

Title VI Program Policies

I. Purpose of the Policy

The Federal Transit Administration (FTA) Circular 4702.1 B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients" effective October 1, 2012) requires that all FTA recipients who operate 50 or more fixed route vehicles in peak service and serve a population of 200,000 or greater, evaluate any fare change or any major service change, during the planning and programming stages.

When planning fare changes or major services changes, the Central New York Regional Transportation Authority (CNYRTA) shall consider if any adverse effect would occur because of the change. CNYRTA shall consider the degree of adverse effects (if any), analyze those effects, and identify any mitigating factors that need to be considered because of the proposed fare change or major service change.

This document contains CNYRTA's definitions and related plans and procedures pertinent to the Major Service Change Policy, Fare Change Policy, Disparate Impact Policy, and Disproportionate Burden Policy.

II. Policy Statement

It is the policy of CNYRTA to solicit and consider public feedback prior to implementing major service changes and/or fare changes. In addition, CNYRTA's Title VI Program objectives are as follows:

- To ensure that transit services are equitably distributed without regard to race, color, or national origin.
- To ensure that the level and quality of transit services are sufficient to provide equal access and mobility for any person.
- To ensure that opportunities to participate in the transit planning and decision-making processes are provided to persons.
- To ensure that decisions on the location of transit services and facilities are made without regard to race, color, or national origin.
- To ensure that corrective and remedial action is taken to prevent discriminatory treatment.

III. Applicability & Participation Eligibility

These standards apply to all properties within the CNYRTA service area, as required by the Federal Transit Administration (FTA) and are consistent with criteria required by the FTA.

IV. Resources & Related Procedures

- Title VI of the Civil Rights Act of 1964
- FTA circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration dated October 1, 2012
- Centro's Language Accessibility Plan for Limited English Proficient Persons (June 2025)
- Centro's Public Participation Plan (June 2025)

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V. Definitions

- **Adverse Effect** refers to a geographical or time-based change in transit service which includes but is not limited to span of service changes, frequency changes, route segment elimination, re-routing, or route elimination. An adverse effect is measured by the changes between the existing and proposed service levels that are deemed significant.
- **American Community Survey (ACS)** is an ongoing statistical survey conducted by the U.S. Census Bureau to collect and provide annually updated information about the nation's population, demographics, housing, and social and economic characteristics. The ACS is conducted annually, providing continuous updates on population and housing characteristics. ACS 5-year estimates are produced by aggregating data over a five-year period, making them more reliable for smaller areas and are the preferred data source for minority and low-income demographic data.
- **Disparate Impact** refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.
- **Disproportionate Burden** refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.
- **Fare Changes** are defined as either an increase or decrease in the price of any CNYRTA fare or fare product.
- **Low-Income Person** refers to an individual whose income is at or below 150 percent of the U.S. Department of Health and Human Services (HHS) poverty guidelines.
- **Low-Income Population** refers to any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed CNYRTA program, policy, or activity.
- **Major Service Changes** are defined as an increase or decrease in service on a fixed route that either changes the number of revenue hours operated on any individual route or combination of routes, by 25% or more; changes the number of revenue miles on any individual route or combination of routes, by 25% or more; or the implementation of a new transit route that provides at least 50% of its route miles without duplicating other routes.
- **Minority Person** refers to an individual who identifies as being part of any racial or ethnic groups aside from white, non-Hispanic.
- **Minority Population** refers to any readily identifiable group of minority persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed CNYRTA program, policy, or activity.
- **Service Area** refers to the geographic area in which CNYRTA is authorized by its charter to provide service to the public. As of March 31, 2025, the following counties are included in the CNYRTA service area: Cayuga, Cortland, Oneida, Onondaga, and Oswego.

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VI. Policy Detail

a. Major Service Change Policy

A Major Service Change is defined as an increase or decrease in service on a fixed route meeting at least one of the following criteria:

- 1) Changes the number of revenue hours operated on any individual route or combination of routes, by 25% or more.
- 2) Changes the number of revenue miles on any individual route or combination of routes, by 25% or more.
- 3) The implementation of a new transit route that provides at least 50% of its route miles without duplicating other routes.

Exceptions to these criteria include:

- School trippers
- Contracted service
- Seasonal service
- Route detours due to circumstances beyond CNYRTA'S control, including but not limited to road and/or lane closures, construction, emergency service roadblocks, fiscal crisis, civil demonstrations, lack of winter maintenance including plowing, salting, and sanding that may lead to unsafe driving conditions, or any other uncontrollable circumstance.
- Route detours due to natural disasters such as tornados, flooding, earthquakes, wildfires, or other natural disasters or human-caused catastrophic disasters that may force the suspension of transit service for public safety.
- When a segment of one route is moved to another route, but the revenue hours or miles do not change by 25%.

Temporary service changes (experimental, demonstration, or emergency service changes) may be operated for twelve months or less without a Title VI Service Equity Analysis being completed. If a temporary service change lasts longer than twelve months, then FTA considers the change permanent, and a service equity analysis must be completed if the service otherwise qualifies as a major service change.

All Major Service Changes will be subject to a service equity analysis to evaluate the effects of the service changes on minority and low-income populations. This includes an analysis of adverse effects relating to possible disparate impacts and disproportionate burden.

A public hearing is required for all Major Service Changes. For details regarding public participation practices related to Major Service Changes, refer to Centro's Public Participation Plan dated June 2025.

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b. Fare Change Policy

A fare change is defined as either an increase or decrease in the price of any CNYRTA fare or fare product.

Exceptions:

- “Spare the air days” or other instances when CNYRTA has declared that all passengers ride free to mitigate air pollution.
- Temporary fare reductions for service changes due to events outside of CNYRTA control. The reduction is used as a mitigating measure for altering the customer’s travel patterns.
- Promotional fare reductions lasting less than six months.

Promotional fare changes that last longer than six months are considered a permanent change by FTA, and a fare equity analysis must be completed.

All Fare Changes will be subject to a fare equity analysis to evaluate the effects of the fare change on minority and low-income populations. This includes an analysis of adverse effects relating to possible disparate impacts and disproportionate burden.

A public hearing is required for all Fare Changes. For details regarding public participation practices related to Fare Changes, refer to Centro’s Public Participation Plan dated June 2025.

c. Disparate Impact Policy

The purpose of this policy is to establish a threshold which identifies when adverse effects of a major service or any fare change are borne disproportionately by minority populations.

Centro defines a disparate impact as occurring when the absolute difference between the percentage of minority and non-minority persons affected is at least 30%. A minority person refers to an individual who identifies as being part of any racial or ethnic groups aside from white, non-Hispanic.

The threshold was determined by calculating 1.5 times the systemwide minority average from ACS 5-year 2019-2023 data (20.3%). For simplicity, the calculated value of 30.45% was standardized to 30%.

When a disparate impact is identified, Centro will consider modification of the proposal in order to avoid, minimize, or mitigate the impacts. This Disparate Impact Policy will be applied to all major service, and fare changes.

d. Disproportionate Burden Policy

The purpose of this policy is to establish a threshold which identifies when the adverse effects of a major service change or any fare change are borne disproportionately by low-income populations.

Centro defines a disproportionate burden as occurring when the absolute difference between the percentage of low-income and non-low-income persons affected is at least 34%. A low-income

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person refers to an individual whose household income is at or below 150 percent of the U.S. Department of Health and Human Services (HHS) poverty guidelines.

The threshold was determined by calculating 1.5 times the systemwide low-income average from ACS 5-year 2019-2023 data (22.6%). For simplicity, the calculated value of 33.90% was standardized to 34%.

U.S. Census Bureau ACS tables, including, but not limited to, Ratio of Income to Poverty in the last 12 months, will be used to determine low-income status for the general population. The U.S. Department of Health and Human Services (HHS) Poverty Guidelines table will be used to determine low-income status based on ridership survey responses for number of persons in household and income.

When a disproportionate burden is identified, Centro will consider modification of the proposal to avoid, minimize, or mitigate the impacts. This Disproportionate Burden Policy will be applied to all major service and fare changes.

**THE CENTRAL NEW YORK REGIONAL TRANSPORTATION AUTHORITY
(and its Subsidiaries)
200 CORTLAND AVENUE, SYRACUSE, NEW YORK
MINUTES OF THE AUGUST 22, 2025, BOARD MEETING**

MEMBERS PRESENT:

ANTHONY DAVIS, Vice Chair
DARLENE LATTIMORE, Secretary
ROBERT CUCULICH
JULIUS LAWRENCE
HEATHER SNOW

MEMBERS ABSENT:

NICHOLAS LAINO, Chair
TINA FITZGERALD, Treasurer
NEIL BURKE
LOUELLA WILLIAMS
FRANK SAYA, Non-Voting Member

STAFF PRESENT:

CHRISTOPHER TUFF, Chief Executive Officer
GEOFF HOFF, VP of Fleet and Facilities
RAHMIN AZRIA, VP of Operations
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
CHRIS MORREALE, Director of Human Resources
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
CASEY BROWN, Graphic Designer/Media Specialist

PUBLIC PRESENT:

BRAD HUNT, Legal Counsel
MARIO COLONE
TOM GEREMIA
DESIREE GEREMIA
MONTY FLYNN

HUMAN RESOURCES – Ms. Musengo

RECRUITMENT

We attended a recruiting event in Homer last week to seek operators for our Cortland location. We also launched a hiring campaign focusing on Centro of Cortland at the beginning of the month. We will be holding an open house recruiting event on Saturday, September 6, 2024, from 9am-12pm at Centro. Advertising for the event will start two weeks prior. The operator class will be starting on September 29, 2025, and hopefully there will be several candidates.

CORTLAND TRAINING

On Saturday, September 13, 2025, the trainers, operation supervisor and service development manager will be going to Cortland to train the drivers on manifest, accident reports, route sheets, etc.

WELLNESS FAIR

We will be hosting another wellness fair this year at Centro. The event is planned for September 18, 2025. Several vendors from last year will be attending along with some new ones requested by the employees.

BUSINESS DEVELOPMENT AND CORPORATE COMMUNICATIONS REPORT – Mr. Koegel

Mr. Koegel reported that ridership continues to grow across all properties. In totality, ridership was up about 8% adjusted for equal weekdays. Oneida County services are the fastest growing at a rate of about 12%. Ridership in Cortland continues to produce about 4,700 riders each month.

Mr. Koegel reported that planned service changes for Cortland have been put on hold pending further research. It's likely they will not be implemented until January at the earliest.

There was also an update informing the Board that two school trippers have been created for the new STEAM school. One route will concentrate on students living East of I-81 and another for those living West of I-81. Both will provide direct service to the school's front sidewalk.

Mr. Koegel invited Ms. Cutrone to the table to present elements of the Authority's Title VI program that will be submitted in Late September to the Federal Transportation Administration.

Ms. Cutrone presented the following items, all of which required a Motion to approve.

SERVICE STANDARDS AND POLICIES EXECUTIVE SUMMARY – MOTION NO. 2792

A Motion to approve the Service Standards and Policies Executive Summary was raised. A copy of the Service Standards and Policies Executive Summary is attached to these Minutes.

Motion – Julius Lawrence
Seconded – Darlene Lattimore
Carried Unanimously

TITLE VI PROGRAM POLICIES UPDATE EXECUTIVE SUMMARY – MOTION NO. 2793

A Motion to approve the Title VI Program Policies Update Executive Summary was raised. A copy of Title VI Program Policies Update Executive Summary is attached to these Minutes.

Motion – Robert Cuculich
Seconded – Heather Snow
Carried Unanimously

TRANSIT SERVICE STANDARDS MONITORING PROGRAM REPORT EXECUTIVE SUMMARY – MOTION NO. 2794

A Motion to approve the Transit Service Standards Monitoring Program Report Executive Summary was raised. A copy of the Transit Service Standards Monitoring Program Report Executive Summary is attached to these Minutes.

Motion – Julius Lawrence
Seconded – Darlene Lattimore
Carried Unanimously

FLEET AND FACILITIES REPORT – Mr. HoffCNG FUELING STATION

DF Automation and Trillium helped fix issues with the Compressed Natural Gas fueling station. Two (2) compressors are back running efficient. The portable backup side is in place for emergencies and running well. Trillium will be out in three (3) weeks to start installing new electric CNG skids. Anticipating around a couple months per to install each skid.

ONEIDA DIESEL TANK

Onieda's above ground diesel fuel tank is being replaced with a new tank. Contractor is on site this performing installation. Installation will take around three (3) weeks for completion. '

DRIVER BARRIERS

Working on ordering and installing locking mechanisms for driver barriers.

CORTLAND

Cortland will be moving into the Grant Street garage on September 8th. Special thanks went out to Procurement, IT, Buildings and Grounds and David Caraccio for working to get Grant Street building open. Mr. Hoff invited Mr. Caraccio up to show before and after pictures of the building.

ADJOURNED

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



Vice Chairman

ATTEST:


Secretary