcohol testing may be established for non-safety sensitive employees. Random drug and alcohol tests may be administered concurrently.

Notice of an employee's selection shall not be provided until the employee's tour of duty in which testing is to be conducted, and then only so far in advance as is reasonably necessary to ensure the employee's presence at the time and place set for testing. Each time an employee is selected for random testing the employee will be informed that the selection was made on random basis and the employee will be provided with a receipt to that effect. The receipt will be provided at the collection site.

Random alcohol tests for safety-sensitive employees may only be conducted just before, during, or just after the performance of safety-sensitive functions. Employees covered under the sole authority of Centro (not USDOT) may be tested at any time they are on duty.

7.5 RETURN TO DUTY TESTING

Employees shall submit to Return to Duty testing in the following circumstances:

- * any employee who is allowed to return to safety-sensitive duty after failing or refusing to submit to a DOT drug and/or alcohol test must first be evaluated by a substance abuse professional (SAP), complete a SAP-required program of education and/or treatment, and provide a negative return-to-duty drug test result and/or an alcohol test result of less than 0.02. Any return-to-duty drug testing will be directly observed. All tests will be conducted in accordance with 49 CFR Part 40, Subpart O. Any non-safety sensitive employee will be evaluated by an employee assistance professional, complete a EAP required program of education and treatment, and provide a negative test result.
- * a positive drug or alcohol (BAC at or above 0.04) test result or test refusal, the employee will be immediately removed from safety-sensitive duty and provided with contact information for Substance Abuse Professionals (SAPs).

Safety-sensitive employees will be tested under the authority of USDOT-FTA while non-safety-sensitive employees will be tested under Centro policy.

Safety sensitive employees will be subject to Direct Observation collection procedures as required by 49 C.F.R. §40.67(b) and as outlined in Section 6.0 of this policy.

7.6 RETURN TO WORK TESTING

Employees shall submit to Return to Work testing under Centro policy if they have not remained in the random pool in the following circumstances.

- Back to work physical following extended illness of 30 days or more but less than 90 days.
- Any extended absence of 30 days or more but less than 90 days.

7.7 FOLLOW UP TESTING

Employees returning to safety-sensitive duty following a return-to-duty test will be required to undergo unannounced follow-up alcohol and/or drug testing for a period of one (1) to five (5) years, as directed by the SAP. The duration of testing will be extended to account for any subsequent leaves of absence, as necessary. The type (drug and/or alcohol), number, and frequency of such follow-up testing shall be directed by the SAP.

A covered employee may only be subject to follow-up alcohol testing while the employee is performing safety-sensitive functions, just before the employee is to perform safety-sensitive functions, or just after the employee has ceased performing such functions. A covered employee may be subject to follow-up drug testing anytime while on duty. All follow-up drug tests will be directly observed. All testing will be conducted in accordance with 49 CFR Part 40, Subpart O. Non- safety-sensitive employees will be tested under Centro policy.

Safety sensitive employees will be subject to Direct Observation collection procedures as required by 49 C.F.R. §40.67(b) and as outlined in Section 6.0 of this policy.

7.8 EMPLOYEE RE-TEST REQUEST

Any employee who questions the results of the required test under paragraphs 7.1 through 7.7 of this policy may request that the MRO have the split specimen analyzed within 72 hours of learning that the original specimen tested was positive. This test must be conducted at a different testing laboratory, one that is certified by the DHHS to meet 49 CFR Part 40 requirements. The testing must be conducted on the same specimen originally submitted to the Centro laboratory. Centro will ensure that the cost for the split specimen is covered in order for a timely analysis of the sample, however, Centro reserves the right to seek reimbursement for the split sample test from the employee.

8.0 RE-ENTRY CONTRACTS

Under Centro's "second chance policy," employees who re-enter the work force after having been found to have violated this policy must agree to a re-entry contract. That contract may include (but is not limited to):

- * a release to work statement from an approved treatment specialist.
(Substance abuse professional must also approve the employee for Return to Duty in a safety-sensitive position)
- * a negative test for drugs and/or alcohol (See Section 7.5, Return To Duty Testing)
- * an agreement to periodic follow-up testing
- * a statement of expected work-related behaviors
- * an agreement to follow specified after-care requirements with the understanding that violation of the re-entry contract is grounds for termination

The DOT regulations require that, when a safety sensitive employee has violated a DOT drug or alcohol regulation, the employee may not return to safety-sensitive duty until after an evaluation by a substance abuse professional. The safety sensitive employee must also successfully comply with the substance abuse professional's recommendations for education and/or treatment. Non safety sensitive employees will be referred to an employee assistance professional and will follow their specific re-entry requirements.

9.0 EMPLOYEE ASSISTANCE

It is Centro's policy to provide assistance to employees and immediate family members who experience personal problems, including substance abuse or dependency, which may adversely affect job performance. Employees are encouraged to voluntarily seek assistance in dealing with emotional, physical, or mental health problems, including substance abuse. Confidential professional assistance, treatment planning, and rehabilitation services are available, as needed. In an instance where a management referral is made, confidentiality means that only the Centro employee assistance program coordinator and the referring supervisor will be aware of the circumstances of the referral.

A request for assistance for a substance abuse problem will not, in itself, be considered grounds for disciplinary action. However, a request for assistance will not prevent the taking of appropriate disciplinary actions for misconduct or performance problems which may be related to substance abuse. In no case will participation in the employee assistance program shield employees who violate this policy from disciplinary action. Employees remain responsible for their on-the-job conduct and work performance, although assistance for substance abuse problems may be handled as a separate but related issue.

9.1 COMPLIANCE WITH TREATMENT REQUIREMENTS

It is the responsibility of each individual who is receiving treatment, by an appropriate treatment provider (SAP), to abide by the treatment program requirements and regulations. It is the expectation of the Company that treatment provider will inform each individual of the treatment program requirements and regulations and how they apply to each individual. If an individual is involuntarily removed from the program, by the treatment provider, or voluntarily stops participation in the program before treatment is completed, then his or her eligibility to Return to Duty will immediately terminate.

Under the sole independent authority of Centro, an individual who has not been certified, by the treating professional (SAP) to be able to Return to Duty within 26 weeks from the date of initial evaluation by the SAP, will be deemed to have forfeited any eligibility to return to work, in accordance with all state and federal regulations. A month by month extension will be granted in cases where the treating professional (SAP) agrees that sufficient progress in treatment has been made. The aforementioned extension shall not exceed 3 months.

Statutory New York State disability payments will be made in accordance with the collective bargaining agreement, federal law, and New York State law.

10. SUBSTANCE ABUSE POLICY DISCIPLINARY CODE

The purpose of the following code is to define Centro's disciplinary steps in relation to infractions of the substance abuse policy.

All employees of Centro are governed by this policy and are subject to its guidelines. These disciplinary procedures are subject to any applicable collective bargaining agreement provisions which are not inconsistent with federal or state law or regulations.

Be advised that the MANUFACTURE, DISPENSING, POSSESSION, USE or SALE of prohibited substances is a violation of Company policy and will result in termination in the first instance. This applies to any employee while:

1. on Centro Property.
2. in transit vehicles.
3. in uniform.
4. conducting Company business.

A drug and/or alcohol test may be required of an employee in the following situations:

1. Pre-Employment
2. Post accident
3. Return to Duty/Follow up
4. Reasonable suspicion

A verified positive test result in the first instance, regarding the above, will result in TERMINATION.

A drug and alcohol test may be required of an employee in the following situations:

1. Random test
2. Return to Work test

A verified positive test result in the first instance from a Random Test or a Return to Work test will result in a CONDITIONAL DISCHARGE. (The employee is separated from the Company, and referral is made to the Substance Abuse Professional (SAP) and/or Employee Assistance Program (EAP). After meeting SAP and/or EAP guidelines, a negative drug and/or alcohol test result is necessary prior to re-entry to the workforce. Negative test results are also required on any additional follow-up testing). This is part of Centro's "second chance policy."

Any employee who refuses to comply with a request for a drug or alcohol test, refuses to sign Step # 2 on the USDOT Alcohol Breath Testing Form, attempts to falsify test results through tampering, contamination, adulteration, or substitution that have been verified by the MRO, or refuses to cooperate with the Collector shall be considered to have a verified positive test result.

As a covered employee, if you refuse to take a drug and/or alcohol test, you incur the same consequences as testing positive and will be immediately removed from performing safety-sensitive functions and provided with contact information for SAP's.

Any employee who engages in conduct which constitutes a "Refusal to Test" as described in Section 5.3 of this policy, shall be considered to have a verified positive test result.

There may be consequences under this policy, even though there are no consequences under DOT regulations, for having a verified positive test result on, or for failing or refusing to take, a non-DOT test that is required by this policy.

An employee MUST notify Centro of any conviction for a violation of a criminal drug statute. Notice of conviction must be supplied no later than five days after the conviction.

All records, reports, recorded observations, test results and corresponding disciplinary action WILL be maintained in the employee's personnel/medical file.

All employees have a right to appeal the disciplinary action.

An employee may, upon written request, obtain a copy of his or her drug and alcohol testing records and have access to other pertinent records (e.g., equipment calibration records and laboratory certifications.)

11. POLICY QUESTIONS

The Company designates the following persons to answer questions regarding this policy:

- * Stacy Schreiner, Manager, Human Resources
- * Kayla Garcia, Compliance Manager, Human Resources
- * Chris Morreale, Director, Human Resources
- * Jackie Musengo, Vice President, Human Resources

APPENDICES

Appendix A List of job titles which have been identified as safety-sensitive under the DOT regulations.

Appendix B Information regarding service providers (names, addresses and phone numbers for collection site, Medical Review Officer, laboratory and Substance Abuse Professional that Centro contracts with for services)

Appendix C Community service hot-line telephone number for employee assistance with drug and alcohol problems.

APPENDIX "A"	
TITLE	Safety Sensitive Status
19-A Supervisor/Instructor	Yes
Bus Operator Trainee	Yes
Bus Operator – Full time, Part time	Yes
Servicer	Yes
Facilities Technician-(CDL license holders who operate a non-revenue service vehicle.)	Yes
First Class Mechanic	Yes
Specialized Transportation Supervisor & ADA Compliance Officer	Yes
Field Operations Manager	Yes

First Class Mechanic, Buildings & Grounds	Yes
HUB Supervisor	Yes
Maintenance Supervisors & Managers	Yes
Manager – Centro of Cayuga	Yes
Manager – Centro Oswego	Yes
Manager of Specialized Transportation	Yes
Mechanic	Yes
Mechanic – First Class	Yes
Mechanic's Helper	Yes
Operations Manager	Yes
Relief Supervisors	Yes
Schedule Board Marker	Yes
Senior Field Operations Supervisor	Yes
Senior Inside Operations Supervisor	Yes
Servicer	Yes
Supervisor Inside Service	Yes
Supervisor Outside Service	Yes
Training Coordinator, Maintenance	Yes
Transportation Coordinator, Mobility Management & CAB	Yes
Working Foremen	Yes

Appendix "B"
CNYRTA/CENTRO
SERVICE PROVIDERS FOR SUBSTANCE ABUSE TESTING

Medical Review Officers:

Dr. Jason Steindler
2280 Grass Valley HGY
Auburn, CA 95603

Specimen Collection Sites:

Primary Urgent Care

1904 Genesee St
Utica, NY 13502
Phone: (315) 804.6800
Hours: Mon- Fri 8am- 8pm
Sat & Sun 9am-5pm

WellNow Urgent Care

961 Canal Street
Syracuse, NY 13210
P: (315) 478.1977
Open 7 days a week 8am-8pm

WellNow Urgent Care

8003 US-11
Cicero, NY 13039
P: (315) 350.3305
Open 7 days a week 8am-8pm

WellNow Urgent Care

200 E. 1st St
Oswego, NY 13126
(315) 207.7391
Open 7 days a week 8am-8pm

WellNow Urgent Care

7375 Oswego Rd
Liverpool, NY 13090
(315) 350.3305
Open 7 days a week 8am-8pm

Laboratory:

Alere Lab Services
450 Southlake Blvd.
Richmond, VA
(800) 433-3823

Substance Abuse Professionals:

Help People
600 E. Genesee Street
Presidential Plaza, Suite 325
Syracuse, NY 13202
Phone: (315)470-7447 & (800)777-6110

Referral Services- (Centro of Oneida)

CNY Labor Agency
270 Genesee Street
Utica, NY 13502
(315) 735-6101

Professional Counseling Center
114 Genesee Street
New Hartford, NY 13413
(315) 733-0520

Alcohol-Drug Crisis Intervention
(866)384-0742

Insight House Chemical Dependency Svc
500 Whitesboro St.
Utica, NY 13502
(315) 724-5168

Appendix "C"

CNYRTA/CENTRO

SUBSTANCE ABUSE TREATMENT RESOURCES

Outpatient Facilities

ONONDAGA COUNTY

Professional Counseling Service
5700 W. Genesee St., Suite 118
Camillus, New York 13031
(315) 488-1641

Clinical Counseling Associates
753 James Street
1st Floor, Suite 4
Syracuse, New York
(315) 422-0671

Syracuse Behavioral Healthcare
329 N. Salina Street Suite 100
Syracuse, New York
(315) 474-5506

Bright Path
7266 Buckley Road
N. Syracuse, New York
(315) 458-0919

Alcohol Services, Inc.
6311 Fly Road
E. Syracuse, New York
(315) 682-3858

Syracuse Recovery Services
319 E Water Street
Syracuse, New York 13202
(315) 475-1771

OSWEGO COUNTY

Farnham, Inc.
283 W 2nd St. Suite 1
Oswego, New York
(315) 342-4489

Harbor Lights
111 Hamilton Street
Mexico, New York
(315) 963-0777

CAYUGA COUNTY

CHAD
75 Genesee Street
Auburn, New York
(315) 253-9786

Recovery Counseling
188 Genesee St. Suite 102
Auburn, New York
(315) 253-3559

Substance Abuse Rehabilitation (Inpatient)

Tully Hill
5821 State Route 80
Tully, New York 13159
(315) 696-6114
(800) 456-6114

Crouse Irving Memorial Hospital
736 Irving Ave.
Syracuse, New York
(315) 470-7314

Syracuse Behavioral Healthcare
329 N. Salina Street Suite 100
Syracuse, New York
(315) 474-5506

Conifer Park
7 Glenridge Road
Glenville, New York 13202
1(800) 989-6446

Half-Way Houses

Syracuse Behavioral Healthcare
Half-Way House
714 Hickory Street
Syracuse, New York 13203
(315) 422-8107

GUIDANCE REGARDING THE USE OF OVER THE COUNTER & PRESCRIPTION DRUGS

The following guidance is provided to safety-sensitive employees and is intended to supplement the FTA requirements as detailed in the CNYRTA Substance Abuse Policy.

This guidance is provided in response to recommendations by the Federal Transit Administration (FTA) and is monitored under the agency's own authority.

All safety-sensitive employees are required to report the use of Prescription and non-prescription medications that may have an impact on their personal safety, the safety of their co-workers, customers, and the general public prior to performing a safety-sensitive duty.

Definition

For the purpose of the following guidance and the CNYRTA Substance Abuse Policy, a legally prescribed drug (Rx) is one that is prescribed by a person licensed to prescribe controlled substances for medical treatment in the State of New York.

An Over the Counter (OTC) medication is one that can be purchased without a prescription at any pharmacy or other establishment that sells medications without a prescription.

Medical-Professional Assistance

Your pharmacist has the knowledge of a variety of medicines, ingredients, and possible side effects, and may be able to offer guidance concerning medications that are available.

Physicians may be able to select an over-the-counter medication that will be effective with no adverse effect. If the Physician determines that there are no satisfactory over-the-counter remedies, they may prescribe a controlled medication to treat your condition.

Physicians may determine that an over-the-counter medication with potentially negative impact is the preferred choice for treatment. They should counsel you about the potential impact on your ability to do your job safely.

Prohibited Behavior

The following behaviors are prohibited:

1. Use of a prescription (Rx) medication that is not legally prescribed for the employee.
2. Use of an Rx or over-the-counter (OTC) medication in excess of the prescribed/recommended dosage.
3. Use of any medication that contains alcohol within four (4) hours before performing safety-sensitive functions.
4. Use of any medication that adversely impacts the employee's ability to safely perform his or her safety sensitive job functions.

Attendance

1. Employees who have been given a prescription drug or advised to take an over-the-counter medication that disqualify them from performing safety-sensitive duties are to give the information to the 19-A Supervisor during regular working hours prior to returning to work.
2. Employees medically withheld from work shall be carried as "sick" on their attendance record.

Employee Responsibility

It is the responsibility of the employee to explain their job duties to their doctor or other medical professional to ensure that use of prescribed medications will not pose a safety risk to themselves, other employees, or the general public. If medication is necessary to treat an illness, injury or condition, employees should ask their medical practitioners, whenever possible, to prescribe a medication that would render effective treatment without creating a safety risk.

Employees must use their best judgment in selecting over the counter medications being certain to read all warning labels before selecting it for use while in working status. Each employee has the responsibility of refraining from using any over-the-counter medication that causes performance altering side effects, (drowsiness, fatigue, etc.). The advice of a pharmacist, if available at the purchase site may be helpful in making a selection appropriate to the employee's job duties.

It is the responsibility of safety-sensitive employees when selecting an over-the-counter medication or when being prescribed medications to read all warning labels before using it while in working status. Employees should avoid over-the-counter medications whose labels indicate they may affect mental functioning, motor skills or judgment.

If no alternate medication is available for the condition, employees should seek professional assistance from their physician, pharmacist, or other medical practitioner.

Prior to taking two or more medications, employees should be aware of the potential consequence of combining any medications. Your doctor or pharmacist can advise you if this situation arises. *

Employees have the personal responsibility to assess their fitness for duty while using any RX or OTC medication. They should not report for or remain on duty while being adversely affected by a prescription or over-the-counter medicine.

Process Summary

If an employee is ill or planning to see their **physician**, they should:

1. Advise the physician of their safety-sensitive job duties and the requirements for reporting medications.
2. Advise the physician of any side effects experienced with any medications in the past.
3. If a medication is prescribed, your physician must be aware of any other prescription or over-the-counter medications you use.

If the employee is planning on taking an over-the-counter medication without a physician's recommendation, they should:

1. Read all of the warning labels before selecting a medication for use while performing safety-sensitive duties.
2. If the label has warnings such as "do not take this medication while operating a motor vehicle, may cause drowsiness, etc" select another medication.
3. If unsure which medication is safe, ask the pharmacist for guidance.

* Note: A letter is available upon request that you can give to your pharmacist explaining the nature of your concern. All information is confidential.

Disciplinary Action

A positive result whether illegal substances, illegal use of a prescription or misuse of a prescription will result in disciplinary action up to and including termination, depending on the circumstances.

A partial listing of common prescriptions and over-the-counter drugs is available from the Human Resources Compliance Manager and Human Resources Manager.

*OTC Guidance Created December 2003
Revised 06/25*

Central New York Regional Transportation Authority

EMPLOYEE RECEIPT OF SUBSTANCE ABUSE POLICY

Return this completed form to your immediate supervisor.

Print Employee Name: _____

I have received The Company's Substance Abuse Testing Policy. I understand that I will be held responsible for the content of the policy, and I agree to abide by the terms and conditions set forth within. If I need any clarification or if I have any questions, I will address them with my supervisor or the program administrator.

I understand that a violation of this Policy may be grounds for immediate termination of my employment.

This policy adheres to the Federal Transit Administration's mandated regulations for substance abuse testing.

Employee Signature: _____

Date Signed: _____

Signature of Parent/Guardian _____

(Needed if employee is under 18 years of age)

Date Signed: _____

- ☐ I have received 60 minutes of training on the effects and consequences of prohibited drug use and the signs, symptoms, and effects of alcohol misuse as required in §655.14(b) by the Department of Transportation in 49 CFR Part 40.

Some provisions set forth are consistent with requirements specifically required by the U.S. Department of Transportation in 49CFR Part 655, or Part 40, as amended. Provisions set forth in the Drug-Free Workplace Act are also applied. All other provisions are set forth under the authority of the transit system.



TO: CNYRTA Board of Members
FROM: Christopher Tuff, Chief Executive Officer
RE: Monthly Summary Report – June 2025
DATE: June 12, 2025

Rome State of the City

On May 27, I attended the Rome State of the City. Mayor Lanigan presented a comprehensive plan for the City of Rome. They are in the process of rebuilding from the storm last year that impacted the heart of the City. They have also revealed plans to construct the Legacy Center Field House (Michael E. Jensen Recreation and Civic Center) and the Chobani facility near the former Griffiss Air Base. I spoke with the Mayor and the County Executive to congratulate them on the projects and share that we are here to support both initiatives in any way we can. Both locations are on existing bus routes.

Department of the State

On June 10, I met Liz Hradil, the Central New York Liaison for the Department of State Office of New Americans. We discussed Centro's opportunities to help new Americans integrate into the community here in Central New York. We also talked about how they could assist with employment opportunities and what they can do to address language barriers.

Federal Budget

On May 30, 2025, President Donald Trump released his Fiscal Year (FY) 2026 budget request. When combined with the advance appropriations included in the Infrastructure Investment and Jobs Act (IIJA), President Trump is requesting \$21.2 billion for public transit in FY 2026, a \$310 million (1.5 percent) increase from the enacted level of FY 2025. The request is \$1.0 billion (-4.7 percent) less than the authorized levels of FY 2026 under the IIJA. We will continue to monitor the budget process.

Various Meetings

Continued meetings to discuss the following items and move these projects forward. The topics include, but are not limited to, Capital Planning, Recruiting, RPM Program, NYPTA, SMTC, Arcadis (Transportation Consultants)

Language Assistance Plan (LAP) Executive Summary

Providing language assistance to persons with limited English proficiency (LEP) in a competent and effective manner helps ensure that the Central New York Regional Transportation Authority's (Centro) services are safe, dependable, convenient, and accessible to those persons.

These efforts may attract riders who would otherwise be excluded from participating in the service because of language barriers and, ideally, will engender riders to continue using the system after they are proficient in English and/or have more transportation options.

Centro evaluates and updates its LAP to correspond with the triennial Title VI Program Report cycle. On March 31, 2025, Centro began service in Cortland County therefore the LAP has been updated to include an analysis of Cortland Census data and rider surveys.

According to the U.S. Census Bureau, 2019-2023 American Community Survey 5-Year Estimates, people who speak Spanish at home represent 3.0% (26,687) of Centro's service area population. Of those persons, 30.5% (8,148) speak English "less than very well". Spanish continues to be the dominant non-English language spoken at home throughout the five-county service area. This is supported by Operator surveys and customer surveys.

A notable improvement to Centro's language assistance measures is the enhancement of the Language Line account by adding video capabilities. This is particularly useful for persons needing ASL translation and for those from cultures who prefer face-to-face interactions.

Centro staff will continue to evaluate the needs of limited English customers in our service area and identify new ways to provide language assistance.





Language Assistance Plan (LAP) for Limited English Proficient (LEP) Persons

June 2025

Central New York Regional Transportation Authority
Recipient ID: 1778

Steven Koegel – email: skoegel@centro.org
VP Business Development & Corporate Communications

Paula Cutrone – email: pcutrone@centro.org
Senior Manager of Transit Data and Equity

In Compliance with: Title VI of the Civil Rights Act of 1964 & Executive Order 13166

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Attachments

- Attachment 1: Language Line Identification Guide
- Attachment 2: Board of Members Approval of Plan (pending)

INTRODUCTION

About Centro

The Central New York Regional Transportation Authority (Centro) is the public transportation provider for Onondaga, Oswego, Cayuga, Oneida, and Cortland counties (including the cities of Syracuse, Oswego, Fulton, Auburn, Utica, Rome, and Cortland). Centro carries approximately 9 million passengers annually on its fleet of 239 buses and currently employs 580 people (including part-time staff).

The Need for a Language Assistance Plan

Individuals having a limited ability to read, write, speak, or understand English are considered limited English proficient, or “LEP.” This language barrier may prevent these individuals from accessing public services and benefits – including public transit services. The Language Assistance Plan is required to determine which services are appropriate and identify the needs of the LEP populations we serve.

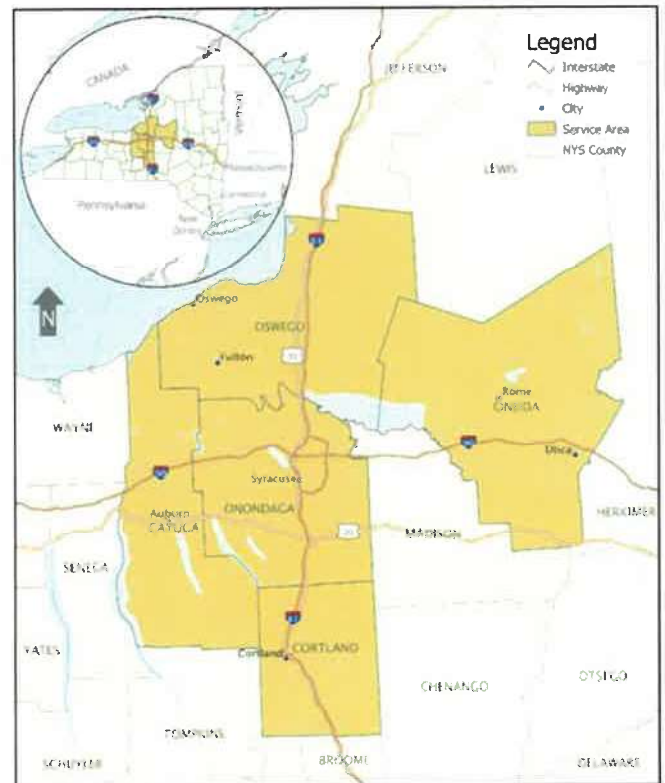
Federal Requirements

Title VI of the Civil Rights Act of 1964 and Executive Order 13166 signed on August 11, 2000, are the federal legislation necessitating LEP Plans from public agencies receiving federal funds. Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide 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 otherwise subjected to discrimination under any program or activity that receives federal financial assistance. The U.S. Supreme Court has ruled that LEP is a component of the protected class of national origin.

Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency,” requires federal agencies to examine the services they provide, identify any need for services to those with LEP, and develop and implement a system to provide those services so LEP persons can have meaningful access to them. Executive Order 13166 also requires that the federal agencies work to ensure that recipients of federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.

The U.S. Department of Transportation (DOT) published revised LEP guidance for its recipients on December 14, 2005. The Federal Transit Authority (FTA) references the DOT LEP guidance in its Circular 4702.1B, “Title VI Requirements and Guidelines for Federal Transit Administration Recipients,” which was published on October 1, 2012. This Circular reiterates the requirement to take responsible steps to ensure meaningful access to benefits, services, and information for LEP persons and suggests that FTA recipients and sub-recipients develop a language implementation plan consistent with provisions of Section VII of the DOT LEP guidance.

Figure 1: Centro Service Area Map



Centro's Language Assistance Plan

Centro's LAP, which complies with the above-cited regulations, outlines the policies and procedures instituted by Centro to ensure that it is adequately assessing the size, location, and needs of the LEP populations it serves. Providing language assistance in a conscientious and effective manner will help ensure that Centro's services are safe, convenient, reliable, environmentally responsible, and accessible to LEP persons in the community. In addition, the Plan discusses how language access services are instituted, and how Centro evaluates the effectiveness of these services.

THE "FOUR FACTOR" ANALYSIS

The DOT guidance outlines "four factors" recipients should consider when assessing language needs and determining appropriate steps to ensure meaningful access to services for LEP persons. In considering these factors, Centro continues to implement a cost-effective and appropriate mix of proactive language assistance measures, and to confidently respond to requests for LEP assistance from constituents. The four factors Centro analyzed are:

Factor 1: The number and proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.

Census Data

Examination by geographic place of U.S. Census Bureau, 2019-2023 American Community Survey 5-Year Estimates, Language Spoken at Home for the Population 5 Years and Over, Table C16001 determined that approximately 3.7% (32,823 / 890,331) of the population over the age of 5 in Centro's service area speaks English less than "very well" and, therefore, is characterized as LEP (*see Table 1*). Oneida County has the highest percentage of LEP people (5.3%) followed by Onondaga County (4.2%).

Table 1: Limited English Proficient Speakers in Centro's Service Area

	Population Total Age 5+	English Only Speakers	Percent of Population	LEP Speakers	Percent of Population
Cayuga County	71,808	68,770	95.8%	980	1.4%
Cortland County	44,218	41,764	94.5%	620	1.4%
Oneida County	216,932	188,052	86.7%	11,459	5.3%
Onondaga County	445,622	396,641	89.0%	18,773	4.2%
Oswego County	111,751	107,167	95.9%	991	0.9%
Total	890,331	802,394	90.1%	32,823	3.7%

Source: U.S. Census Bureau, 2019-2023 American Community Survey 5-Year Estimates; table C16001

Analysis shows there are 10 non-English language categories spoken at home by over 1,000 persons in Centro's service area (*see Table 2*). Onondaga County, the primary UZA and largest county in the Centro service area, has the greatest number of LEP speakers and languages spoken. Cortland County, Centro's least populated county, does not have any non-English languages spoken by 1,000 persons or more.

Table 2: Language Spoken at Home for the Population 5 Years and Over by 1,000+ Persons in Centro's Service Area (by number of speakers descending)

Language Spoken at Home	Estimated Speakers	% County Population	Total LEP	% County Population	% Speakers
CAYUGA COUNTY					
English Only	68,770	95.8%	n/a	n/a	n/a
Spanish	1,458	2.0%	459	0.6%	31.5%
CORTLAND COUNTY					
English Only	41,764	94.5%	n/a	n/a	n/a
ONEIDA COUNTY					
English Only	188,052	86.7%	n/a	n/a	n/a
Spanish	8,409	3.9%	2,972	1.4%	35.3%
Russian, Polish or Other Slavic	6,419	3.0%	2,573	1.2%	40.1%
Other Asian and Pacific Island	6,152	2.8%	3,027	1.4%	49.2%
Other Indo-European	2,008	0.9%	642	0.3%	32.0%
Other and Unspecified Languages	1,575	0.7%	286	0.1%	18.2%
Arabic	1,241	0.6%	579	0.3%	46.7%
ONONDAGA COUNTY					
English Only	396,641	89.0%	n/a	n/a	n/a
Spanish	14,457	3.2%	4,378	1.0%	30.3%
Other Indo-European	6,756	1.5%	2,318	0.5%	34.3%
Russian, Polish or Other Slavic	5,256	1.2%	2,440	0.5%	46.4%
Chinese (incl. Mandarin, Cantonese)	4,720	1.1%	2,346	0.5%	49.7%
Other and Unspecified Languages	4,652	1.0%	1,958	0.4%	42.1%
Arabic	3,556	0.8%	1,646	0.4%	46.3%
Other Asian and Pacific Island	3,163	0.7%	1,623	0.4%	51.3%
French, Haitian, or Cajun	1,977	0.4%	297	0.1%	15.0%
Vietnamese	1,710	0.4%	1,069	0.2%	62.5%
German or Other West Germanic	1,370	0.3%	246	0.1%	18.0%
OSWEGO COUNTY					
English Only	107,167	95.9%	n/a	n/a	n/a
Spanish	1,743	1.6%	317	0.3%	18.2%

Source: U.S. Census Bureau, 2019-2023 American Community Survey 5-Year Estimates; table C16001

People who speak Spanish at home represent 3.0% (26,687) of Centro's service area population. Of those persons, 30.5% (8,148) speak English "less than very well". The LEP Spanish speakers represent less than 1% of the total population of the service area.

The following maps depict the census tracts within the service area with 25 or more limited English persons per square mile. These maps help the Service Development Department to evaluate if service is being provided in areas where LEP persons are likely to need it. Centro provides fixed route service coverage to many of the areas, particularly those with the higher concentrations of LEP persons.

Figure 2: Cayuga County LEP

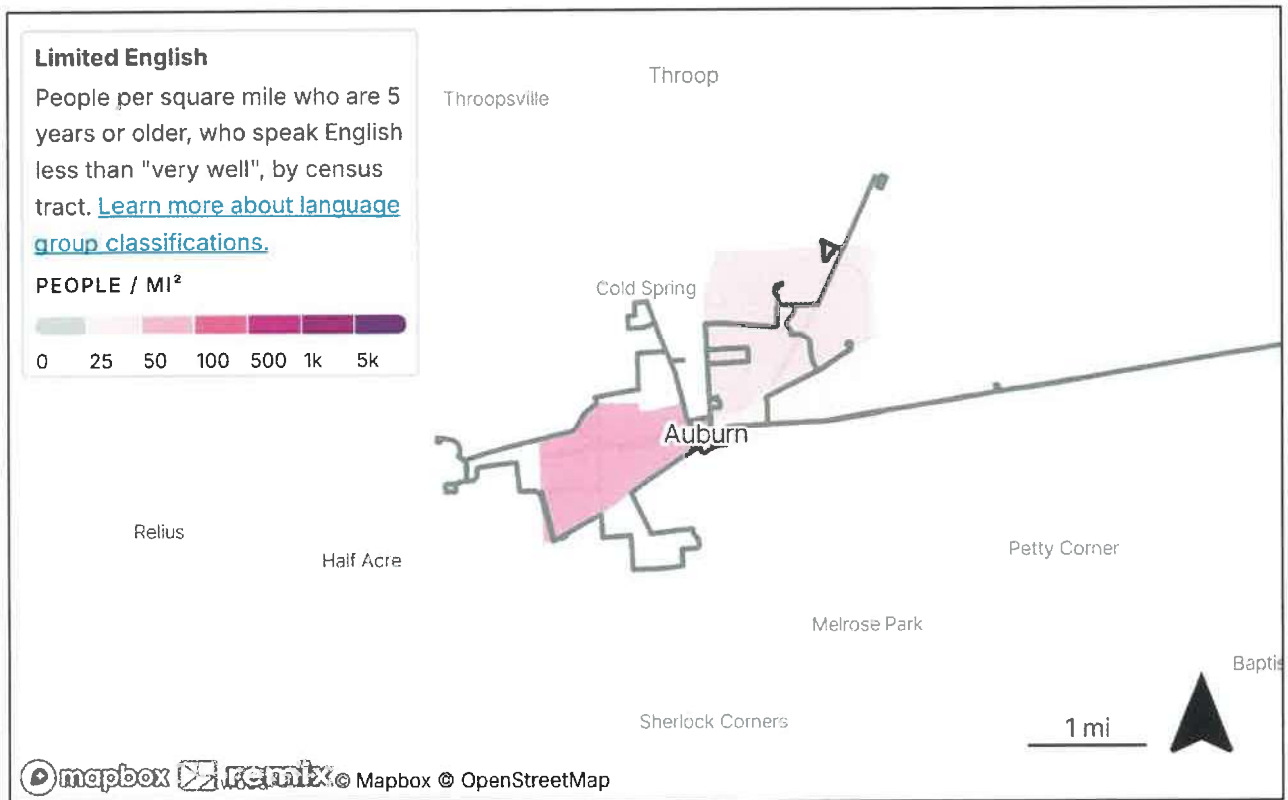


Figure 3: Cortland County LEP

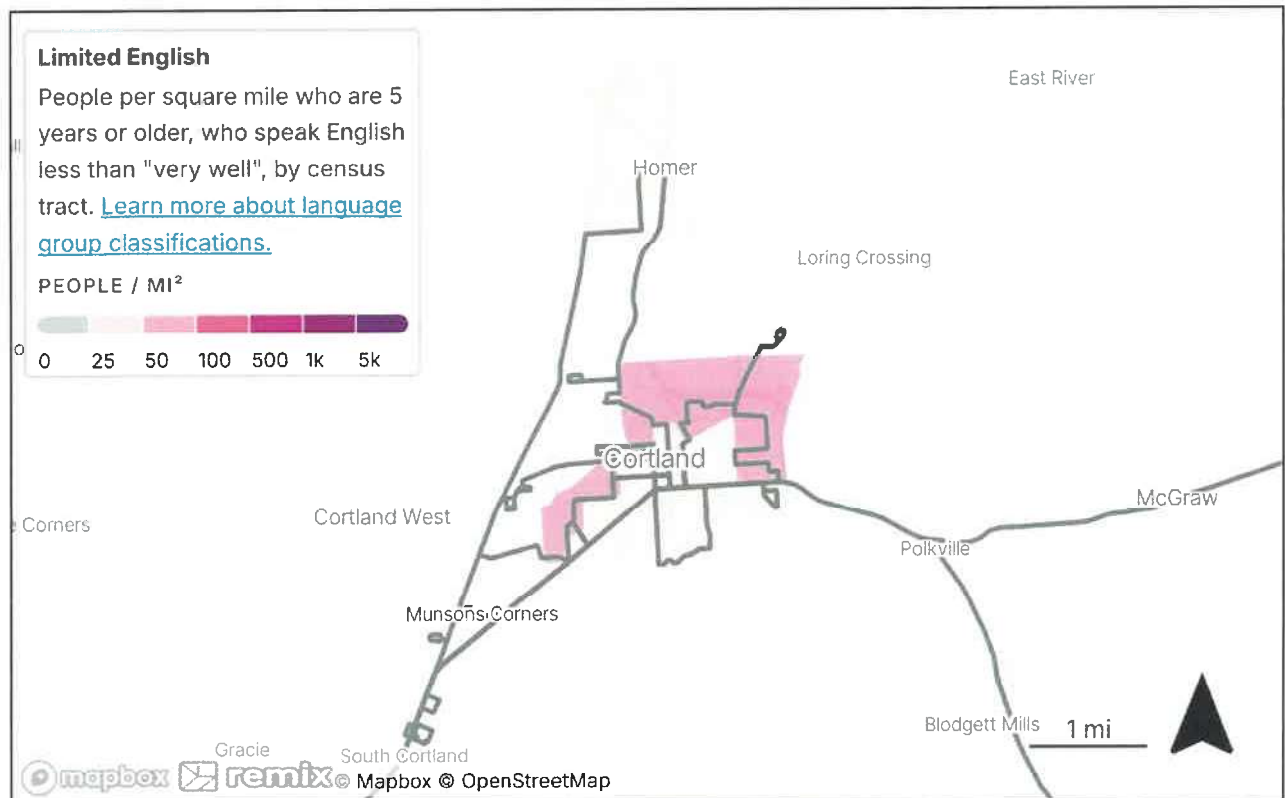


Figure 4: Oneida County (Utica City) LEP

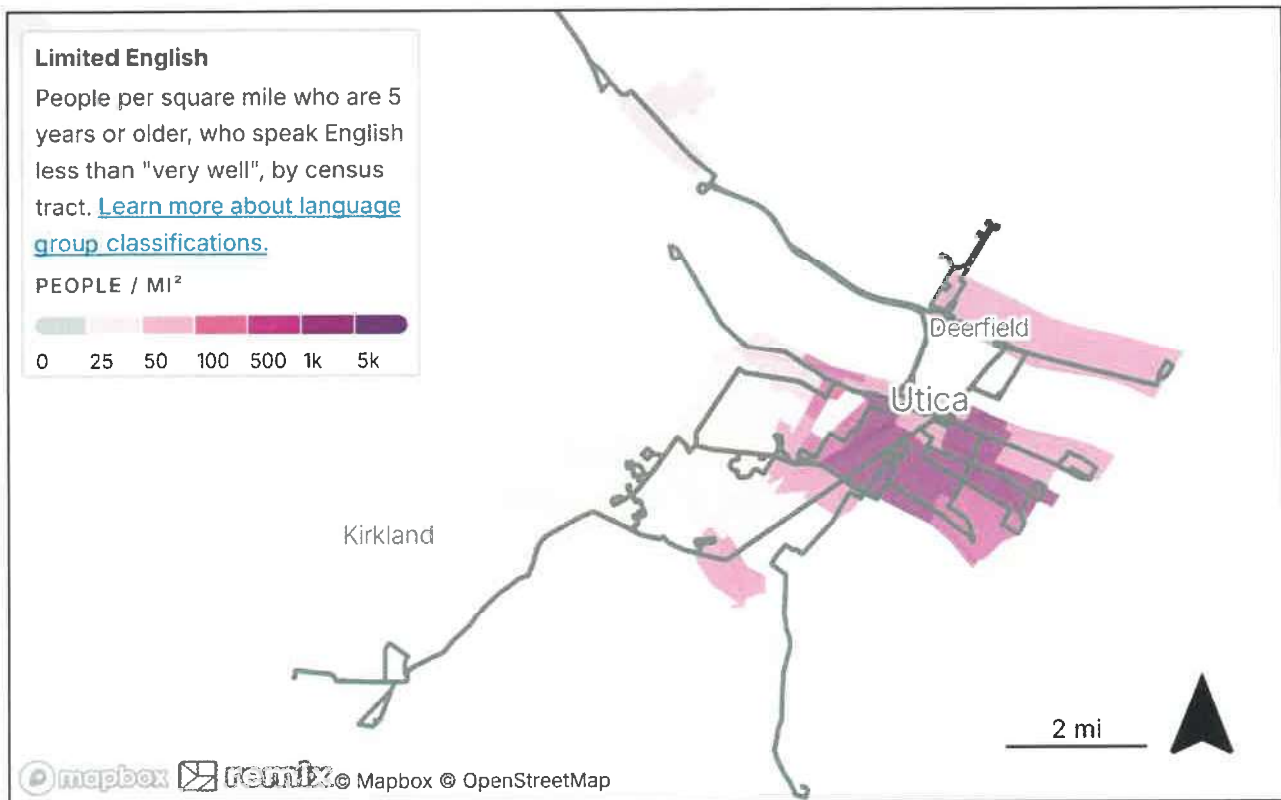


Figure 5: Oneida County (Rome City) LEP

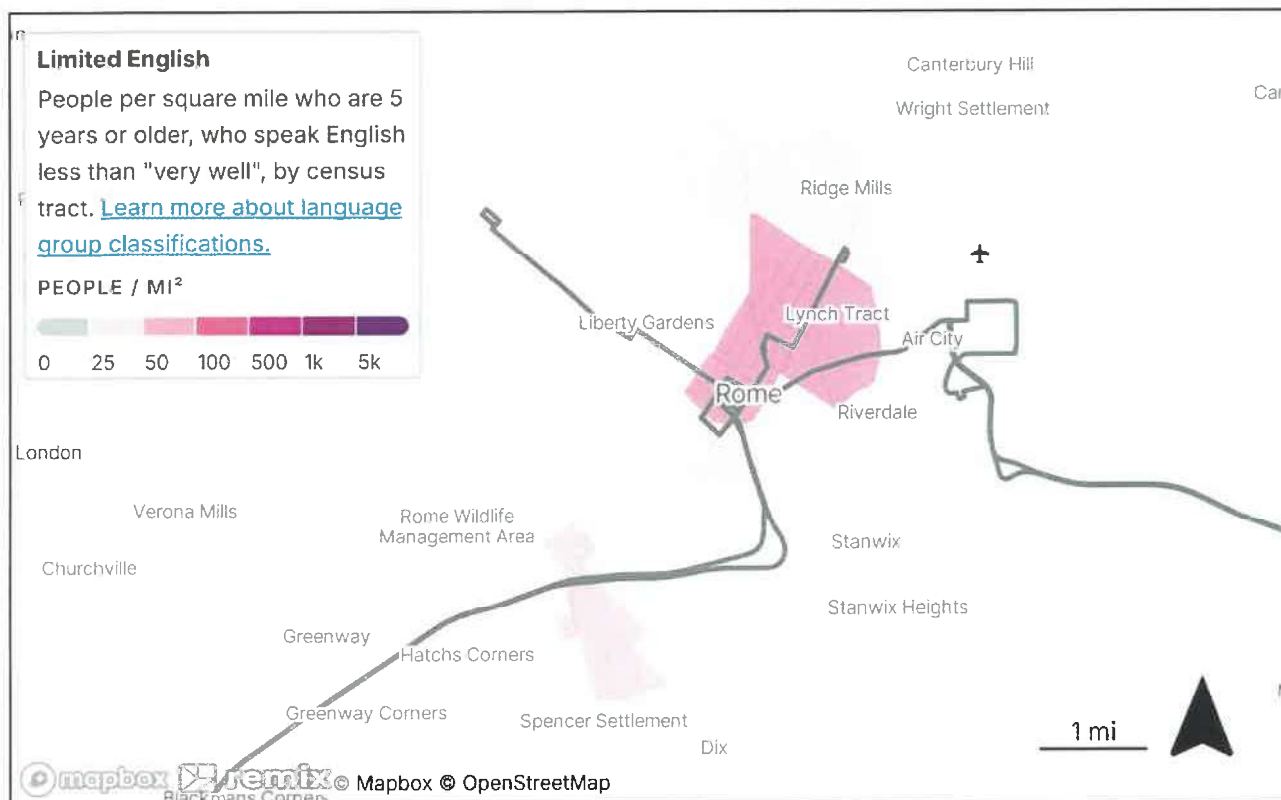


Figure 6: Onondaga County LEP

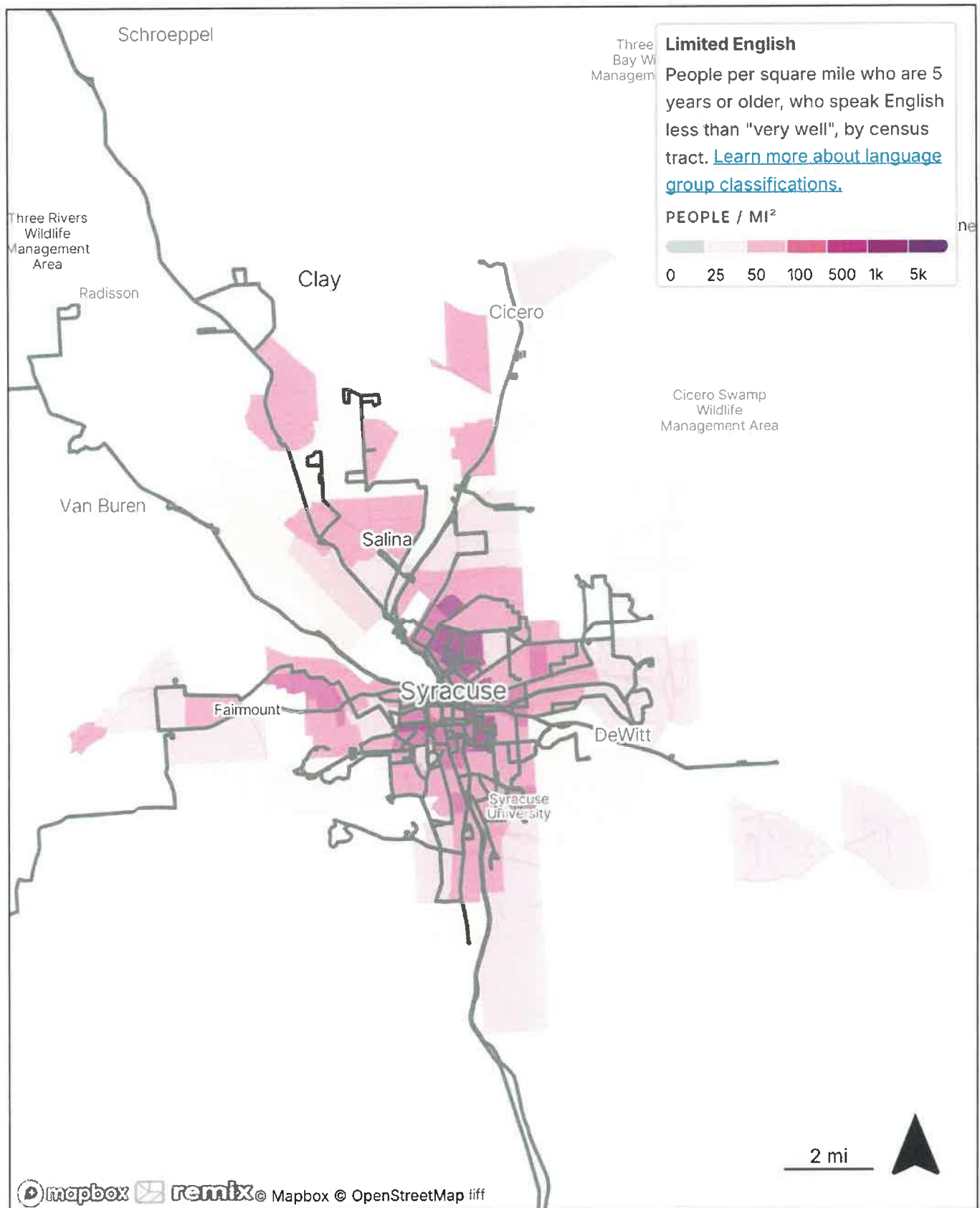


Figure 7: Oswego County (Oswego City) LEP

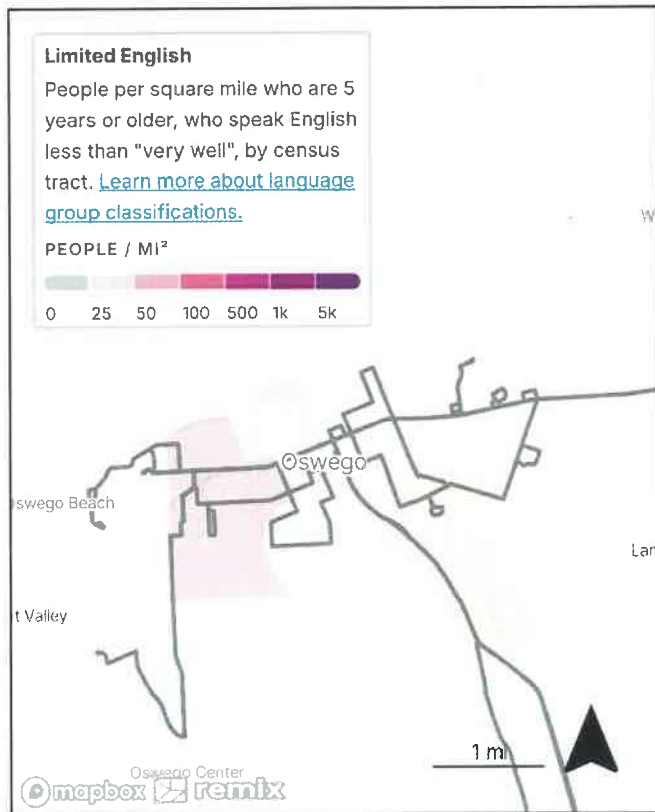
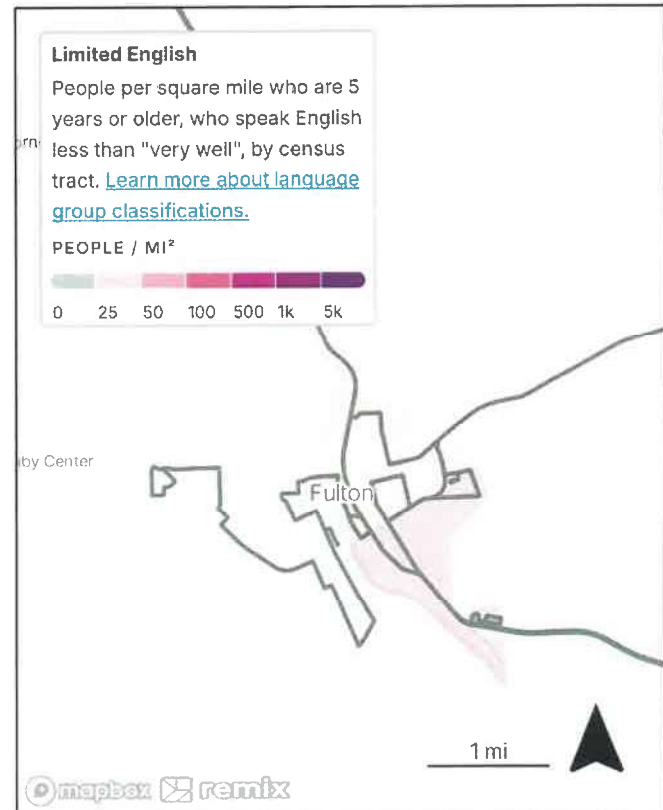


Figure 8: Oswego County (Fulton City) LEP



Factor 2: The frequency with which LEP persons come into contact with the program.

Centro encounters LEP individuals on a regular basis either on vehicles, at transit centers, via its Call Center and Revenue Operations departments, or through scheduled travel training initiatives.

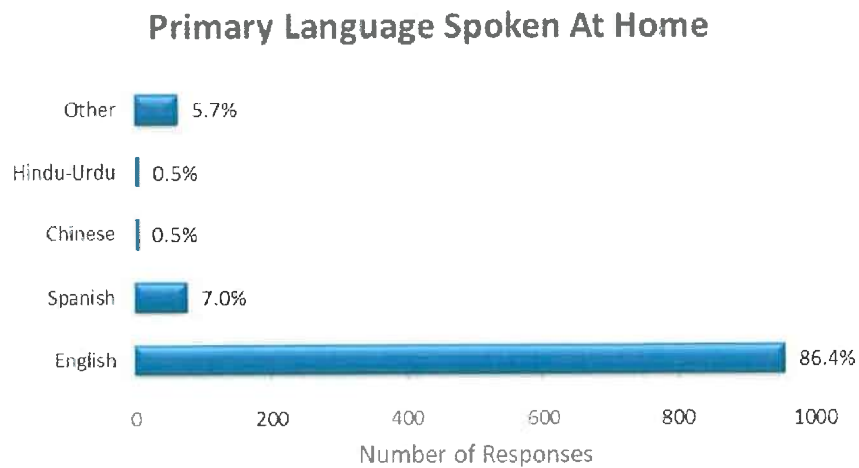
To address key program areas and assess our major point of contact with the public, we rely on our established rider and operator survey programs in addition to the contacts with our Customer Service Department via Centro's Call Center.

Rider Surveys

Onboard rider surveys were conducted throughout the Centro service area between Spring 2024 and Spring 2025. Customers were asked for the primary language spoken at home and if the use of the English language posed a difficulty in navigating the Centro system. Most customers systemwide (86.4%) use English at home. Of the customers who use a language other than English, Spanish was the most common answer.

[continued next page]

Figure 9: Rider Survey Results for Primary Language Spoken at Home



The following graphs depict the primary language spoken at home by individual county in the service area.

Figure 10: Cayuga County Primary Language Spoken at Home

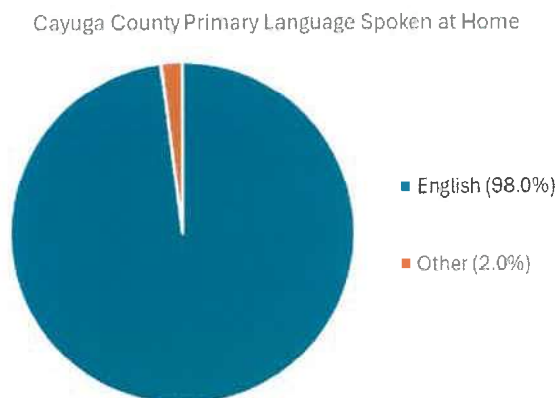


Figure 11: Cortland County Primary Language Spoken at Home

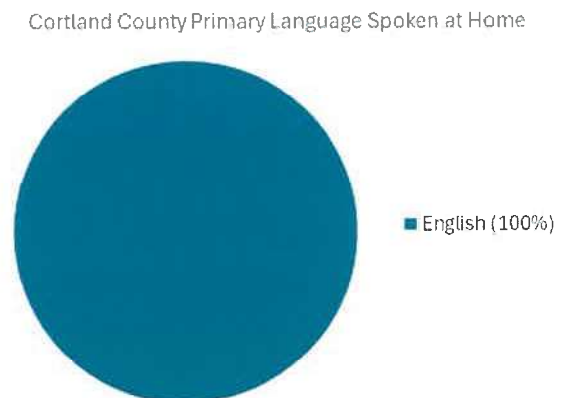


Figure 12: Oneida County Primary Language Spoken at Home

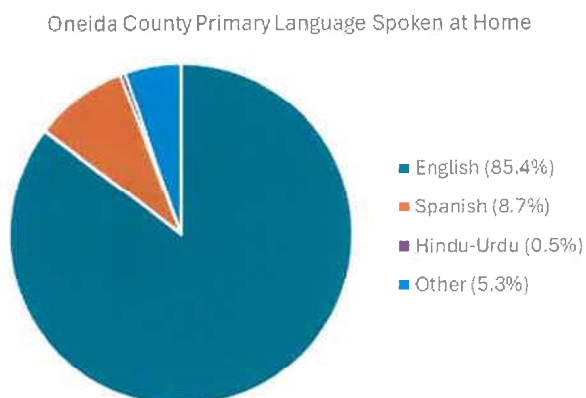


Figure 13: Onondaga County Primary Language Spoken at Home

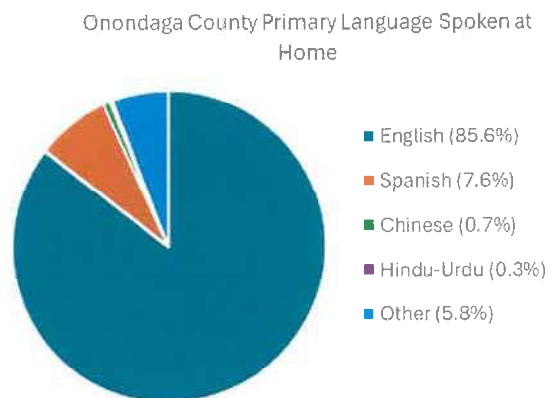
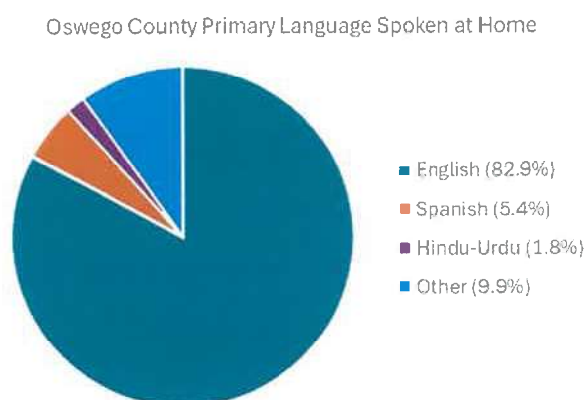


Figure 14: Oswego County Primary Language Spoken at Home



Customers who selected 'Other' as the primary language spoken at home were asked to specify the language if it was not listed. A total of 41 unique languages or language categories were received. Of the responses, fourteen were identifiable as African languages and were found in both Oneida and Onondaga counties, while eleven were identifiable as Middle Eastern languages found in Onondaga county. There was not a substantial number of responses for any one language.

Most customers systemwide (86.8%) do not have difficulty navigating the Centro system due to the use of English. The most 'Yes' responses came from our most populated counties, Onondaga and Oneida.

Table 3: Responses to Rider Survey Question "Does use of the English language pose a difficulty in navigating the Centro system?"

	Yes	% Total	No	% Total	Total
Cayuga County	2	4.1%	47	95.9%	49
Cortland County	0	0.0%	48	100.0%	48
Oneida County	33	15.9%	174	84.1%	207
Onondaga County	105	15.2%	588	84.8%	693
Oswego County	7	6.1%	107	93.9%	114
Total	147	13.2%	964	86.8%	1,111

Of the 147 'Yes' responses, 109 selected 'English' as the primary language spoken at home. Additional responses include 27 'Spanish', one 'Chinese', and 10 'Other' (specified languages: Bangla/Bengali, Creole, French, Haitian Kreyol, and Middle Eastern).

Operator Surveys

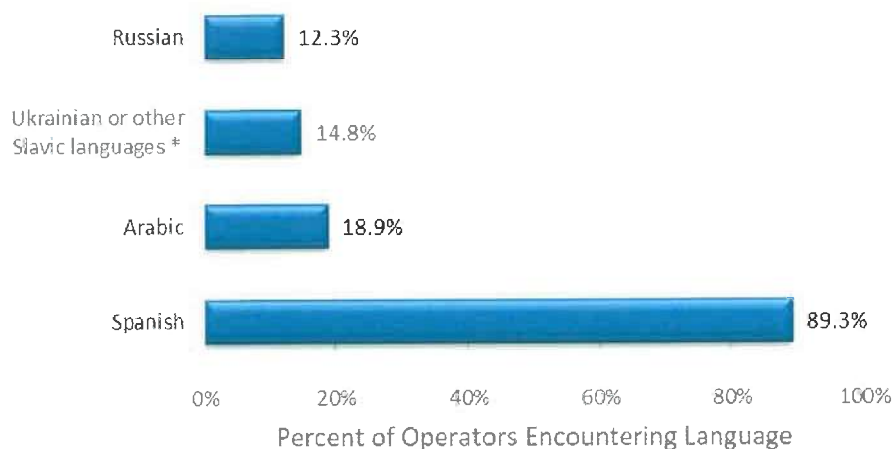
In May of 2024, Centro bus operators were asked to complete a brief survey to help evaluate the effectiveness of Centro's current language access program. The survey contained questions about driver interaction with LEP customers and was available in both paper and electronic formats. Operators were asked if they were able to identify the languages spoken from a list. Of the responses received:

- 85.4% encountered customers who speak limited or no English over the past year.
- 40% experienced this 5-15 times.
- 90.5% of the time, customers attempted to communicate with Centro drivers in their native language.
- 64.1% could identify the language spoken. More than half identified two or more languages.
 - Known languages encountered by 10% or more operators:

▪ Spanish	89.3%
▪ Arabic	18.9%
▪ Ukrainian or other Slavic languages*	14.8%
▪ Russian	12.3%

Figure 15: Language Encounters

Language Encounters by >10% of Operators



* Includes operators who selected 'Other' as the language being spoken, then specified 'Bosnian' as the language.

Call Center / Revenue Operations

Centro's Call Center provides customer assistance and travel information via telephone for those seeking to use Centro services. The call center answered 70,022 calls in fiscal year 2024 (4/1/2023 to 3/31/2024) and 68,969 calls in fiscal year 2025 (4/1/2024 to 3/31/2025).

The Revenue Operations Department receives telephone calls related to issues with fare payments including cash transactions, passes, the mobile app, and tap-to-pay.

Both Call Center and Revenue Operations staff may receive calls from LEP individuals. Once the need for language assistance is identified, staff can connect to the Language Line service to speak with interpreters in more than 200 languages. Callers, as well as visitors at Centro's facilities, can use this free service from 6:30 a.m. to 5:30 p.m., Monday through Friday.

Records indicate that 57 calls placed to Centro's Call Center or Revenue Operations Departments during fiscal year 2024 utilized the Language Line interpretation service. Of the 57 calls received, 87.7% (50) requested information in Spanish.

Other languages included Arabic, Dari, French, Italian, and Tigrigna. During fiscal year 2025, 127 of the calls utilized the Language Line interpretation service. Of the 127 calls received, 90% (115) requested information in Spanish. Other languages included Arabic, Bengali, Dari, Hindi, Pashto, Tigrigna, and Ukrainian.

Table 4: Fiscal Year 2024 & 2025 Language Line Calls

Language	FY 24 Calls	FY 25 Calls
Arabic	3	1
Bengali	0	1
Dari	1	3
French	1	0
Hindi	0	4
Italian	1	0
Pashto	0	1
Spanish	50	115
Tigrigna	1	1
Ukrainian	0	1
Total	57	127

While LEP individuals currently have infrequent and unpredictable contact with Centro's Call Center and services, we have seen a 300% increase in calls from LEP persons since the last report was submitted in 2022. Centro will continue monitoring trends in the calls on a regular basis.

Travel Training

Centro's Travel Training program is discussed in detail under Factor 3.

Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives.

Access to public transportation is critical for many to fully participate in society, and Centro provides a range of important transportation options to the community through its fixed-route, paratransit, and on-demand services. Riders use Centro services to assist with multiple travel needs within the community, including trips to work, school, job interviews, grocery stores, retail shops, medical offices, and community service agencies.

The nature and importance of the program can be assessed by the number and frequency by which LEP people use Centro's services. To make this determination, two methods are employed – the first is through Centro's Travel Training Program, and the second is through rider surveys.

Travel Training

Centro's Onondaga County area travel trainer performs outreach services and maintains an office at the Syracuse Transit Hub, which is conveniently located a short distance from many of the community-based organizations that refer LEP individuals to Centro. From this location, the travel trainer has direct contact with the LEP community and can assess the needs of LEP people.

In fall of 2022, Centro of Oneida appointed a travel trainer to work with organizations in the Utica and Rome service area. The program has been gaining popularity especially throughout 2024. The travel trainer is fluent in Bosnian, Croatian, and Serbian languages and was a non-English speaker when first arriving in the United States in 1997. He is uniquely qualified to assist LEP and non-English speakers due to his personal and professional experience as an interpreter/translator collaborating with community groups in the area.

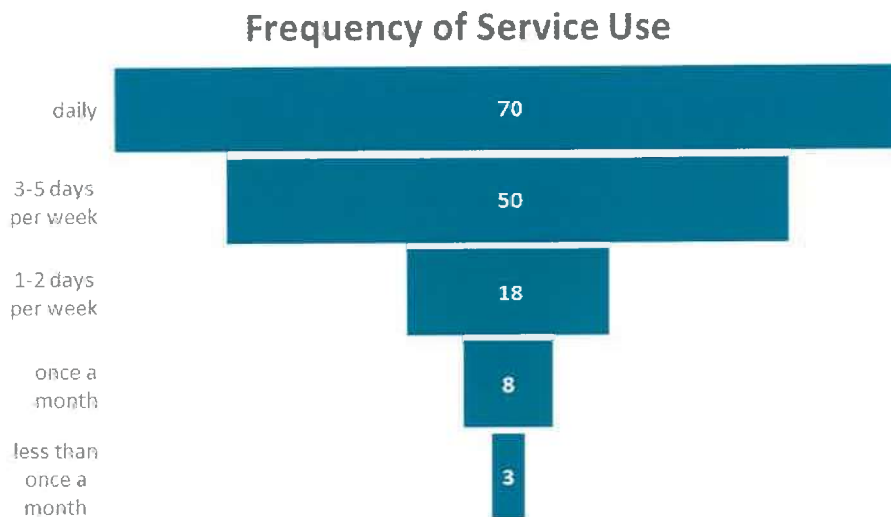
The travel trainers report their interactions to Centro's Planning and Operations Departments and to the Chief Executive Officer so that the LEP program and its activities can be assessed and modified as appropriate. Centro collaborates with various community organizations that assist and refer LEP individuals to Centro. The organizations provide feedback on the way in which Centro assists LEP populations to determine how effectively those individuals are being served.

Travel training for LEP people is usually performed in groups. For example, training was recently conducted with a group of newly arrived people from Ghana, employed by Upstate Caring Partners, who will be using the bus to get to work.

Rider Surveys

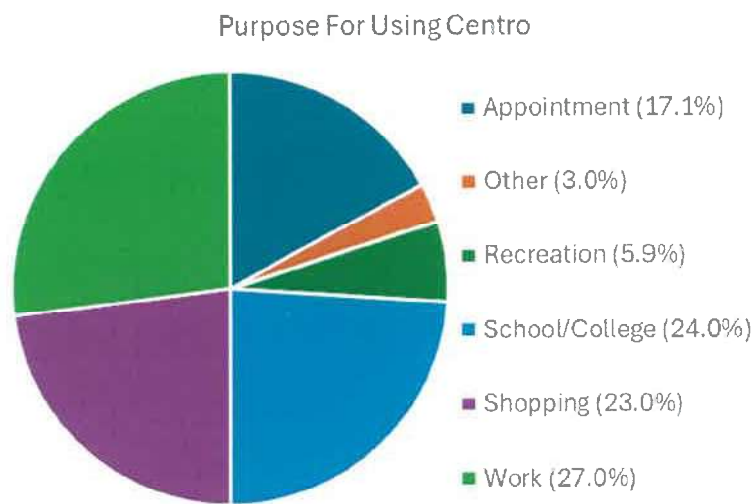
In the most recent rider survey, customers were asked "How often do you ride?" and "For what purpose do you use Centro?" Of the systemwide riders whose primary language spoken at home is not English, more than half (70 persons) answered they ride the bus daily. Of those daily riders, 54 are in Onondaga County, 14 are in Oneida County, and two are in Oswego County.

Figure 16: Frequency of Service Use (LEP Customers)



Customers were able to choose more than one answer to the question, "For what purpose do you use Centro?" Of the systemwide riders whose primary language spoken at home is not English, the primary use is for 'Work' (27%), followed closely by 'School/College' (24%) and Shopping (23%).

[continued next page]

Figure 17: Purpose for Using Centro (LEP Customers)

Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

Because Centro's service area does not have a large LEP population, Centro provides LEP services on a case-by-case basis. This methodology represents a cost-effective method for applying LEP services since they are infrequent. If the population of LEP individuals within Centro's service area was larger, then a wider array of services and materials would be required.

Centro's annual operating budget funds outreach efforts and translation services to effectively communicate with LEP persons in the community. As funding allows, Centro will continue to expand its efforts.

Centro's Marketing & Communications and Human Resource Departments spend approximately \$2,000 annually on bilingual advertising and recruiting placements in local community newspapers. Modest funding is available for translation services, which are typically used for news releases, route information, passenger bulletins, and other marketing efforts targeted at Spanish speaking audiences.

Centro's Call Center annually budgets \$1,000 to support the translation phone service. Annual costs are dependent upon usage.

[continued next page]

DEVELOPING THE LANGUAGE ASSISTANCE PLAN

After completing the Four Factor Analysis, Centro has determined which language assistance services are appropriate for our community. Spanish has been identified as the language for which translations are most needed through demographic data, rider surveys, and operator surveys. Additionally, the DOT LEP Guidance recommends that recipients develop an implementation plan to address the needs of the LEP populations they serve. The DOT LEP notes that effective implementation plans typically include the following five elements:

1. Identifying LEP individuals who need language assistance.
2. Providing language assistance measures.
3. Training staff.
4. Providing notice to LEP persons.
5. Monitoring and updating the Plan.

Centro Language Assistance Plan Implementation

Element 1: Identifying LEP individuals who need language assistance.

As previously documented, Centro utilized data from the U.S. Census Bureau's American Community Survey to determine the number of LEP individuals residing in its five-county service area (Cayuga, Cortland, Oneida, Onondaga, and Oswego) to whom it provides transit services.

Centro assists LEP individuals on a regular basis through either direct contact with drivers or the Centro Call Center, or via a Centro travel trainer.

1. **Census data:** Census 2019-2023 data indicates that Spanish-speaking LEP persons are the primary groups requiring language assistance in Centro's service area. Centro will continue monitoring and using Census data releases to identify and locate significant and emerging LEP populations.
2. **Rider Survey:** Centro routinely collects passenger data using on-board surveys to help satisfy requirements outlined by the Federal Transit Administration (FTA), which is an arm of the U.S. Department of Transportation. As recipients of federal funds, Centro must be accountable to the government regarding how and why it provides service the way it does.

To comply with the accountability requirement, Centro regularly conducts rider surveys, which provide detailed information about passenger demographics and travel patterns. These surveys include questions to help quantify LEP riders, their travel patterns and route use, and to provide essential information to help further identify and understand the transit needs of transit-dependent LEP persons. As previously detailed, the most recent rider survey was conducted starting in Spring 2024 and was completed in Spring 2025. The survey was available in both English and Spanish.

3. **Documenting Staff Encounters with LEP Persons at Centro Public Meetings:** When open houses or public meetings are held, Centro will provide interpretive services, upon request, to those who request it ahead of time. Centro previously provided Spanish and ASL translators at all Public Hearings; however, there were no persons in attendance who needed these services which resulted in an undue expense. Staff will also be able to

deploy the Language Line video interpretation service if it is needed. A continuous record will be kept detailing the primary languages of LEP persons attending Centro's public meetings and public hearings.

4. **Tracking Calls to the Language Line:** Centro will continue to monitor and quantify the volume and trends of calls to the translation phone line for language assistance. As previously indicated, Spanish is by far the most requested language by those needing assistance.

Element 2: Providing language assistance measures.

Centro currently employs various methods and strategies to provide LEP customers with information critical to using its services. Many of these efforts focus on reaching Spanish-speaking persons, the dominant LEP population in Centro's service area.

Centro's current and planned efforts to provide language assistance to LEP customers in the future include the following:

1. **Translation services via phone:** Centro has access to Language Line interpreters who can assist riders with bus schedule information in more than 200 languages. Callers to the Call Center (315-442-3400), and visitors to Centro's facilities who need language assistance, are personally connected to the language line services. This free service is available from 6:30 a.m. to 5:30 p.m. Monday through Friday.
2. **Translation services via video:** In 2024, Centro added video services to the current Language Line plan. This allows customers to see an interpreter and is especially useful for those requiring ASL interpretation.
3. **Pocket schedules and route maps.** Customer Satisfaction Survey results provide information about routes frequented by LEP riders in need of bilingual printed passenger information. To date, no customer requests have been received regarding alternate language schedules. However, Centro will continue to monitor customer inquiries should this change. Additionally, Centro maintains a mobile app so that customers can access real-time bus tracking on their smart device. The app allows customers to pinpoint real-time bus locations and see estimated bus arrival times. They can also store favorite routes and stops for easy reference, create customized travel plans, provide feedback with email and photos, and identify the nearest stops using their device's Geolocation – all in their native language based on the language settings on their device. The app allows users to switch the language from English to Spanish within the language settings menu.
4. **On-Board Announcements:** To accommodate its Spanish-speaking riders, Centro includes automated messages in Spanish regarding service changes, safety, and new products. Additional messaging will be identified and automated in applicable alternate languages should the need arise.
5. **Centro Website and social media translation:** To improve contact with LEP populations, Centro's website contains a language translator. Centro schedules and documents can be translated into the native language of the site visitor upon request. Additionally, Centro social media followers can view Centro information in their native language on their mobile devices using the language settings feature.
6. **Transit Tools:** Centro's website-based tools include Track By Text, Bus Tracker (available in Spanish), and Trip Planner (available in all languages found in Google translate). Centro's mobile app (GoCentroBus) is available for Android and iOS devices (available in Spanish).

7. **Critical documents in alternate languages:** The following documents are available in Spanish on the Centro website: Title VI Notice, Title VI Complaint Form, and Title VI Complaint Procedure. An overview of Centro's Title VI Program and a Title VI complaint form are available at: <https://www.centro.org/misc-group/title-vi-and-reasonable-modification-policy>. Other important announcements and documents such as the 'Respect the Ride' campaign have been translated into Spanish and displayed on buses. Upon request, applications for reduced fare cards for seniors, and people with disabilities can be made available in alternate languages.
8. **Assisting LEP Persons on-board Centro buses:** If an LEP passenger needs assistance while on board a Centro bus, recommended approaches to understand and appropriately respond to the passengers' needs and situations are as follows:
- The driver may inquire if another passenger can serve as a translator.
 - The driver could direct the LEP person to Centro's Call Center for language assistance. Drivers are provided with information cards containing the call center contact information which they can distribute to LEP customers. The cards are printed in English on one side and Spanish on the reverse. (See Figure 18).
 - More difficult or emergency situations may necessitate contacting Transportation Supervisors or Dispatch for additional help and phone access to language line interpreters.

Figure 18: Call Center Interpretation Services Card



9. **Travel Training:** Centro has worked with organizations throughout the community to assist those needing translation or interpretation services related to public transit services. Some of the organizations that particularly support limited and non-English speaking persons include:
- ARISE
 - InterFaith Works
 - Kelberman Center
 - RISE (Refugee and Immigrant Self Empowerment)
 - The Center
 - Upstate Caring Partners

Over 3,600 individuals have been trained on how to use Centro's transportation services; 1,190 since Centro's last LEP Plan submission (September 2022) through the end of Fiscal Year 2025 (03/31/2025). Official languages of program participants include the following: Amharic, Arabic, Armenian, Burmese, Dari, Dzongkha, Farsi, French, Karen, Karenni, Kinyarwanda, Kurdish, Mali, Maay Maay, Nepali, Pashto, Persian, Rohingya, Russian, Somali, Spanish, Swahili, Syriac, Tigrin, Turkmen, Ukrainian, Urdu, and Vietnamese.

Element 3: Training Staff

To establish meaningful access to information and services for LEP individuals, various personnel and departments that regularly interact with the public are trained in how to provide the language assistance services contained within Centro's LAP Plan. Training efforts include:

- The executive staff and Board of Members are familiar with the LAP Plan to reinforce its importance and ensure its implementation by Centro employees.
- Staff within the Customer Service, Marketing and Communications, Operations, and Service Development Departments are familiar with the LAP Plan, with particular emphasis on LEP outreach efforts at Centro public meetings/hearings and community events. Training focuses on using interpreter services to communicate with and quantify the number of LEP people attending public meetings and community events.
- The Customer Service Department, which is responsible for the Call Center and the Centro on-site reception area, have periodic refresher training on directing LEP callers and walk-in customers to the phone line for assistance accessing interpretation services.
- The Operations Department trains dispatchers, roadside supervisors, and operators on best practices and procedures for assisting LEP passengers in need of assistance. LEP passenger assistance measures are incorporated into orientation training for new operators, and refresher training for current operators.
- With the availability of the video interpretation service through Language Line, in person and virtual training was provided for Customer Service, Operations, and Travel Trainers. In addition, printed brochures and laminated materials containing multiple languages were distributed to assist in identifying the language needs of customers. (See Attachment 1).

Element 4: Providing Notice to LEP Persons

Centro's current and planned measures to inform LEP persons of the availability of language assistance avenues include, but is not limited to, the following:

1. **Placards on buses:** Centro has informational placards on buses in Spanish that inform riders of Centro's language line and translation services.
2. **Local non-English newspapers:** When applicable, Centro issues media press releases in Spanish, and purchases advertisements in local non-English newspapers publicizing Centro services.
3. **Direct engagement with LEP populations and community organizations:** Through working with various community organizations, Centro seeks to identify and engage LEP populations in the community and inform them of available public transportation services and related language assistance mediums. Conducting "How-to-Ride" clinics in partnership with community organizations continues to be a great tool in educating LEP persons on how to use Centro services. Direct engagement with LEP persons also helps Centro learn what additional agency information may need translation.

Element 5: Monitoring/Updating the Plan

Centro routinely reviews and updates its Language Assistance Plan, as necessary. Anticipated updates include the release of new Decennial Census data, LEP ridership trends identified through routine Customer Satisfaction Surveys, the addition of new counties to the Authority, and public comments received about the Plan. A review of the Language Assistance Plan occurs with each triennial Title VI program submission.

LanguageLine Solutions' Interpreters are available in more than 240 languages and American Sign Language, 24 hours a day, seven days a week to communicate with limited English proficient or Deaf or Hard-of-Hearing individuals.

- Present this guide to determine which language to request.
- Languages are listed by geographic location.
- The individual can point to their preferred language.
- Each statement is translated to read:

English Point to your language. An interpreter will be called. The interpreter is provided at no cost to you.

To Access an Interpreter:

1. Dial: 1-866-874-3972
2. Provide:
3. Indicate: Language

For more information on all our language access solutions:
visit www.LanguageLine.com or call 1-800-752-6096

- Phone, video, and onsite interpreting
- Translation and Localization
- Bilingual staff and interpreter testing and training

CustomerCare@LanguageLine.com
1-800-752-6096



Fili
Vosa Vakaviti

Filipin	Vosa Vakaviti
Dusia na nomu vosa. Ni na Vakavutaki mai e dua na dau vakakadeva vosa e sala e sauni ni sauni.	
Ilocano	Ilokano
Itudyo yu ti sao yu. Ag awag da timaysa nga mangipabatans nga tumulong kadakayo nga awan ti bayad na.	
Indonesian	Bahasa Indonesia
Tunjukkan bahasa Anda. Penyeramah akan dihubung.	
Malay	Bahasa Melayu
Tunjukkan bahasa anda. Jurbahasa akan dihubung.	
Marshallese	Kajin Majol
Kelet kajin eo anaj. Im renajit kùr ijo anaj Ri-Uok.	
Samoan	Fa'asamoa
Fa asino lau gegana. Ole a vala au se fa amatala upu. Ua saunaisa se fa amatala upu e aunoa ma se lau e te totagala.	
Tagalog	Tagalog
Ituro po ang inyong wika. Isang tagasalin ang ipagkakaloob nang libre sa iyo.	
Tongan	Lea Faka-Tonga
Tuhu i mai hō o lea fakatonua. E ulu hō fakatonulea.	
	Oki ta etotonui kia 'a e fakatonulea.

American Sign Language

Point to your language. An interpreter will be called. The interpreter is provided at no cost to you.

French	Indiquez votre langue et nous appellerons un interprète. Le service est gratuit.
Français	Indiquez votre langue et nous appellerons un interprète. Le service est gratuit.
Italian Creole	
Kreyòl	
Navaho	
Portuguesa	
Português	
Spanish	
Español	

Icelandic
Islenska

Icelandic	Islandica
Benti á þitt tungumál. Það verður hringt í tulk.	Tolkunn er hér að kostnaðarlausu.
Italian	Italiano
Indicare la propria lingua. Un interprete sarà chiamato.	Il servizio è gratuito.
Lithuanian	Lietuvių
Nurodykite savo kalbą. Bus pakviestas vertėjas.	Vertėjas jums bus suteiktas nemokamai.
Macedonian	Македонски
Пожалте на јазикот на кој зборувате. Ќе повикаме преведувач. Услугите на преведувачот се бесплатни.	
Norwegian	Norsk
Peik på språket ditt. En tolk vil bli tilkalt.	Tolken vil bli sendt på kostnadsfritt for deg.
Polish	Polski
Proszę wskazać swój język i wezwielemy tłumacza.	Usługa ta zapewniana jest bezpłatnie.
Portuguese	Português
Indique o seu idioma. Um intérprete será-lhe solicitado.	A interpretação é fornecida sem qualquer custo para si.
Romanian	Română
Indicați limba pe care o vorbiți. Vi se va face legătura cu un interpret care vă este asignat gratuit.	
Russian	Русский
Укажите язык, на котором вы говорите. Вам вызовут переводчика. Услуги переводчика предоставляются бесплатно.	
Serbian	Српски
Pokažite svoj jezik. Prevodiocać biti pozvan.	Prevodiocać je za vas obezbeđen besplatno.
Slovak	Slovenčina
Ukážte na svoj jazyk. Zavolaíme tlmočníka.	Tlmočenie je pre vás bezplatné.
Spanish	Español
Señale su idioma y llamaremos a un intérprete.	El servicio es gratuito.
Svenska	Svenska
Peke på ditt språk. En tolk kommer att tillkallas.	Tolken erbjuds utan kostnad för dig.
Ukrainian	Українська
Вкажіть вашу мову. Вам викличуть перекладача.	Послуги перекладача надаються безкоштовно.
Yiddish	יידיש
צווייזט איר שפראך, וועט מען אים אדער איר אונזערע דערשטע זאכען פארשטיין.	

Albanian Shain

Albanian	Tregoni me gisht gjuhën tuaj. Do të thërrasim për përkthyes. Përkthyesi ofronet falas për ju.	Shqip
Armenian	Նշե՛ք, թե որ լեզվով եք խոսում: Բարձրագույն կարգավիճակում: Բարձրագույն խոսակցականի մոտ մոտավորապես համարժեք է:	Հայերեն
Basque	Erakutsi zure hizkuntza. Jarraitzen jarraituko dugu. Zerbitzu hau doakoa da.	Euskara
Bosnian	Pokažite svoj jezik. Poznat ćemo tumača. Usluge tumača su besplatne za vas.	Bosanski
Bulgarian	Позочете вашия език. Ще бъде извикан преводач. Преводачът е осигурен безплатно за вас.	Български
Croatian	Pokažite svoj jezik. Prevoditelj će biti pozvan. Prevoditelja ćete dobiti besplatno.	Hrvatski
Czech	Čechte na váš jazyk. Bude zavolán tlumočník. Tlumočníci je pro vás bezplatné.	Čeština
Danish	Peg på dit sprog. En tolk vil blive tilkaldt. Tolken tilbydes uden omkostninger for dig.	Dansk
Dutch	Wij uw taal aan. Er zal contact worden opgenomen met een tolk. De service van de tolk is geheel gratis.	Nederlands
Estonian	Osutage oma keelt. Vastava tõlgi jaoks võetakse ühendust. Tõlketeenus on teile jooks tasuta.	Eesti keel
Finnish	Osota maasi kieltä. Kussumme tulkin paikalle. Tulkin käyttö on sinulle ilmaista.	Suomi
French	Indiquez votre langue et nous appellerons un interprète. Le service est gratuit.	Français
German	Zeigen Sie auf Ihre Sprache. Ein Dolmetscher wird angefordert. Der Dolmetscher ist für Sie kostenlos.	Deutsch
Greek	Δείξτε τη γλώσσα σας και θα καλέσουμε ένα διερμηνέα. Ο διερμηνέας σας παρέχεται δωρεάν.	Ελληνικά
Hungarian	Válassza ki a nyelvét. Tölmácsot fogunk hívni. A tölmács az Ön számára díjtalan.	Magyar

Attachment 1: Language Line Identification Guide

India, Pakistan, and Southwest Asia	
Bengali বাংলা আমাদের ভাষায় কিছু লিখুন এবং। এখন চাক্ষুষক ভাষা এবং লেখার ভাষায় লিখুন।	Arabic نظم خدمة العملاء بمصر.
Gujarati ગુજરાતી આમણે ભાષામાં કોઈકું કોઈકું લખો અને। અમણે ભાષામાં લખો અને।	Chinese 普通话 普通话是中国的官方语言。以便为 您提供免费的普通话服务。
Hindi हिन्दी आमने भाषा में कुछ कुछ लिखें और। आमने भाषा में लिखें और।	Cantonese 廣東話 廣東話是香港的官方语言。以便为 您提供免费的广东话服务。
Malayalam മലയാളം നമുക്കു ഭാഷയിൽ എന്തെങ്കിലും എഴുതുക. ഇത് നമുക്കു ഭാഷയിൽ എഴുതുക.	Chaochow 潮州話 潮州話是潮州的官方语言。以便为 您提供免费的潮州话服务。
Nepali नेपाली आमने भाषा में कुछ कुछ लिखें और। आमने भाषा में लिखें और।	Fukienese 福建話 福建話是福建的官方语言。以便为 您提供免费的福建话服务。
Punjabi ਪੰਜਾਬੀ ਆਮਨੇ ਭਾਸ਼ਾ ਵਿੱਚ ਕੁਝ ਕੁਝ ਲਿਖੋ ਅਤੇ। ਆਮਨੇ ਭਾਸ਼ਾ ਵਿੱਚ ਲਿਖੋ ਅਤੇ।	Mandarin 國語 國語是中国的官方语言。以便为 您提供免费的普通话服务。
Sinhalese සිංහල අපගේ භාෂාවේ කිසිවක් ලියන්න. එය අපගේ භාෂාවේ ලියන්න.	Shanghai 上海話 上海話是上海的官方语言。以便为 您提供免费的上海话服务。
Tamil தமிழ் எனது மொழியில் என்னவாவது எழுதின. இது எனது மொழியில் எழுதின.	Taiwanese 台灣話 台灣話是台灣的官方语言。以便为 您提供免费的台湾话服务。
Telugu తెలుగు నా భాషలో ఏదైనా ఏదైనా రాసండి. ఇది నా భాషలో రాసండి.	Toishanese 台山話 台山話是台山的官方语言。以便为 您提供免费的台山话服务。
Urdu اردو میں اپنی زبان پر کچھ لکھوں گا۔ یہ میں اپنی زبان پر لکھوں گا۔	

Middle East	
Arabic العربية نظم خدمة العملاء بمصر.	Armenian Հայերեն Մեր լեզվով կամ անգլերենով արագությամբ օգնություն ներկայացնում ենք։
Azerbaijani Azərbaycan dili Dənizinizizi dili bildirin. Sizim üçün tərcüməçi olunacaq. Tərcümə xidməti üçün ödəniş tələb olunmur.	Burmese မြန်မာစာ ကျွန်ုပ်တို့၏ မြန်မာစာ သို့မဟုတ် အင်္ဂလိပ်စာဖြင့် အကူအညီပေးပါမည်။
Dari داری زبان خود را بنویسید. یک مترجم برای شما آمده است. این برای زبان شما می باشد.	Chinese 普通话 普通话是中国的官方语言。以便为 您提供免费的普通话服务。
Hebrew עברית הצג את השפה שלך. אנחנו נספק מترجم עבורך.	Cantonese 廣東話 廣東話是香港的官方语言。以便为 您提供免费的广东话服务。
Kurdish کوردی پێشانی ئێمانێ بێ. ئێمانێ بێ. ئێمانێ بێ. ئێمانێ بێ. ئێمانێ بێ.	Chaochow 潮州話 潮州話是潮州的官方语言。以便为 您提供免费的潮州话服务。
Pashto پښتو خپل ژبه په پښتو ژبه وړاندې کړئ. موږ په خپل ژبه کې تاسو ته مرګونې په ځانګړې توګه کېږي.	Fukienese 福建話 福建話是福建的官方语言。以便为 您提供免费的福建话服务。
Turkish Türkçe Konuştuğunuz dili gösterin. Sizin için bir çevirmen atanacaktır. Bu çevirmen size ücretsiz sağlanır.	Mandarin 國語 國語是中国的官方语言。以便为 您提供免费的普通话服务。
	Shanghai 上海話 上海話是上海的官方语言。以便为 您提供免费的上海话服务。
	Taiwanese 台灣話 台灣話是台灣的官方语言。以便为 您提供免费的台湾话服务。
	Toishanese 台山話 台山話是台山的官方语言。以便为 您提供免费的台山话服务。

Asia - continued	
Burmese မြန်မာစာ ကျွန်ုပ်တို့၏ မြန်မာစာ သို့မဟုတ် အင်္ဂလိပ်စာဖြင့် အကူအညီပေးပါမည်။	Burmese မြန်မာစာ ကျွန်ုပ်တို့၏ မြန်မာစာ သို့မဟုတ် အင်္ဂလိပ်စာဖြင့် အကူအညီပေးပါမည်။
Hmong Hmoob Taw rau koj hom lus. Yuav hu rau ib tug neeg txhais lus. Yuav muaj neeg txhais lus yam ua koj tsis tau them dab tsu.	Hmong Hmoob Taw rau koj hom lus. Yuav hu rau ib tug neeg txhais lus. Yuav muaj neeg txhais lus yam ua koj tsis tau them dab tsu.
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LanguageLine
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Public Participation Plan Executive Summary

Public participation is the process by which an organization consults with interested or affected individuals, organizations, and government entities before making decisions. It is a two-way communication and collaborative problem-solving effort intended to guide and manage diverse opinions.

This Public Participation Plan will guide the dissemination of information and establish a framework for the solicitation of public comments on the development and review of programs and projects carried out by the Authority.

Notable revisions from the last report (2019):

- Updated service area to include Cortland County.
- Added goals of the PPP.
- Added details of engagement strategies for mobile, virtual, and on-board & transit hub engagement.
- Increased minor route and service change notification from at least seven (7) days to at least ten (10) days prior to change taking effect.
- Updated Public Hearing Process details including:
 - Decreased legal notice publication from 21 days to a minimum of fourteen (14) days before hearing is held
 - Information to be presented at the hearing will be made available to the public at least 72 hours before the hearing is held
 - Public comments are limited to three (3) minutes per speaker

PUBLIC PARTICIPATION PLAN

2025 Revision



Central New York Regional Transportation Authority
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All photographs courtesy of Centro Marketing and Communications Department.



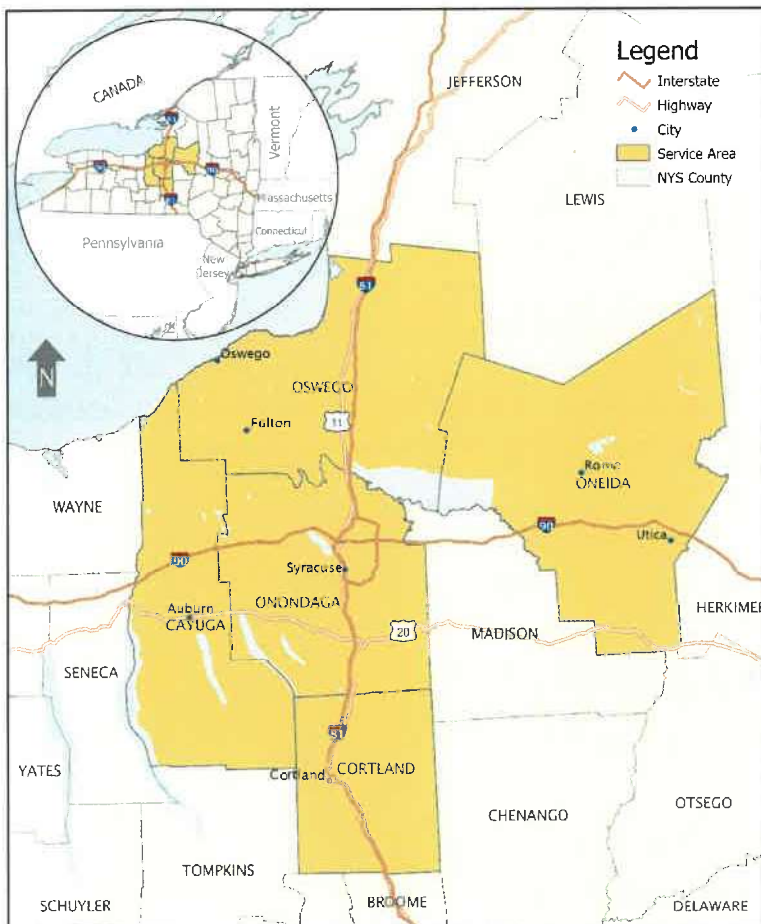
INTRODUCTION

About Centro

The Central New York Regional Transportation Authority (Centro) is the public transportation provider for a five-county area serving the center of New York State. Centro serves the counties of Onondaga, Cayuga, Cortland, Oneida, and Oswego, including the cities of Syracuse, Auburn, Cortland, Rome, Utica, Oswego, and Fulton. Centro's Board of Members and staff are committed to providing efficient, effective transportation services that enhance the quality of life throughout the Central New York region.



Service Area Map



Goals of the Public Participation Plan

Centro respects and values the input of the community and its stakeholders in its decision-making process. As such, Centro has adopted the following key goals to help guide its public participation process.

1. Provide multiple ways for the public to share meaningful feedback.
2. Conduct outreach early to identify key issues and challenges faced by the community.
3. Build trust with the community and strengthen the legitimacy of decisions.
4. Promote fair treatment and opportunity for participation in all major service and fare changes.

Revision Justification

The last revision of Centro's Public Participation Plan (PPP) was in 2019. As a result of the COVID-19 pandemic, modern technologies and strategies emerged for engaging with the public. To better serve its customers and the community, Centro's public participation strategies needed to change. The revision of this document incorporates the methods of outreach Centro finds to be successful for its region. Centro's service is being expanded as well as being redesigned. It is crucial that this PPP reflects Centro's commitment to continuous, open communication in support of these projects.

REGULATIONS AND POLICIES

Below is an overview of the regulations and policies that Centro operates within. Supporting circulars, when available, are documented for reference.

Federal Requirements

- Urbanized Area Formula Funding - 49 U.S.C. 5307
 - FTA C 9050.1A dated November 1, 2024
- Rural Areas Formula Funding – 49 U.S.C. 5311
 - FTA C 9040.1H dated November 1, 2024
- Americans with Disabilities Act of 1990
 - FTA C 47101.1 Americans with Disabilities Act (ADA) Guidance dated November 4, 2015
- Title VI of the Civil Rights Act of 1964
 - FTA C 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients dated October 1, 2012
- Executive Order 13166 – Improving Access to Services for Persons with Limited English Proficiency
 - FTA C 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients dated October 1, 2012
- Executive Order 12898 – Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (*rescinded January 21, 2025*)
 - FTA C 4703.1 – Environmental Justice Policy Guidance for Federal Transit Administration Recipients dated August 15, 2012
- Executive Order 14096 – Revitalizing Our Nations Commitment to Environmental Justice for All (*rescinded January 21, 2025*)
- National Environmental Policy Act of 1969 (NEPA) - 42 U.S.C. §4321 et seq.

New York State Requirements

- NY Public Authorities Law
- NY Public Officers Law Article 7 §100-111 - Open Meetings Law

Language Access Plan for Limited English Proficient Populations

Title VI directs each Federal agency to develop and implement a system by which limited English proficient (LEP) populations can meaningfully access the services it funds. Centro, as an FTA grantee, is required to ensure meaningful access to benefits, services, and information for LEP individuals. Centro has developed a Language Assistance Plan (LAP) for LEP individuals as part of its Title VI program. The plan is updated to correspond with the triennial Title VI Program Report submission to the FTA. A summary of outreach efforts since the previous Title VI Program submission is included in the content of the report.

ENGAGEMENT STRATEGIES

The tactics described below are used to engage with and provide outreach to the community and its stakeholders. Centro both communicates information and solicits feedback from the public.

MOBILE ENGAGEMENT

Community Bus: Centro has retrofitted a bus by removing seats and adding counters and cabinets. The bus has ample space to welcome members of the community aboard to meet with Centro representatives.

The Community Bus is a mobile meeting space, allowing Centro to take public engagement to any location where the bus can be accommodated. Centro employees have used the space on the Community Bus to share available fare and pass options, instruct individuals on how to use Centro's transit tools to access real-time bus information, explain paratransit services and how to apply for Call-A-Bus, and explain the MOVE on-demand service.



A Public Hearing was held on board the Community Bus in the parking lot of a park in an affected service area. Centro representatives were able to give a presentation, answer questions, and get feedback regarding proposed service changes.

Community Events: Centro participates in many diverse types of community events. Over the past three years, Centro has been inviting employees and their families to march alongside a bus in several different parades including St. Patrick's Day, Memorial Day, Juneteenth, CNY Pride, and the CNY Veterans Parade and Expo. Centro has participated in events during which children were welcomed aboard its buses for an interactive experience at events such as Big Rig Day, Story Bus, and Touch-A-Truck. Centro provides shuttle services for events including the ADA Anniversary Parade, Honor Flight, Lights on the Lake, and the Salvation Army Distribution Day which exposes community members to the services Centro offers. In addition, Centro staff volunteer annually with the Southside cleanup in honor of Earth Day. Participating in these events is critical for fostering a positive relationship with the community.



Community Feedback & Information Sessions / Public Meetings: In person outreach events are held at times and locations that are convenient and accessible for the community. When practicable, events may be coordinated with community organizations, educational institutions, or other organizations to engage members of affected minorities and LEP communities. When considering a major service or fare change, a public meeting may be held to present the draft changes.

Other outreach efforts may solicit input from a forum of organizations serving minorities, low-income individuals, as well as individuals with disabilities and limited English proficient populations. Structured meetings may be held on specific proposals and projects to expand support and encourage broad-based public participation in the development and review of programs and projects. Centro promotes opportunities for the inclusion of minority, low-income and limited-English populations in this forum. Public input may be drawn from, but not necessarily limited to, organizations such as:

- Arise
- Aurora of CNY, Inc.
- Catholic Charities
- CenterState CEO
- CNY Works
- Enable
- InterFaith Works of Central New York
- National Association for the Advancement of Colored People
- PEACE, Inc.
- Refugee Resettlement Services
- The Salvation Army
- Spanish Action League
- Syracuse Metropolitan Transportation Council
- Syracuse Public Schools
- Tomorrow's Neighborhoods Today (TNT)
- University/College Representatives
- Veterans Service Agencies

Open Houses / Job Fairs: The primary focus of hosting open houses and participating in job fairs has been to recruit employees. These events may also be used for outreach and feedback regarding service and fare changes or to solicit general feedback from the community.

VIRTUAL ENGAGEMENT

Customer Service: Free over-the-phone and in-person interpretation services are available to limited and non-English speaking individuals with questions regarding Centro's service. The service, which is available either by contacting Centro's Call Center during regular business hours or approaching a Centro representative, is provided via Centro's Language Line interpretation service account. Centro also offers ASL interpretation services on an as-needed basis utilizing this same approach.

Mobile App: The GoCentroBus mobile app, which provides access to real-time bus information, is available for download on portable smart devices. The app provides Centro contact information including phone numbers, mailing addresses, and a link to Centro's website. There is also a feedback form through which Centro can receive feedback.

Press Releases and Media Relations: Radio, television, newspaper, and digital media ads are regularly placed in media outlets that serve the general population as well as minority and LEP populations.

Service Alerts / Email: Customers wishing to receive email and/or text alerts concerning Centro detours, delays, and public outreach events are encouraged to sign up via the Centro website.

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Social Media: Facebook, Instagram, X (formerly Twitter), and LinkedIn pages are updated regularly with information concerning Centro projects, planning, and community events. Social media followers can view Centro information in their native language on their mobile devices through the language settings feature. Centro solicits public input on an ongoing basis through its social media channels. This approach provides opportunities for proactive, early, and continuous public participation regarding Centro projects, programs, and overall decision-making process. This social media strategy allows staff wide latitude to adapt to and take advantage of changing communication technologies. Social media is used to interact with individuals, groups, businesses, and strategic partners to help improve customer satisfaction.



The monthly Board of Members meeting is live streamed on Centro's YouTube page with the recording made available for playback following the meeting. In addition, instructional videos on how to ride Centro's service and how to use different payment methods can also be accessed on this site. The closed captions settings allow viewers to choose the language to be displayed on the screen.

Website: Centro's website (www.centro.org) provides access to Board of Members meetings, Board approved policies, information regarding public meetings, public hearings, significant service redesign projects, upcoming events, and schedule information. The website also contains an online form through which the public may submit feedback, concerns, questions, complaints, or contact the Authority regarding any Centro matter. The website contains Centro's mailing address, email address, and telephone number as alternative methods of contact. To help improve communication with LEP populations, Centro's website contains a language translator. Centro schedules and documents can be translated into the native language of the site visitor upon request.

ON-BOARD & TRANSIT HUB ENGAGEMENT

Announcements: Centro buses have automated messages in English and Spanish regarding service changes, new products, and public meetings.

Customer Surveys: Customer demographic/travel pattern on-board surveys are conducted every three to five years on fixed route service. Surveys are available in English and Spanish. Customer satisfaction and other types of feedback surveys are conducted on an as-needed basis. In certain instances, those surveys may be made available via Centro's website.

Centro engages in outreach initiatives with the Syracuse Metropolitan Transportation Council (SMTC) to gain a better understanding of the community's public transit needs and expectations. The most recent example was Exploring Tomorrow's Transit (ETT), which has helped shape Centro's future Onondaga County system



redesign. Community members were invited to participate in an online survey, the results of which were shared with Centro and its consulting team.

Flyers: Flyers detailing service changes, feedback sessions, etc. are printed and posted on buses in and near affected service area. Flyers are posted a minimum of ten days before a minor route or schedule change and ten days before a major service or fare change. Flyers are also handed out to customers boarding affected bus routes.

PUBLIC NOTIFICATION OF MINOR ROUTE AND SCHEDULE CHANGES

Except when impossible due to an emergency condition, minor route and service changes are publicized no less than ten days prior to such changes taking effect. Methods of providing notice may include any of the following: social media announcements, distribution of revised timetables, flyers, posted notices, and media releases. Centro continuously solicits feedback on service changes.

MAJOR SERVICE AND FARE CHANGE PUBLIC PARTICIPATION

Centro's policy is to solicit feedback and respond to public comments regarding major service changes and fare changes in a reasonable and practicable manner.

Major service changes (as described in the Major Service Change Policy) and any fare structure changes are made available for public input and CNYRTA Board consideration prior to implementation. The following changes are exempt from the formal hearing process: school tripper, specialized service, experimental service, temporary service changes, and promotional fares.

Public Outreach Process

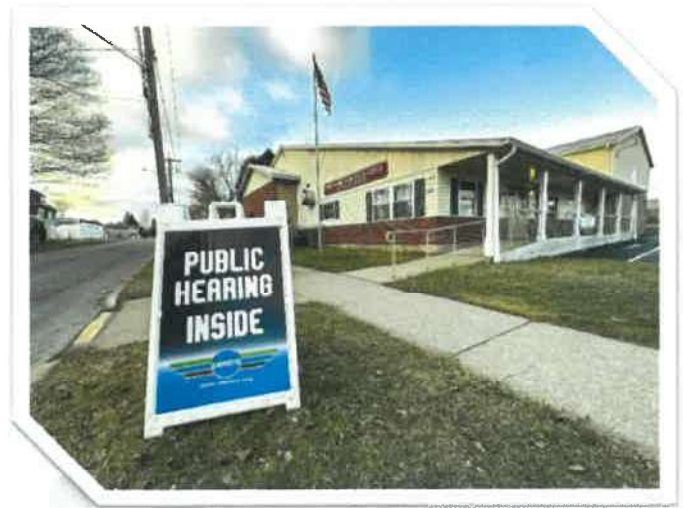
Centro undertakes a comprehensive and inclusive outreach process during the planning phase of a major service change. During the public outreach period, Centro posts information and accepts comments regarding proposed changes on its website and social media accounts. Centro may also elect to hold public information meetings in local communities, attend stakeholder group meetings, and present the changes to its Accessible Transportation Advisory Committee (ATAC). The purpose is to include the community, with special regard for minority, low-income, and limited English proficient populations, in the planning stages of proposed changes.

Public Hearing Process

As required by the FTA, and in compliance with Title VI of the Civil Rights Act of 1964, Centro conducts a Service and Fare Equity Analysis to assess the effects of a proposed fare or major service change on minority and low-income populations during the planning of such changes. The analysis may address alternatives available for people affected by the changes. The results of the analysis are reported to Centro's Board of Members prior to a formal public hearing.

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- A legal notice of the proposed change(s) is published in a newspaper of general circulation or their affiliated website and, if applicable, in newspapers or on websites oriented to the specific groups or communities affected. The information is also posted inside buses. Such notices include information as to the date, time, and place of the hearing, a summary of the proposed changes, and information for requesting translation services. Notices are published for a minimum of 14 days before the public hearing is held.
- Information to be presented at the public hearing is made available to the public at least 72 hours before the hearing. Documents are posted on the Centro website or any secondary website maintained by consultants or other organizations acting on behalf of Centro.
- Public hearings are held at an accessible location, on days and times that allow the public maximum opportunity for public comment. At least one hearing will be held in each affected county. Locations should be selected which are within, or near, the area affected by the change. Ideal locations will be accessible via the existing transit network, except in cases where service is being added to an area where transit does not currently exist.
- The Chairman of the Board, Chief Executive Officer, or their designee shall preside over the meeting.
- Participants are invited to sign in as they enter the meeting room and anyone wishing to deliver a public comment regarding the subject of the meeting is asked to indicate such on the form. Comments are limited to three minutes. Lengthier comments are accepted in written form after the hearing is closed.
- Public hearings are video recorded and posted to Centro's YouTube channel except when circumstances prevent it.
- A transcript of the hearing proceedings is produced for the record. Oral comments made at the hearing are transcribed. Written comments are also accepted for seven days after the hearing. Comments on social media channels related to the content of the public hearing will be documented.
- A report on all public comments received, and the responses given, is submitted to Centro's Board of Members. Recommended changes to the proposal in response to public comments are also presented. Adequate time is allowed for the Board of Members to review any transcripts or written comments prior to taking official action.
- Following completion of the process described above, decisive action shall be taken by formal resolution at an official meeting of the CNYRTA Board of Members.
- Final public notice of major service changes or any changes in the fare structure are given at least ten days in advance of the effective date of the change.



MONITORING AND EVALUATION OF PPP

Centro continuously monitors and evaluates its public participation process. Regular review is accomplished by tracking website and social media usage and conducting periodic online surveys to determine demographic usage of website and social media sites. The public is encouraged to provide comments and suggestions through various channels and open dialogue is maintained with advisory groups and stakeholders throughout the community on transportation and planning issues. A record of public comments and those of institutional representatives is documented as well as Centro's response to such comments.

The Public Participation Plan is reviewed and updated as necessary every three years.