



**Central New York
Regional Transportation Authority**

2019 Title VI Program Report



Prepared by: Central New York Regional Transportation Authority (Centro)
**In Compliance with: Title VI of the Civil Rights Act of 1964 (section 601) and FTA
Circular 4702.1B**
September 2019

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INTRODUCTION

As the primary public transportation provider in the Greater Syracuse Metropolitan Area and Oneida County, the Central New York Regional Transportation Authority's transit service area covers four counties in central New York; Cayuga, Oneida, Onondaga and Oswego (Map 1). According to the 2010 Census, upwards of 900,000 people reside within this four-county area. On an annual basis, between 10 and 11 million passengers use the fixed route services, with most occurring on routes in Onondaga County. The mission of the Central New York Regional Transportation Authority is to be responsive to the transportation needs of the Central New York Community by providing services which are safe, convenient, reliable, and environmentally responsible with a goal of maximizing the taxpayers' return on investment.

The Federal Transit Administration (FTA) requires that all recipients of Federal Transit funding submit a compliance report to the respective FTA regional office every three years following a variety of processes and requirements outlined in the Federal Transit's October 2012 Circular 4702.1B (Title VI Requirements and Guidelines for Federal Transit Administration Recipients). Additionally, this circular contains other requirements for those transit agencies that provide service within urbanized areas with over 200,000 in population, such as the Syracuse area.

This 2019 report adheres to the prescriptive Federal processes and requirements for the development of a Title VI Program.

Final Report
September 2019

For further information contact:

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Central New York Regional Transportation Authority (CNYRTA)
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www.centro.org

Map 1 – Central New York Regional Transportation Authority Service Area

GENERAL REQUIREMENTS FOR TRANSIT PROVIDERS

Notify Beneficiaries of Protection Under Title VI

Centro provides information to the public regarding its Title VI obligations and appraises members of the public of the protections against discrimination afforded to them by Title VI via posted notices on the Centro web site (www.centro.org), at Centro offices and transit facilities / garages in Syracuse, Utica, Rome, Auburn and Oswego, and on transit / paratransit buses.

Notice to the Public of Rights Under Title VI

Central New York Regional Transportation Authority (CNYRTA)

CNYRTA, as a recipient of federal funding, gives public notice of its policy to fully comply with Title VI of the Civil Rights Act of 1964 and all related laws and statutes. 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 CNYRTA program or activity, as provided by Title VI of the Civil Rights Act of 1964 and as amended, and the Civil Rights Restoration Act of 1987 (P.L. 100.259). CNYRTA operates its programs without regard to race, color, or national origin.

For more information on CNYRTA's Title VI program, contact the Title VI Complaint Officer:

Central New York Regional Transportation Authority
PO Box 820
200 Cortland Ave
Syracuse, NY 13205

- **Email:** cnyrta@centro.org
- **Visit our website:** <https://www.centro.org/misc-group/title-vi-and-reasonable-modification-policy>
- **Call Main Office:** 315-442-3333 for more information

A person may also file a complaint directly with the FTA by contacting the Federal Transit Administration Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor – TCR, 1200 New Jersey Avenue SE, Washington, DC 20590.

Title VI Complaint Procedures and Complaint Form

The Centro website includes a statement informing the public of the procedures for filing a Title VI complaint. In addition, printed materials are available to the public upon request. All comments received by Centro via telephone and email are recorded on a written form by Customer Service representatives. If a specific problem is identified, these forms are then routed to the responsible department for response and/or resolution. If a Title VI complaint is received, it is routed to the Title VI Complaint Officer. In addition, Centro has a computerized Customer Service software program which records each complaint by type, name, incident type, issue type, priority and resolution status. This system makes the tracking and categorization of incidents and issues much more efficient and effective, when fully utilized. The Title VI Complaint Procedure as listed on the Centro website is illustrated below. The Title VI Complaint Form in both English and Spanish are included as Attachment 1; the Title VI Notice and Complaint Procedure in dual language format is included as Attachment 2.

Title VI Complaint Procedure

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the Central New York Regional Transportation Authority (hereinafter referred to as Centro) may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

Please submit this form in person at the address below, or mail this form to:

Title VI Complaint Officer

Central New York Regional Transportation Authority

PO Box 820

200 Cortland Ave

Syracuse, NY 13205

- Email: cnyrta@centro.org
- Visit our website: <https://www.centro.org/misc-group/title-vi-and-reasonable-modification-policy>
- Call Main Office: 315-442-3333 for more information

Centro investigates complaints received no more than 90 days after the alleged incident. Centro will process complaints that are complete. A copy of the complaint form is available on the Centro website or by mail by calling any of the Centro offices in the four-county service area.

Once the complaint is received, Centro will review it to determine if our office has jurisdiction and if the complaint falls under the scope of Title VI. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

The Authority has 30 calendar days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the Centro official investigating the complaint. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, the Authority can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has 10 business days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the FTA by contacting the Federal Transit Administration Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor – TCR, 1200 New Jersey Avenue SE, Washington, DC 20590.

Note: Complaints must be signed and include contact information.

No one may intimidate, threaten, coerce, or engage in other discriminatory conduct against anyone because he or she has either filed a complaint to secure rights protected by the nondiscrimination statutes Centro enforces. Any individual alleging such harassment or intimidation may file a complaint with Centro and/or the Federal Transit Administration and an investigation will be conducted.

Record and Report Transit-Related Title VI Investigations, Complaints and Lawsuits

Centro has no active Title VI investigations, complaints or lawsuits alleging discrimination on the basis of race, color or national origin with respect to service or other transit benefits. Centro maintains a log of all Title VI complaints and related actions. All Title VI complaints received since the last Title VI Report are shown below.

Date of Complaint	Summary of Complaint	Status of Investigation of Complaint	Action Taken as a Result of the Complaint
7/25/2016	Allard-passenger boarded bus and he requested for younger passenger to move out of the first seats. The young passenger refused and he asked driver for help.	Closed	HR Director interviewed the driver and driver did not recall the incident. Driver stated that he would not make that comment and if the passenger refused to move, he cannot make them move. HR Director spoke with Supervisor and she explained the law and how priority seating rules are applied. A letter was sent to Mr. Allard explaining the circumstances and that there was no discrimination found.
8/11/2016	Smith-passenger on the bus boarded bus at Destiny mall. Passenger showed her red&white card and paid \$1. Driver requested to see the passenger's ID. Another passenger boarded the bus later and paid \$1. Driver never requested the passenger to show her ID. Driver did not ask white passenger. Feel it is discriminatory because driver only asks African Americans.	Closed	Video was reviewed. Operator did request to see ID which is part of his job. Letter dated 9/24/16 from HR Director. Also notified Customer Service Supervisor.
1/9/2017	Shewell-customer on the bus boarded at N. Center & E. Manlius St traveled to Walmart. Passenger claims driver discriminated against him due to his disability and color when driver requested to see ID for a reduced fare and then told passenger to sit in the back of the bus.	Closed	HR Director contacted customer for further information. Based upon the conversation, staff reviewed the bus video. The video recording shows the driver asking to see ID from the passenger and the customer complying. Driver thanks the customer and customer then proceeds to take a seat. No further conversation between driver and customer. Letter dated 1/30/2017 sent to customer.

Promoting Inclusive Public Participation

Public participation is the process by which an organization consults with interested or affected individuals, organizations and government entities before making a decision. It is a two-way communication and collaborative problem-solving effort intended to guide and manage diverse opinions. Centro's Public Participation Plan is included as Attachment 3.

By adoption of this 2019 Title VI program, the Authority's Board of Members makes a strong statement that its policies and procedures adhere to the intent of Title VI, the Executive Order on Limited English Proficiency (LEP), and the DOT LEP Guidance. Further, the Authority fully complies with the public participation requirements of 49 USC Sections 5307(b) and 5307 (c)(1)(I). The viewpoints of minority, low-income and LEP populations are actively sought for any new projects via Centro's social media platforms on Facebook, Twitter, Instagram and YouTube.

To ensure that the transportation needs of the communities it serves are fulfilled to the best of its ability, Centro regularly meets with community stakeholders to solicit feedback regarding its services. The meetings serve as two-way communication and collaborative problem-solving efforts intended to guide and manage diverse opinions. Many of the agencies serve minority and/or low-income community members including refugees and displaced persons.

In 2018-2019, Centro met with the following organizations to discuss transit-related initiatives:

- AccessCNY
- Alliance of Communities Transforming Syracuse
- Amalgamated Transit Union
- ARC of Onondaga
- ARISE
- Bike CNY
- Center for New Americans
- CenterState CEO
- City of Syracuse
- Greater Syracuse Tenants Network
- GreeningUSA
- Human Services Leadership Council of CNY
- Interfaith Works
- NAACP
- National Action Network
- National Federation of the Blind
- Onondaga County
- Onondaga County Department of Adult & Long-Term Care Services
- Syracuse Common Council
- Syracuse Metropolitan Transportation Council
- Urban Jobs Task Force
- Visions for Change, Inc.

Centro regularly advertises both in print and electronic medium through The Post-Standard, the area's primary newspaper in the Syracuse metropolitan region, which includes Onondaga, Oswego and Cayuga Counties. Market research indicates that The Post-Standard is the most widely read newspaper among the minority populations in the three counties. Centro also regularly advertises in CNY Latino, a newspaper published for the Latino community in Syracuse. Centro has Spanish speaking staff on hand to address Spanish requests for information. Additionally, a language interpretation telephone line is available for the LEP population.

Outreach Efforts

Centro personnel at all levels, from the Chief Executive Officer down, participate in outreach efforts in support of inclusive public participation. From service change proposal meetings, school district meetings, and job fairs, to demonstrations of the GoCentroBus mobile app and participation in transportation panels. Centro strives to interact with, instruct, and inform the community about transportation. A summary of some of Centro's Outreach efforts since the last Title VI Program Report is included as Attachment 4.

Customer Feedback Sessions

In 2018 and 2019, Centro held Customer Feedback Sessions at the Syracuse and Utica Transit Hubs, as well as in public spaces in Auburn and Oswego. The purpose of the sessions was to:

1. Share what's new
2. Answer questions
3. Take feedback

During each 2-hour feedback session, Centro representatives were on hand to:

- recap recent service changes and allow customers to share their thoughts on recent route improvements
- explain available fare media options and answer pass related questions
- educate customers on new technology/strategies/practices aimed at improving customer service
- show and/or assist customers with signing up for our text and email alert service
- explain our paratransit services and process of applying for CAB to interested parties
- respond to questions regarding our Travel Training program
- collect/respond to general questions and customer service complaints
- discuss open positions and hand out/collect applications

Notification of the meetings were made via the Centro website, on social media platforms, via the GoCentroBus App and Service Alert System, and through notices posted on Centro buses. Customers planning to attend the sessions who needed alternative language assistance, or a sign language interpreter were asked to contact Centro so that necessary arrangements could be made prior to each event. While Centro received no alternative language assistance requests, one sign language interpreter request was received. Centro provided an interpreter for that session and was able to successfully respond to the customers questions and informational needs.

Customers wishing to ask questions or share feedback with Centro who were unable to attend the sessions were encouraged to contact Centro's Call Center for assistance.

Centro not only received several customer requests in the areas of service/schedule, fares/passes, transit tools, customer service, and paratransit services requests during the sessions, it was also made aware of a number of problems customers have encountered while using Centro's service.

Customer feedback is extremely important to Centro, as it provides valuable information used to help determine how to best serve local communities. The information collected was summarized and presented to management for review, evaluation, and where feasible – implementation.

centro *Customer Feedback Session*



Please join us
Monday, July 16
11AM - 1PM OR 4PM - 6PM
Centro Transit Hub
599 S. Salina St, Syracuse



Centro representatives will be available to answer questions and collect feedback regarding: Service & Schedules, Fares & Passes, Transit Tools, Call-A-Bus & OSCAR service, Travel Training, and Career Opportunities.

centro
www.centro.org

centro *Customer Feedback Session*




Please join us
Wed, August 15
11AM - 1PM & 3PM - 5PM
Centro Transit Hub
15 Elizabeth St, Utica




Centro representatives will be available to answer questions and collect feedback regarding: Service & Schedules, Fares & Passes, Transit Tools, Call-A-Bus service, Travel Training, and Career Opportunities.

centro
www.centro.org

centro *Customer Feedback Session*




Please join us
Wed, April 24
4PM - 6PM
Roy C. McCrobie Building
41 Lake St, Oswego




Centro representatives will be available to answer questions and collect feedback regarding: Service & Schedules, Fares & Passes, Transit Tools, Call-A-Bus service, and Career Opportunities.

centro
www.centro.org

centro *Customer Feedback Session*



Please join us
Tues., June 25
4PM - 6PM (Conference Room E)
Oswego County Office Building
46 E. Bridge St., Oswego, NY



Centro representatives will be available to answer questions and collect feedback regarding: Service & Schedules, Fares & Passes, Transit Tools, Call-A-Bus service, and Career Opportunities.

centro
www.centro.org

centro *Customer Feedback Sessions*

Phoenix Building (Havana Room)
2 South St, Auburn
4:00 PM - 6:00 PM

Thursday, August 1



Please join us!



Providing Meaningful Access to LEP Persons

Centro utilizes Census data to assess the number of LEP persons in its service area. Per Centro's LEP Plan, the population that self-identifies as speaking English less than "very well" is considered to be of Limited English Proficiency (LEP). The census data is then combined with input from drivers, customer service personnel, and representatives of other agencies serving LEP persons to inform Centro's Limited English Proficiency (LEP) Plan, which is included as Attachment 5.

Examination of U.S. Census Bureau 2013-2017 C16001 tables, "Language Spoken at Home for the Population 5 Years and Over," by geographic place determined that there are 10 non-English language categories spoken at home by over 1,000 persons in Centro's service area (see table below). People who speak Spanish at home represent 2.9% of Centro's service area population. The remaining languages were each spoken by less than 3.7% of the population in Centro's service area.

Language Spoken at Home	Estimated Number of Speakers	Percentage of Population
Cayuga County		
English	70,918	95.4%
Spanish	1,759	2.4%
Oneida County		
English	192,975	88.1%
Spanish	7,678	3.5%
Russian, Polish or Other Slavic	5,684	2.6%
Other Indo-European	2,537	1.2%
Vietnamese	1,261	0.6%
Other Asian and Pacific Island	4,519	2.1%
Onondaga County		
English	394,532	89.5%
Spanish	13,642	3.1%
French, Haitian, or Cajun	2,155	0.5%
German or Other West Germanic	1,476	0.3%
Russian, Polish or Other Slavic	4,981	1.1%
Other Indo-European	7,082	1.6%
Chinese (incl. Mandarin, Cantonese)	4,450	1.0%
Vietnamese	2,071	0.5%
Other Asian and Pacific Island	3,003	0.7%
Arabic	3,169	0.7%
Other and Unspecified Languages	2,991	0.7%
Oswego County		
English	108,628	95.9%
Spanish	1,852	1.6%

Centro will adhere to USDOT and USDOJ Safe Harbor Provision regarding translation of written materials for LEP populations. The Safe Harbor Provision directs that written translation of vital documents are to be provided for LEP language groups constituting five percent or 1,000 persons of the total population of the Centro's service area, whichever is less. Based on Centro's survey results, translations of vital documents will be provided in Spanish.

Additionally, the Centro website contains a feature that allows the screen text to be translated into multiple languages and, a language interpretation telephone line is available.

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

- Placards on buses: Centro has informational placards on buses in Spanish that inform riders of Centro's language line and translation services.
- Local non-English newspapers: Centro will continue to issue media press releases in Spanish, and purchase advertisements in local non-English newspapers publicizing Centro services.
- Direct engagement with LEP populations and community organizations: Through working with various community organizations, Centro will seek 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 will also help Centro learn what additional agency information may need translation.

Travel Training Program

Centro's travel trainer provides outreach services to citizens and community-based organizations and agencies that rely on Centro's public transit system. Providing face-to-face contact within the community and assisting individuals with a desire to learn more about Centro's services, the travel trainer instructs individuals on how to ride the bus, so they are comfortable and proficient with using the service and have an understanding of how the service is provided.

Centro's travel trainer performs outreach services and maintains an office at the Transit Hub, which is conveniently located within close proximity to 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 persons. The travel trainer reports back 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. The various community organizations that Centro works with that assist and refer LEP individuals to Centro, provide feedback on the way in which Centro assist's LEP populations to determine how effectively those individuals are being served.

In total, 3,229 individuals have been trained on how to utilize Centro's transportation services, 1,229 since Centro's last LEP Plan submission. Official languages of program participants include the following: Amharic, Arabic, Armenian, Burmese, Dari, Dzongkha, Farsi, French, Karen, Karenni, Kinyarwanda, Kurdish, Mali, Nepali, Pashto, Persian, Russia, Somali, Spanish, Swahili, Syriac, Tigrin, Turkmen, Ukrainian, Urdu, and Vietnamese.

More details about the Travel Training Program can be found in the Centro's Limited English Proficiency (LEP) Plan (Attachment 5).



Travel Training Program Helps Many Throughout Community



Since its inception in May 2013, Centro's Travel Training Program has grown tremendously. The program, which provides outreach services to citizens, community-based organizations, and agencies that depend on Centro's public transit system, has had a total of 1,684 participants since its debut. The program goal is to help riders feel more comfortable and confident with using Centro's service while gaining an understanding of how the service is provided.



Working directly with community organizations across Onondaga and Oneida Counties, Centro Travel Trainer, Victoria Sonne provides face-to-face, customized instruction on everything from planning a trip and purchasing passes, to using a transfer and reading a schedule. The result? Comfortable and confident riders who have successfully learned how to get to work, school, medical offices, and recreation sites on their own.



"Victoria puts her whole heart and soul into her work as a travel trainer," said Centro Senior Vice President of Operations, Joseph DeGray. "Watching Victoria interact with the participants is a very rewarding experience. It's easy to understand why the participants are grateful for the service she provides and why the program is such a big success."

Centro's Travel Training Program is free-of-charge and is available to anyone located in Centro's transit service coverage area.



Victoria Sonne
Travel Trainer / Supervisor
Operations Department

Minority Representation on Planning and Advisory Bodies

Centro is governed by an independent Board of Members. The Board consists of 13 representatives, each of which is nominated by the Legislatures of the four Counties in Centro's service area and the City of Syracuse Common Council. Representatives are appointed by the Governor of the State of New York and also confirmed by the New York State Senate. Representation on the Board is as follows: five from Onondaga County; three from the City of Syracuse; one from Cayuga County; one from Oswego County; two from Oneida County; and one non-voting seat representing the Amalgamated Transit Union.

Centro's Board of Members currently has four open seats. Two of the current Board members are minorities, comprising 22% of the seated Board at the time of this writing.

It is not within the purview of Centro's Board or staff to recommend or advocate for particular individuals or types of individuals for Board membership.

Table 1: Board of Members

Body	Caucasian	Latino	African American	Asian American	Native American
Board of Members	78%	0%	22%	0%	0%

Providing Assistance to Subrecipients \ Monitoring Subrecipients

Centro does not have any subrecipients as of February 2016.

Determination of Site or Location of Facilities

Since our last filing in September 2016, no new facilities have been constructed or are planned for construction.

Provide Additional Information Upon Request

Centro is prepared to provide any and all information FTA may require.

REQUIREMENTS FOR FIXED ROUTE TRANSIT PROVIDERS

All fixed route transit providers are required to submit the General Requirements previously described as well as their system-wide service standards and policies.

System-Wide Service Standards and Policies

Centro's board approved Service Standards, adopted in August 2016, are utilized by Centro's Service Development Department in service planning and quality assurance efforts. These standards include and expand upon a basic set of standards approved by Centro's Board of Members. The mission of Centro is to be responsive to the transportation needs of the Central New York Community by providing services which are safe, convenient, reliable and environmentally responsible with a goal of maximizing the taxpayers' return on investment.

Centro's Service Standards & Guidelines are included as attachments 6 and 7. These standards are consistent with criteria required by the FTA. As these standards will be major determinants of Centro's operating and capital costs, the ability to adhere to them is largely dependent on Centro's fiscal position. As such, these standards are "targets." Therefore, Centro staff use their best judgement in providing efficient, effective public transportation within the confines of Centro's fiscal means. Policies related to the distribution of transit amenities and vehicle assignments are included in both the CNY Centro and Non-UZA Service Standards & Guidelines.

REQUIREMENTS WHEN OPERATING 50 OR MORE FIXED ROUTE VEHICLES IN PEAK SERVICE AND LOCATED IN A UZA OF 200,000 OR MORE IN POPULATION

Although Centro serves a four-county area in Central New York, only the Syracuse UZA/Onondaga County portion of the service area operates 50 or more fixed route vehicles in peak service and is located in a UZA of 200,000 or more in population. This area is operated by CNY Centro. In accordance with these requirements, all applicable demographic and service profile maps and charts have been prepared as recommended by the FTA.

Collect and Report Demographic Data

Centro collects demographic data on an annual basis from the U.S. Census Bureau utilizing the Decennial Census or American Community Survey tables. Census data is used to conduct analysis related to service and fare changes, and for other transit-related projects. On-board rider surveys are conducted on a regular basis, and the responses are analyzed and used for various projects, including fare equity analyses.

General Service Profile Information and Maps

The FTA requires transit providers to prepare maps of service areas containing both general and transit-specific features. A description of these features is found below.

There are 50 bus routes (lines) serving 165 shelters, and an additional 3,880 stops throughout Onondaga County.

Transit Trip Generators for the CNY Centro service area are identified as Colleges and Universities, Hospitals, Public Buildings, Shopping Centers, and Sports and Entertainment complexes.

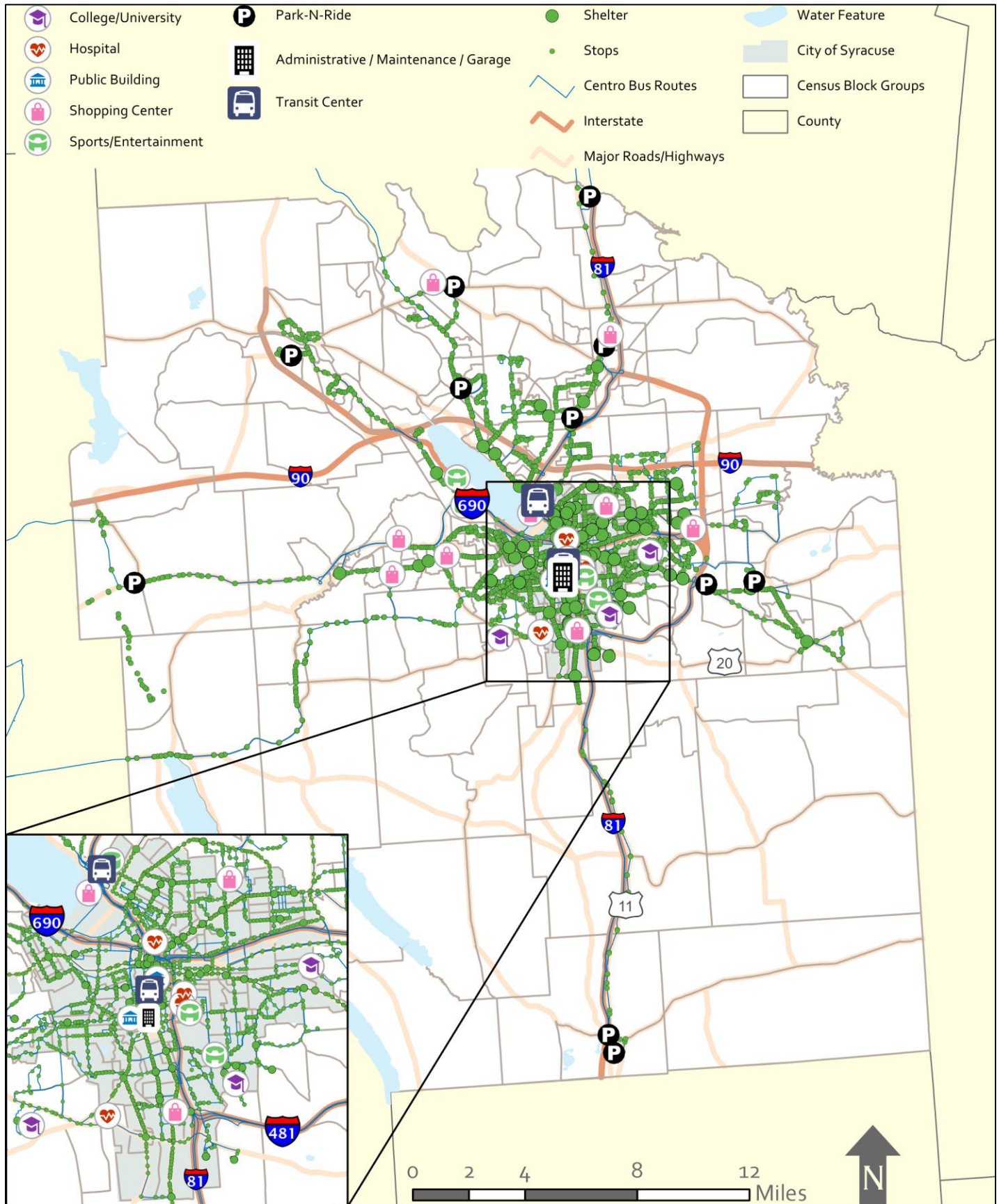
CNY Centro has two transit centers: the Regional Transportation Center (RTC), which is located just outside the City of Syracuse, provides both local and intercity transportation; and the Syracuse Hub, which is located in Downtown Syracuse, provides local bus service. The administrative, maintenance, and garage facilities are located on the same property just outside of the Central Business District in Downtown Syracuse.

CNY Centro operates 13 Park-N-Ride locations in Onondaga County. These locations are primarily at or near shopping centers, grocery stores, or other well-known public spaces utilized by commuters.

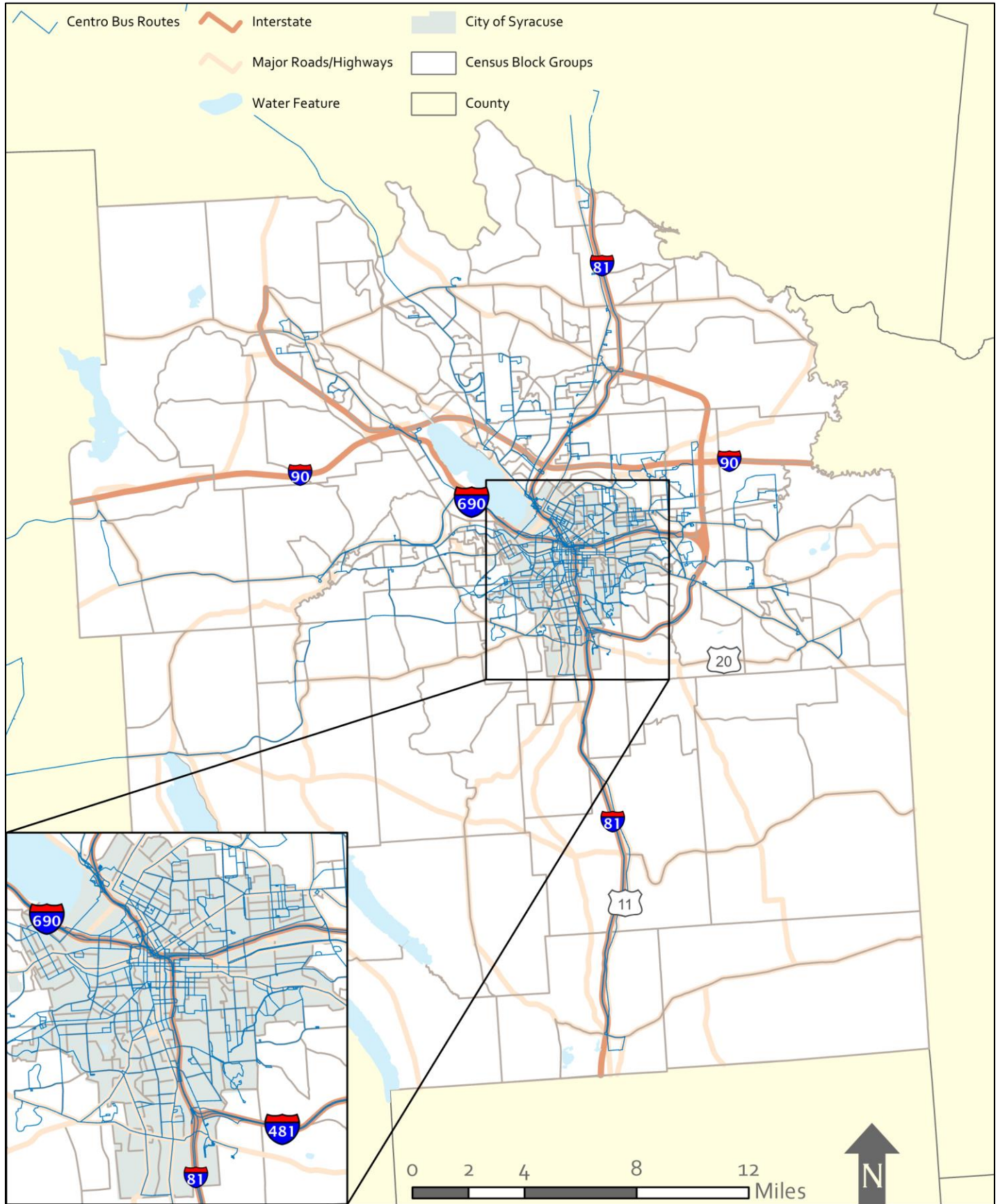
In accordance with FTA Circular 4702.1B, Chapter IV-8, the following Service Profile Maps were prepared:

- Map 2 - Onondaga County Service Area Base Map (contains all feature layers requested by FTA)
- Map 3 - Bus Routes
- Map 4 - Bus Shelters and Stops
- Map 5 - Transit Trip Generators
- Map 6 - Transit Facilities and Park-N-Rides
- Map 7 - Transit Facility Improvements
 - *Recently Completed or In Progress*
 - One transit center improvement
 - Four garage and maintenance facility improvements
 - *Planned Improvements*
 - 10 shelter replacements
 - One garage and maintenance facility improvement
 - Three transit center improvements

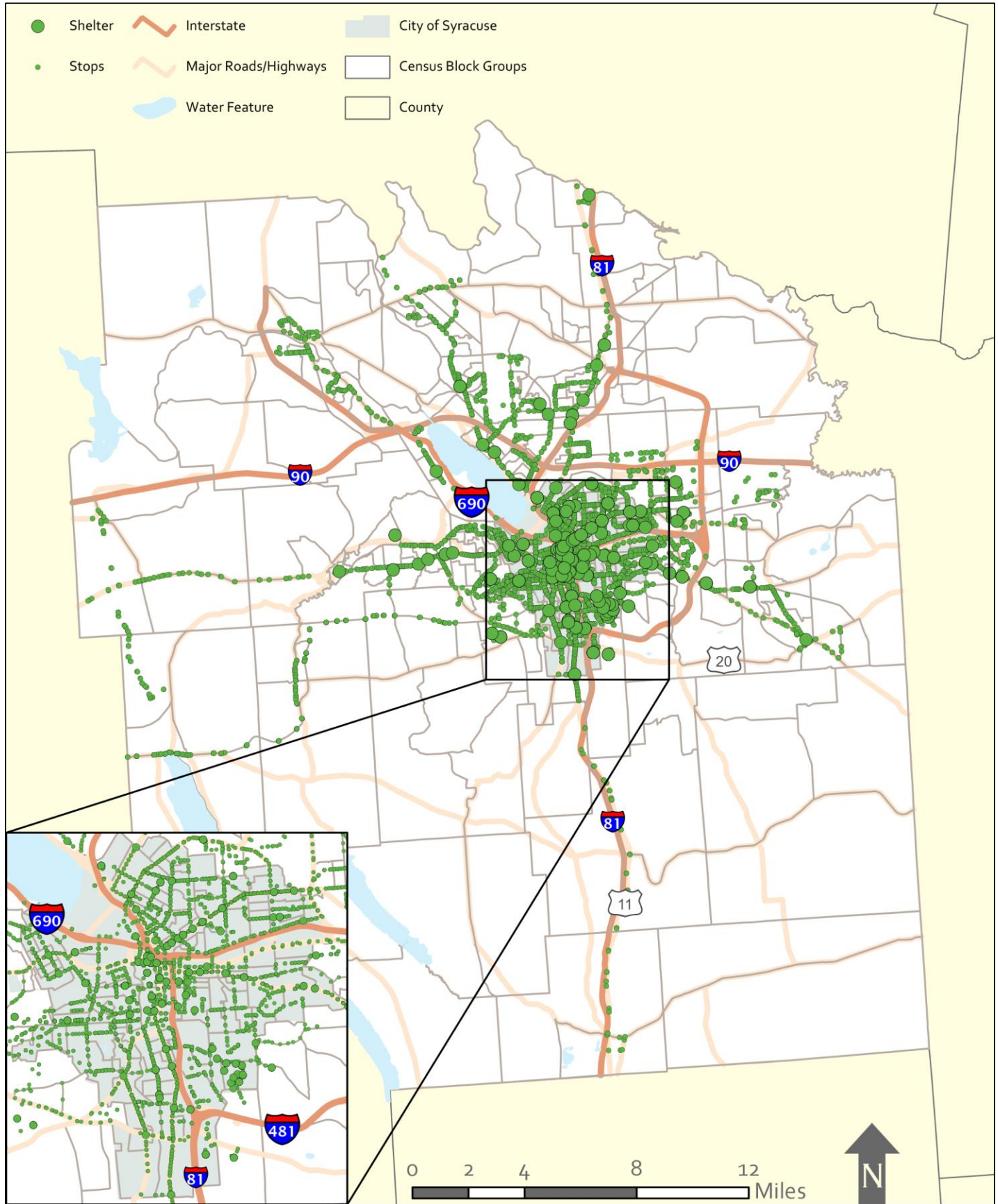
Map 2 – Onondaga County Service Area Base Map



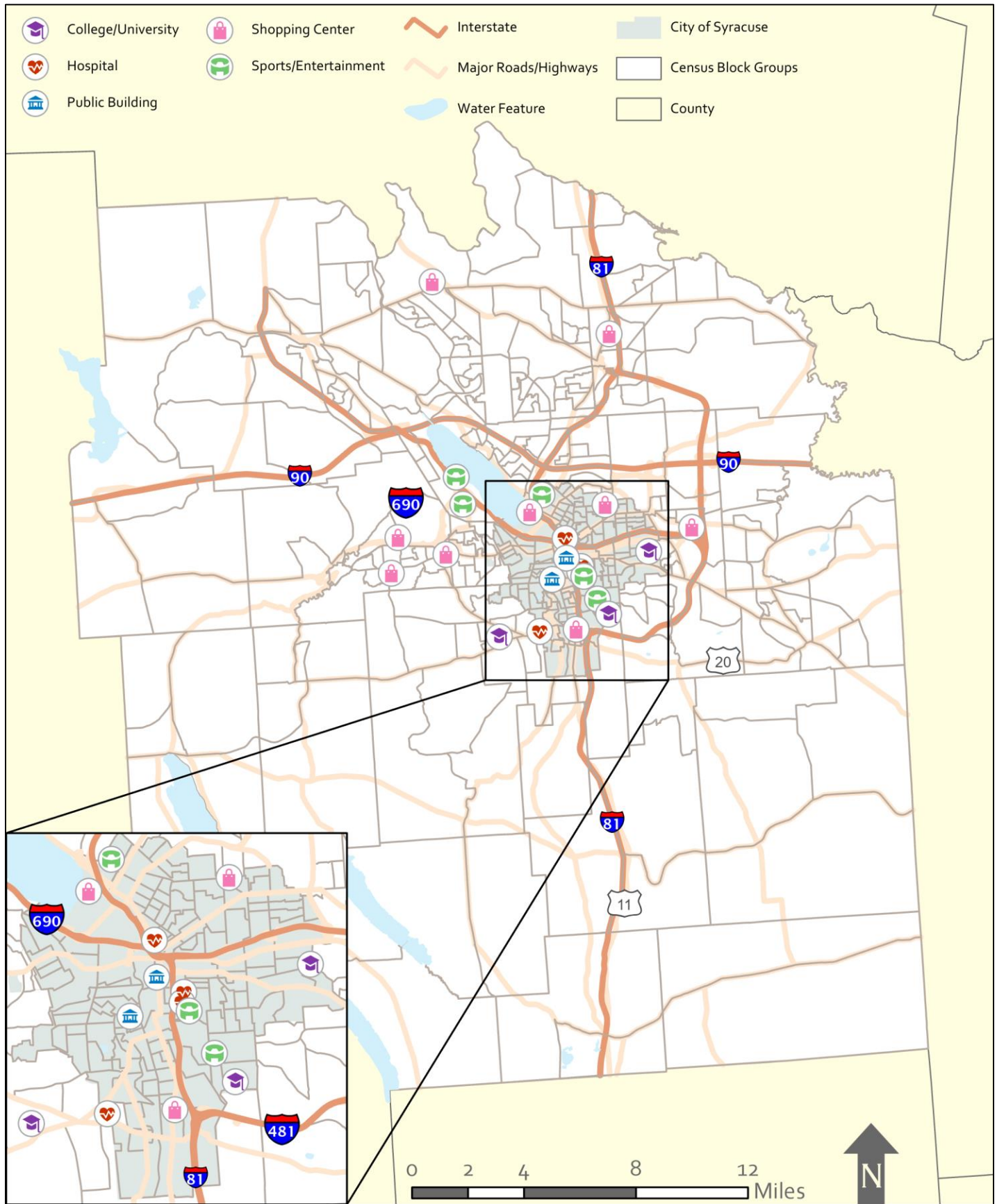
Map 3 – Bus Routes



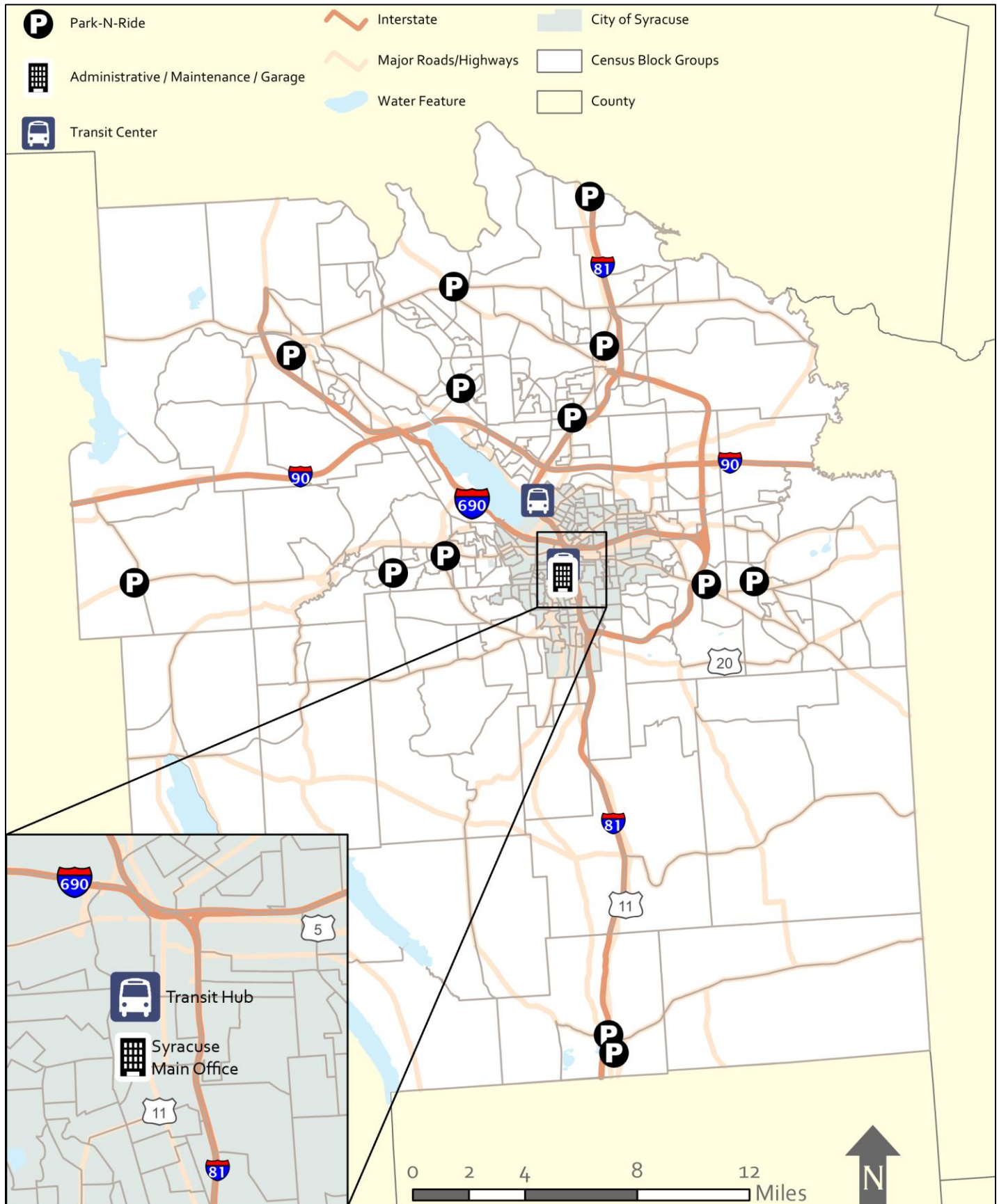
Map 4 – Bus Shelters and Stops



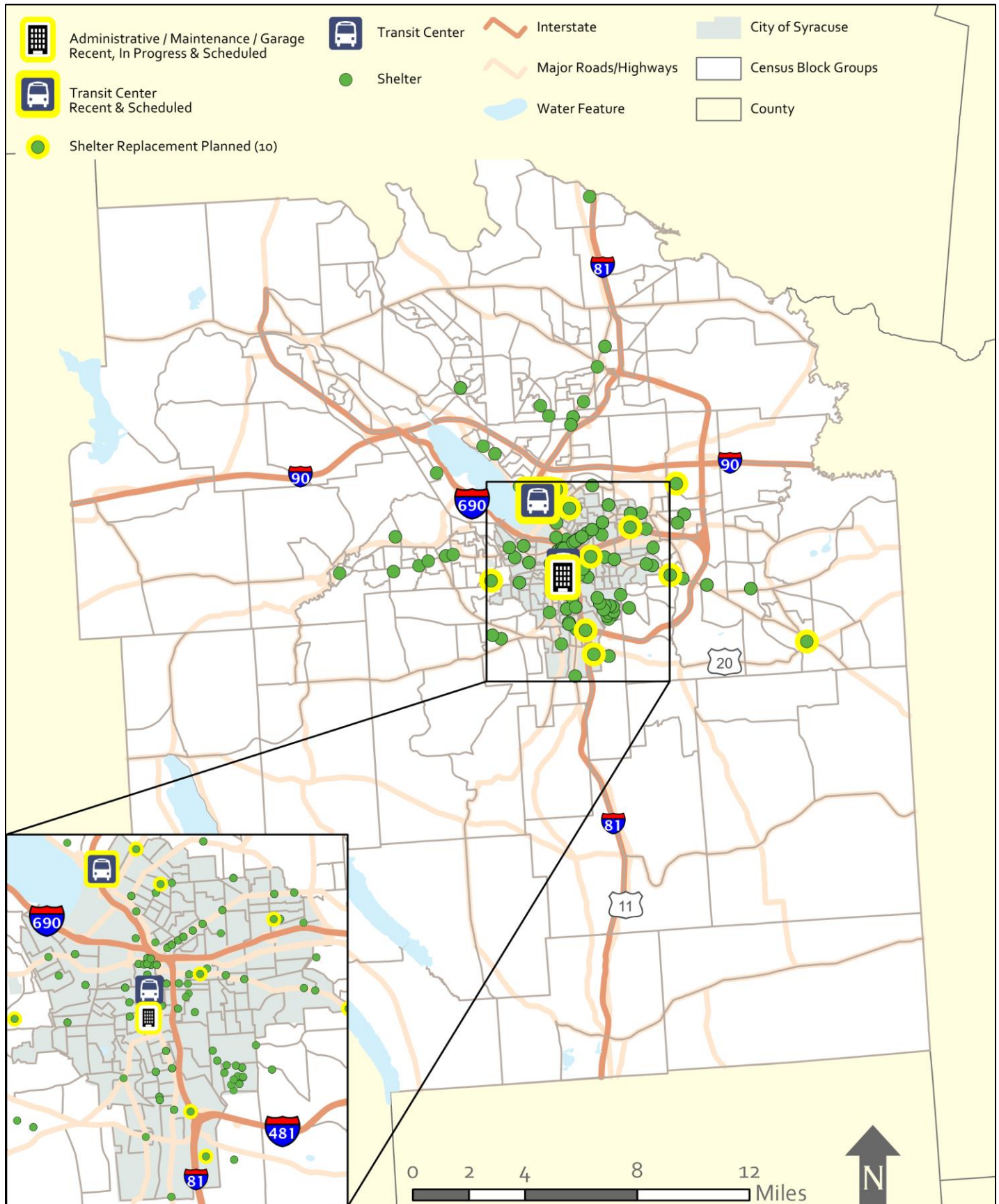
Map 5 – Transit Trip Generators



Map 6 – Transit Facilities and Park-N-Rides



Map 7 – Transit Facility Improvements



Demographic and Service Profile Maps and Charts

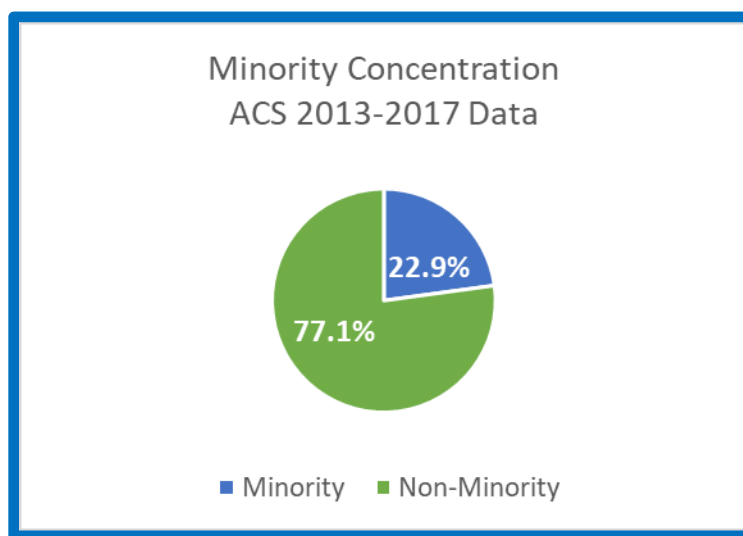
A demographic analysis of the Onondaga County service area was conducted utilizing data obtained from the U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates. The following demographic profiles were analyzed: minority and low-income. Included in this report are summary statistics, charts, and maps depicting concentration areas within the CNY Centro service area.

Minority Concentration

Per Centro's established Title VI Policies, minorities are defined as any populations self-identified as any race other than white only by Census race classifications including those persons self-identified as Hispanic in ethnicity regardless of race. According to the 2013-2017 ACS, the total population of Onondaga County is 467,669, while the minority population is 106,866.

Total Population	Minority Population	Concentration
467,669	106,866	22.9%

Concentration Area: Census Block Groups with 22.9% or more of the population identified as minority.

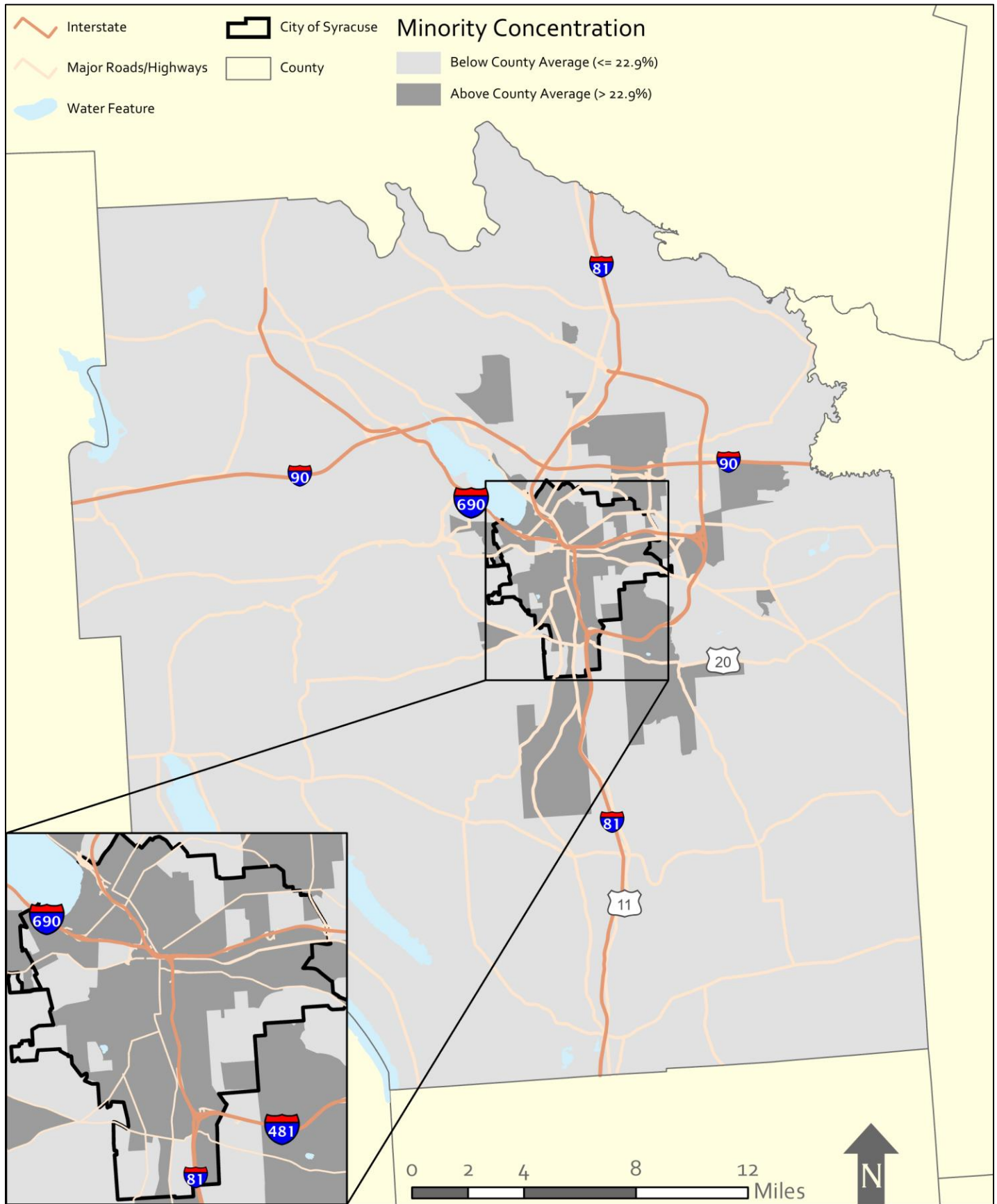


Dataset: Hispanic or Latino Origin by Race (table B03002); Universe: Total population; Geographic Level: Census block group

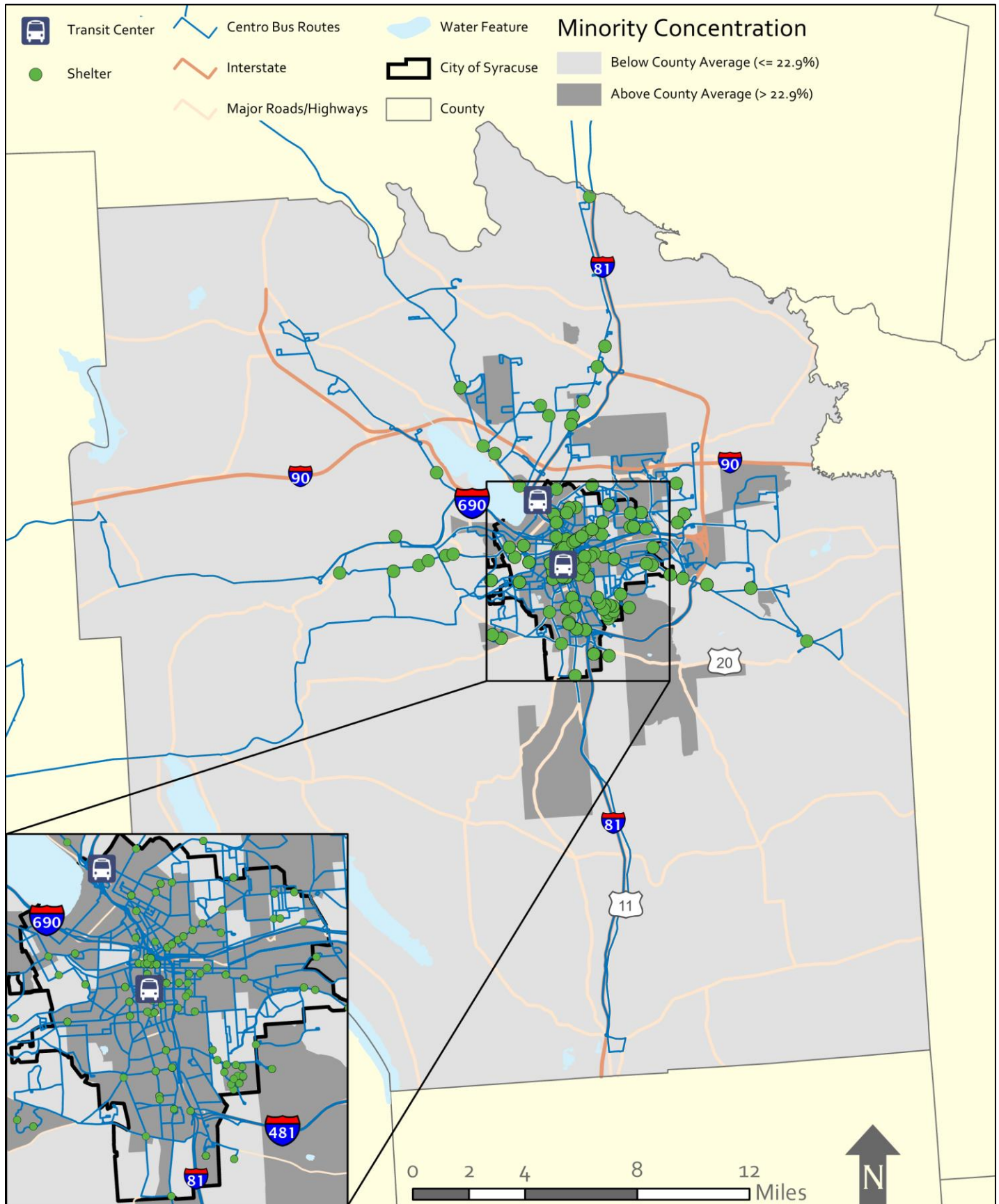
In accordance with FTA Circular 4702.1B, Chapter IV-8, the following Demographic Service Profile Maps were prepared for the Minority population:

- Map 8 - Minority Concentration Base Map
- Map 9 - Minority Concentration with Bus Routes, Shelters, and Transit Centers
- Map 10 - Minority Concentration with Transit Trip Generators
- Map 11- Minority Concentration with Transit Facility Improvements

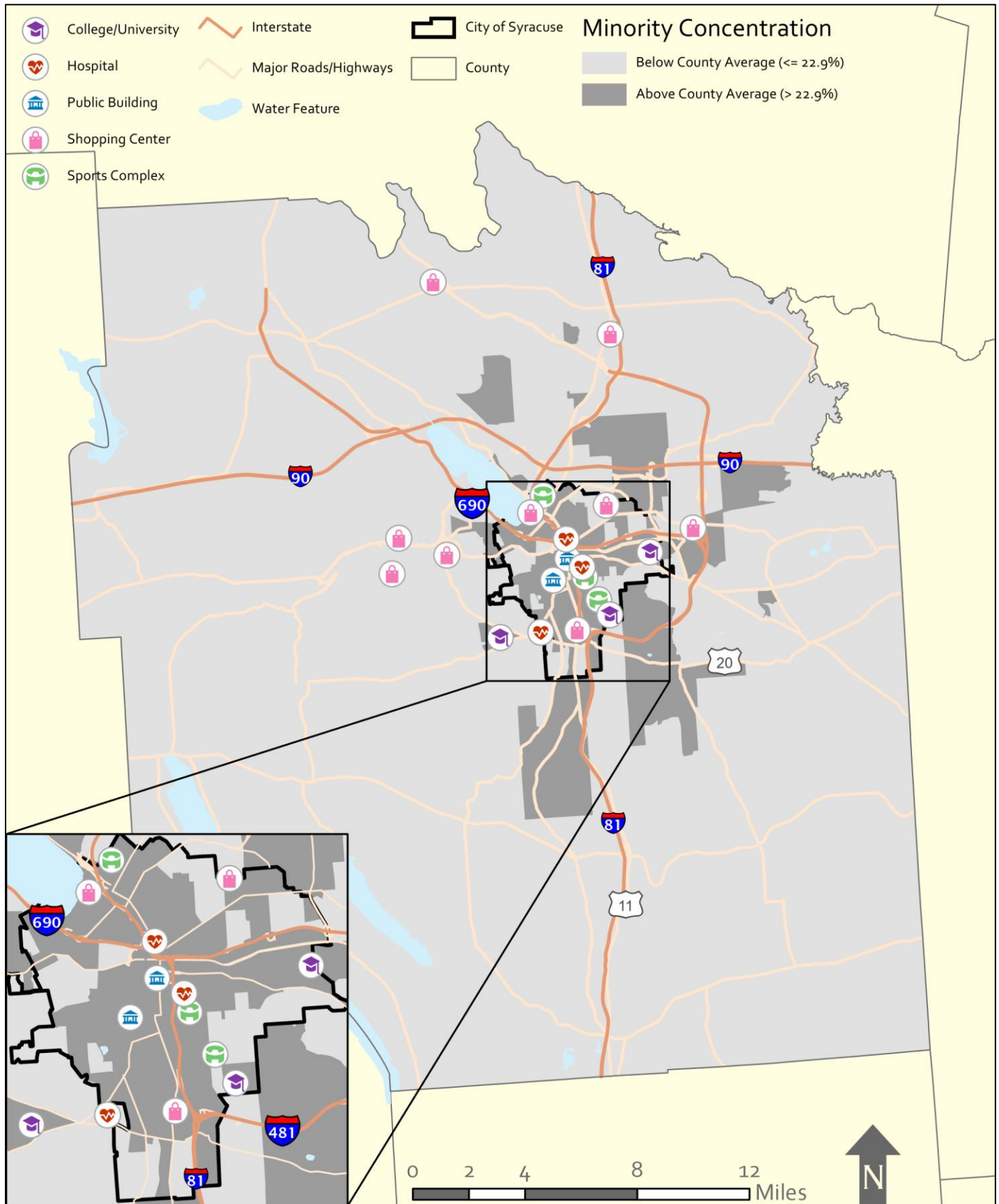
Map 8 – Minority Concentration Base Map



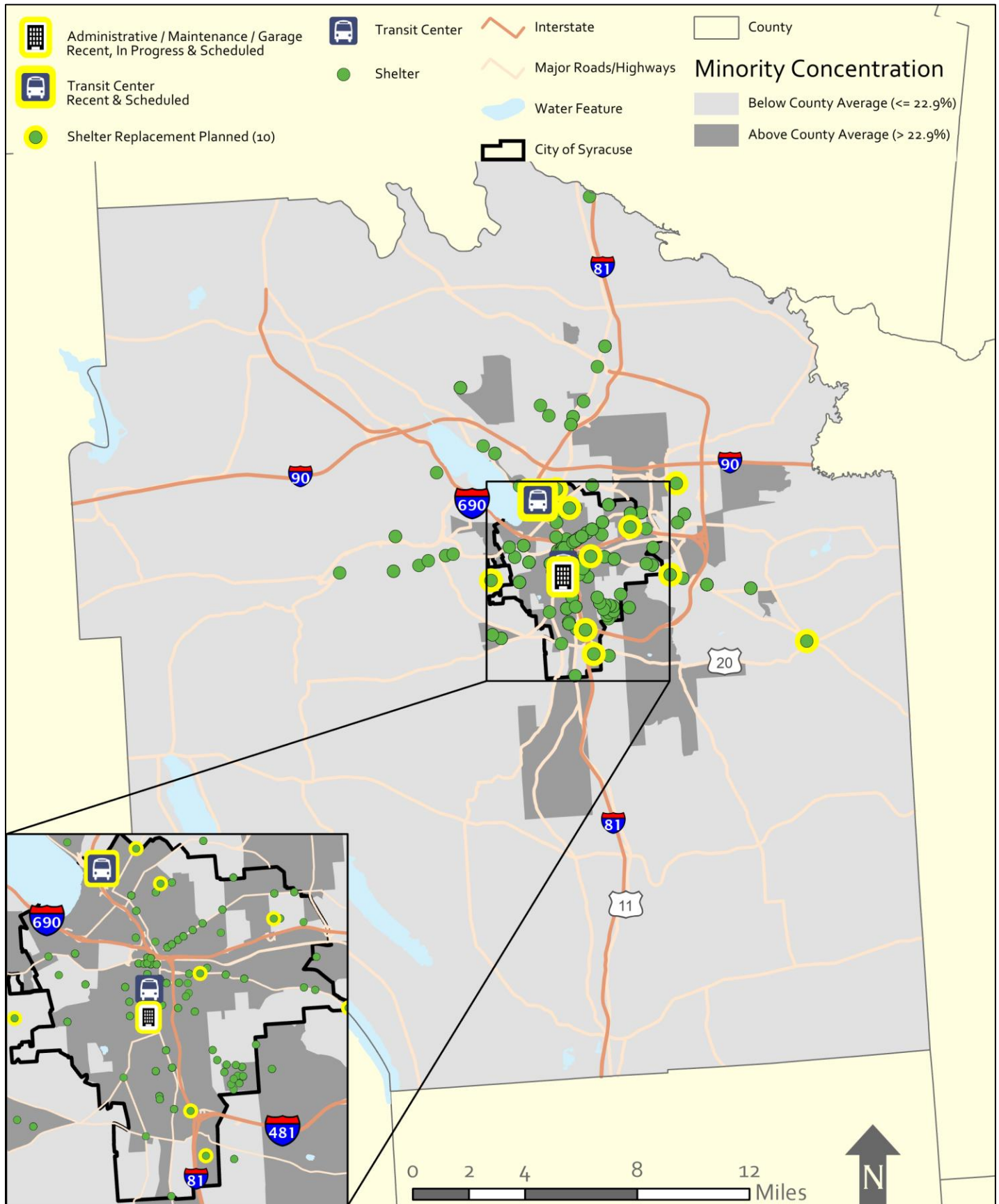
Map 9 – Minority Concentration with Bus Routes, Shelters, and Transit Centers



Map 10 – Minority Concentration with Transit Trip Generators



Map 11 – Minority Concentration with Transit Facility Improvements

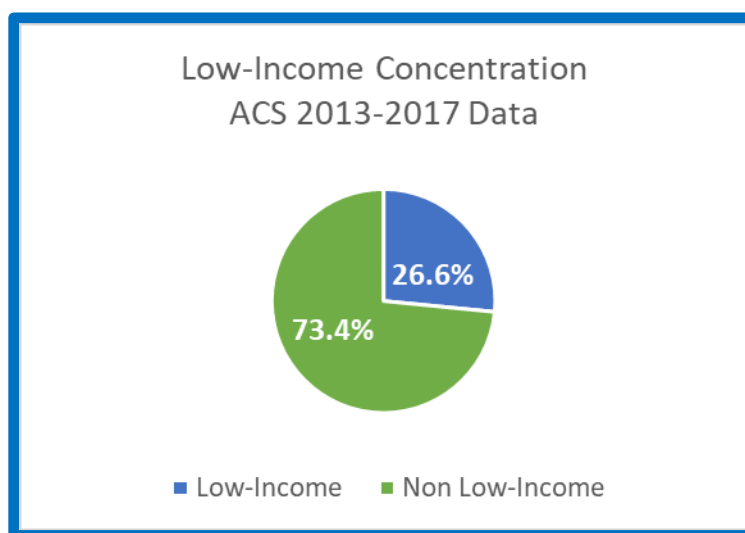


Low-Income Concentration

Per Centro's established Title VI Policies, low-income means a household whose median household income does not exceed 50% of the median household income for the service area. Based on the 2013-2017 ACS data, the median household income for Onondaga County is \$57,271, making the low-income threshold \$28,636. The Household Income table from the ACS is grouped by income brackets; therefore, all households with a median household income of \$29,999 and below were considered 'low-income' for this analysis.

Total Households	Low-Income Households	Concentration
185,840	49,352	26.6%

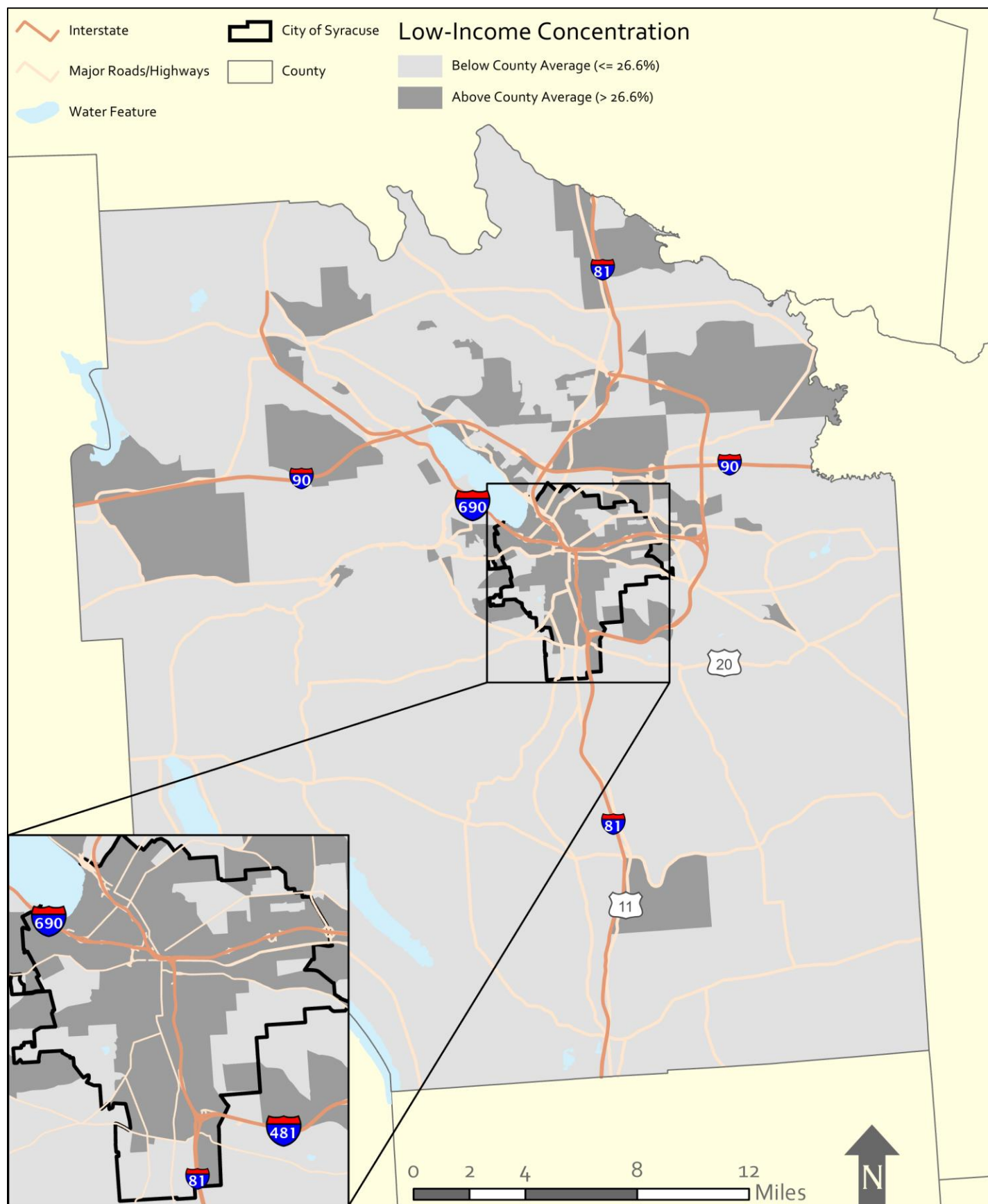
Concentration Area: Census Block Groups with 26.6% or more of the households identified as low-income.



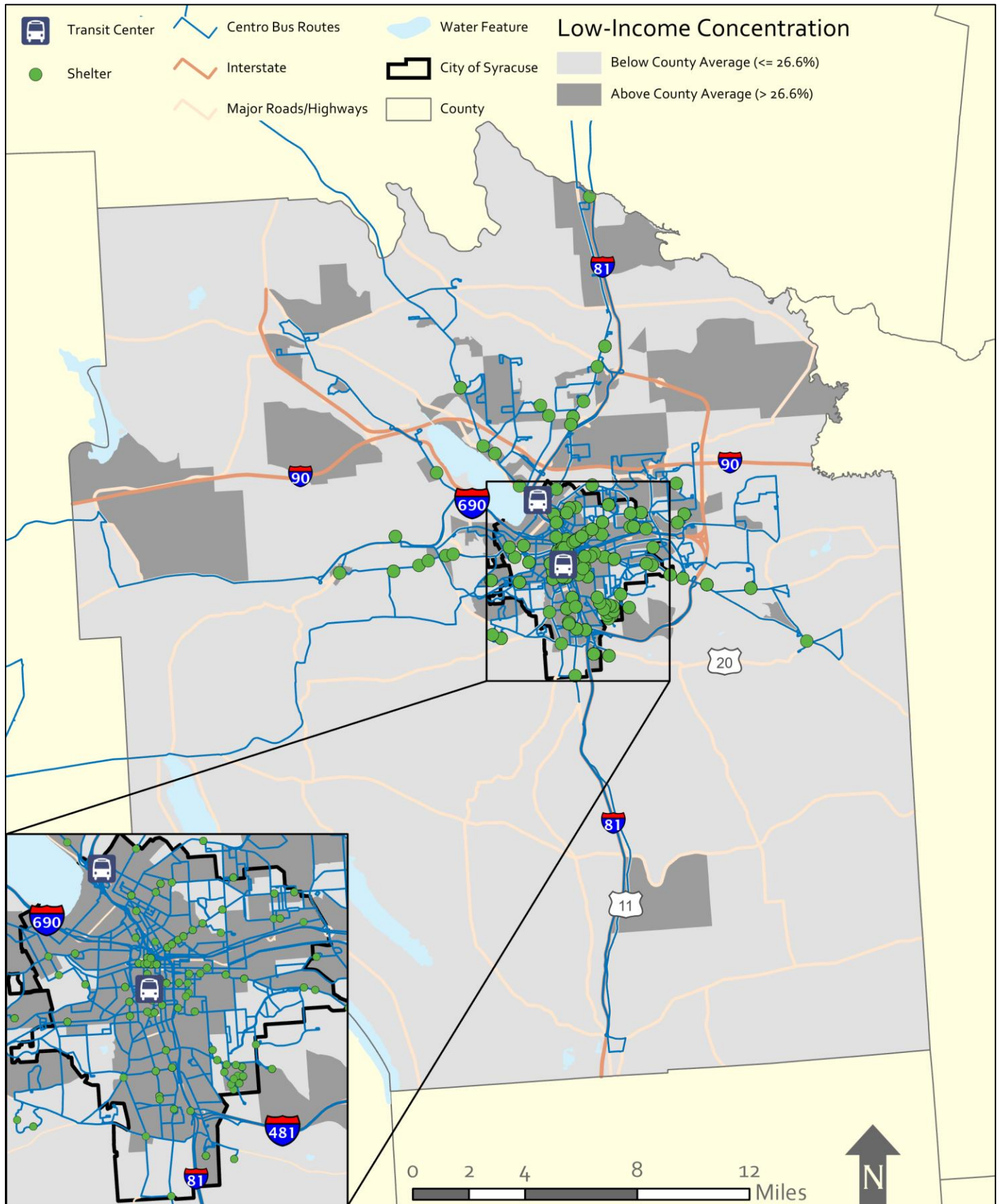
Dataset: Household income in the past 12 months (table B19001); Universe: Households; Geographic Level: Census block group

In accordance with FTA Circular 4702.1B, Chapter IV-8, for purposes of addressing environmental justice, the following Demographic Service Profile Maps were prepared for the Low-Income households:

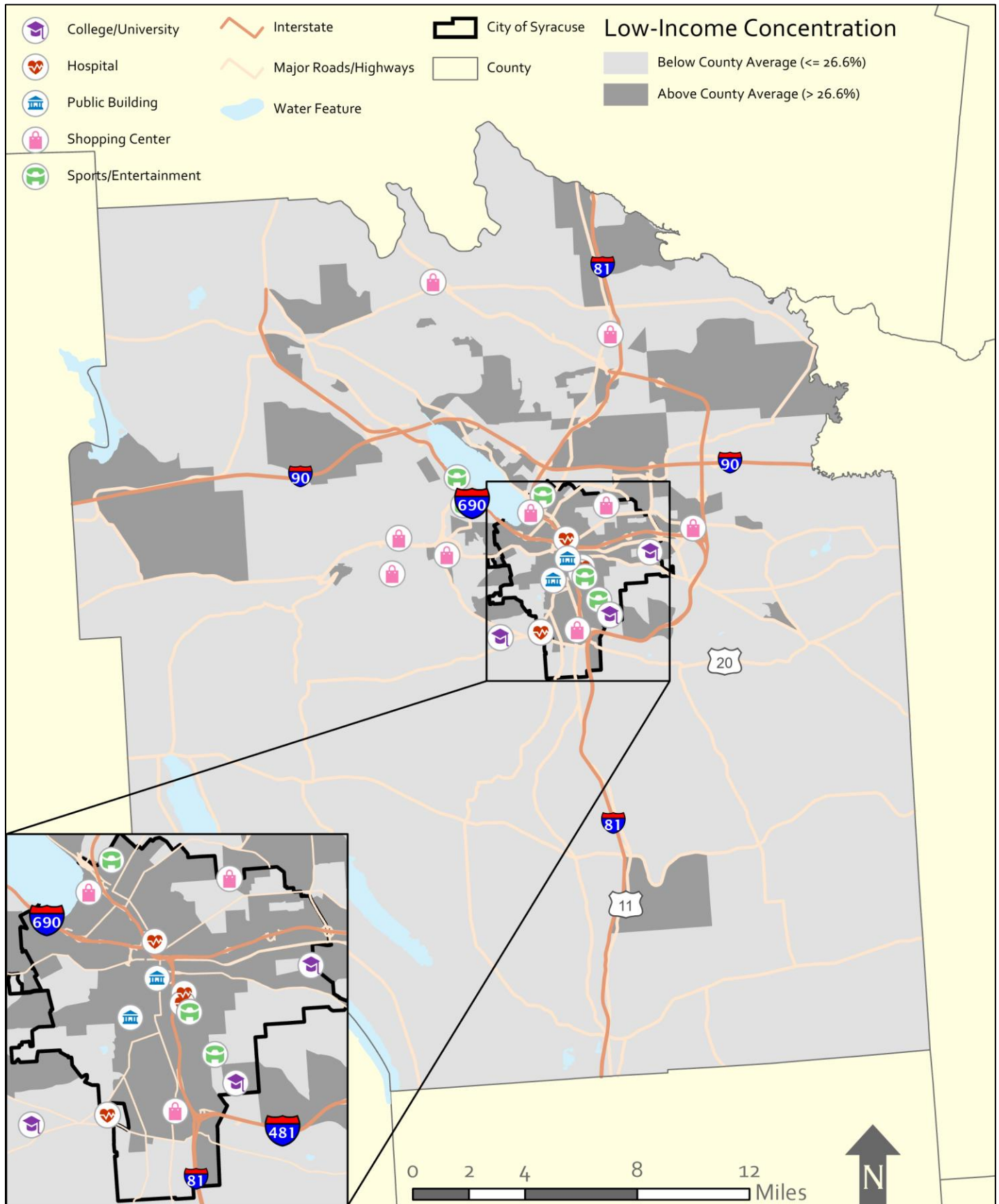
- Map 12 - Low-Income Concentration Base Map
- Map 13 - Low-Income Concentration with Bus Routes, Shelters, and Transit Centers
- Map 14 - Low-Income Concentration with Transit Trip Generators
- Map 15 - Low-Income Concentration with Transit Facility Improvements

Map 12 – Low-Income Concentration Base Map

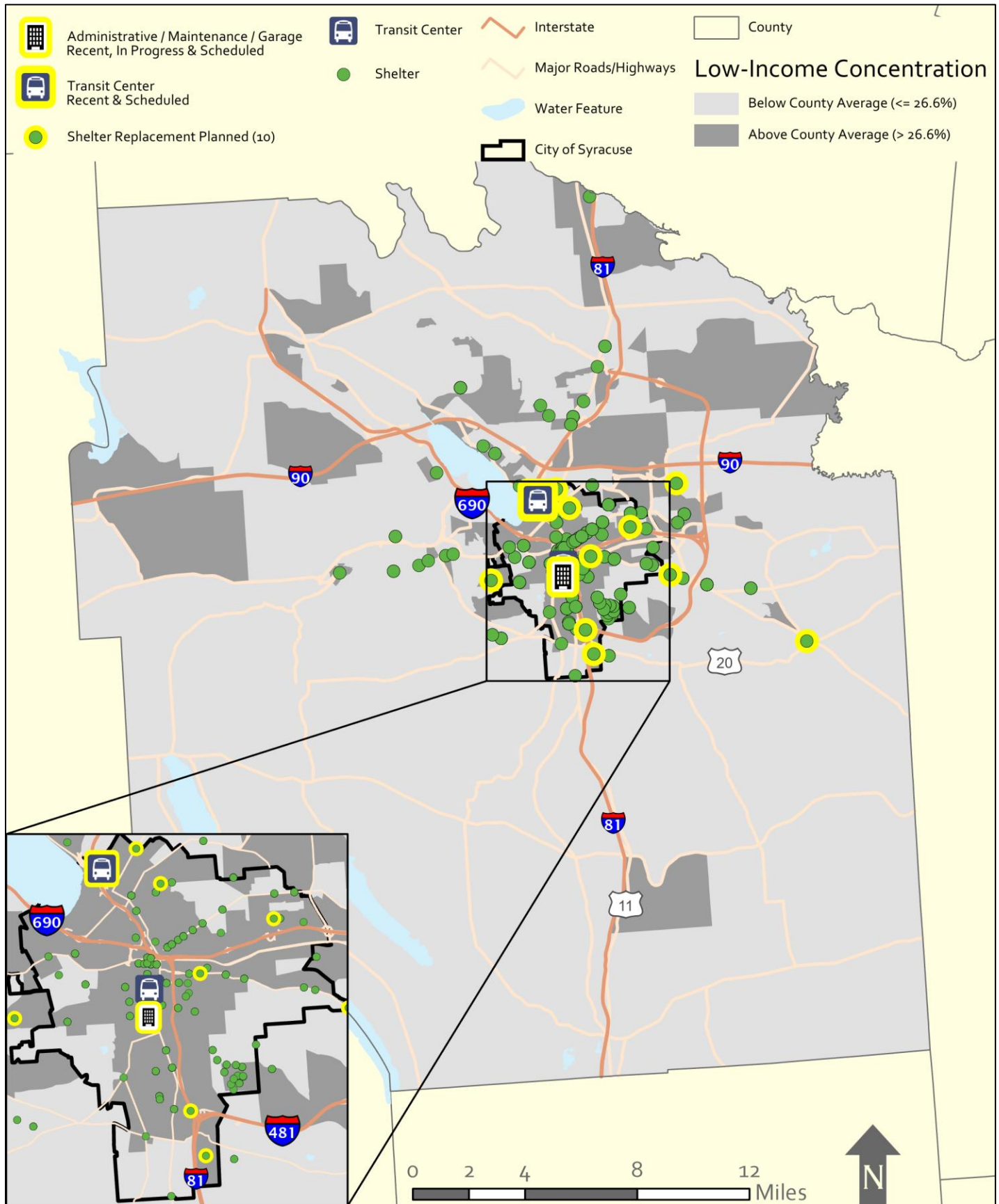
Map 13 – Low-Income Concentration with Bus Routes, Shelters, and Transit Centers



Map 14 – Low-Income Concentration with Transit Trip Generators



Map 15 – Low-Income Concentration with Transit Facility Improvements



Demographic Ridership and Travel Patterns from Passenger Surveys

Centro routinely performs survey data collection 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 needs to be accountable to the government on how and why it provides service the way it does. Specifically, Centro needs to verify that it has collected surveys that provide the demographic ridership and travel patterns of its customers.

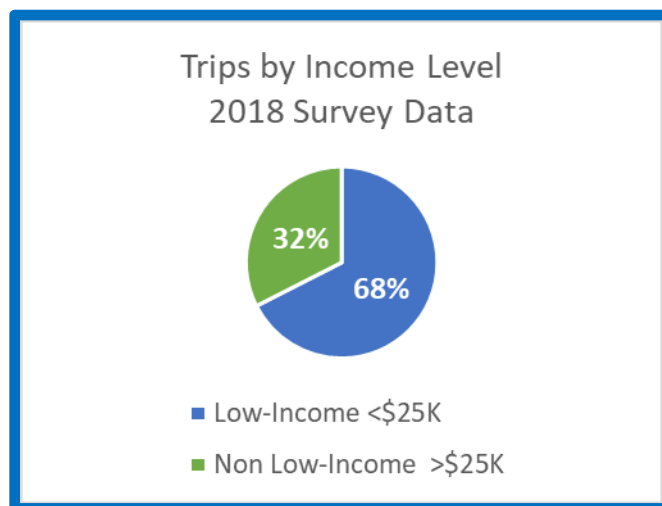
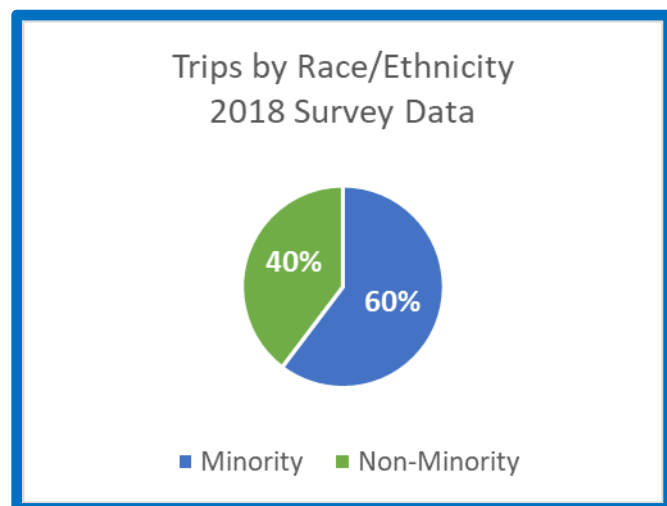
The Triennial Review is one of the Federal Transit Administration's (FTA) management tools for examining grantee performance and adherence to current FTA requirements and policies. Mandated by Congress in 1982, the Triennial Review occurs once every three years. It examines how recipients of Urbanized Area Formula Program funds meet statutory and administrative requirements. The review currently examines 17 areas. In addition to helping evaluate grantees, the review gives FTA an opportunity to provide technical assistance on FTA requirements and aids FTA in reporting to the Secretary, Congress, other oversight agencies, and the transit community on the Urbanized Area Formula Program.

Under this program, Centro is required to collect information on the race, color, national origin, English proficiency, language spoken at home, household income, and travel patterns of its riders using customer surveys. Centro, in turn, uses this information to develop a demographic profile comparing minority riders and non-minority riders, and trips taken by minority riders and non-minority riders. Demographic information is also collected on fare usage by fare type amongst minority users and low-income users, in order to assist with fare equity analyses.

This 2019 Title VI report incorporates the results of ridership surveys performed in 2018-2019, which depict the race, color, or national origin, English proficiency, language spoken at home, household income, and travel patterns of riders in the Syracuse-based service area.

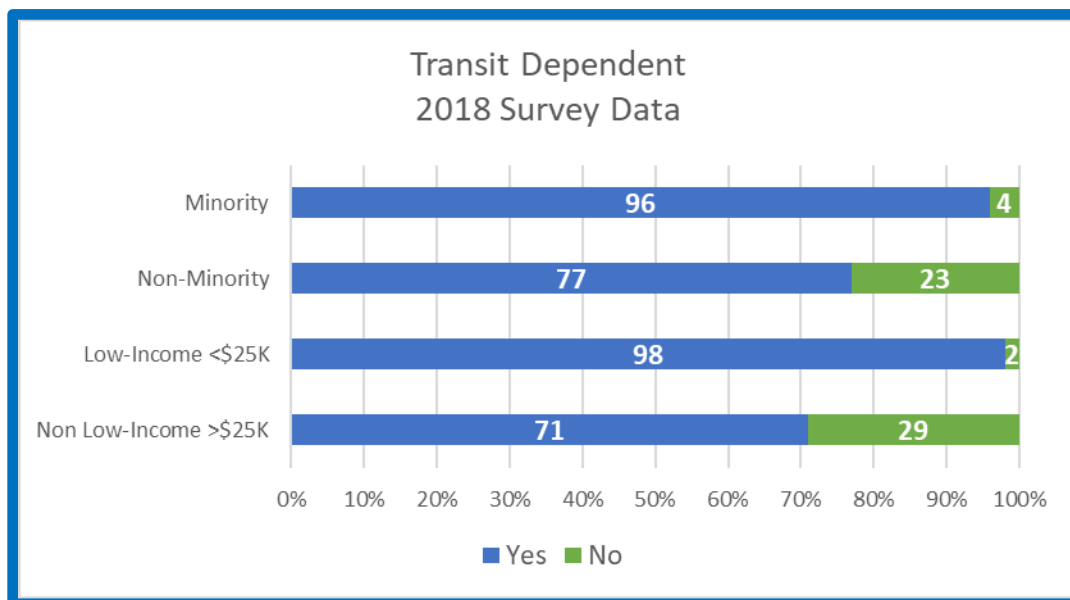
Trip Characteristics by Race/Ethnicity and Income

The majority of trips surveyed (60%) are made by minority riders. This rate far exceeds the minority population of the Onondaga County service area (22.9%). Similarly, the majority of trips (68%) are made by low-income riders, which exceeds the low-income concentration of the Onondaga County service area (26.6%).



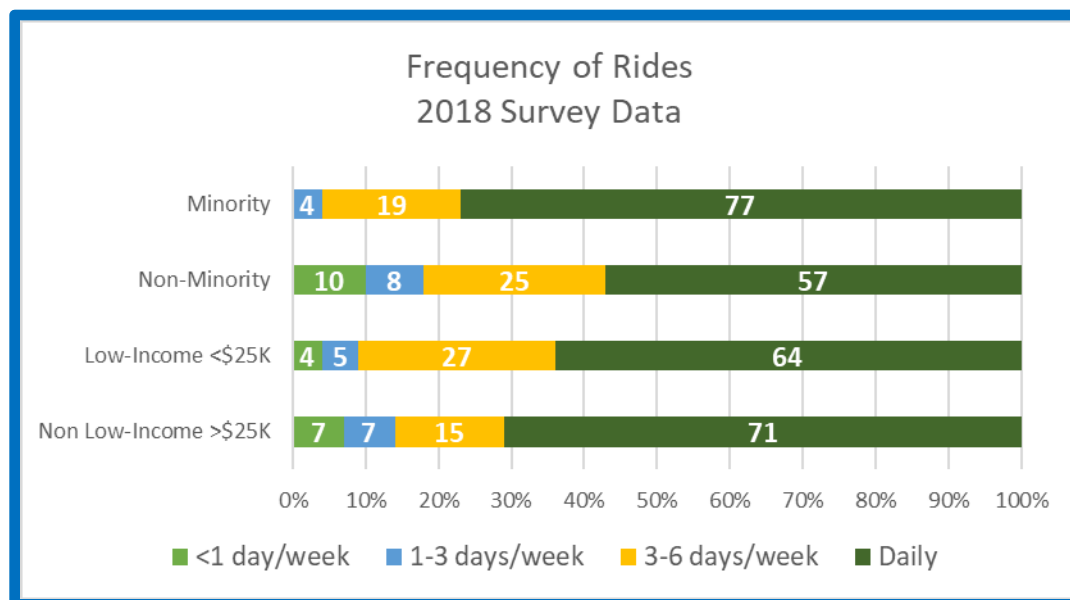
Transit Dependency

Most Centro riders surveyed are transit dependent. This is especially true for both minority (96%) and low-income (98%) riders. More than 70% of both non-minority and non low-income riders are transit dependent.



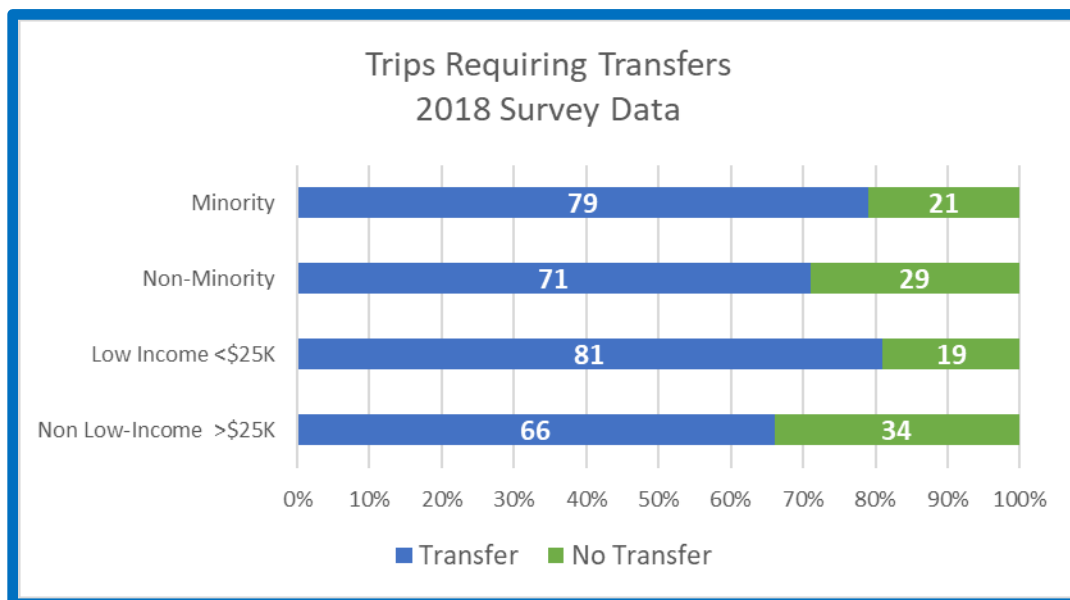
Frequency of Riding Centro

The majority of Centro riders (57% or more) use the service daily. The minority riders surveyed use the service at least one or more days per week. Of all other riders surveyed, the majority use the service at least 3 or more days per week.



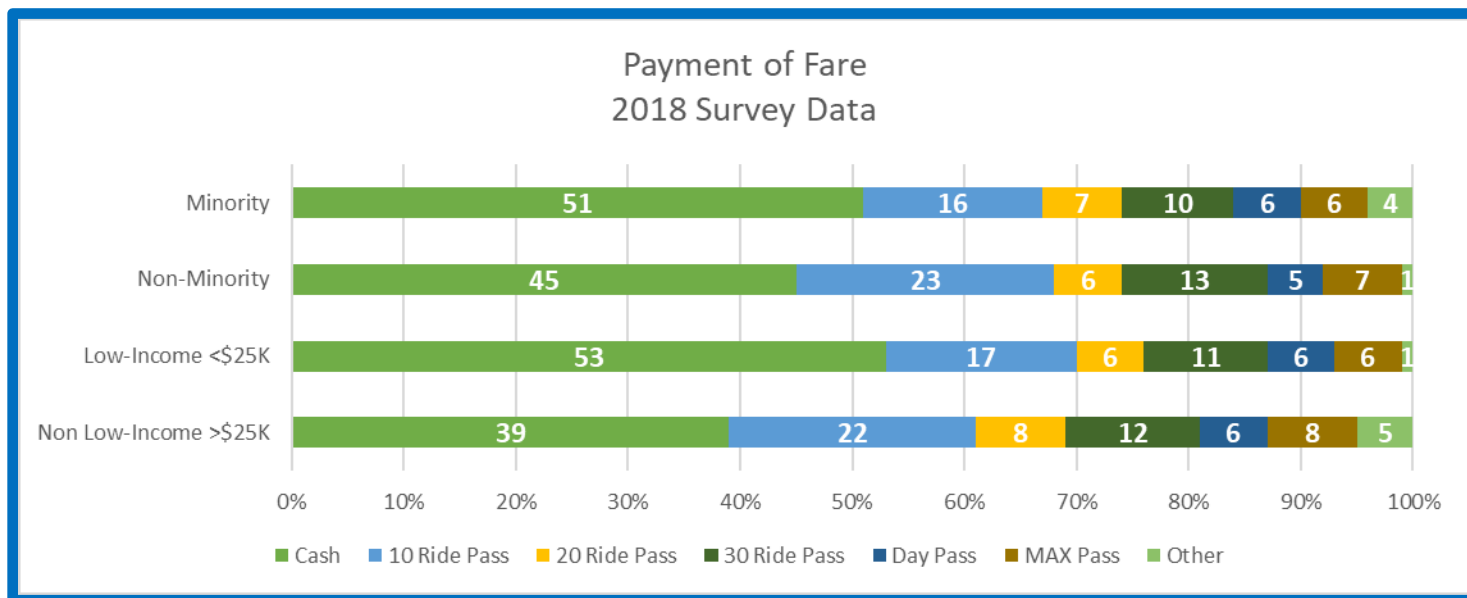
Transfers

Most trips (66% or more) require a transfer for all populations surveyed. On average, 74.25% of both minority and low-income riders require a transfer for their trip.



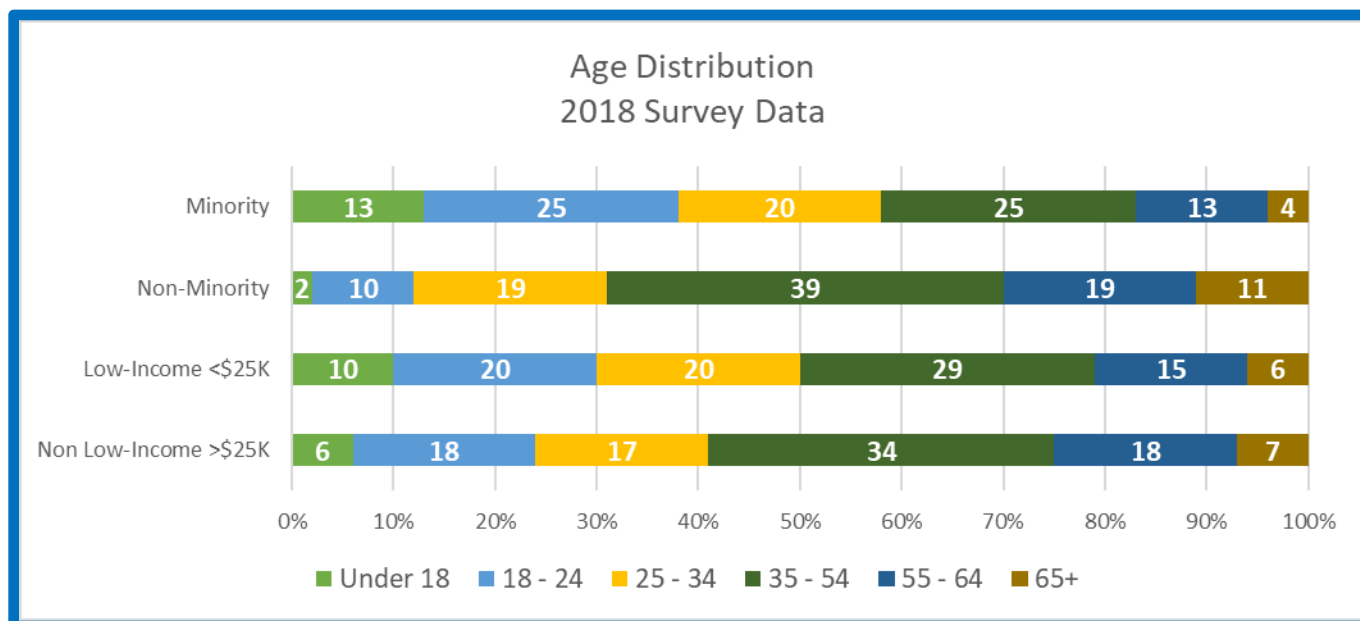
Fare Payment

Fare payment by race/ethnicity appears similar when comparing minority and non-minority trips. In both categories, cash accounts for approximately half of the payments, while a combination of passes makes up the rest. Of the available pass options, the 10 Ride Pass and the 30 Ride Pass are the most popular. Fare payment between low-income and non low-income riders shows a difference in cash usage. While low-income riders use cash more than non low-income riders (53% versus 39%). Both low-income and non low-income riders use the 10 Ride and 30 Ride Pass options more than any other pass type.



Age

Age is distributed differently for minority versus non-minority riders. A higher percentage of minority riders are on the younger end of the age spectrum; under 18 (13% versus 2%) and 18-24 (25% versus 10%). Non-minority riders exceed minority in ages above 35, especially in the 35-54 range. The distribution of age across income levels is more consistent with the largest difference being in the 35-54 range in which non low-income is 34% versus low-income at 29%.



Monitor Transit Services

As per Federal Transit Administration Title VI regulations, a random sample of three minority and three non-minority routes were analyzed under Centro's Monitoring Program. Each route was reviewed to determine whether it adhered to the required elements and found to be in accordance with Centro's established service standards.

- **Vehicle Load:** All minority and non-minority routes averaged less than the bus seated capacity of 39 persons.
- **Vehicle Headway:** Each urban and suburban route's headway is operating in accordance with established standards.
- **On-Time Performance:** Each route's on-time performance reasonably meets established service standards.
- **Service Availability:** Each of the minority and non-minority routes analyzed serve a minority population above the minority concentration percentage (22.9%) for Onondaga County based on ACS 2013-2017.
- **Vehicle Assignment:** Vehicles are equitably assigned in accordance with established service standards.
- **Distribution of Transit Amenities:** Amenities are equitably distributed between both minority and non-minority routes.

For details regarding the above service standards, refer to Centro's Board Approved Service Monitoring Program included as Attachment 8.

Centro's transit service corresponds with all Title VI objectives, as listed below.

Objectives:

1. To ensure that FTA-assisted benefits and related services are made available and are equitably distributed without regard to race, color, or national origin.
2. To ensure that the level and quality of FTA-assisted transit services are sufficient to provide equal access and mobility for any person without regard to race, color, or national origin.
3. To ensure that opportunities to participate in the transit planning and decision-making processes are provided to persons without regard to race, color, or national origin.
4. To ensure that decisions regarding the location of transit services and facilities are made without regard to race, color or national origin.
5. To ensure that corrective and remedial action is taken by all applicants and recipients of FTA assistance to prevent discriminatory treatment of any beneficiary based on race, color or national origin.

Public Engagement in Setting Title VI Policies

As required by Title VI of the Civil Rights Act of 1964, Centro maintains policies for identifying and analyzing major transit service changes and fare changes to ensure there are no discriminatory impacts. These policies include the Major Service Change Policy, Disparate Impact Policy, and Disproportionate Burden Policy. Centro's Title VI Policies are posted on the company website where feedback is continuously sought. In addition, an annual reminder is distributed via social media and Centro's Rider Alert System soliciting feedback. Information is also made available in the form of handouts at annual Customer Feedback Sessions held in all four service counties.

Centro is committed to the principles embodied in Title VI and seeks to ensure that the impacts of major service changes and/or fare changes are not disproportionately borne by minority or low-income populations. Additionally, Centro has taken steps to enhance its 2016 policies in an effort to make key terms and processes easier to understand and more inclusive of current procedures. Prior to the submission of the 2019 Title VI Program Report, Centro advised the public of the changes via the company website, social media platforms, Service Alert System as well as by posting notifications on the buses and digital Hub monitors.



Proposed Title VI Policy Updates

Centro is updating its Title VI policies and procedures to make them easier to understand, and we want your feedback. To view the proposed clarifications, [CLICK HERE](#).

Public feedback will be accepted until **July 31, 2019** as follows:

- Submit feedback via Centro's [website](#)
- Submit online feedback via Centro's [Facebook](#), [Twitter](#) or [Instagram](#) social media sites
- Leave a message at (315) 442-3400
- Fax your comments to (315) 442-3337
- Write to Centro at 200 Cortland Avenue, Syracuse, NY 13205

Following the public feedback acceptance deadline, Centro will analyze all public comments received and will revise the proposed policies as appropriate. The policies will subsequently be submitted to the Centro Board of Members for approval.

Centro Stakeholders were contacted via a letter advising them of the proposed updates and requesting feedback. A copy of the proposed Title VI Policies document was included.

After the public feedback period ended, the revised Policy document was submitted to the Board of Members for approval. A Centro Board of Members motion adopting the Title VI of the Civil Rights Act of 1964 Policies and all attendant policies and procedures is included as Attachment 9.

Evaluate Service and Fare Changes

In general, whenever service changes are needed, Service Development staff compiles ridership data and applies Centro's Board sanctioned service and ridership standards to the entire Centro routing system. Each route identified as a candidate for reduction or elimination is analyzed on a number of levels. Impacts on the integrity of the transit system and budgetary ramifications are important, but even more determinant is the impact on the riding public, particularly those who are transit-dependent. Centro's prime goal is always to provide the best level of mobility possible for as much of the population as possible, given the resources available.

Fare Equity Analysis for Day Pass Fare Media

In May 2016, Centro introduced a new Day Pass option for customers in CNY Centro, and Centro of Oneida (Utica only). The cost of the Day Pass is \$5.00 for those paying full fare, and \$2.50 for those who qualify for half fare. The Day Pass is available for purchase on each Centro bus operated by CNY Centro. Beginning in September 2016, CNY Centro began conducting rider surveys to determine usage of the Day Pass in an effort to identify potential disparate impacts and disproportionate burdens on minority and low-income riders as required under Title VI regulations outlined in FTA Circular 4702.1B. In January 2017, a Fare Equity Analysis was conducted to evaluate the addition / availability of the Day Pass to its fare options. This review, performed after a six-month trial of the Day Pass, addressed how the proposal impacted Title VI populations, and how impacts would be mitigated, if necessary, in accordance with Federal Transit Administration (FTA) guidelines.

CNY Centro concluded that offering a Day Pass for sale on its buses at pricing levels for adult fare and reduced fare riders does not constitute a fare increase, nor does it create a disparate impact or disproportionate burden on minority or low-income populations. Additionally, the creation of the Day Pass was applauded by the local anti-poverty Hope Initiative as a benefit to low-income individuals who use public transit.

A Centro Board of Members motion adopting this Title VI Fare Equity Analysis and all its attendant policies and procedures is included as Attachment 10.

Fare Equity Analysis for Weekly MAX Pass Fare Media

In November 2017, Centro introduced a new Weekly MAX Pass option for customers in CNY Centro, Centro of Oneida, Centro of Oswego and Centro of Cayuga. Beginning in May 2018, CNY Centro began conducting rider surveys to determine usage of the Max Pass to identify potential disparate impacts and disproportionate burdens on minority and low-income riders as required under Title VI regulations outlined in FTA Circular 4702.1B. In June 2018, a Fare Equity Analysis was conducted to evaluate the addition / availability of the Max Pass to its fare options. This review, performed after a six-month trial of the MAX Pass, addressed how the proposal impacted Title VI populations, and how impacts would be mitigated, if necessary, in accordance with Federal Transit Administration (FTA) guidelines.

CNY Centro concluded that offering a MAX Pass for sale at its current pricing levels for adult fare and reduced fare riders does not constitute a fare increase, nor does it create a disparate impact or disproportionate burden on minority or low-income populations. Additionally, the creation of the MAX Pass was instituted after suggestions from riders for a weekly pass that would offer unlimited rides; and therefore, a convenient and less expensive option for frequent riders.

A Centro Board of Members motion adopting this Title VI Fare Equity Analysis and all its attendant policies and procedures is included as Attachment 11.

Centro Title VI Complaint Form

Section I:				
Name:				
Address:				
Telephone (Home):		Telephone (Other):		
E-Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?		Yes*		No
*If you answered "yes" to this question, go to Section III.				
If not, please provide the name of and your relationship to the person for whom you are filing the complaint:				
Name: _____		Relationship: _____		
Please explain why you have filed for a third party:				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party,		Yes		No
Section III:				
I believe the discrimination I experienced was based on (check all that apply):				
[] Race [] Color [] National Origin				
Date of Alleged Discrimination (Month, Day, Year): _____				
Time of Day: _____				
<u>Bus Route</u> Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please attach additional sheets to this form.				

Centro Title VI Complaint Form

Section IV:

Have you previously filed a Title VI complaint with this agency?

Yes

No

Section V:

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State Court?

☐ Yes ☐ No

If yes, check all that apply:

☐ Federal Agency: _____

☐ Federal Court: _____

☐ State Agency: _____

☐ State Court: _____

☐ Local Agency: _____

Please provide information about a contact person at the agency/court where the complaint was filed.

Name:

Title:

Agency:

Address:

Phone Number:

You may attach any written materials or additional information you feel is relevant to your complaint.

Signature and date required below:

Signature

Date

Please submit this completed Title VI Complaint Form in person at the address below, or mail to:

Title VI Complaint Officer

Central New York Regional Transportation Authority

200 Cortland Avenue

PO Box 820

Syracuse, NY 13205

cnyrta@centro.org

Centro Título VI Formulario de Queja

Sección I:

Nombre:

Dirección:

Teléfono (Hogar):

Teléfono (Otro):

Dirección de Correo Electrónico:

Formato Accesible
Requisitos?

Letra Grande

Cinta de Audio

TDD

Otro

Sección II:

Está presentando esta queja en su propio nombre?

Sí*

No

*Si respondió "sí" a esta pregunta, vaya a la Sección III.

De lo contrario, proporcione el nombre y su relación con la persona para la que presenta la queja:

Nombre: _____ Relación: _____

Por favor, explique por qué ha solicitado un tercero:

Confirme que ha obtenido el permiso de la parte
perjudicada si está presentando una solicitud en nombre
de un tercero.

Sí

No

Sección III:

Creo que la discriminación que experimenté se basó en (marque todo lo que corresponda):

[] Raza [] Color [] Origen Nacional

Fecha de Presunta Discriminación (Mes, Día, Año): _____

Hora del Día _____

Ruta del Autobus

Explique lo más claramente posible qué sucedió y por qué cree que lo discriminaron. Describa a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de las personas que lo discriminaron (si se conoce), así como los nombres y la información de contacto de los testigos. Si necesita más espacio, adjunte hojas adicionales a este formulario.

Centro Título VI Formulario de Queja

Sección IV:

Ha presentado anteriormente una queja del Título VI con esta agencia?

Sí

No

Sección V:

Ha presentado esta queja ante cualquier otra agencia federal, estatal o local, o ante cualquier tribunal federal o estatal?

☐ Sí ☐ No

En caso afirmativo, marque todo lo que corresponda:

☐ Agencia Federal: _____

☐ Corte Federal: _____

☐ Agencia del Estado: _____

☐ Corte Estatal: _____

☐ Agencia local: _____

Proporcione información sobre una persona de contacto en la agencia / corte donde se presentó la queja.

Nombre:

Título:

Agencia:

Dirección:

Número de Teléfono:

Puede adjuntar cualquier material escrito o información adicional que considere relevante para su queja.

Firma y fecha requerida a continuación:

Firma

Fecha

Envíe este Formulario de reclamación del Título VI completado en persona a la dirección que figura a continuación, o envíela por correo a:

Title VI Complaint Officer

Central New York Regional Transportation Authority
200 Cortland Avenue
PO Box 820
Syracuse, NY 13205
cnyrta@centro.org

Notice: Title VI

Notice to the Public of Rights Under Title VI Central New York Regional Transportation Authority (CNYRTA)

CNYRTA, as a recipient of federal funding, gives public notice of its policy to fully comply with Title VI of the Civil Rights Act of 1964 and all related laws and statutes. 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 CNYRTA program or activity, as provided by Title VI of the Civil Rights Act of 1964 and as amended, and the Civil Rights Restoration Act of 1987 (P.L. 100.259). CNYRTA operates its programs without regard to race, color, or national origin.

For more information on CNYRTA’s Title VI program, contact the Title VI Complaint Officer:

**Central New York Regional Transportation Authority
PO Box 820
200 Cortland Ave
Syracuse, NY 13205**

- Email: cnyrta@centro.org
- Visit our website: <https://www.centro.org/misc-group/title-vi-and-reasonable-modification-policy>
- Call Main Office: 315-442-3333 for more information

A person may also file a complaint directly with the FTA by contacting the Federal Transit Administration Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor – TCR, 1200 New Jersey Avenue SE, Washington, DC 20590.

Title VI Complaint Procedure

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the Central New York Regional Transportation Authority (hereinafter referred to as Centro) may file a Title VI complaint by completing and submitting the agency’s Title VI Complaint Form.

Please submit this form in person at the address below, or mail this form to:

**Title VI Complaint Officer
Central New York Regional Transportation Authority PO Box 820
200 Cortland Ave
Syracuse, NY 13205**

Centro investigates complaints received no more than 90 days after the alleged incident. Centro will process complaints that are complete. A copy of the complaint form is available on the Centro website or by calling any of the Centro offices in the four county service area.

Once the complaint is received, Centro will review it to determine if our office has jurisdiction and if the complaint falls under the scope of Title VI. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

The Authority has 30 calendar days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the Centro official investigating the complaint. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, the Authority can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has 10 business days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the FTA by contacting the Federal Transit Administration Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor – TCR, 1200 New Jersey Avenue SE, Washington, DC 20590.

Note: Complaints must be signed and include contact information.

No one may intimidate, threaten, coerce, or engage in other discriminatory conduct against anyone because he or she has either filed a complaint to secure rights protected by the nondiscrimination statutes Centro enforces. Any individual alleging such harassment or intimidation may file a complaint with Centro and/or the Federal Transit Administration and an investigation will be conducted.

Darse Cuenta: Título VI

Aviso al público de derechos bajo el Título VI Autoridad de Transporte Regional del Centro de Nueva York (CNYRTA)

CNYRTA, como receptor de fondos federales, notifica públicamente su política de cumplir plenamente con el Título VI de la Ley de Derechos Civiles de 1964 y todas las leyes y estatutos relacionados. Ninguna persona en los Estados Unidos, por motivos de raza, color u origen nacional, será excluida de la participación, se le negarán los beneficios o se le someterá a discriminación bajo cualquier programa o actividad de CNYRTA, según lo dispuesto en el Título VI de la Ley de Derechos Civiles de 1964 y sus enmiendas, y la Ley de Restauración de Derechos Civiles de 1987 (PL 100.259). CNYRTA opera sus programas sin distinción de raza, color u origen nacional.

Para obtener más información sobre el programa Título VI de CNYRTA, comuníquese con el Oficial de Quejas Título VI:

**Autoridad de transporte regional central de Nueva York
PO Box 820
200 Cortland Ave
Syracuse, NY 13205**

- Correo electrónico: cnyrta@centro.org
- Visite nuestro sitio web: <https://www.centro.org/misc-group/title-vi-and-reasonable-modification-policy>
- Llame a la oficina principal: 315-442-3333 para más información.

Una persona también puede presentar una queja directamente al TLC contactando a la Oficina de Derechos Civiles de la Administración Federal de Tránsito, Atención: Equipo de Quejas, Edificio Este, 5to piso - TCR, 1200 New Jersey Avenue SE, Washington, DC 20590.

Procedimiento de queja del Título VI

Cualquier persona que crea que ella o él han sido discriminados por motivos de raza, color u origen nacional por la Autoridad de Transporte Regional del Centro de Nueva York (en lo sucesivo, Centro) puede presentar una queja de Título VI completando y presentando el Título de la agencia VI Formulario de queja.

Envíe este formulario en persona a la siguiente dirección o envíe este formulario a:

**Oficial de Quejas del Título VI
Autoridad de Transporte Regional del Centro de Nueva York
PO Box 820
200 Cortland Ave
Syracuse, NY 13205**

Centro investiga las quejas recibidas no más de 90 días después del presunto incidente. Centro procesará las quejas que estén completas. Una copia del formulario de queja está disponible en el sitio web del Centro o llamando a cualquiera de las oficinas del Centro en el área de servicio de cuatro condados.

Una vez que se recibe la queja, Centro la revisará para determinar si nuestra oficina tiene jurisdicción y si el la queja cae dentro del alcance del Título VI. El demandante recibirá una carta de confirmación informándole si la queja será investigada por nuestra oficina.

La Autoridad tiene 30 días calendario para investigar la queja. Si se necesita más información para resolver el caso, la Autoridad puede contactar al demandante. El demandante tiene 10 días hábiles a partir de la fecha de la carta para enviar la información solicitada al funcionario del Centro que investiga la queja. Si el demandante no contacta al investigador o no recibe la información adicional dentro de los 10 días hábiles, la Autoridad puede cerrar el caso administrativamente. Un caso puede cerrarse administrativamente también si el demandante ya no desea continuar con su caso.

Después de que el investigador revisa la queja, él / ella emitirá una de dos cartas al demandante: una carta de cierre o una carta de hallazgo (LOF). Una carta de cierre resume las acusaciones y establece que no hubo una violación del Título VI y que el caso se cerrará. Un LOF resume las acusaciones y las entrevistas sobre el presunto incidente, y explica si ocurrirá alguna acción disciplinaria, capacitación adicional del miembro del personal u otra acción. Si el demandante desea apelar la decisión, tiene 10 días hábiles después de la fecha de la carta o el LOF para hacerlo.

Una persona también puede presentar una queja directamente al TLC contactando a la Oficina de Derechos Civiles de la Administración Federal de Tránsito, Atención: Equipo de Quejas, Edificio Este, 5to piso - TCR, 1200 New Jersey Avenue SE, Washington, DC 20590.

Nota: Las quejas deben estar firmadas e incluir información de contacto.

Nadie puede intimidar, amenazar, coaccionar o participar en otra conducta discriminatoria contra alguien porque él o ella ha presentado una queja para garantizar los derechos protegidos por los estatutos de no discriminación que Centro hace cumplir. Cualquier persona que alegue tal acoso o intimidación puede presentar una queja ante Centro y / o la Administración Federal de Tránsito y se llevará a cabo una investigación.



www.centro.org

CNY CENTRO, INC.

Public Participation Plan

The purpose of this document is to establish public participation policies and procedures for information dissemination and public comment solicitation for development and review of programs and projects carried out by CNY Centro, Inc., the public transportation provider in Central New York.

A. Introduction

The Central New York Regional Transportation Authority (CNYRTA) operates public transportation services in six cities and four counties in the Central New York region. CNYRTA operates services in Syracuse, NY metropolitan region through its wholly owned subsidiary, CNY Centro, Inc. (Centro). The Authority's Board and staff are firmly committed to providing efficient, effective transportation services that enhance the quality of life throughout the Central New York region. Centro's goal is to be responsive to the transportation needs of the Central New York community by providing services which are safe, convenient, reliable and environmentally responsible with a goal of maximizing the taxpayers' return on investment.

Public participation is the process by which an organization consults with interested or affected individuals, organizations and government entities before making a decision. 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 comment on the development and review of programs and projects carried out by the Authority. To the extent possible, the goal is to provide opportunities for proactive, early and continuing public participation for projects, programs, and decision making to ensure that these programs reflect community values and benefit all segments of the community equally.

B. Public Participation Law

The Federal regulations bearing on this Public Participation Plan are as follows:

B.1. Federal Transit Administration Program-of-Projects Requirements and Section 5307 Grant Program

49 U.S.C. Section 5307(c)(1) through (c)(7) is the enabling legislation empowering Federal grant programs for public transit throughout the United States. The legislation also instructs the Federal Transit Administration (FTA) to implement public participation requirements as a condition of Federal funding. FTA grant applicants must integrate compliance with the public participation requirements into Section 5307 grant program applications. FTA allows the public involvement process to be locally developed and adopted as part of the regional Transportation Improvement Program (TIP) maintained by the regional Metropolitan Planning Organization (MPO). Grantees must coordinate with the MPO and ensure that the public is aware that the TIP development process is being used to satisfy the public hearing requirements of Section 5307(c). The grant applicant must explicitly state that public notice of public involvement activities and time established for public review and comment on the TIP will satisfy the program-of-projects requirements of the Urbanized Area Formula Program. A project that requires an environmental assessment or an environmental impact statement will involve additional public involvement, as presented in joint FHWA/FTA environmental regulations, "Environmental Impact and Related Procedures," 23 C.F.R. Part 771.

Centro works directly with the two regional MPOs in its service area, the Syracuse Metropolitan Transportation Council (SMTTC) and the Herkimer Oneida Counties Transportation Study (HOCTS), to develop the transit elements for the regional TIPs. The public involvement activities and the time established for public review and comment on the TIPs satisfy the program-of-projects requirements of the Urbanized Area Formula Program.

B.2. Americans with Disabilities Act (ADA)

The American with Disabilities Act (ADA) of 1990 encourages the involvement of people with disabilities in the development and improvement of transportation and paratransit plans and services. In accordance with ADA guidelines, all meetings conducted by Centro take place in locations that are accessible to persons with mobility limitations. Also, auxiliary aids and services are provided when necessary to ensure effective communication, unless an undue burden or fundamental alteration would result, to allow a person with a disability to participate. "Auxiliary aids" include such services or devices as qualified interpreters, assistive listening headsets, television captioning and decoders, telecommunication devices for deaf persons (TDD's), videotext displays, readers taped text, Brailled materials, and larger print materials. Centro public meeting notices specify that special accommodations will be provided upon request.

B.3. Title VI

Title VI of the Civil Rights Act of 1964 prohibits discrimination by recipients of Federal financial assistance on the basis of race, color, and national origin, including matters related to language access for limited English proficient (LEP) persons. The objectives of Title VI of the Civil Rights Act of 1964 are:

- To ensure FTA-assisted benefits and related services are equitably distributed without regard to race, color or national origin.
- To ensure that both the level and quality of transit services provide equal access and mobility for any person without regard to race, color or national origin.
- To ensure that access to the planning and decision-making process is open and without regard to race, color or national origin
- To ensure that decisions on the location of transit facilities and services are made without regard to race, color or national origin.

To comply with these objectives, Centro has adopted the suggested methodology and framework set forth in the Title VI reporting guidelines (FTA Circular 4702.1B, Chapter IV). By using this methodology, Centro monitors and compares performance of all its routes based on level of service and quality of service criteria. To facilitate this evaluation, Centro continually collects data relating to its service standards, such as load factor, vehicle assignment, frequency, and on time performance. These analyses are conducted on a route-by-route basis, thus enabling a system-wide evaluation. The findings of these analyses are used to guide service delivery in line with the stated objectives of the Title

VI program. The Authority submits Title VI reports to FTA every three years for their review, documenting the results of this methodology and Centro's compliance with the Title VI regulations.

B.4. Limited English Proficiency (LEP)

Title VI directs each Federal agency to develop and implement a system by which limited English proficiency persons can meaningfully access the services it funds. Federal agencies published guidance for their respective grant recipients in order to assist them with their obligations to LEP persons under Title VI. As a result, the FTA published guidance and implemented regulations requiring that grant recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for LEP individuals. Centro, as an FTA grantee, is required to ensure meaningful access to benefits, services and information for LEP persons. Centro has developed a language implementation plan for LEP persons as part of its Title VI program.

C. Centro Public Participation Program Elements

C.1. Citizens Input

Centro will solicit public input on an ongoing basis thru a multifaceted social media strategy including, but not necessarily limited to blog, Facebook, or Twitter vehicles. This approach will provide opportunities for proactive, early, and continuing public participation for Centro projects, programs and decision making. This social media strategy will allow staff wide latitude to adapt to and take advantage of changing communications technologies. Social media will be used to interact with individuals, groups, businesses and strategic partners to improve customer service satisfaction.

Other outreach efforts may be made to solicit input from a forum of organizations serving minorities, low income people, as well as people with disabilities and limited English proficient populations. More structured meetings may be held on specific proposals and projects when desirable to expand support and encourage broad-based public participation in the development and review of programs and projects. Centro will aggressively promote 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, entities such as:

- Service area transit users
- The general public
- Salvation Army
- CNY Works
- PEACE, Inc.

- Aurora of CNY, Inc.
- Syracuse Public Schools
- Catholic Charities
- National Association for the Advancement of Colored People
- Spanish Action League
- Refugee Resettlement Services
- Veterans Service Agency
- Arise
- Enable
- CenterState CEO
- Syracuse Metropolitan Transportation Council
- University/College Representatives

This strategy will be applied to programs and projects applicable to CNY Centro, Inc. (Onondaga County) as mandated by Title VI initially. It may also be expanded to other CNYRTA subsidiary companies, if desirable or necessary.

C.2. Service Restructuring/Fare Analysis

In the event of a proposed fare or major service change, staff will conduct a Service and Fare Equity Analysis required by FTA for compliance with Title VI of the Civil Rights Act of 1964 to assess the effects of such a change on minority and low-income populations during the planning of such changes. The analysis may also address alternatives available for people affected by the changes. The results of the analysis will be reported to Centro's Board prior to any public discussion or implementation of the proposed changes.

Centro will undertake a comprehensive and inclusive public participation and outreach process in the event of a major service or fare change. During the public outreach period, Centro will post information and accept comments regarding the proposed change on Centro's website & social media vehicles. Prior to hosting formal public hearings on proposed route or fare changes, Centro will employ the social media strategy previously described. Centro may hold public information meetings in local communities; stakeholder group meetings; and present the changes to its Accessible Transportation Advisory Committee. The purpose of such efforts is to include minority, low-income and LEP populations in the planning stages of the change. Centro's policy for the Soliciting of Public Comment and Conducting a Title VI Service and Fare Equity Analysis on Transit Service and Fare Changes is incorporated by reference and is included in Centro's Title VI Policies document.

C.3. Limited English Proficiency Plan

To improve contact with Limited English proficiency populations, Centro has developed a Limited English Proficiency (LEP) program designed to communicate important Centro information to those populations. Elements within Centro's LEP include but are not limited to:

- A website language translator.
- A translation service for Centro's Call Center.
- A travel training program.
- Ongoing LEP training for all Centro Bus Operators and Customer Service Representatives.
- Inclusion of organizations that represent LEP individuals as stakeholders in workshops and public hearings.
- To solicit participation, publications that represent LEP populations are used to advertise changes in fares and service, as well as the meetings and hearings associated with such changes. These mediums are also used to advertise and disseminate information from and about Centro that is informational and does not require public participation.

A copy of Centro's LEP program is submitted to the FTA for approval with each Title VI Program report.

C.4. Monitoring and Evaluation

Centro will continuously monitor and evaluate its public participation process. Regular review will be accomplished by tracking-website and social media usage and conducting periodic online surveys to determine demographic usage of website and social media vehicles. The public will be encouraged to provide comments and suggestions through various channels and open dialogue will be maintained with advisory groups and stakeholders throughout the community on transportation and planning issues. A record of public comments and those of institutional representatives will be kept as well as Centro response to such comments, where pertinent.



**Central New York
Regional Transportation Authority**

Outreach Efforts Summary



Attachment 4



**May 5-6, 2016
Sweet Adelines
Syracuse**

Transportation services were provided to more than 1,000 female singers partaking in an annual chorus and quartet competition in Syracuse, NY. The winner would go on to represent the Lake Ontario Region at the 2017 International Convention in Las Vegas.

**May 13, 2016
Big Rig Day
Syracuse**

The City of Syracuse's Big Rig Day at Burnet Park once again drew big crowds. Hundreds of inquisitive visitors were greeted by our driver as they climbed aboard to explore the interior of a Centro transit bus.

**June 7, 2016
Corporate Challenge
Syracuse**

More than 6,500 runners and walkers, including 35 Centro employees, participated in the 34th annual J.P. Morgan Corporate Challenge. The 3.5-mile race at Onondaga Lake Park, open to all full-time employees in Syracuse, is one of 13 worldwide sponsored by J.P. Morgan to encourage fitness and workplace camaraderie.

**June 11, 2016
Go Team Therapy Dog Training
Syracuse**

For the third year in a row, Centro hosted more than a dozen dogs and their handlers during the Go Team Therapy Dog Training Class at its Main Office and Transit Hub in Syracuse. The Go Team Therapy Dogs are dedicated to placing well-trained, certified therapy dog teams in programs that provide comfort and caring through a canine-human bond.

**June 16, 2016
Dump the Pump Day
System-wide**

More than 150 public transit systems and organizations across the nation participated in the 11th annual National Dump the Pump Day. Sponsored by the American Public Transportation Association (APTA), this national public awareness day encourages people to "Dump the Pump" by parking their car and riding a bus or train instead.

**June 21, 2016
Dr. Weeks Big Rig Day
Syracuse**

Centro participated in the Dr. Edwin E. Weeks Elementary School Big Rig Day where students in grades K-5 were welcomed aboard by a Centro driver. Students had the opportunity to explore and ask questions about "how things work" and received a copy of a Centro-themed transportation coloring book.

**June 24, 2016
Mobility Summit
Ithaca**

Joshua Gardner, Centro CAD/AVL System Coordinator, presented the benefits, costs and lessons of deploying Google Transit and GTFS as a means for smaller fixed route operators to provide real-time passenger information to customers wondering "Where's my bus?" at the Mobility Summit meeting held in Ithaca, NY. Centro is one of four Upstate NY authorities to offer this service on a system-wide basis.

**July 2-3, 2016
M&T Jazz Fest
Syracuse**

Centro provided extra service to Onondaga Community College along its Sy 26 South Ave line for the 34th Annual M&T Jazz Fest, which featured Michael McDonald, Trombone Shorty, Julia Goodwin and The Mavericks. Additional trips from the Centro Transit Hub were provided to help ease traffic congestion around the campus and ensure that the regularly scheduled service would be maintained.

**July 4, 2016
Utica 4th of July
Utica**

Celebrating our nation's birthday, Centro along with over 160 organizations took part in the annual 4th of July Parade through the City of Utica. Centro also provided a free parking shuttle service to the Party in the Park (F.T. Proctor Park) fireworks show and concert from Mohawk Valley Community College (MVCC).

**July 13, 2016
Assemblyman Magnarelli's Fair
Baldwinsville**

Representatives from local social service and community service organizations gathered at the Ray Middle School in Baldwinsville so that residents in the Town of Van Buren could access information about important resources available to them in our community. The Community Services on the Road Day was sponsored by New York State Assemblyman William B. Magnarelli.

**July 26, 2016
ADA Anniversary
Syracuse**

Along with several other local service organizations, Centro participated in the 26th Anniversary of the Americans with Disabilities Act. The event, which was held at the Atrium in Downtown Syracuse, promotes awareness about cross-disability rights and issues. Centro participated in the annual parade around Downtown Syracuse alongside one of its Call-A-Bus paratransit vehicles.

**August 11, 2016
Sustainable Development
Central New York**

Centro Chief Executive Officer Rick Lee participated on a panel at the first regional sustainability conference in Syracuse. Organized by Governor Andrew Cuomo, the conference brings together community development leaders to share successful economic growth strategies. The conference marks the first of a series of Statewide events to boost awareness of State resources available to local governments and non-profit organizations.

**August 26, 2016
Utica College Orientation
Utica**

Staff from Centro's Utica facility met with students and parents at the Freshman Orientation Resource Fair at Utica College to answer questions and discuss the available transportation options for getting around the City of Utica as well as commuting to and from campus. Utica College is served by Centro's Ut 114 Mohawk St and Ut 20 Lenox Ave - Business Park routes.

**September 27, 2016
Sen. DeFrancisco's Senior Fair
Syracuse**

Centro took part in State Senator John A. DeFrancisco's 12th Annual Senior Fair at the NYS Fairgrounds. Centro representatives were on hand to discuss transportation options available to seniors including the Onondaga Senior Call-A-Ride (OSCAR) program, Call-A-Bus service, and Travel Training for those interested in learning to ride the Centro transit system.

**October 5, 2016
NYS MWBE Forum
Albany**

Representatives from Centro's Procurement Department participated in the 6th Annual New York State MWBE Forum in Albany. The Forum, New York's largest annual business event for minority and women-owned business enterprises, assists small businesses with navigating the State's available contract opportunities to grow their businesses.

**October 27, 2016
MS Fair - Barbegallos
Syracuse**

When the Multiple Sclerosis Resources of Central New York hosted its 2nd Annual Health and Wellness Expo at Barbegallos's Restaurant in East Syracuse - Centro was on hand. Representatives from Centro's Marketing Department answered questions that participants had about available transportation options.



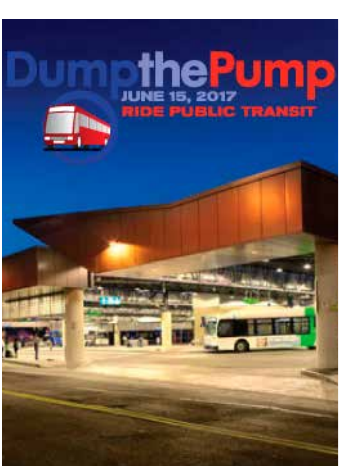
Stuff-A-Bus
 THE ADRIAN RAY
 CLOUTIER MORTGAGE
 MM MOVEMENT MORTGAGE

December 10th
 Walmart
 8064 Brewerton Rd
 Cicero, NY 13039
 9:00am - 7:00 pm



MARCH 18
TRANSIT DRIVER
APPRECIATION DAY
 transitdriverday.org

<p>October 24-25, 2016 VETCON Albany</p> <p>Representatives from Centro's Procurement staff engaged with dozens of certified disabled veteran business owners to discuss potential contracting opportunities for services and commodities at the first annual VETCON. The 500+ veteran attendees, from as far away as Texas and Maryland, gathered for the two-day conference that featured presentations, panel discussions, informal matchmaking sessions with both public agencies and private business, and a job fair.</p>	<p>November 10, 2016 SMTC SMART Study Phase II Syracuse</p> <p>SMTC held its second open house for the SMART 1 project, and Centro personnel were on hand to answer questions concerning possible impacts to area bus service. Attendees visited interactive stations and learned more about project background, purpose and goals, mode eligibility screening, preliminary route alternatives, evaluation criteria, and next steps.</p>	<p>November 19, 2016 Lights on Caravan Syracuse</p> <p>Once again, Centro played host to the 33rd Annual Donald H. Barrett "Lights On Caravan." The event, sponsored by the Onondaga County Traffic Safety Advisory Board (OTSAB), is held annually to honor and remember victims of drunk and drugged driving crashes, and to remind all drivers of the dangers of driving while impaired.</p>	<p>December 5, 2016 OCM BOCES Services Fair Liverpool</p> <p>Centro representatives met with students at the annual BOCES Service Fair who were looking for alternative means to get to BOCES, internship locations, and prospective places of employment.</p>
<p>December 10, 2016 Stuff-A-Bus Walmart - Cicero</p> <p>Centro was at the Cicero Walmart along with staff from the Azzarello Team & Movement Mortgage for the "Stuff-A-Bus" Toy Drive. Toys for kids of all ages along with non-perishable food items were collected and donated to children at Upstate Golisano Children's Hospital and The Salvation Army Syracuse Area Services.</p>	<p>January 11, 2017 29th OCTSAB Award Ceremony Syracuse</p> <p>Since 1996, the Onondaga County Traffic Safety Advisory Board (OTSAB) has recognized professionals in the community who have made a difference in the traffic safety field with the Gerald E. Deitz Individual Safety Service Award. Deitz, a 39-year Centro employee and past president of the OTSAB, spearheaded the "Lights On Caravan" raising awareness against DWI. This year's award was presented by Mike Walsh, Centro's Director of Security to Michael Johnson of Branch's Driving School.</p>	<p>June 24, 2016 Upstate Medical University Syracuse</p> <p>Representatives from Centro met with employees from SUNY Upstate Medical University in their new offices at the Syracuse Galleries to provide information on commuter services, commuter tax benefits for bus fare, travel training, accessible transportation options, and to demonstrate the new GoCentroBus mobile app's features.</p>	<p>January 18, 2017 Housing & Homeless Coalition Syracuse</p> <p>Centro Marketing and Communications Manager Lynette Paduano and Sr. CAD/AVL System & Operations System Analyst Joshua Gardner presented to the Housing and Homeless Coalition of Central New York at United Way in the Rosamond Gifford Room. The presentation included an overview of Centro's service, schedules, passes, and its new GoCentroBus mobile app.</p>
<p>January 20, 2017 FOCUS Forum Syracuse</p> <p>Centro's Chief Executive Officer Rick Lee spoke with members at the FOCUS Greater Syracuse Forum on the future of public transportation in Syracuse and led a discussion introducing Uber and Lyft rideshare services. The Forum, titled "How Central New York Moves into the Future," also featured guest speaker Jim D'Agostino, Director of the Syracuse Metropolitan Transportation Council (SMTC).</p> <p>(Photo credit: Syracuse in Focus)</p>	<p>February 3, 2017 SWAT Training Syracuse</p> <p>The Syracuse Police S.W.A.T. Team and K-9 Units held their regular training exercises at Centro's facilities as part of their safety and security preparedness program.</p>	<p>February 18, 25 & 26 2017 Winterfest Express Syracuse</p> <p>Collaborating with community organizers during the annual Syracuse Winterfest, Centro provided its popular Winterfest Express service. The Express is a continuous, free shuttle service that transports attendees between participating venues throughout Downtown Syracuse.</p>	<p>March 11, 2017 St. Patrick's Day Parade Utica</p> <p>Centro's green bus took its place in the long green line, spreading cheer during the annual St. Patrick's Day Parade in Utica.</p>
<p>March 11, 2017 St. Patrick's Parade Syracuse</p> <p>The Centro green bus, emblazoned with its orange LED destination sign stating "Happy St. Patrick's Day - Erin Go Centro," rolled through the streets of Syracuse during the 35th Annual St. Patrick's Parade. Celebrating the Erie Canal's Bicentennial, the parade theme: "From Eire to Erie" recognized the efforts of the local men and women who helped build the canal - a significant event in Syracuse's transportation history.</p>	<p>March 13, 2017 OCC - College Transition Fair Syracuse</p> <p>Representatives from Centro's Specialized Transportation Department met with many of the 250+ attendees at the conference titled "Finding Your Way! Understanding Transition Planning In and After High School." The all-day conference and resource fair was held at the SRC Events Center on the OCC Campus. The event helps families and students with disabilities learn more about planning for life after high school by providing details about the numerous services offered in the local community.</p>	<p>March 16-18, 2017 CNY Home & Garden Show Syracuse</p> <p>Visitors to the 2017 CNY Home & Garden Show at the NYS Fairgrounds were welcomed to stop by the Center of Progress building where a full-size CNG Centro bus was on display. Visitors were invited aboard to explore, and offered a copy of the new System Map, GoCentroBus mobile app literature, and Centro bookmarks. Centro buses also ran the on-site shuttle service for the duration of the event to transport visitors from the parking lots to the buildings.</p>	<p>March 18, 2017 Transit Driver Appreciation System-wide</p> <p>Centro, along with APTA and thousands of transit agencies around the country, participated in Transit Driver Appreciation Day to celebrate the great women and men who keep Central New Yorkers moving.</p>



**April 4-6, 2017
NTI Procurement Training
Syracuse**

Procurement staff from 11 transit organizations from across the country, including seven staff members from Centro, participated in a three-day National Transit Institute (NTI) training program. Held at Centro's Gerald Deitz Training Center, the course "Risk Assessment and Basic Cost or Price Analysis" covered topics on independent cost estimates, direct and indirect cost analysis, and profit and/or fee analysis.

**April 7, 2017
OCM BOCES Service Fair
Syracuse**

Centro representatives were on hand at the OCM BOCES Community Service Fair (hosted at their Main Campus) to meet with many of the 400 adult students engaged in full-time vocational training and literacy programs. Centro answered questions and provided commuter information to students and their families who were preparing for employment and internship opportunities following the completion of their coursework.

**April 12, 2017
Eastwood Senior Center
Syracuse**

Centro Call-A-Bus Transportation Coordinator, Amber Hergenhan, (pictured) and Communications & Publications Coordinator, Casey Brown met with Eastwood resident seniors to discuss Centro's transit and paratransit services. Topics covered during the presentation included, Call-A-Bus service and eligibility, using Centro's fixed route service, access to Shopper Buses, accessing and reading bus schedules, travel training, and the GoCentroBus mobile app. The Eastwood seniors, an inquisitive group, asked lots of great questions and were most appreciative for the presentation.

**April 27, 2017
CNY Works Info Session
Syracuse**

Centro held an informational session for CNY Works clients to answer questions and provide information about Centro's bus service, fares and passes, travel training, transit tools, and to discuss available career opportunities. CNY Works is a not-for-profit organization bringing businesses, job seekers, and training providers together.

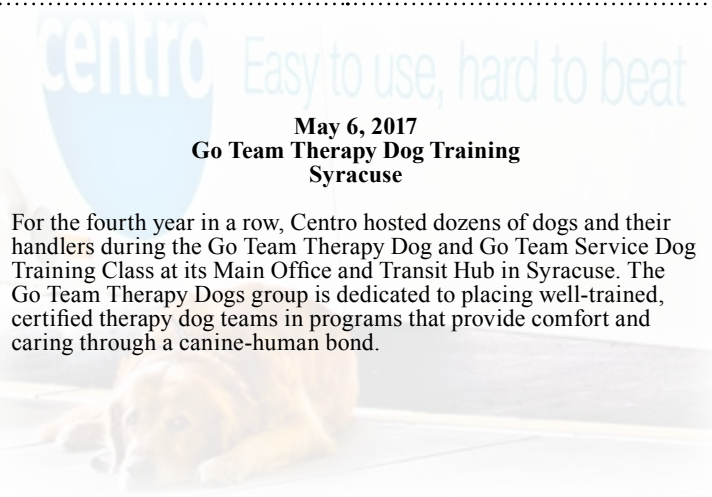
**May 4-7, 2017
Sweet Adelines
Syracuse**

Transportation services were provided to more than 1,000 female singers who participated in the annual Lake Ontario Region 16 chorus and quartet competition at the Onondaga County Civic Center in Downtown Syracuse.



**May 6, 2017
Go Team Therapy Dog Training
Syracuse**

For the fourth year in a row, Centro hosted dozens of dogs and their handlers during the Go Team Therapy Dog and Go Team Service Dog Training Class at its Main Office and Transit Hub in Syracuse. The Go Team Therapy Dogs group is dedicated to placing well-trained, certified therapy dog teams in programs that provide comfort and caring through a canine-human bond.



**May 20, 2017
City of Syracuse Big Rig Day
Syracuse**

The City of Syracuse's Big Rig Day at Burnet Park once again drew a large crowd. Hundreds of inquisitive families were greeted by our driver as they climbed aboard to explore the interior of a Centro bus, and children received stickers and bookmarks.

**May 20, 2017
Downtown Living Tour
Syracuse**

Centro provided a public shuttle service to over 1,000 attendees of the Downtown Committee's annual Downtown Living Tour. The event showcases unique residential locations in Syracuse; each giving a glimpse of the styles and amenities available.



**May 21, 2017
Syracuse Pedal Party
Syracuse**

Centro, along with 40 Below, Cycle in the City, Bike CNY, and the Syracuse Metropolitan Transportation Council (SMTCC) hosted a mini-festival at Syracuse's Inner Harbor to celebrate National Bike Month. Activities included a bike rack demonstration, 10 and 20 mile organized rides, a kid's bike safety course, food trucks, games, City / County bike suitability maps, and prizes.

**June 15, 2017
Dump the Pump Day
Central New York**

Centro, along with public transit systems and organizations across the nation, participated in the 12th annual National Dump the Pump Day. Sponsored by the American Public Transportation Association (APTA), this national public awareness day encourages people to "Dump the Pump" by parking their car and riding a bus or train instead.

**June 17, 2017
Juneteenth
Syracuse**

Centro provided a public bus shuttle service to and from the Syracuse Dunbar Center for participants in the Juneteenth Festival parade. The Festival is held to acknowledge and educate the community about the importance of achieving and maintaining freedom, equality, and opportunity for our nation's African American population.

**June 19, 2017
Dr. Weeks Big Rig Day
Syracuse**

Centro participated in the Dr. Edwin E. Weeks Elementary School Big Rig Day where students in grades K-5 had the opportunity to explore a Centro bus and ask a bus driver questions about "how things work." The students also received a copy of a Centro-themed transportation activity book once their trip aboard was complete.

**July 4, 2017
4th of July Parade
Utica**

Centro, along with over 160 organizations, took part in the annual 4th of July Parade through the City of Utica to help celebrate our nation's birthday. Centro provided a free parking shuttle service to the Party in the Park (F.T. Proctor Park) fireworks show and concert from Mohawk Valley Community College (MVCC).



**June 21, 2017
NYSAMPO Conference
Syracuse**

Steven Koegel, Vice President of Communications & Business Planning gave a presentation on "Implementing System-Wide GPS Technology: Public Benefits and Technical Challenges" at the New York State Association of Metropolitan Planning Organizations (NYSAMPO) Conference. NYSAMPO is a coalition of the 14 MPOs across NYS, which have committed to work together toward common goals.

**July 21, 2017
Arc of Onondaga Safety Fair
Syracuse**

Centro Travel Trainer, Victoria Sonne talks about bus safety and demonstrates how to use the bus service, pay a fare, and secure mobility devices during Arc of Onondaga's 2nd Annual Safety Fair. The Fair is held to educate participants about how to stay safe in and out of their homes.

**July 26, 2017
ADA Anniversary Celebration
Syracuse**

Celebrating the 27th year of the Americans with Disabilities Act (ADA), Centro along with several other local service organizations, participated in the annual parade around Downtown Syracuse. Centro Board Member Donna Reese, along with many members of Centro's Accessible Transportation Advisory Committee (ATAC), took part in the parade to show their support.

**July 26, 2017
ADA Anniversary Celebration
Utica**

Centro participated in the ADA 27th Anniversary Celebration at Hanna Park. Hosted by the Resource Center for Independent Living (RCIL), the event took place outside the doors of City Hall, a centralized and accessible locale, and featured proclamations, musical performances, voting demonstrations, and a number of related exhibits.

**August 15, 2017
NYS Police 100th Anniversary
Central New York**

New York State Police (NYSP) Troop D and the Police Benevolent Association for the New York State Troopers presented Centro with a plaque in recognition of its continued support and service during the NYS Police Centennial Celebration. Centro operated a public parking shuttle for the thousands of attendees to/from their open house event in August.

Pictured from left: NYSP Sgt. Bernard Kennett, NYSP Major Philip Rougeux, Centro CEO Rick Lee, Centro Director of Field Operations Leo Williams, and Centro Senior Vice President of Operations Joseph DeGray.



**August 25, 2017
Bridge Street - New York State Fair
Syracuse**

Centro Chief Executive Officer, Rick Lee was interviewed in front of a live audience at Chevy Court at the New York State Fair during a Bridge Street Live (News Channel 9 morning show) broadcast. Hosts Sistine Giordano and TeNesha Murphy spoke with Lee about the convenience of Centro's Park-N-Ride Shuttle service to get Fairgoers to and from the Fair.

**September 19, 2017
Senator John DeFrancisco's Senior Fair
Syracuse**

Centro took part in State Senator John A. DeFrancisco's 13th Annual Senior Fair at the NYS Fairgrounds. Centro's Call-A-Bus Administrative Supervisor Jennifer Crossley was on hand to discuss transportation options available to seniors including the Onondaga Senior Call-A-Ride (OSCAR) program, Call-A-Bus service, how to obtain Reduced Fare ID cards, and Travel Training for those interested in learning to ride the Centro transit system.

**October 4-5, 2017
NYS MWBE Forum
Albany**

Representatives from Centro's Procurement Department took part in the 7th Annual New York State MWBE Forum. The largest statewide business event for MWBE public sector contracting, the Forum assists small businesses with navigating the State's available contract opportunities to grow their businesses.

**October 24, 2017
Multiple Sclerosis Fair
Syracuse**

Multiple Sclerosis Resources of CNY, Inc. invited Centro to participate in their annual services fair at Barbagallo's. Representatives spoke with attendees about specialized transportation options (Call-A-Bus & OSCAR), travel training, accessibility features, and how to obtain a Centro Reduced Fare ID card.



**October 18, 2017
Syracuse Fire Department Facilities Tour
Syracuse**

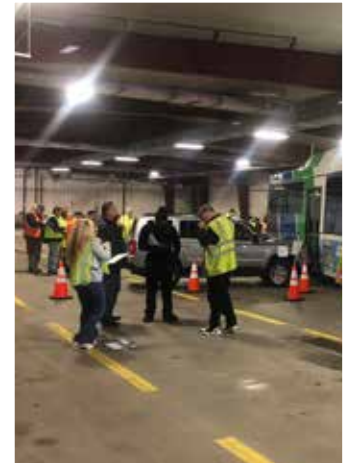
Members of the Syracuse Fire Department (Stations 1 & 3) were given a tour of Centro's maintenance and fuel dispensing facilities by Centro Senior Director of Facilities, David Ryan. The tour included identifying the fire boxes and access locations, shutting off the fuel valves on the different types of buses, discussing the fire suppression systems in the building and aboard the buses, an overview of the building ventilation systems, and an orientation of the fire alarm map.

**November 7, 2017
Senior Companion In-Service
Syracuse**

Lynette Paduano and Casey Brown of Centro's Marketing & Communications Department met with members of the InterFaith Works of CNY Senior Companion program and provided information on bus services, and how companions can help their clients access public transportation.

**November 15, 2017
National GIS Day
Syracuse**

Paula Cutrone and Josh Gardner from Centro's Service Development Department participated in National GIS Day at PSLA at Fowler. Students learned how Centro uses geographic information systems (GIS) technology to analyze Centro bus routes and to track buses on the road.



**December 16, 2017
Stuff-A-Bus
Syracuse**

Centro was at the Liverpool Walmart along with staff from Better Homes & Gardens Real Estate Select for the "Stuff-A-Bus" Toy Drive. Toys for kids of all ages along with non-perishable food items were collected and donated to children through The Salvation Army Syracuse Area Services.

**December 20, 2017
Christmas Bureau Shuttle
Syracuse**

Centro spread some holiday cheer by providing free public shuttle service between ShoppingTown Mall and the Centro Transit Hub during the Annual Salvation Army - United Way Christmas Bureau Distribution Day.



**January 23, 2018
NYPTA Transit Awareness Day
Albany**

Centro managers, community leaders and transit-related organizations from across the State convened in Albany for New York Public Transit Association (NYPTA) Transit Awareness Day 2018. Participants, along with the 2017-18 Public Transit Leadership Institute (PTLI) class, including Centro System Analyst, Joshua Gardner (top right) met with lawmakers and visited exhibit displays in The Well of the NYS Legislative Office Building in support of a strong State investment in public transportation.



**January 16, 2018
Upstate Golisano Children's Hospital Donation
Syracuse**

What started as a small wager amongst friends, turned into a generous donation to the Upstate Golisano Children's Hospital. On a whim, Mechanic trainee Tyler Winn approached Mechanic Al Darwish and asked what it would take for him to shave his head and moustache - styles he'd been sporting for over 20 years. Darwish's response was "\$500 for each." The money quickly started accumulating and Darwish decided to donate whatever was collected to the Upstate Golisano Children's Hospital. Over a four-day period, members of Centro's Maintenance Department collected \$1025 and Darwish headed to the barber for his shave. The barber at The Shop on Erie Blvd provided his services for free when he learned the details behind the shave.

Pictured from left: Mechanics Frank Saya, Al Darwish, and Tyler Winn.

**February 14-24, 2018
Winterfest Express
Syracuse**

Collaborating with community organizers during the annual Syracuse Winterfest, Centro provided its popular Winterfest Express service. The Express is a continuous, free shuttle service that transports attendees between participating venues throughout Downtown Syracuse.

**February 26-28, 2018
B.A.I.T.F.I.S.H.
Syracuse**

More than 20 operations and accident professionals from across the country, including 10 from Centro, participated in the Public Transportation Safety Board's (PTSB) Bus Accident Management and Investigation, Accident Preventability and Hazard Assessment and Mitigation and Recertification training (B.A.I.T.F.I.S.H.). The event was led by Jonathan Nicastro from the New York State Department of Transportation (NYSDOT).

**March 16, 2018
Let's Go Orange
Syracuse**

Centro's Syracuse buses displayed a special destination sign (LET'S GO ORANGE) during March Madness in support of both the SU Women's & Men's Basketball teams, who played in the NCAA tournament. Centro personnel were encouraged to wear Syracuse University blue and orange attire in support of the University.

**March 17, 2018
St. Patrick's Day Parades
Syracuse & Utica**

Centro's green buses rolled through the streets of Syracuse and Utica during their annual St. Patrick's Day Parades.



**March 18, 2018
Transit Driver Appreciation Day
Central New York**

Centro, along with thousands of transit agencies around the country, participated in Transit Driver Appreciation Day to celebrate the great women and men who keep Central New Yorkers moving.

**March 21, 2018
Resident Fair
Syracuse**

Centro representatives Shakeria Thomas and Casey Brown met with residents of Resort Lifestyle Communities at Towne Center in Fayetteville during their Resident Fair where they offered information on senior transportation, reduced fare options, paratransit, and travel training.

**March 22, 2018
Cayuga Onondaga BOCES Services Fair
Auburn**

Representatives from Centro's Auburn and Syracuse's offices participated in the annual Services Fair at Cayuga Onondaga BOCES in Auburn. Students and educators were encouraged to ask questions and pick up informational brochures regarding local and intercity bus services.

**March 29, 2018
W. Genesee SEPTSA Fair
Syracuse**

Communications & Publications Coordinator, Casey Brown was on hand at West Genesee High School in Camillus where he met with parents and educators involved with the district's Special Education Parent Teacher Student Association. Brown answered questions and provided material on Centro's paratransit services and reduced fares.



**Central New York
Regional Transportation Authority**

Limited English Proficiency (LEP) Plan



Prepared by: Central New York Regional Transportation Authority

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

September 2019

EXECUTIVE SUMMARY

Providing language assistance to persons with limited English proficiency in a competent and effective manner helps ensure that the Central New York Regional Transportation Authority's (Centro) services are safe, reliable, 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. Catering to LEP persons may also help increase and retain ridership among Centro's broader immigrant communities in two important ways:



1. Reaching out to recent immigrant populations in order to conduct a needs assessment and prepare a language implementation plan (pursuant to the DOT LEP Guidance) will send a positive message to these persons from Centro that their business is valued; and
2. Developing a community outreach to identify appropriate language assistance measures can also assist Centro in identifying the transportations needs of immigrant populations and ensure that Centro's transit routes, hours and days of service, and other service parameters are responsive to the needs of these populations.

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INTRODUCTION

About Centro

The Central New York Regional Transportation Authority (Centro), which is the public transportation provider for Onondaga, Oswego, Cayuga, and Oneida counties (including the cities of Syracuse, Oswego, Fulton, Auburn, Rome and Utica) carries approximately 11 million passengers annually on its fleet of 246 buses. Centro currently employs 667 people (including part-time staff).

Our Mission

Centro's mission is to be responsive to the transportation needs of the Central New York community by providing services which are safe, convenient, reliable, and environmentally responsible with a goal of maximizing the taxpayers' return on investment.

The Need for an LEP 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.

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 Executive Order applies to all federal agencies and all programs and operations of entities that receive funding from the federal government – including state agencies, local agencies and governments, private and non-profit entities, and sub-recipients such as public transit agencies.



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.

Centro’s LEP Plan

As Central New York’s primary public transportation provider, Centro’s transit service area covers four counties – Cayuga, Oneida, Onondaga, and Oswego. As a designated direct recipient of FTA funding, Centro is required to develop and routinely update its LEP Plan as part of its Title VI Program. Based on bus counts, an LEP Plan is required only in Onondaga County; however, Centro has elected to provide a comprehensive LEP Plan that covers all counties within its service area.

Centro’s LEP Plan, 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 the means by which 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. As a result of conducting the “Four Factor Analysis” Centro is well-positioned to formalize and 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:

1. The number and proportion of LEP persons served or encountered in Centro’s eligible services population.
2. The frequency with which LEP individuals come into contact with Centro’s programs, activities, and services.
3. The importance to LEP persons of Centro’s programs, activities, and services.
4. The resources and associated costs available to recipients.



Centro's "Four Factor Analysis"

Factor 1: The number and proportion of LEP persons served or encountered in Centro's eligible services population.

For planning purposes, Centro considers its current service area to be the counties of Cayuga, Oneida, Onondaga, and Oswego. Analysis of U.S. Census Bureau 2013-2017 data was conducted to estimate the LEP population in Centro's service area (*see Figure 1*).

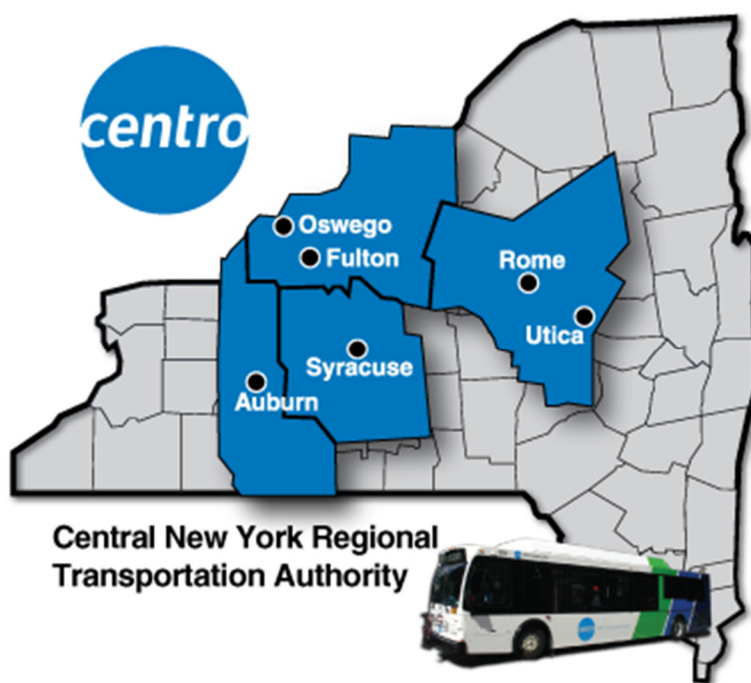


Figure 1: Centro Service Area

Examination of U.S. Census Bureau 2013-2017 C16001 tables, "Language Spoken at Home for the Population 5 Years and Over," by geographic place determined that there are 10 non-English language categories spoken at home by over 1,000 persons in Centro's service area (*see Table 1*). People who speak Spanish at home represent 2.9% of Centro's service area population. The remaining languages were each spoken by less than 3.7% of the population in Centro's service area.

Table 1: Language Spoken at Home for the Population 5 Years and Over by 1,000+ Persons in Centro's Service Area

Language Spoken at Home	Estimated Number of Speakers	Percentage of Population
Cayuga County		
English	70,918	95.4%
Spanish	1,759	2.4%
Oneida County		
English	192,975	88.1%
Spanish	7,678	3.5%
Russian, Polish or Other Slavic	5,684	2.6%
Other Indo-European	2,537	1.2%
Vietnamese	1,261	0.6%
Other Asian and Pacific Island	4,519	2.1%
Onondaga County		
English	394,532	89.5%
Spanish	13,642	3.1%
French, Haitian, or Cajun	2,155	0.5%
German or Other West Germanic	1,476	0.3%
Russian, Polish or Other Slavic	4,981	1.1%
Other Indo-European	7,082	1.6%
Chinese (incl. Mandarin, Cantonese)	4,450	1.0%
Vietnamese	2,071	0.5%
Other Asian and Pacific Island	3,003	0.7%
Arabic	3,169	0.7%
Other and Unspecified Languages	2,991	0.7%
Oswego County		
English	108,628	95.9%
Spanish	1,852	1.6%

U.S. Census Bureau 2013-2017 American Community Survey S1601 tables, "Language Spoken at Home," tables by county were also examined. Using FTA guidelines, the LEP population – the population that speaks English less than "very well" – was estimated by summing the Census responses for Speak English only or speak English "very well" and speak English "less than very well." The data is categorized by the language groups spoken by respondents: "Spanish," "Other Indo-European," "Asian and Pacific Island," or "Other languages."

The study determined that approximately 3.5% (29,663 / 847,416) 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 2*). As indicated in the table, the majority of the LEP population (1.2%) speaks Asian and Pacific Island languages.

Table 2: Ability to Speak English by Place in Centro's Service Area**2013-2017 American Community Survey 5-Year Estimate: Table S1601, "Language Spoken at Home"**

Geographic Area (Place)	Population Age 5+	Speak Only English		Speak English Less Than "Very Well"									
				Spanish		Other Indo-European Languages		Asian and Pacific Island Languages		Other Languages		Estimated Total LEP Population	
Cayuga County	74,365	70,918	95.4%	704	40%	193	18.2%	102	49.5%	83	19.8%	1,082	1.5%
Oneida County	218,948	192,975	88.1%	2,358	30.7%	3,671	37%	4,328	65%	588	34.4%	10,945	5%
Onondaga County	440,792	394,532	89.5%	3,798	27.8%	5,339	34%	5,497	51.1%	1,821	29.6%	16,455	3.7%
Oswego County	113,311	108,628	95.9%	402	21.7%	578	26.1%	198	41.5	3	2.1%	1,181	1%
TOTAL	847,416	767,053	90.5%	7,262	0.86%	9,781	1.1%	10,125	1.2%	2,495	0.29%	29,663	3.5%

Conclusion: Although the 'Asian and Pacific Island Languages' category is the largest represented in Table 2, the most prevalent language spoken by LEP persons throughout Centro's comprehensive service area is Spanish. As a result, Centro has focused its efforts on providing translation and language assistance services to its Spanish-speaking customers.

Factor 2: The frequency with which LEP individuals come into contact with Centro's programs, activities, and services.

Centro comes into contact with LEP individuals on a regular basis either on its vehicles, via its Call Center, or as a result of scheduled travel training initiatives.

In June of 2019, Centro drivers were asked to complete a short survey to help evaluate the effectiveness of Centro's current customer language interpretation services. The survey contained questions about driver interaction with Limited English Proficient (LEP) customers. Survey responses received indicated that:

- 86.39% of Centro drivers have encountered customers who speak limited or no English over the past year
- 41% of Centro drivers experienced this between 6 and 25 times and 17% experienced this more than 25 times
- during the encounters, customer attempted to communicate with Centro drivers in their native language 92.75% of the time

Of the drivers surveyed who interacted with customers who spoke languages other than English, 56% spoke Spanish, 14% spoke Bosnian, 10% spoke Chinese, 5% spoke Russian, and 4% spoke French. These percentages are not indicative of Centro's LEP ridership population; rather, they indicate languages encountered by drivers interacting with LEP customers.

Centro's Call Center also provides customer assistance and travel information via telephone for those seeking to use Centro services. While LEP individuals currently have infrequent and unpredictable contact with Centro's Call Center and services, the small and growing size of the LEP population in Centro's service area will likely increase its future contact with Centro services. As a result, it will be important for Centro to continue monitoring population trends.

When LEP individuals contact Centro's Call Center, a language line interpretation service is available to connect Centro's Call Center employees with interpreters who are able to assist riders with bus schedule information in more than 200 languages. Callers to the Call Center (315-442-3400), as well as visitors at Centro's facilities, who are in need of language assistance are connected to the language line services. This free service is available from 6:30 a.m. to 6:00 p.m., Monday through Friday.

Records indicate that 43 of the 231,979 total calls placed to Centro's Call Center during the past 12 months utilized a Language Line interpretation service. Of the 43 calls received, 39 callers requested information assistance in Spanish, while the remaining 4 callers requested assistance in Arabic, Bosnian and Burmese.

Factor 3: The importance to LEP persons of Centro's programs, activities and services.

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 and paratransit services. Riders use Centro services to assist with multiple travel needs within the community, including trips to work, school, job interviews, grocery stores and 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 persons 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 regular route surveys.

Centro's travel trainer performs outreach services and maintains an office at the Transit Hub, which is conveniently located within close proximity to 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 persons. The travel trainer reports back 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. The various community organizations that Centro works with that assist and refer LEP individuals to Centro, provide feedback on the way in which Centro assist's LEP populations to determine how effectively those individuals are being served.

Factor 4: The resources and associated costs available to recipients.

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 relatively 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 & Communication and Human Resource Departments spend approximately \$2,000 annually in 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.



IMPLEMENTING THE LEP PLAN

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 LEP 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 four-county service area (Cayuga, 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 the Centro travel trainer. Centro has not, in general, provided multilingual materials. We do, however, provide interpretive services, upon request, to those using American Sign Language (ASL) at public meetings, and through TTY technology on the telephone.

1. **Census data:** Census 2013-2017 data indicates that Asian and Pacific Island-speaking LEP persons are the primary group requiring language assistance in Centro's service area. In general, the highest concentrations of Asian and Pacific Island-speaking LEP persons are in Oneida and Onondaga Counties.

Centro will continue monitoring and using Census data releases to identify and locate significant and emerging LEP populations.

2. **Customer Satisfaction Survey:** Centro routinely performs survey data collection 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 needs to be accountable to the government on 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, which include questions to help quantify LEP riders, their travel patterns, and route use provide important information to help further identify and understand the transit needs of transit-dependent LEP persons. Of the on-board surveys conducted, 94.4% identified English as their primary language, 3.6% identified Spanish, 0.3% identified Chinese, 0.2% identified Russian, and 1.6% identified Other.

3. **Documenting Staff Encounters with LEP Persons at Centro Public Meetings:** When open houses or public meetings are held, Centro staff will have interpreters available to help assist LEP persons. While Centro staff may not be able to personally provide translation assistance at the time, the interpreters will be an important asset in identifying language needs for future public events. A continuous record will be kept detailing the primary languages of LEP persons attending Centro’s public meetings.
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.

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 second 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 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 are in need of language assistance, are personally connected to the language line services. This free service is available from 6:30 a.m. to 6:00 p.m. Monday through Friday.

2. **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 smartphone. 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 phone's Geolocation – all in their native language.
3. **On-Board Announcements:** To accommodate its Spanish-speaking riders, Centro includes automated messages in Spanish regarding service changes and new products. Additional messaging will be identified and automated in applicable alternate languages should the need arise.
4. **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 as a result of the language settings feature.
5. **Critical documents in alternate languages:** Upon request, applications for reduced fare cards for seniors, youths, and persons with disabilities can be made available in alternate languages. An overview of Centro's Title VI Program and a Title VI complaint form are available at: <http://www.centro.org/misc-group/title-vi>
6. **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 passenger's 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.
 - More difficult or emergency situations may necessitate contracting Transportation Supervisors or Dispatch for additional help and phone access to language line interpreters.

Table 3 lists organizations that Centro has worked with throughout the community that are in need of translation or interpretation services. In total, 3,229 individuals have been trained on how to utilize Centro's transportation services, 1,229 since Centro's last LEP Plan submission. Official languages of program participants include the following: Amharic, Arabic, Armenian, Burmese, Dari, Dzongkha, Farsi, French, Karen, Karenni, Kinyarwanda, Kurdish, Mali, Nepali, Pashto, Persian, Russia, Somali, Spanish, Swahili, Syriac, Tigrin, Turkmen, Ukrainian, Urdu, and Vietnamese.

Table 3: Community Organizations that Centro Works With to Assist LEP Individuals

Organization	Assistance Provided	Date Provided	Number of Participants
Aurora of Central New York	How-to-Ride	8/4/16	25
Center for New Americans	How-to-Ride	8/22/16	52
Refugee Assistance Program	How-to-Ride	9/27/16	29
Center for New Americans	How-to-Ride	11/1/16	35
Mohawk Valley Resource Center for Refugees	How-to-Ride	11/2/16	24
Elmcrest	Train-the-Trainer	12/19/16	2
Elmcrest	Train-the-Trainer	12/21/16	2
Center for New Americans	How-to-Ride	1/10/17	50
Mohawk Valley Resource Center for Refugees	How-to-Ride	1/18/17	11
Mohawk Valley Resource Center for Refugees	How-to-Ride	2/8/17	18
Center for New Americans	How-to-Ride	3/2/17	14
Huntington Family Center	How-to-Ride	3/28/17	14
Mohawk Valley Resource Center for Refugees	How-to-Ride	4/11/17	25
Madison-Oneida BOCES	How-to-Ride	4/11/17	25
Refugee Assistance Program	How-to-Ride	4/19/17	15
ARC Oneida Lewis	Train-the-Trainer	4/20/17	11
Solvay High School Special Education Program	How-to-Ride	4/26/17	10
Elmcrest	Train-the-Trainer	5/1/17	1
Mohawk Valley Resource Center for Refugees	How-to-Ride	5/10/17	11
Center for New Americans	How-to-Ride	5/15/17	12
Unity House of Cayuga County	How-to-Ride	5/19/17	18
ARC of Onondaga	How-to-Ride	6/13/17	31
Mohawk Valley Resource Center for Refugees	How-to-Ride	6/14/17	15
ARC of Onondaga	How-to-Ride	6/20/17	30
Center for New Americans	How-to-Ride	7/5/17	9
Exceptional Family Resources	How-to-Ride	7/6/17	12



Organization	Assistance Provided	Date Provided	Number of Participants
ARC of Onondaga	How-to-Ride	7/11/17	31
Mohawk Valley Resource Center for Refugees	How-to-Ride	7/12/17	2
ARC of Onondaga	How-to-Ride	7/21/17	28
ARC Oneida Lewis	How-to-Ride	7/26/17	6
Center for New Americans	How-to-Ride	8/2/17	16
Mohawk Valley Resource Center for Refugees	How-to-Ride	8/18/17	100
The Kelberman Center	Train-the-Trainer	8/18/17	10
Center for New Americans	How-to-Ride	9/13/17	3
Mohawk Valley Resource Center for Refugees	How-to-Ride	11/8/17	7
Center for New Americans	How-to-Ride	1/3/18	20
Mohawk Valley Resource Center for Refugees	How-to-Ride	1/8/18	7
ARC Oneida Lewis	How-to-Ride	2/28/18	10
Center for New Americans	How-to-Ride	3/20/18	13
Mohawk Valley Resource Center for Refugees	How-to-Ride	3/21/18	16
Exceptional Family Resources	How-to-Ride	4/4/18	7
Exceptional Family Resources	How-to-Ride	4/5/18	5
Elmcrest (Casey's Place)	Train-the-Trainer	4/9/18	1
Mohawk Valley Resource Center for Refugees	How-to-Ride	5/2/18	5
Madison-Oneida BOCES	How-to-Ride	5/30/18	22
Center for New Americans	How-to-Ride	5/31/18	16
Mohawk Valley Resource Center for Refugees	How-to-Ride	6/6/18	10
Parkway Center (Utica)	Train-the-Trainer	6/6/18	2
Towne Center Retirement Community	How-to-Ride	6/7/18	7
Huntington Family Center	How-to-Ride	6/14/18	8
Mohawk Valley Resource Center for Refugees	How-to-Ride	7/11/18	8
Center for New Americans	How-to-Ride	7/17/18	11
Aurora of Central New York	How-to-Ride	7/18/18	12



Organization	Assistance Provided	Date Provided	Number of Participants
Mohawk Valley Resource Center for Refugees	How-to-Ride	8/1/18	8
Elmcrest (Casey's Place)	How-to-Ride	9/14/18	11
SUNY ESF	How-to-Ride	9/17/18	2
Center for New Americans	How-to-Ride	9/18/18	11
New York State Office for People With Developmental Disabilities (Rome)	How-to-Ride	9/26/18	15
YMCA of Auburn	How-to-Ride	10/10/18	31
Toomey Supported Independent Living Program	How-to-Ride	12/11/18	6
Girl Scouts of the USA	How-to-Ride	1/25/19	25
Center for New Americans	How-to-Ride	2/19/19	23
Mohawk Valley Resource Center for Refugees	How-to-Ride	4/10/19	13
Center for New Americans	How-to-Ride	4/16/19	28
Catholic Charities Refugee Resettlement Program	How-to-Ride	4/17/19	47
The Neighborhood Center, Inc. (Utica)	How-to-Ride	6/4/19	10
Liberty Resources Inc.	How-to-Ride	6/5/19	6
ARC of Oneida	How-to-Ride	6/11/19	11
Mohawk Valley Resource Center for Refugees	How-to-Ride	6/12/19	10
Center for New Americans	How-to-Ride	6/18/19	28
ARC of Oneida (Collegeworks Program @ MVCC)	How-to-Ride	6/19/19	11
Chadwick Residence	How-to-Ride	6/25/19	11
Aurora of Central New York	How-to-Ride	7/8/19	17
Mohawk Valley Resource Center for Refugees	How-to-Ride	7/17/19	10
Mohawk Valley Resource Center for Refugees	How-to-Ride	9/11/19	11



Element 3: Training Staff

In order to establish meaningful access to information and services for LEP individuals, various personnel and departments that regularly interact with the public are trained on how to provide the language assistance services contained within Centro's LEP Plan.

Training efforts include:

- Executive staff are familiarized with the LEP Plan in order to reinforce its importance and ensure its implementation by Centro employees.
- Staff within the Customer Service and Marketing & Communications Departments are familiarized with the LEP Plan, with particular emphasis on LEP outreach efforts at Centro public meetings and community events. Training focuses on using interpreter services in an effort to communicate with and quantify the number of LEP persons 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 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.

Element 4: Providing Notice to LEP Persons

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

- **Placards on buses:** Centro has informational placards on buses in Spanish that inform riders of Centro's language line and translation services.
- **Local non-English newspapers:** Centro will continue to issue media press releases in Spanish, and purchase advertisements in local non-English newspapers publicizing Centro services.
- **Direct engagement with LEP populations and community organizations:** Through working with various community organizations, Centro will seek 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 will also help Centro learn what additional agency information may need translation.

Element 5: Monitoring/Updating the Plan

Centro will routinely review and update its LEP Plan as necessary. Anticipated updates will include the incorporation of new Census data, LEP ridership trends identified through routine “Customer Satisfaction Surveys,” and public comments about the LEP Plan. Full review of the LEP Plan will occur with each triennial Title VI program submission.

CNY CENTRO SERVICE STANDARDS & GUIDELINES

The mission of the Central New York Regional Transportation Authority (Centro) is to be responsive to the transportation needs of the Central New York community by providing services which are safe, convenient, reliable and environmentally responsible with a goal of maximizing the taxpayers' return on investment.

Accordingly, the Authority's Board of Members adopts the following service standard targets for the provision of public transportation service in keeping with the Authority's mission. These standards apply to CNY Centro Inc., as required by the Federal Transit Administration (FTA) and are consistent with criteria required by the FTA. As these standards will be major determinants of the Authority's operating and capital costs, the ability to adhere to them is largely dependent on the Authority's fiscal position. As such, these standards are "targets". Staff is therefore directed to use its best judgement in providing efficient, effective public transportation within the confines of the Authority's fiscal means.

I. VEHICLE LOAD

Vehicle load is a metric expressed as the ratio of passengers on board to the number of seats available on a vehicle, at the vehicle's maximum load point.

The composition of the vehicle fleet is to be matched to the ridership patterns and volumes served by each garage facility. Regular route loadings in the urbanized Syracuse region require the majority of the fleet to be 40 foot buses. However, within the 40 foot category, various seating configurations yield between 36 and 44 seats. Moreover, CNY Centro Inc. also uses 10 smaller vehicle types between 35 foot and 26 foot long, with seating capacities ranging from 21 seats to 35 seats.

The variety of service area characteristics, vehicle types, amenities and seating configurations make identification of a "one size fits all" vehicle load standard difficult. To the extent possible, the following vehicle load guideline should be used in service planning:

TIME PERIOD	% OF SEATING CAPACITY/MAX. LOAD
Peak – Maximum any 1 trip	155%
Peak – 1 hour average	130%
Non-peak average	100%

II. VEHICLE HEADWAYS

A “headway” is the time interval between two vehicles traveling in the same direction on the same route.

As with the vehicle loading standard, vehicle headways are tailored to the route’s ridership characteristics and patterns. To the extent possible, Centro should strive to achieve the following minimum vehicle headways:

AREA TYPE	WEEKDAY	WEEKDAYS	SATURDAY	SUNDAY
	Peak Periods	Non-Peak Periods		
Urban	30 - 40	45 - 60	60 - 80	60 - 80
Suburban	40	90	90	NA
Intercity	TBD	TBD	NA	NA

Notes:

- a. More frequent headways may be provided if warranted by passenger loads.
- b. Specialized services may be designed to only make trips as required by passenger demand. Service on such routes may be scheduled to extend outside of the vehicle headway guidelines.
- c. Intercity bus service is largely determent on customer demand, available funding and in many cases are considered services performed as a matter of policy.

III. ON-TIME PERFORMANCE

On-time performance is a measure of trips completed as scheduled. Adherence to a published schedule is critical to ensure reliability of service to the public.

1. A vehicle is considered on time if it departs a scheduled timepoint no more than 5 minutes late. Centro’s on-time performance objective is 90% or greater.
2. Any bus line exceeding 10% of trips late will be defined as having a schedule adherence problem and steps will be taken to rectify the situation.
3. No trips should leave a terminal or time point ahead of schedule.
4. Wherever practical, recovery time should be built into running times and used as a management tool to support schedule adherence. Recovery time should be minimal but sufficient to maintain timely schedules under most conditions.

IV. SERVICE AVAILABILITY

Centro defines service "availability" as the average walking distance to a bus line, which is a function of route spacing. Other factors that affect the public's perception of the availability of transit services include the land use pattern adjacent to bus routes and stops, topography, the presence of sidewalks and the condition of the bus stop area in good weather and bad. Centro has no control over some of these elements, nevertheless, the regular bus route target spacing standard is as follows:

POPULATION DENSITY	ROUTE SPACING
Urban Area (3,600 people/sq. mile)	½ mile (6 to 8 blocks)
Suburban Area (1,800-3,600 people/sq. mile)	1 mile (12 to 14 blocks)

V. VEHICLE ASSIGNMENT

Equipment guidelines must take into account the operating characteristics of buses of various lengths, which are to be matched to the operating parameters of the route. Local routes with lower ridership may be assigned lower capacity buses. In addition:

1. Bus assignments must be done to assure that no route is given a disproportionate percentage of old buses or buses without amenities deemed desirable.
2. In keeping with Federal Title VI guidelines bus assignments will be made without regard to the race, color or national origin of the population to be served.
3. Single-door suburban buses should not be used on urban routes where standees are commonplace.
4. Over-the-road style coaches may be assigned to intercity and some suburban routes due to the extended travel distance and the extent of highway travel.

VI. TRANSIT AMENITIES

The installation of transit amenities along bus routes will be based on the number of passenger boardings at individual bus stops. Transit amenities include bus shelters, benches, static information panels, dynamic messaging signs, maps and other Intelligent Transportation System (ITS) elements used to provide information to the public.

1. Bus Shelters

Bus shelters are the most frequently requested transit amenity. However, many bus stops are not physically suitable candidates for a bus shelter. In addition, Centro has limited capital and operating (maintenance) resources to devote to bus shelters. Accordingly, staff will evaluate each requested shelter location using the criteria below as a guide. Based on the results, a recommendation will be made to the Executive Director or his/her designee for final decision. The decision to install a shelter will include, but not be limited to, the following factors:

- a. At least 50 passenger boardings per weekday at the site in question.
- b. No alternate shelter is available (i.e. a building entrance/overhang, etc.).
- c. There must be sufficient space to safely install a shelter.
- d. If over 15% of the stop patrons are seniors or disabled, the boarding standard may be decreased appropriately by 50% to 25 passenger boardings per day.
- e. All shelters will be compliant with Americans with Disabilities Act guidelines.
- f. Shelters shall be installed only where the Authority's equipment investment is deemed to be safe from vandalism.

2. Bus Shelter Benches

Benches are to be installed within bus shelters only if ADA guidelines can be met. Free-standing benches without bus shelters are not to be installed due to liability and maintenance concerns. Benches will normally be installed in shelters. If the number of passengers waiting at a shelter exceeds the shelter capacity, a bench may not be installed.

3. Information Maps and Panels

Information schedules are to be installed in shelters wherever possible.

4. Intelligent Transportation System (ITS) elements

ITS elements include dynamic, real-time messaging signs linked to Centro's automated vehicle location system and voice annunciators for the visually impaired to announce "next bus" arrival times at bus stops. Centro may install such equipment, if/when funding permits, at bus stops generating at least 50 passenger boardings per day. If over 50% of the users of a stop are seniors or disabled, then the standard may be decreased by 50% to 25 passengers per day. ITS equipment shall be installed only where the Authority's equipment investment is deemed to be safe from vandalism.

CNYRTA SMALL UZA and NON-UZA SERVICE STANDARDS & GUIDELINES

The mission of the Central New York Regional Transportation Authority (Centro) is to be responsive to the transportation needs of the Central New York community by providing services which are safe, convenient, reliable and environmentally responsible with a goal of maximizing the taxpayers' return on investment.

Accordingly, the Authority's Board of Members adopts the following service standard targets for the provision of public transportation service in keeping with the Authority's mission. These standards apply to Centro's service areas in small UZA and non-UZA communities as required by the Federal Transit Administration (FTA) and are consistent with criteria required by the FTA. As these standards will be major determinants of the Authority's operating and capital costs, the ability to adhere to them is largely dependent on the Authority's fiscal position. As such, these standards are "targets". Staff is therefore directed to use its best judgement in providing efficient, effective public transportation within the confines of the Authority's fiscal means.

I. VEHICLE LOAD

Vehicle load is a metric expressed as the ratio of passengers on board to the number of seats available on a vehicle, at the vehicle's maximum load point.

The composition of the vehicle fleet is to be matched to the ridership patterns and volumes served by each garage facility. Regular route loadings in Utica, and the non-urbanized areas of Rome, Oswego, and Auburn regions require various vehicle sizes to meet the local ridership demand. Within these service areas, bus sizes range from 30 to 40 feet in length with seating capacities ranging from 29 to 49 seats. This includes a number of coach vehicles that provide intercity service.

The variety of service area characteristics, vehicle types, amenities and seating configurations make identification of a "one size fits all" vehicle load standard difficult. To the extent possible, the following vehicle load guideline should be used in service planning:

TIME PERIOD	% OF SEATING CAPACITY/MAX. LOAD
Peak – Maximum any 1 trip	155%
Peak – 1 hour average	130%
Non-peak average	100%

II. VEHICLE HEADWAYS

A “headway” is the time interval between two vehicles traveling in the same direction on the same route.

As with the vehicle loading standard, vehicle headways are tailored to the route’s ridership characteristics and patterns. To the extent possible, Centro should strive to achieve the following minimum vehicle headways listed in minutes:

Utica

AREA TYPE	WEEKDAY	WEEKDAYS	SATURDAY	SUNDAY
	Peak Periods	Non-Peak Periods		
Urban	30 – 45	45 - 60	45 - 60	NA
Suburban	45 - 60	60 - 90	60 - 90	NA
Intercity	TBD	TBD	TBD	NA

Auburn

AREA TYPE	WEEKDAY	WEEKDAYS	SATURDAY	SUNDAY
	Peak Periods	Non-Peak Periods		
Urban	30 - 45	45 - 60	45 - 60	NA
Suburban	NA	NA	NA	NA
Intercity	TBD	TBD	TBD	TBD

Oswego

AREA TYPE	WEEKDAY	WEEKDAYS	SATURDAY	SUNDAY
	Peak Periods	Non-Peak Periods		
Urban	30 - 45	45 - 60	45 - 60	NA
Suburban	NA	NA	NA	NA
Intercity	TBD	TBD	TBD	TBD

Fulton

AREA TYPE	WEEKDAY	WEEKDAYS	SATURDAY	SUNDAY
	Peak Periods	Non-Peak Periods		
Urban	30 - 45	45 - 60	45 - 60	NA
Suburban	NA	NA	NA	NA
Intercity	NA	NA	NA	NA

Rome

AREA TYPE	WEEKDAY	WEEKDAYS	SATURDAY	SUNDAY
	Peak Periods	Non-Peak Periods		
Urban	30 - 45	45 - 60	45 - 60	NA
Suburban	45 - 60	60 - 90	NA	NA
Intercity	NA	NA	NA	NA

Notes:

- a. More frequent headways may be provided if warranted by passenger loads.
- b. Specialized services may be designed to only make trips as required by passenger demand. Service on such routes may be scheduled to extend outside of the vehicle headway guidelines.
- c. Intercity bus service is largely determined on customer demand, available funding and in many cases are considered services performed as a matter of policy.

III. ON-TIME PERFORMANCE

On-time performance is a measure of trips completed as scheduled. Adherence to a published schedule is critical to ensure reliability of service to the public.

1. A vehicle is considered on time if it departs a scheduled timepoint no more than 5 minutes late. Centro's on-time performance objective is 90% or greater.
2. Any bus line exceeding 10% of trips late will be defined as having a schedule adherence problem and steps will be taken to rectify the situation.
3. No trips should leave a terminal or time point ahead of schedule.
4. Wherever practical, recovery time should be built into running times and used as a management tool to support schedule adherence. Recovery time should be minimal but sufficient to maintain timely schedules under most conditions.

IV. SERVICE AVAILABILITY

Centro defines service "availability" as the average walking distance to a bus line, which is a function of route spacing. Other factors that affect the public's perception of the availability of transit services include the land use pattern adjacent to bus routes and stops, topography, the presence of sidewalks and the condition of the bus stop area in good weather and bad. Centro has no control over some of these elements, nevertheless, the regular bus route target spacing standard is as follows:

POPULATION DENSITY	ROUTE SPACING
Urban Area (3,600 people/sq. mile)	½ mile (6 to 8 blocks)
Suburban Area (1,800-3,600 people/sq. mile)	1 mile (12 to 14 blocks)

V. VEHICLE ASSIGNMENT

Equipment guidelines must take into account the operating characteristics of buses of various lengths, which are to be matched to the operating parameters of the route. Local routes with lower ridership may be assigned lower capacity buses. In addition:

1. Bus assignments must be done to assure that no route is given a disproportionate percentage of old buses or buses without amenities deemed desirable.
2. In keeping with Federal Title VI guidelines bus assignments will be made without regard to the race, color or national origin of the population to be served.
3. Single-door suburban buses should not be used on urban routes where standees are commonplace.
4. Over-the-road style coaches may be assigned to intercity routes due to the extended travel distance and the extent of highway travel.

VI. TRANSIT AMENITIES

The installation of transit amenities along bus routes will be based on the number of passenger boardings at individual bus stops. Transit amenities include bus shelters, benches, static information panels, dynamic messaging signs, maps and other Intelligent Transportation System (ITS) elements used to provide information to the public.

1. Bus Shelters

Bus shelters are the most frequently requested transit amenity. However, many bus stops are not physically suitable candidates for a bus shelter. In addition, Centro has limited capital and operating (maintenance) resources to devote to bus shelters. Accordingly, staff will evaluate each requested shelter location using the criteria below as a guide. Based on the results, a recommendation will be made to the Executive Director or his/her designee for final decision. The decision to install a shelter will include, but not be limited to, the following factors:

- a. Weekday ridership usage at the site must be among the top 25% of the most frequently used bus stops on the route.
- b. No alternate shelter is available (i.e. a building entrance/overhang, etc.).
- c. There must be sufficient space to safely install a shelter.
- d. If over 15% of the stop patrons are seniors or disabled, the boarding standard may be decreased appropriately by 50% to amount the top 50% of the most frequently used bus stops on the route.
- e. All shelters will be compliant with Americans with Disabilities Act guidelines.
- f. Shelters shall be installed only where the Authority's equipment investment is deemed to be safe from vandalism.

2. Bus Shelter Benches

Benches are to be installed within bus shelters only if ADA guidelines can be met. Free-standing benches without bus shelters are not to be installed due to liability and maintenance concerns. Benches will normally be installed in shelters. If the number of passengers waiting at a shelter exceeds the shelter capacity, a bench may not be installed.

3. Information Maps and Panels

Information schedules are to be installed in shelters wherever possible.

4. Intelligent Transportation System (ITS) elements

ITS elements include dynamic, real-time messaging signs linked to Centro's automated vehicle location system and voice annunciators for the visually impaired to announce "next bus" arrival times at bus stops. Centro may install such equipment, if/when funding permits, at bus stops among the top 25% of the most frequently used bus stops on the route. If over 50% of the users of a stop are seniors or disabled, then the standard may be decreased by 50% to amount the top

50% of the most frequently used bus stops on the route. ITS equipment shall be installed only where the Authority's equipment investment is deemed to be safe from vandalism.



CNY CENTRO, INC.

Transit Service Standards Monitoring Program for Title VI 2019

Service Metrics Summary

As per Federal Transit Administration Title VI regulations, a random sample of three minority and three non-minority routes were analyzed for our Monitoring Program. Each was tested for all required elements and found to be in accordance with established service standards. A summary of our findings are below. Details of each metric are in the pages that follow.

Vehicle Load: *All minority and non-minority routes averaged less than the bus seated capacity of 39 persons.*

Vehicle Headway: *Each urban and suburban route's headway is operating in accordance with established standards.*

On-Time Performance: *Each route's on-time performance reasonably meets our service standards.*

Service Availability: *Each of the minority and non-minority routes analyzed serve a minority population above the minority concentration percentage (22.9%) for Onondaga County based on ACS 2013-2017.*

Vehicle Assignment: *Vehicles are equitably assigned in accordance with our service standards.*

Distribution of Transit Amenities: *Amenities are equitably distributed between both minority and non-minority routes.*

CNYRTA TRANSIT SERVICE STANDARDS MONITORING PROGRAM FOR TITLE VI 2019

Service Metrics: The distribution of assets on minority versus non-minority routes was monitored in accordance with the 2016 CNYRTA Transit Service Standards Monitoring Program and CNY Centro Service Standards Guidelines. As per the FTA requirement for monitoring transit service, the bus routes serving the Onondaga County Urbanized Area (UZA) were analyzed to determine which routes should be classified as “minority transit routes”. A minority transit route is one in which at least 1/3 of the total revenue mileage is in an area in which the percentage of minority population exceeds the percentage of minority population of the service area (22.9% per ACS 2013-2017). For this analysis, CNYRTA calculated the percent of minority population for each census block group. Routes which passed through or adjacent to a census block group were selected and calculations performed to determine the total length of feet/miles of the bus route corresponding to the minority and non-minority designations.

As per FTA guidance, three minority and three non-minority routes were randomly selected for monitoring.

C1: Vehicle Load Monitoring- Peak capacity was derived from calculating the average passenger load per hour during the peak one-hour timeframe of 7:00 am – 8:00 am for trips in both directions of travel between Monday April 22, 2019 and Friday April 26, 2019. *All minority and non-minority routes averaged less than the bus seated capacity of 39 persons.*

Minority Route	Revenue Miles	Average Passenger Load
Sy 30	15.7	19.0
Sy 84	9.5	11.4
Sy 86	6.7	5.2
Average		11.9

Non-Minority Route	Revenue Miles	Average Passenger Load
SY 36	21.9	17.4
SY 88	53.8	8.2
Osw46	58.5	16.2
Average		13.9

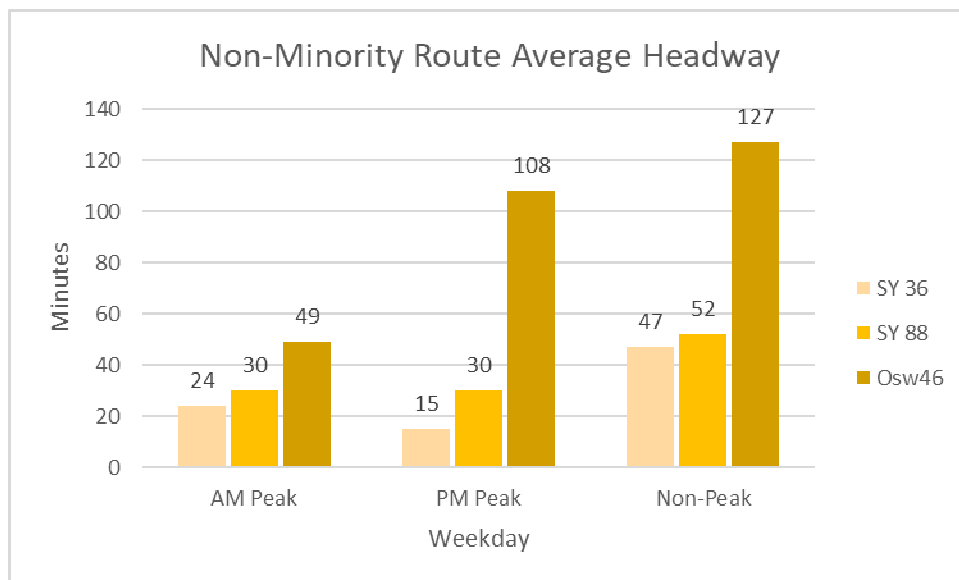
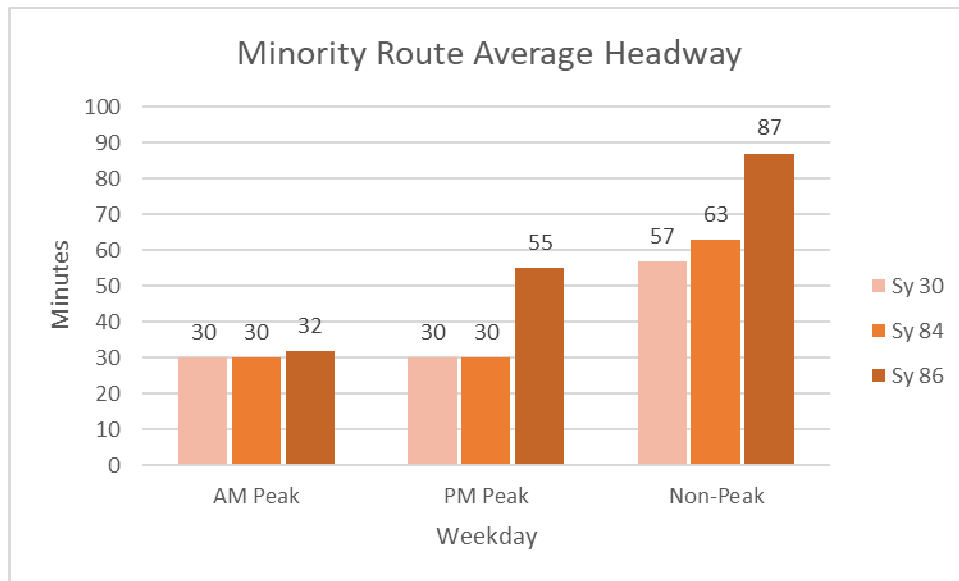
C2: Vehicle Headway Monitoring- The bus routes were categorized as urban or suburban based on a GIS analysis of the distance the route travels through census block groups classified as such based on 2010 Decennial Census population density. The Osw46 is classified as an Intercity route as it provides service between the City of Syracuse (Onondaga County) and City of Oswego (Oswego County). The average headway in minutes was calculated and analyzed for both peak and non-peak periods for weekdays, Saturdays, and Sundays as per the established Centro standards. *Each urban and suburban route’s headway is operating in accordance with established standards.*

Weekday Headway

Minority Route	Route Type	AM Peak	PM Peak	Non-Peak
Sy 30	Urban	30	30	57
Sy 84	Suburban	30	30	63
Sy 86	Suburban	32	55	87

Non-Minority Route	Route Type	AM Peak	PM Peak	Non-Peak
SY 36	Suburban	24	15	47
SY 88	Suburban	30	30	52
Osw46	Intercity	49	108	127

Refer to the charts below for a visual representation of the weekday headway for the selected lines.



Weekend Headway

Minority Route	Route Type	Saturday	Sunday
Sy 30	Urban	n/a	n/a
Sy 84	Suburban	280	n/a
Sy 86	Suburban	n/a	n/a

Non-Minority Route	Route Type	Saturday	Sunday
SY 36	Suburban	110	110
SY 88	Suburban	n/a	n/a
Osw46	Intercity	240	240

Due to the limited data in the above tables, charts were not included for the weekend headway.

C3: On-Time Performance Monitoring- On-Time Performance was calculated from a review of weekday service line-up data collected between Monday April 22, 2019 and Friday April 26, 2019. The scheduled arrival and departure times from the Centro Transit Hub in downtown Syracuse were compared to the actual bus arrival and departure times recorded by Centro Supervisors. Five of the six routes included in this analysis had an on-time performance rate of 94% or higher which exceeds the service standard of 90%. One route, the Osw46, had an on-time performance rate of 87% for the survey week due to two atypical delays on the same day. All other days of the week had a 100% on-time performance for the reported trips, therefore it is not believed the Osw46 has a systematic schedule adherence problem. *Each route's on-time performance reasonably meets our service standards.*

Minority Route	% On Time	Non-Minority Route	% On Time
Sy 30	94%	SY 36	99%
Sy 84	97%	SY 88	100%
Sy 86	100%	Osw46	87%

C4: Service Availability – Service Availability was analyzed using the ACS 2013-2017 population by race demographic data. The service area includes portions of census block groups within ¼ mile of urban segments of bus routes and ½ mile of suburban/rural segments of bus routes. Segments were derived from a GIS analysis of census block group population data. *Each of the minority and non-minority routes analyzed serve a minority population above the minority concentration percentage (22.9%) for Onondaga County based on ACS 2013-2017.*

Minority Route	Service Area Size (sq mile)	Total Population per sq mile	% Minority	Minority Population per sq mile	% Non-Minority	Non-Minority Population per sq mile
Sy 30	7.0	4,633	46%	2,153	54%	2,481
Sy 84	12.2	3,505	37%	1,293	63%	2,211
Sy 86	11.5	3,014	39%	1,190	61%	1,824
Average	10.2	3,717	42%	1,545	58%	2,172

Non-Minority Route	Service Area Size (sq mile)	Total Population per sq mile	% Minority	Minority Population per sq mile	% Non-Minority	Non-Minority Population per sq mile
SY 36	17.3	2,433	29%	703	71%	1,730
SY 88	28.3	1,705	32%	547	68%	1,159
Osw46	43.4	1,579	27%	420	73%	1,160
Average	29.7	1,906	29%	556	71%	1,349

C5: Vehicle Assignment – All vehicles operated by CNY Centro Inc. are equipped with Wi-Fi and accessible ramps or lifts. The most recent vehicle year for buses currently in operation is 2018. Most of the buses in operation are 40 feet in length. Due to passenger loads, there is a 30 foot bus assigned to one minority and one non-minority route; all the rest of the routes utilize 40 foot buses. High back seats are available on buses for both minority and non-minority routes, however; there are more high back buses in operation on the non-minority routes. This is due to the route revenue miles, which far exceed those of the minority routes. As per Centro standards, high back seats are used primarily for longer trips. The Osw46 is exclusive coach usage as it is an intercity route in which customers are traveling much greater distances and on the vehicles for much longer periods of time. The majority of buses assigned are low floor models with the exception of MCIs, Coach, and the 30 foot buses. *Vehicles are equitably assigned in accordance with our service standards.*

		Vehicle Amenities		
Minority Route	Average Age	High Back	Low Floor	ADA Compliant
Sy 30	7.0	No	Yes	100%
Sy 84	4.3	No	Yes	100%
Sy 86	6.3	mixed	Yes	100%

		Vehicle Amenities		
Non-Minority Route	Average Age	High Back	Low Floor	ADA Compliant
SY 36	7.1	mixed	Yes	100%
SY 88	7.7	mixed	Yes	100%
Osw46	6.0	Coach	No	100%

C6: Distribution of Transit Amenities – Transit Amenities analyzed included bus shelters, benches, and shelter information panels. Due to the significant difference in revenue mileage between the routes, the amenities per revenue mile were calculated to more evenly quantify the amenities by type, per route. *Amenities are equitably distributed between both minority and non-minority routes.*

Minority Route	Revenue Miles	# shelters	# benches	# shelter info panels	shelters per Revenue Mile	benches per Revenue Mile	shelter info panels per Revenue Mile
Sy 30	15.7	10	11	19	0.64	0.70	1.21
Sy 84	9.5	6	7	11	0.63	0.74	1.16
Sy 86	6.7	9	7	18	1.34	1.04	2.69
Total	31.9	25	25	48			
Average					0.78	0.78	1.50

Non-Minority Route	Revenue Miles	# shelters	# benches	# shelter info panels	shelters per Revenue Mile	benches per Revenue Mile	shelter info panels per Revenue Mile
SY 36	21.9	15	14	26	0.68	0.64	1.19
SY 88	53.8	15	13	26	0.28	0.24	0.48
Osw46	58.5	10	8	18	0.17	0.14	0.31
Total	134.2	40	35	70			
Average					0.30	0.26	0.52

Data Sources: U.S. Census Bureau 2010 Decennial Census; American Community Survey 2013-2017 5-year estimate; CNYRTA CNY Centro, Inc.

**MINUTES OF THE REGULAR MEETING OF
THE CENTRAL NEW YORK REGIONAL TRANSPORTATION AUTHORITY
HELD ON FRIDAY, JULY 26, 2019 AT 10:00 A.M.
AT THE RTA OFFICES, 200 CORTLAND AVENUE
IN SYRACUSE, NEW YORK**

MEMBERS PRESENT: BRIAN SCHULTZ (Chairman); ROBERT CUCULICH; TINA FITZGERALD; JOSEPH HARDICK; DARLENE LATTIMORE; DONNA REESE; LOUELLA WILLIAMS

MEMBER ABSENT: NICHOLAS LAINO

STAFF ALSO PRESENT: RICHARD LEE (Chief Executive Officer); CHRISTINE LoCURTO; ROBERT LoCURTO; BARRY M. SHULMAN and IAN S. LUDD of counsel

The Chairman opened the meeting, noting that a quorum was present. He announced that the next Authority monthly Board meeting will be held on August 16, 2019. The Governance Committee will meet at 9:00 A.M. followed by Audit and Finance at 9:30 A.M. and the Board meeting, thereafter. It is possible that a Legal Committee meeting might also be called.

APPROVAL OF MONTHLY MINUTES: Mr. Cuculich wished his remarks at the May meeting commenting with regard to non-funded health care liabilities, not immediately payable, but spread over time as concurred with by Gregg Evans, Auditor. These remarks of Mr. Cuculich should be put into the record. With that exception, a Motion was then made, seconded and unanimously carried as Motion No. 2391, that the Minutes of the May 17, 2019 and June 21, 2019 monthly CNYRTA Board meeting be adopted.

HONOR TO MS. REESE: The Chairman then read a Resolution of the City of Syracuse, Honoring Donna Reese for her unwavering dedication to the City of Syracuse and for her decades of community and disability rights activism which have improved the lives of so many in our community. The Chairman read the City of Syracuse Resolution to the Board, and then congratulated Ms. Reese on this excellent honor. A copy of the City of Syracuse Resolution was then ordered appended to these Minutes, by the Chairman.

CHIEF EXECUTIVE OFFICER'S REPORT: Mr. Lee next gave the Chief Executive Officer's report at the request of the Chairman.

ADA ANNIVERSARY CELEBRATION PARADE: Centro participated in the 2019 ADA Anniversary Celebration parade. It was held on Wednesday, July 24, 2019. Centro provided two vehicles to those who could not march but wished to still to participate in the parade.

ROUTE 81 PRESENTATION: Mr. Lee then discussed a New York State DOT presentation regarding the draft environmental impact statement for the replacement of Route 81. The session was held on June 26, 2019 at the Oswego Metro Center. Chairman Schultz attended along with Mr. Lee.

JCOPE LOBBYING RULES: Mr. Lee next discussed in detail amended Lobbying Rules promulgated by JCOPE. JCOPE has implemented these new rules together with a new reporting system. Board members were encouraged to stay in communication with Mr. Lee on the various rules and their applicability.

SERVICE MATTERS – TITLE VI: The Chairman then called upon Mr. Koegel to review Title VI requirements. He discussed the three phases of implementation. He further discussed the basis of Title VI, contained in an informational brochure distributed to each Board member. Specifically, they are the Authority's Service Standards for its UZA and Non / Small UZA bus services; the Authority's Public Participation Plan which relates to policies on public outreach and interactions with customers; and the Authority's Service Monitoring Program. He presented policy reports and discussed the entire Title VI program. Thereafter, and upon Motion duly made, seconded and unanimously carried as Motion No. 2392, that the Authority Board authorized acceptance of the Service Standards; Public Participation Plan and Service Monitoring Program to facilitate compliance with Title VI requirements, including how they become implemented over time.

PAID FAMILY LEAVE: At Mr. Lee's request, the Chairman called upon the Board to approve of the New York State Paid Family Leave Time participation. According to its rules, non-represented employees are eligible and will pay for this benefit. Thereafter, and upon Motion duly made, seconded and unanimously carried as Motion No. 2393, NYS Paid Family Leave, according to its rules, was approved by the Board.

AUDIT AND FINANCE COMMITTEE REPORT: Ms. LoCurto reviewed the Financial Report. This is the end of the first quarter of Fiscal Year 2020. Certain financial documents had previously been distributed to the Board. These include for the Authority and various subsidiary corporations, Consolidated Statement of Net Position as of June 30, 2019, Consolidated Statement of Revenues and Expenditures from April 1, 2019 through June 30, 2019 and Accounts Receivable and Investment reports. Also, supplemental reports for information purposes only include Reserves, Cash Balance Report, MRT, Grants Summary and Risk Management Policy Summary. She reviewed the Authority's cash position, which is low and Receivables, which are 'tight'. As of 06/30/2019 CNYRTA has just over \$1.51 in current assets to pay for every \$1 in current liabilities. The Consolidated Statement of Revenues and Expenditures show an operating loss of approximately \$53,000. Ms. LoCurto indicated how in several areas the budgeting by her staff has proven accurate. She then reviewed budgeting for 2021. Mr. Schultz posed certain questions with regard to fiscal year 2021 and 2022 reserve. Mr. Schultz thanked the staff for keeping expenses under control. Thereafter, and upon Motion duly made, seconded and unanimously carried, approval of the Financial Reports collectively was moved, seconded and unanimously carried as Motion No. 2394.

The Chairman then indicted that during the Audit and Finance meeting, Mr. Koegel had presented certain additional Motions, annexed hereto, as follows:

A contract amendment with the New York State Department of Agriculture and Markets with regard to such new Willis Avenue location and additional service hours.

A contract amendment with Syracuse University where Syracuse University students would ride fare-free in sections of Nob Hill fixed route service.

Ratify amendment to existing State Fair agreement for service to the new Willis Avenue lot and increasing the number of hours in the agreement, by Motion duly made, seconded and unanimously carried as Motion No. 2395, annexed hereto.

Ratify amendment to the Syracuse University agreement to provide additional campus service and operate Nob Hill free Fair service. Approved by Motion duly made, seconded and unanimously carried as Motion No. 2396, annexed hereto.

Approve Cayuga Community College Auburn Campus service renewal, approved by Motion duly made, seconded and unanimously carried as Motion No. 2397, annexed hereto.

Approve Cayuga Community College Fulton Campus service renewal, approved by Motion duly made, seconded and unanimously carried as Motion No. 2398, annexed hereto.

Approve SUNY Oswego Auxiliary Services Blue Route service renewal, approved by Resolution duly made, seconded and unanimously carried as Motion No. 2399, annexed hereto.

Approve SUNY Oswego Auxiliary Services Green Route service renewal, approved by Resolution duly made, seconded and unanimously carried as Motion No. 2400, annexed hereto.

Mr. Koegel was excused from the meeting.

WORKER'S COMPENSATION: Ms. Musengo presented, as she had in the Audit and Finance Committee meeting, a certain Motion with regard to the administration of the Central New York Regional Transportation Authority Worker's Compensation Program. This is a recommendation to the Board of the Authority, that the incumbent Traveler's Insurance Group be awarded a one-year policy renewal to administer the CNYRTA Worker's Compensation program from the period of August 1, 2019 to August 1, 2020. Ms. Musengo reviewed in-depth, all of the financial aspects of this Motion after which it was made, seconded and unanimously carried as Motion No. 2401. Ms. Musengo was excused from the meeting.

Ms. Musengo was excused from the meeting.

RESOLUTION - PEST CONTROL SERVICES: Ms. MacCollum presented a Resolution approving of a pest control services contract with Ehrlich Pest Control. She reviewed the price per unit and the number of responses for this agreement. Thereafter, and upon motion duly made, seconded and unanimously approved Resolution No. 2401, attached to these Minutes was moved, seconded and unanimously approved.

Ms. MacCollum was excused from the meeting.

RESOLUTION – LEGAL SERVICES: Ms. Spraker was invited into the Meeting to present, as she had at the Audit and Finance Committee meeting, a Resolution to authorize a contract for Legal Services for 2019-2024. Ms. Spraker reviewed the number of applications and the RFP process. Thereafter, and upon motion duly made, seconded and unanimously carried, it was decided, per the Resolution annexed hereto and made a part of hereof, that a contract be awarded for general corporate, legal coordination as well as litigation work to Mackenzie Hughes LLP law firm and labor relations legal work to Ferrara Fiorenza PC law firm. The hourly rates for each such contracts are contained on the fact sheet provided to the Board with regard to legal services. Thereafter, and upon motion duly made, seconded and unanimously approved Resolution No. 2402, attached to these Minutes was moved, seconded and unanimously approved.

Ms. Spraker was excused from the meeting.

OPERATIONS / TRANSPORTATION REPORT: Rob LoCurto invited Josh Gardner and Chris Tuff to join him in giving the Operations/Transportation Report.

Josh Gardner discussed the Call-a-bus quarterly report for all counties.

Chris Tuff discussed the expanded Customer Travel Training Program to familiarize new Centro riders to our services. He also discussed the need for new bus operators and the training program for them.

PENSION COMMITTEE REPORT: The Chairman then reported on the Pension Committee meeting, held earlier this morning. He reported that the Pension Committee agenda was in two parts. The first had to do with an analysis of the Pension Plans for salaried and non-salaried employees. In this regard, Jeff Ingraham from Manning and Napier, gave a presentation. Several questions were raised by the Board, including as to fiscal year. Mr. Schultz questioned many investment decisions. It was decided after Mr. Ingraham's presentation and, on his recommendation, that the current allocation of equity to debt and the overall analysis of the Authority's portfolio remain without change.

CENTRO PARKING INC. PENSION WITHDRAWAL: The second section of the Pension Committee was guided by Jackie Musengo who was invited into the meeting for such purpose. Ms. Musengo noted that the parking contract with SUNY Upstate expires on July 31, 2019. Therefore, Centro Parking, Inc. will no longer have active employees. As a result, Centro Parking, Inc. has been removed from the Authority pension plans. The following Motions, annexed hereto, were therefore made, carried and unanimously adopted. They are as follows: Centro Parking, Inc.'s withdrawal from the Centro Defined Benefit Plan for Salaried Employees (Motion No. 2302) and withdrawal from Centro's 401(a) Plan for Salaried Employees (Motion No. 2303). Additionally, an amendment to remove Centro Parking, Inc. from the pension plan (Motion No. 2304). Information was also presented to the Board as to Centro's non-salaried Disability Pension impact from the Centro Defined Benefit Plan for non-salaried employees.

Ms. Musengo was excused from the meeting.

In discussion of the above, Mr. Cuculich questioned the level of financial impact and the number of employees. Ms. Musengo indicated that there are less than ten employees and a very small commitment of funds for reimbursement to employees as refunds due to the termination of a program which had vested.

LEGAL COMMITTEE REPORT: It was then, again moved, seconded and unanimously adopted, pursuant to Section 105 (1)(h) (discussion of lease negotiations) that the meeting move into Executive Session. Upon exiting Executive Session, the Chairman noted that several lease analyses were discussed but no action taken.

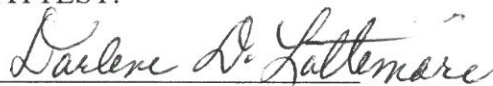
EXECUTIVE SESSION: The Board then went into Executive Session on motion duly made, seconded and unanimously carried as Motion No. 2405. The basis for Executive Session was Section 105(d) of the New York Public Officer's Law (discussions regarding proposed, pending or current litigation) discussed with legal litigation counsel and accident litigation. Upon exiting Executive Session, the Chairman announced that a certain accident litigation matter was discussed, but no action taken.

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



Chairman

ATTEST:



Secretary

Central New York Regional Transportation Authority (CNYRTA)

Title VI of the Civil Rights Act of 1964 Policies

Title VI of the Civil Rights Act of 1964 states that “no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

CNYRTA (Centro) is committed to the principles embodied in Title VI. Analysis of services provided by the Authority indicates a consistent history of excellent distribution of transit resources for the various populations in its service area. Centro serves a wide range of social, geographic and economic disparity, including most areas with higher populations of minorities, limited English proficiency and low-income populations. No particular group in the Centro service area is excluded from transit services.

Should changes be considered, Centro will adhere to the following Objectives and Policies:

Objectives

The CNYRTA Title VI objectives are as follows:

- To ensure that transit benefits and related 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 without regard to race, color, or national origin.
- To ensure that opportunities to participate in the transit planning and decision-making processes are provided to persons without regard to race, color, or national origin.
- 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 based on race, color, or national origin.

Major Service Change Policy

CNYRTA defines a Major Service Change as a change in any route, other than a school tripper, specialized service or experimental route, that 1) changes the number of service hours operated on any route by 25% or more, or, 2) changes the length of a route¹ by 25% or more. All Major Service Changes will be subject to an equity analysis including an analysis of adverse effects on minority and low-income populations.

An adverse effect is defined as a geographical or time-based change in 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.

¹ The length of a route is based on map length rather than vehicle miles.

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.

For the purpose of this policy, minorities are defined as persons self-identified as any race other than white only by Census race classifications including those persons self-identified as Hispanic in ethnicity regardless of race.

Centro defines a disparate impact as occurring when there is a difference in adverse effects of plus or minus 20% between minority and non-minority populations.

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.

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.

For the purpose of this policy, a household is considered low-income if the median household income does not exceed 50% of the median household income for the service area.

Centro defines a disproportionate burden as occurring when there is a difference in adverse effects of plus or minus 20% between low-income and non-low-income households.

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

Analysis Framework

Centro may use any and all datasets available, applicable and appropriate in conducting equity analysis for Major Service Changes and fare/fare-type changes. While Centro does not preclude the use of any dataset, ridership data by route and bus trip is the best data available for analysis of equity impacts on the riding public, therefore, when possible, route and trip specific data will be used. Ridership data is obtained through farebox counts, monitoring cameras or Automated Passenger Counters. However, these sources have limitations with respect to equity analysis, therefore, when resources are available, Centro will conduct periodic or “spot” rider surveys by route, which will enable an accurate assessment of impacts on the riding public with regards to race, color, national origin, income level and English proficiency.

Rider surveys can be labor intensive and, therefore, costly. When rider surveys are not readily available and/or cannot be obtained in a timely or cost-efficient manner to complete an equity analysis, data

generated by the U.S. Census Bureau, either from the Decennial Census or American Community Survey (ACS) may be combined with Census tract, block group, or block level data, whichever is the best representation of the affected area using the smallest geographic area available. The demographic datasets regarding race, color, national origin, income and English proficiency, as applicable to the analysis of those areas, will be the datasets used. This method is also appropriate where surveys of existing ridership do not yield a statistically valid assessment, such as when service is proposed for a new corridor or neighborhood not previously served.

Service Equity Analysis

Centro will show how the proposed Major Service Change impacts minority and low-income populations at the geographic level by including:

- Overlay maps showing proposed service changes as well as demographic data in order to study the affected population;
- Tables showing impacts associated with each type of route or service change (e.g., routing, frequency, span of service, addition or elimination of routes).

If a disparate impact or disproportionate burden exists and the proposed service changes must take place despite such impact:

- Centro will clearly demonstrate that a substantial legitimate justification for the proposed service changes exists; and
- Centro will clearly demonstrate that alternatives were analyzed to determine whether the proposed service changes are the least discriminatory alternative; and
- Centro will take steps to avoid, minimize, or mitigate impacts where practicable. Alternatives available to minority and low-income passengers affected by the service changes will be considered.
- In the case of a proposed service improvement, Centro will analyze the accrual of benefits for minority populations as compared to non-minority populations, and low-income populations as compared to non-low-income populations, using the comparison population selected (i.e., ridership or service area).
- If a service is proposed to be increased and/or expanded, but minority and/or low-income populations are not expected to benefit from the expansion as much as non-minority and/or non-low-income populations, then Centro will explain any plans to improve service to the minority and/or low-income populations.
- Centro will describe any plans to restore service if/when additional funds become available.

Fare Equity Analysis

Centro will show how the proposed fare change or fare-type change impacts minority and low-income populations by conducting a comprehensive Fare Equity Analysis. Centro will utilize data generated from ridership surveys to conduct the analysis.

- For all proposed fare changes, Centro will compare the percentage change in the average fare for minority riders and riders overall and for low-income riders and riders overall.

- When a fare-type change is proposed, Centro will analyze the fare media usage to determine the number and percent of users of each fare media being changed. Centro will identify whether minority and/or low-income riders are disproportionately more likely to use the payment type or fare media that would be subject to the change.
- Centro will include a profile of fare usage by group – minority, low-income and overall ridership.
- If the proposed changes would only affect certain fare media, the analysis should address whether focusing changes on those fare media may lead to a disparate impact or disproportionate burden.
- Centro will depict the information in tabular format. The table will depict the fare media comparing the existing and proposed cost, the absolute change, the percent change, and the usage of minority groups as compared to overall usage and low-income groups as compared to overall usage. Centro will analyze fare media for minority groups distinct from low-income.
- Centro will compare the differences in impacts between minority users and overall users and analyze any alternative fare payment types, or fare media available for people affected by the fare change. The analysis will compare the fares paid by the proposed changes with fares that would be paid through available alternatives.

If a disparate impact or disproportionate burden exists and the proposed fare changes must take place despite such impact:

- A modification to the fare change proposal will be considered to remove the impacts. Centro may seek public comment on any proposed mitigation measures, including any less discriminatory alternatives that may be available.
- If the proposal is modified, Centro will analyze the modified proposal following the same procedure as previously stated.
- Centro will also explore alternatives, including the timing of implementing the fare increases, providing discounts on passes to social service agencies that serve the impacted populations, and other alternatives as appropriate.

Public Participation

Centro policy is to disseminate information and to solicit and respond to public comment on bus service and fare changes to the extent reasonable and practical. Specific elements of this policy are as follows:

- Except when impossible because of an emergency condition, advance notice of not less than one week will be given to the affected public of minor route and schedule changes. Methods of providing such notice include, but are not limited to, distribution of revised timetables, handouts, posted notices and/or media releases.
- Major service changes (as described in the Major Service Change Policy) and any change in the fare structure will be made available for public input and CNYRTA Board consideration prior to implementation. School tripper, specialized or experimental service may be changed without recourse to a formal hearing process.
- A notice of the proposed change(s) will be published in a newspaper of general circulation or their affiliated website and also, if applicable, in newspapers oriented to the specific groups or communities affected, and in buses. Such published notices will include information as to the date,

time and location of any public hearings. Not sooner than twenty-one (21) days after the notices are published and posted at least one public hearing shall be held. Special promotional fares are not included in the requirements of this section.

- Staff will conduct a Service and Fare Equity Analysis required by FTA for compliance with Title VI of the Civil Rights Act of 1964 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 also address alternatives available for people affected by the changes. The results of the analysis will be reported to CNYRTA's Board prior to any public discussion or implementation of the proposed changes.
- A report of all public comments received, and the responses given will be submitted to the Board. Recommended changes in the proposal as a result of public comment may also be presented.
- Following completion of the process described above, the CNYRTA Board may authorize staff to implement the changes or may direct other action. Final public notice of major changes in service or any changes in the fare structure will be given at least ten days in advance of the effective date of the change.

In discussion of the above, Mr. Cuculich questioned the level of financial impact and the number of employees. Ms. Musengo indicated that there are less than ten employees and a very small commitment of funds for reimbursement to employees as refunds due to the termination of a program which had vested.

LEGAL COMMITTEE REPORT: It was then, again moved, seconded and unanimously adopted, pursuant to Section 105 (1)(h) (discussion of lease negotiations) that the meeting move into Executive Session. Upon exiting Executive Session, the Chairman noted that several lease analyses were discussed but no action taken.

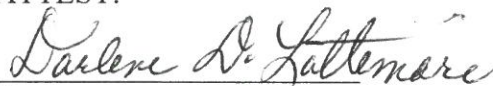
EXECUTIVE SESSION: The Board then went into Executive Session on motion duly made, seconded and unanimously carried as Motion No. 2405. The basis for Executive Session was Section 105(d) of the New York Public Officer's Law (discussions regarding proposed, pending or current litigation) discussed with legal litigation counsel and accident litigation. Upon exiting Executive Session, the Chairman announced that a certain accident litigation matter was discussed, but no action taken.

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



Chairman

ATTEST:



Secretary

**MINUTES OF THE REGULAR MEETING OF
THE CENTRAL NEW YORK REGIONAL TRANSPORTATION AUTHORITY
HELD ON FRIDAY, SEPTEMBER 27, 2019 AT 10:00 A.M.
AT THE RTA OFFICES, 200 CORTLAND AVENUE
IN SYRACUSE, NEW YORK**

MEMBERS PRESENT: **BRIAN SCHULTZ (Chairman); ROBERT CUCULICH; JOSEPH HARDICK; NICHOLAS LAINO; DONNA REESE; LOUELLA WILLIAMS**

MEMBER ABSENT: **TINA FITZGERALD; DARLENE LATTIMORE**

STAFF ALSO PRESENT: **RICHARD LEE (Chief Executive Officer); LINDA BIATA; CHRISTOPHER TUFF; BARRY M. SHULMAN and IAN S. LUDD of counsel**

The Chairman called the meeting to order at 10:00 A.M., noting that a quorum was present. He announced that the next Authority monthly Board meeting will be held on October 25, 2019. On that date, there will be a Pension Committee meeting at 9:00 A.M., a Strategic Planning Committee meeting at 9:30 A.M., an Audit and Finance Committee at 10:00 A.M., with the Board immediately meeting thereafter.

APPROVAL OF MONTHLY MINUTES: A Motion was made, seconded and unanimously carried as Motion No. 2406, that the Minutes of the July 26, 2019 monthly CNYRTA Board meeting be adopted.

CHIEF EXECUTIVE OFFICER'S REPORT: Mr. Lee gave the Chief Executive Officer's report at the request of the Chairman. He began by reminding the Board that they will be soon be contacted, if they have not already been so, for Ethics training as mandated by law. Such training is currently scheduled to follow the next month's Board meeting.

NEW YORK STATE FAIR: Mr. Lee and Mr. Tuff reported on the recently held New York State Fair. It was a huge success. Mr. Tuff described the Fair, post-event. Mr. Tuff observed that this was another record year at the Fair, with total attendance growing from 1,279,010 in 2018 to 1,329,275 in 2019. This indicates growth, since 2015, of an astounding 46%. In response to questions posed by Board members, Mr. Tuff complimented all of the Centro personnel, both drivers, mechanics, buildings and grounds staff and administrative staff, who together worked to make this event such a success. Mr. Tuff also discussed Park-And-Ride operations adjustments that were made day by day at the Fair, based on continual assessment of attendance and traffic flow. Ms. Reese asked to be included in future planning sessions, regarding transportation and accessibility at the Fair. She complimented the Centro staff on-site, including for easing transportation for the disabled.

Mr. Tuff then reviewed various other changes in 2019, such as addition of the Willis Avenue lot. A detailed State Fair report had previously been distributed to each Board member. The Board congratulated Mr. Tuff and his staff.

CNG BUSES: Mr. Geoff Hoff then discussed CNG buses and their utility onsite as it relates to fuel economy. Mr. Hoff reviewed for the board the tremendous amount of savings over the last 10 years when the authority elected to continue with the technology as compared to other fuel typed vehicles such as diesel or diesel electric hybrid buses.

Mr. Hoff was excused from the meeting.

CONGRESSMAN KATKO – CYBER SECURITY ROUND TABLE: As part of the Chief Executive Officer's Report, Mr. Lee reported noted that he has been invited by Congressman Katko to represent public transportation at a Cyber Security Roundtable he hosted. Security experts and representatives from the United State Department of Homeland Security were present. Mr. Lee was able to share Centro's general security framework and what has been accomplished with improving Cyber Security. Our cyber security program is directed by Michael Fitzgibbons. It was a very informative meeting.

UPSTATE TRANSIT FEDERAL CENSUS PROMOTION: Representatives of Governor Cuomo's office recently met with leaders of the four Upstate Transit Authorities to discuss how they might participate in promoting the upcoming 2020 Federal Census. The intent is to remind citizens of the importance of participating in the upcoming Census. Crucial to this effort is educating all to the importance of the Census. Ms. Reese stressed the need for the inclusion of disabled individuals to enhance adequate governmental program funding.

TITLE VI POLICIES AND TITLE VI PROGRAM REPORT: Ms. Paula Cutrone was then invited into the meeting to give a report on Title VI. The Program Report, submitted to the Federal Transit Administration every three years, was prepared by the Centro Planning Department, Ms. Cutrone described Title VI Policies and the Title VI Program Report, in depth. Copies of these Policies and Reports had also been distributed earlier as part of the Board packet, prior to this meeting. Thereafter, and after much discussion, and upon Motion duly made, seconded and unanimously carried, approval of the Title VI Policies was adopted as Motion No. 2407. After discussion of its contents, the Title VI Program Report, as presented by Ms. Cutrone was likewise reviewed and unanimously carried as Motion No. 2408.

Ms. Cutrone was then excused from the meeting.

AUDIT AND FINANCE COMMITTEE REPORT: Mr. Laino, Chairman of the Audit and Finance Committee then reported on matters dealt with at the Audit and Finance Committee meeting, held earlier this morning.

INSURANCE REPORT: Mr. Maloff, Insurance Consultant to the Authority, was invited into the meeting. As he had at the Audit and Finance Committee, held earlier this morning, he presented a proposed renewal for Property Insurance, effective September 9, 2019. It is the same carrier as is currently serving the Authority, Factory Mutual Insurance Company. Last year, the premium cost was \$161,682. This year the cost is \$175,308. Otherwise the insurance contract is the same as last

Title VI Fare & Service Reduction Equity Analysis Report – Introduction of Day Pass Fare Media



January 2017

1. Introduction

The Central New York Regional Transportation Authority (CNYRTA) is conducting a Fare Equity Analysis Under Title VI of the Civil Rights Act of 1964 to evaluate the addition / availability of a Day Pass to its fare options in 2016. This review, performed after a six-month trial of the Day Pass, addresses how the proposal impacts Title VI populations, and how impacts will be mitigated, if necessary, in accordance with Federal Transit Administration (FTA) guidelines.

2. Title VI Guidelines

Section 601 of Title VI of the Civil Rights Act of 1964 states the following:

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

The FTA Circular 4702.1B *Title VI Requirements and Guidelines for Federal Transit Administration Recipients* was published in 2012 by the FTA in order to comply with the law and fulfill the requirement for all transit agencies receiving Federal funds to develop and implement an agency-wide Title VI program. Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations” is a directive from the Federal government to prevent minority communities and low-income populations from being subject to disproportionately high and adverse environmental effects. The FTA circular on Title VI compliance states that while low-income populations are not a protected class under Title VI, there is an “...inherent overlap of environmental justice principles in this area, and because it is important to evaluate the impacts of service and fare changes on passengers who are transit-dependent, FTA requires transit providers to evaluate proposed service and fare changes to determine whether low-income populations will bear a disproportionate burden of the changes.”

3. Major Service Change and Fare Equity Policies

In accordance with updated guidance from the FTA Circular 4702.1B, the CNYRTA is required to develop policies for evaluating impacts of fare changes on Title VI populations. The following sections provide policy thresholds and definitions for CNY Centro.

CNYRTA TITLE VI POLICIES MAJOR SERVICE CHANGE & FARE EQUITY ANALYSES

Title VI of the Civil Rights Act of 1964 states that “no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

CNYRTA (Centro) is committed to the principles embodied in Title VI. Analysis of services provided by the Authority indicates a consistent history of excellent distribution of transit resources for the various populations in its service area. Centro serves a wide range of social, geographic and economic disparity, including most areas with higher populations of minorities,

limited English proficiency and low-income populations. No particular group in the Centro service area is excluded from transit services.

Should changes be considered Centro will adhere to the following Objectives and Policies:

CNYRTA Title VI Objectives

The Authority FTA Title VI objectives are as follows:

- To ensure that transit benefits and related 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 without regard to race, color, or national origin.
- To ensure that opportunities to participate in the transit planning and decision making processes are provided to persons without regard to race, color, or national origin.
- 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 based on race, color or national origin.

1. Major Service Change Policy

CNYRTA will conduct an Equity Analysis to ensure that the impacts of fare changes &/or major service changes are not disproportionately borne by any minority or low-income populations. CNYRTA defines a Major Service Change as a change in any route, other than a school tripper, specialized service or experimental route, that 1) changes the number of service hours operated on any route by 25% or more, or, 2) changes the length of a route by 25% or more.

2. Disparate Impact Policy

Centro defines a disparate impact as an adverse effect of service changes or fare change borne disproportionately by minority populations. Centro's Policy is that any time there is a difference in adverse impacts between minority and non-minority populations of plus or minus 20% for service changes, or any time there is a difference in adverse impacts between minority and overall populations of plus or minus 20% for fare changes, such difference in adverse impacts are disparate. As an example, if the overall bus ridership on a route proposed for a major service change is composed of 40% minorities and 60% non-minorities, and minorities would bear 70% of the impacts and non-minority riders bearing 30% of the impacts; there is a disparate impact as the minority group bears 30% more than its expected share and non-minorities bear 30% less than their share. When a disparate impact is identified, Centro will consider modification of the proposal in order to avoid, minimize, or mitigate the disparate impact. This Disparate Impact Policy will be applied to all major service changes.

2a. Major Service Change - Analysis Framework

Centro may use any and all datasets available, applicable and appropriate in conducting equity analysis for major service changes. While Centro does not preclude the use of any dataset, ridership data by route and bus trip is the best data available for analysis of equity impacts on the riding public, therefore, when possible, route and trip specific data will be used. Ridership data is obtained through farebox counts, monitoring cameras or Automated Passenger Counters. However, these sources have limitations with respect to equity analysis, therefore, when resources are available, Centro will conduct periodic or “spot” rider surveys by route, which will enable an accurate assessment of impacts on the riding public with regards to race, color, national origin, income level and English proficiency.

Rider surveys can be labor intensive and, therefore, costly. When rider surveys are not readily available and/or cannot be obtained in a timely or cost-efficient manner to complete an equity analysis, data generated by the U.S. Census American Community Survey (ACS) may be combined with Census block level data or the smallest geographic area available. The demographic datasets applicable to race, color, national origin, income and English proficiency of the neighborhoods within those areas will be the datasets used. This method is also appropriate where surveys of existing ridership do not yield a statistically valid assessment, such as when service is proposed for a new corridor or neighborhood not previously served.

2b. Assessing Major Service Changes

Centro will show how the proposed major service change impacts minority and low-income populations at the geographic level by including:

- Overlay maps showing proposed service changes as well as demographic data in order to study the affected population
- Tables showing impacts associated with each type of route or service change (e.g., routing, frequency, span of service, addition or elimination of routes).

If a disparate impact exists and the proposed service changes must take place despite such impact:

- Centro will clearly demonstrate that a substantial legitimate justification for the proposed service changes exists; and
- Centro will clearly demonstrate that alternatives were analyzed to determine whether the proposed service changes are the least discriminatory alternative
- Centro will take steps to avoid, minimize, or mitigate impacts where practicable. Alternatives available to low-income passengers affected by the service changes will also be considered.
- In the case of a proposed service improvement, Centro will analyze accrual of benefits for minority populations as compared to non-minority populations, and low-income populations as compared to non-low-income populations, using the comparison population selected (i.e., ridership or service area).
- If a service is proposed to be increased and/or expanded, but minority and/or low-income populations are not expected to benefit from the expansion as much as non-

minority and/or non-low-income populations, then Centro will explain any plans to improve service to the minority and/or low-income populations.

- Centro will describe any plans to restore service if/when additional funds become available.

2c. Fare Equity Analysis

Centro defines a fare related disparate impact as an adverse effect of a fare change borne disproportionately by minority or low-income populations. A disproportionate impact is present if there is a difference in adverse impacts between minority and overall populations or low-income and overall populations of plus or minus 20%.

- When a fare change is proposed, Centro will analyze the fare media usage data generated from ridership surveys indicating whether minority and/or low-income riders are disproportionately more likely to use the payment type or fare media that would be subject to the fare increase or decrease.
- Centro will include a profile of fare usage by group – minority, low-income and overall ridership.
- If the proposed changes would only affect certain fare media, the analysis should address whether focusing changes on those fare media may lead to a disparate impact or disproportionate burden.
- Centro will depict the information in tabular format. The table will depict the fare media comparing the existing cost, the percent change, and the usage of minority groups as compared to overall usage and low-income groups as compared to overall usage. Centro will analyze fare media for minority groups distinct from low-income.
- Centro will compare the differences in impacts between minority users and overall users and analyze any alternative fare payment types, or fare media available for people affected by the fare change. The analysis will compare the fares paid by the proposed changes with fares that would be paid through available alternatives.
- If Centro determines that a disparate impact exists, a modification to the fare change proposal will be considered to remove the impacts. If the proposal is modified, Centro will analyze the modified proposal to determine whether minority populations will experience disparate impacts. Centro will also explore alternatives, including the timing of implementing the fare increases, providing discounts on passes to social service agencies that serve the impacted populations, and other alternatives as appropriate.

Minority Persons and Populations

According to FTA Circular 4702.1B, a minority person is defined as an individual identifying as: American Indian and Alaska Native, Asian, Black or African American, Hispanic or Latino, and Native Hawaiian or Other Pacific Islander. Minority populations are defined by FTA as any readily identifiable group of minority persons who live in geographic proximity, or who may be geographically dispersed, but who may be similarly affected by a proposed action. Ridership data on minority populations is obtained from the transit agency ridership surveys.

Low Income Persons and Populations

The FTA Circular on Title VI compliance states that while low-income populations are not a protected class under Title VI, there is an "...inherent overlap of environmental justice principles in this area, and because it is important to evaluate the impacts of service and fare changes on passengers who are transit-dependent, FTA requires transit providers to evaluate proposed service and fare changes to determine whether low-income populations will bear a disproportionate burden of the changes."

According to the FTA Circular, "low-income" is defined as a person whose median household income is at or below the U.S. Department of Health and Human Services poverty guidelines or within a locally developed income threshold that is at least as inclusive as these guidelines. In Syracuse, the poverty level household income in 2013 was set at \$23,500. Centro research seeks information on household incomes less than \$25,000. Low-income population is defined by FTA as any readily identifiable group of low-income persons who live in geographic proximity or who may be geographically dispersed, but who may be similarly affected by a proposed action. Data on low-income populations is obtained from the U.S. Census Bureau and transit agency ridership surveys dependent upon the analysis required.

4 Overview of Proposed Changes

In May 2016, the CNYRTA introduced a new Day Pass option for customers in CNY Centro, and Centro of Oneida (Utica only). The cost of the Day Pass is \$5.00 for those paying full fare, and \$2.50 for those who qualify for half fare. The Day Pass is available for purchase on each Centro bus operated by CNY Centro.

In accordance with Chapter 4 of 4702.1B of the FTA Title VI guidelines, fixed route transit providers that operate 50 or more fixed route vehicles in the peak and are located in an urbanized area with a population of 200,000 or more are required to analyze the impacts of any fare changes. CNY Centro meets the thresholds; therefore, a fare equity analysis is required for the proposed fare increases / service reductions.

The equity analysis in this report focuses on potential impacts to Title VI populations amid CNY Centro riders. CNY Centro provides transit services for the City of Syracuse and its surrounding communities in Onondaga County. CNY Centro operates 44 routes, including two inter-city routes connecting Syracuse with Auburn and Syracuse with Oswego. CNY Centro provides approximately 26,000 weekday passenger trips and logs 4.5 million vehicle revenue miles annually. CNY Centro also serves multiple colleges and universities within the region, which accounts for a large share of CNY Centro's ridership. CNY Centro's bus fleet consists of 162 full-sized fixed route vehicles and nearly 30 paratransit vehicles.

5. Disparate Impact and Disproportional Burden Analysis

Determining if the introduction of a Day Pass constitutes a Fare Increase:

The first step in our equity analysis is to determine if the Day Pass constituted a fare increase in actual usage over the first 6 months. This analysis is derived from CNY Centro farebox data and is depicted in Fig. 1 below. CNYRTA charges \$5.00 per adult day pass and \$2.50 per reduced fare day pass. In the first six months, CNYRTA sold 17,345 Adult Fare Day Passes and 5,591 Reduced Fare Day Passes. There were 75,937 rides taken on Adult Fare Day Passes and 28,810 rides taken on Reduced Fare Day Passes. Based on historical data, 25% of all Centro rides are provided by the use of free transfers. When that factor is applied to the rides used via day pass it reduces the number of revenue generating rides to 56,953 Adult Fare Day Pass Rides and 21,608 Reduced Day Pass rides. When dividing the number of revenue generating rides by the number of passes sold, it is determined that the average Adult Fare Day Pass user receives approximately 3.28 riders per Day Pass and the average Reduced Fare Day pass user receives 3.86 riders per day pass. When divided into the price of the pass, adult fare Day Pass users pay approximately \$1.52 per ride and Reduced fare Day Pass users pay approximately \$0.65 per ride. Each of these fares are less than the current per ride cost of cash fares or multi-ride passes and therefore the introduction of the Day Pass does not constitute a fare increase.

Fig. 1

CNY Centro Day Pass Cost / Ride Analysis		
	Adult Fare Day Pass	Reduced Fare Day Pass
May 15, 2016 - November 15, 2016	\$5.00	\$2.50
Number of Passes Sold	17,345	5,591
Number of Rides Taken	75,937	28,810
Revenue Rides (Less 25% for use as free transfer)	56,953	21,608
Rides taken per pass	3.28	3.86
Day Pass Cost / Ride	\$1.52	\$0.65
CNY Centro Cash Fare Cost / Ride	\$2.00	\$1.00
CNY Centro Multi-Ride pass Cost / Ride	\$1.80	\$0.90

Ensuring Access to Day Pass for all populations.

In an effort to ensure that all CNY Centro riders have access to the Day Pass, Day Passes may be purchased when boarding all CNY Centro based buses through the farebox. CNY Centro may decide to expand its Day Pass point of sale locations in the future to its centrally located transit hub in Downtown Syracuse. However, it should be noted that offering a Day Pass at the transit hub changes its functionality as it would not be active upon purchase. Day Passes that are sold on transit vehicles are immediately active. This difference may lead to confusion among riders.

Determining Impact on Title VI Protected Individuals

Beginning in September 2016, CNY Centro began conducting rider surveys to determine usage of the Day Pass in an effort to identify potential disparate impacts and disproportionate burdens on minority and low-income riders as required under Title VI regulations outlined in FTA Circular 4702.1B. As stated in the policy above, Centro defines a fare related disparate impact as an adverse effect of a fare change borne disproportionately by minority or low-income populations. A disproportionate impact is present if there is a difference in adverse impacts between minority and overall populations or low-income and overall populations of plus or minus 20%. The results of these surveys are displayed below in Fig. 2.

Impacts to Minority Ridership

Rider survey results indicate that 45.03% of minority bus riders have used a Day Pass since the pass was offered. This compares to 39.69% of overall bus riders who have used a Day Pass since its inception. This indicates that minority bus rides are using the Day Pass at a 5% greater rate than all users. The 5% is well within CNY Centro's threshold of +/- 20%, and therefore does not represent a disparate impact.

Impacts to Low-Income Ridership

Rider survey results indicate that 42.25% of low-income bus riders have used a Day Pass since the pass was offered. This compares to 39.69% of overall bus riders who have used a Day Pass since its inception. This indicates that low-income bus rides are using the Day Pass at 2.5% greater rate than all users. The 2.5% is well within CNY Centro's threshold of +/- 20%, and therefore does not represent a disproportionate burden.

Fig. 2

Day Pass Usage by Demographics							
	Customers Surveyed	%	Have Used Day Pass	%	Have Not Used Day Pass	%	Total %
Minority	322	62.65%	145	45.03%	177	54.97%	100%
Non-Minority	192	37.35%	59	30.73%	133	69.27%	100%
<\$25,000	329	64.01%	139	42.25%	190	57.75%	100%
>\$25,000	185	35.99%	65	35.14%	120	64.86%	100%
Overall	514	100.00%	204	39.69%	310	60.31%	--

6. Conclusion:

CNY Centro concludes that offering a Day Pass for sale on its buses at pricing levels for adult fare and reduced fare riders does not constitute a fare increase, nor does it create a disparate impact or disproportionate burden on minority or low-income populations.

Additionally, the creation of the Day Pass was applauded by the local anti-poverty Hope Initiative as a benefit to low income individuals who use public transit.

Although the Day Pass only accounts for approximately 5% of current ride payments, the percentages are growing and its usefulness is illustrated by the percentage of individuals who have purchased the Day Pass at least once.

Should the CNYRTA choose to expand its Day Pass program, allowing the pass to be purchased on buses will continue universal access to the Day Pass.

**MINUTES OF THE REGULAR MEETING OF
CNY CENTRO, INC.
HELD ON FRIDAY, FEBRUARY 24, 2017 AT 10:00 A.M.
AT THE RTA OFFICES, 200 CORTLAND AVENUE
IN SYRACUSE, NEW YORK**

DIRECTORS PRESENT: BRIAN SCHULTZ (Chairman); ROBERT CUCULICH; JOSEPH A. HARDICK; NICHOLAS LAINO; DARLENE LATTIMORE; DONNA REESE; LOUELLA WILLIAMS

DIRECTORS ABSENT: DERAUX BRANCH; H.J. HUBERT; JOHN RILEY (Non-voting)

STAFF ALSO PRESENT: RICHARD LEE (Chief Executive Officer); CHRISTINE LoCURTO; ROBERT LoCURTO; BARRY M. SHULMAN and BRADLEY J. MOSES, of Counsel; STEVEN KOEGEL

The Chairman opened the meeting noting a quorum is present. He announced that the next meeting will be held March 24, 2017. The Audit and Finance committee will meet at 9:00 a.m. with a Board meeting to follow immediately thereafter.

APPROVAL OF REGULAR MONTHLY MINUTES: The Chairman requested approval of the Minutes of the January 27, 2017 Board meeting. Adoption of these Minutes was moved, seconded and unanimously carried as Motion No. 1258.

CHIEF EXECUTIVE OFFICER'S REPORT: Mr. Lee next gave the Chief Executive Officer's Report.

FINANCIAL REPORT: Ms. LoCurto gave the Financial Report which was moved, seconded, and unanimously adopted as Motion No. 1259.

OPERATIONS REPORT: Mr. LoCurto then gave the Operation's Report.

Mr. LoCurto discussed certain potential staffing changes and the cost effects of reorganizational improvements.

INTERFAITH LEADERSHIP AWARD DINNER: Mr. Lee reminded the Board of the Interfaith Works of CNY dinner honoring Centro at its annual award dinner on May 2, 2017. Details for attendance will be distributed timely to all Board Members timely. This is an important award recognizing Centro for its work with the refugee community.

DAY PASS EQUITY ANALYSIS: Mr. Koegel was invited into the meeting to discuss the completion of an Equity Analysis performed in accordance with requirements of FTA and regarding Day Passes in Onondaga County. All results were in conformance with applicable requirements. The Board accepted and acknowledged the Equity Analysis.

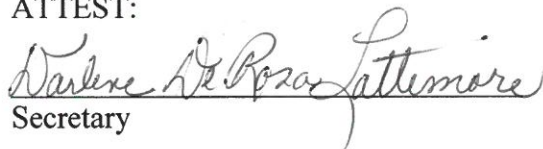
SYRACUSE CITY SCHOOL DISTRICT: Mr. Lee announced that Mr. Koegel, Ed Mueller, Julia Fuster, and he attended the District transportation committee meeting on October 20, 2016. A Committee was established to develop a strategy for the Syracuse City School District to acquire the necessary funds to increase the number of high school students, who might be eligible to be bused to school within a 1.5 miles radius. The District hopes to develop a plan to submit to New York State by the end of this calendar year with regards to whether it is possible that extended service can be underwritten and the walk-zone be decreased.

Mr. Koegel was then excused from the meeting.

There being no further business to come before the Board, the CNY Centro, Inc. meeting was thereupon duly adjourned.


Chairman

ATTEST:


Secretary

Title VI Fare & Service Reduction Equity Analysis Report – Introduction of Weekly Max Pass Fare Media



June 2018

1. **Introduction**

The Central New York Regional Transportation Authority (CNYRTA) is conducting a Fare Equity Analysis Under Title VI of the Civil Rights Act of 1964 to evaluate the addition / availability of a Max Pass to its fare options. This review, performed after a six-month trial of the Day Pass, addresses how the proposal impacts Title VI populations, and how impacts will be mitigated, if necessary, in accordance with Federal Transit Administration (FTA) guidelines.

2. **Title VI Guidelines**

Section 601 of Title VI of the Civil Rights Act of 1964 states the following:

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

The FTA Circular 4702.1B *Title VI Requirements and Guidelines for Federal Transit Administration Recipients* was published in 2012 by the FTA in order to comply with the law and fulfill the requirement for all transit agencies receiving Federal funds to develop and implement an agency-wide Title VI program. Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations” is a directive from the Federal government to prevent minority communities and low-income populations from being subject to disproportionately high and adverse environmental effects. The FTA circular on Title VI compliance states that while low-income populations are not a protected class under Title VI, there is an “...inherent overlap of environmental justice principles in this area, and because it is important to evaluate the impacts of service and fare changes on passengers who are transit-dependent, FTA requires transit providers to evaluate proposed service and fare changes to determine whether low-income populations will bear a disproportionate burden of the changes.”

3. **Major Service Change and Fare Equity Policies**

In accordance with updated guidance from the FTA Circular 4702.1B, the CNYRTA is required to develop policies for evaluating impacts of fare changes on Title VI populations. The following sections provide policy thresholds and definitions for CNY Centro.

CNYRTA TITLE VI POLICIES MAJOR SERVICE CHANGE & FARE EQUITY ANALYSES

Title VI of the Civil Rights Act of 1964 states that “no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

CNYRTA (Centro) is committed to the principles embodied in Title VI. Analysis of services provided by the Authority indicates a consistent history of excellent distribution of transit resources for the various populations in its service area. Centro serves a wide range of social,

geographic and economic disparity, including most areas with higher populations of minorities, limited English proficiency and low-income populations. No particular group in the Centro service area is excluded from transit services.

Should changes be considered Centro will adhere to the following Objectives and Policies:

CNYRTA Title VI Objectives

The Authority FTA Title VI objectives are as follows:

- To ensure that transit benefits and related 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 without regard to race, color, or national origin.
- To ensure that opportunities to participate in the transit planning and decision making processes are provided to persons without regard to race, color, or national origin.
- 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 based on race, color or national origin.

1. Major Service Change Policy

CNYRTA will conduct an Equity Analysis to ensure that the impacts of fare changes &/or major service changes are not disproportionately borne by any minority or low-income populations. CNYRTA defines a Major Service Change as a change in any route, other than a school tripper, specialized service or experimental route, that 1) changes the number of service hours operated on any route by 25% or more, or 2) changes the length of a route by 25% or more.

2. Disparate Impact Policy

Centro defines a disparate impact as an adverse effect of service changes or fare change borne disproportionately by minority populations. Centro's Policy is that any time there is a difference in adverse impacts between minority and non-minority populations of plus or minus 20% for service changes, or any time there is a difference in adverse impacts between minority and overall populations of plus or minus 20% for fare changes, such difference in adverse impacts are disparate. As an example, if the overall bus ridership on a route proposed for a major service change is composed of 40% minorities and 60% non-minorities, and minorities would bear 70% of the impacts and non-minority riders bearing 30% of the impacts; there is a disparate impact as the minority group bears 30% more than its expected share and non-minorities bear 30% less than their share. When a disparate impact is identified, Centro will consider modification of the proposal in order to avoid, minimize, or mitigate the disparate impact. This Disparate Impact Policy will be applied to all major service changes.

2a. Major Service Change - Analysis Framework

Centro may use any and all datasets available, applicable and appropriate in conducting equity analysis for major service changes. While Centro does not preclude the use of any dataset, ridership data by route and bus trip is the best data available for analysis of equity impacts on the riding public. Therefore, when possible, route and trip specific data will be used. Ridership data is obtained through farebox counts, monitoring cameras or Automated Passenger Counters. However, these sources have limitations with respect to equity analysis. Therefore, when resources are available, Centro will conduct periodic or “spot” rider surveys by route, which will provide an accurate assessment of impacts on the riding public with regards to race, color, national origin, income level and English proficiency.

Rider surveys can be labor intensive and, therefore, costly. When rider surveys are not readily available and/or cannot be obtained in a timely or cost-efficient manner to complete an equity analysis, data generated by the U.S. Census American Community Survey (ACS) may be combined with Census block level data or the smallest geographic area available. The demographic datasets applicable to race, color, national origin, income and English proficiency of the neighborhoods within those areas will be the datasets used. This method is also appropriate where surveys of existing ridership do not yield a statistically valid assessment, such as when service is proposed for a new corridor or neighborhood not previously served.

2b. Assessing Major Service Changes

Centro will show how the proposed major service change impacts minority and low-income populations at the geographic level by including:

- Overlay maps showing proposed service changes as well as demographic data in order to study the affected population
- Tables showing impacts associated with each type of route or service change (e.g., routing, frequency, span of service, addition or elimination of routes).

If a disparate impact exists and the proposed service changes must take place despite such impact:

- Centro will clearly demonstrate that a substantial legitimate justification for the proposed service changes exists; and
- Centro will clearly demonstrate that alternatives were analyzed to determine whether the proposed service changes are the least discriminatory alternative
- Centro will take steps to avoid, minimize, or mitigate impacts where practicable. Alternatives available to low-income passengers affected by the service changes will also be considered.
- In the case of a proposed service improvement, Centro will analyze accrual of benefits for minority populations as compared to non-minority populations, and low-income populations as compared to non-low-income populations, using the comparison population selected (i.e., ridership or service area).
- If a service is proposed to be increased and/or expanded, but minority and/or low-income populations are not expected to benefit from the expansion as much as non-

minority and/or non-low-income populations, then Centro will explain any plans to improve service to the minority and/or low-income populations.

- Centro will describe any plans to restore service if/when additional funds become available.

2c. Fare Equity Analysis

Centro defines a fare related disparate impact as an adverse effect of a fare change borne disproportionately by minority or low-income populations. A disproportionate impact is present if there is a difference in adverse impacts between minority and overall populations or low-income and overall populations of plus or minus 20%.

- When a fare change is proposed, Centro will analyze the fare media usage data generated from ridership surveys indicating whether minority and/or low-income riders are disproportionately more likely to use the payment type or fare media that would be subject to the fare increase or decrease.
- Centro will include a profile of fare usage by group – minority, low-income and overall ridership.
- If the proposed changes would only affect certain fare media, the analysis should address whether focusing changes on those fare media may lead to a disparate impact or disproportionate burden.
- Centro will depict the information in tabular format. The table will depict the fare media comparing the existing cost, the percent change, and the usage of minority groups as compared to overall usage and low-income groups as compared to overall usage. Centro will analyze fare media for minority groups distinct from low-income.
- Centro will compare the differences in impacts between minority users and overall users and analyze any alternative fare payment types, or fare media available for people affected by the fare change. The analysis will compare the fares paid by the proposed changes with fares that would be paid through available alternatives.
- If Centro determines that a disparate impact exists, a modification to the fare change proposal will be considered to remove the impacts. If the proposal is modified, Centro will analyze the modified proposal to determine whether minority populations will experience disparate impacts. Centro will also explore alternatives, including the timing of implementing the fare increases, providing discounts on passes to social service agencies that serve the impacted populations, and other alternatives as appropriate.

Minority Persons and Populations

According to FTA Circular 4702.1B, a minority person is defined as an individual identifying as: American Indian and Alaska Native, Asian, Black or African American, Hispanic or Latino, and Native Hawaiian or Other Pacific Islander. Minority populations are defined by FTA as any readily identifiable group of minority persons who live in geographic proximity, or who may be geographically dispersed, but who may be similarly affected by a proposed action. Ridership data on minority populations is obtained from the transit agency ridership surveys.

Low Income Persons and Populations

The FTA Circular on Title VI compliance states that while low-income populations are not a protected class under Title VI, there is an "...inherent overlap of environmental justice principles in this area, and because it is important to evaluate the impacts of service and fare changes on passengers who are transit-dependent, FTA requires transit providers to evaluate proposed service and fare changes to determine whether low-income populations will bear a disproportionate burden of the changes."

According to the FTA Circular, "low-income" is defined as a person whose median household income is at or below the U.S. Department of Health and Human Services poverty guidelines or within a locally developed income threshold that is at least as inclusive as these guidelines. In Syracuse, the poverty level household income in 2013 was set at \$23,500. Centro research seeks information on household incomes less than \$25,000. Low-income population is defined by FTA as any readily identifiable group of low-income persons who live in geographic proximity or who may be geographically dispersed, but who may be similarly affected by a proposed action. Data on low-income populations is obtained from the U.S. Census Bureau and transit agency ridership surveys dependent upon the analysis required.

4 Overview of Proposed Changes

In November 2017, the CNYRTA introduced a new Weekly Max Pass option for customers in CNY Centro, Centro of Oneida, Centro of Oswego and Centro of Cayuga. The cost of the Weekly Max Pass is:

CNY Centro (Syracuse):	\$20.00 full fare ; \$10.00 half fare
Centro of Oneida (Utica):	\$15.00 full fare ; \$7.50 half fare
Centro of Oneida (Rome):	\$10.00 full fare ; \$5.00 half fare
Centro of Oswego (Oswego):	\$10.00 full fare ; \$5.00 half fare
Centro of Oswego (Fulton):	\$10.00 full fare ; \$5.00 half fare
Centro of Cayuga (Auburn):	\$10.00 full fare ; \$5.00 half fare

In accordance with Chapter 4 of 4702.1B of the FTA Title VI guidelines, fixed route transit providers that operate 50 or more fixed route vehicles in the peak and are located in an urbanized area with a population of 200,000 or more are required to analyze the impacts of any fare changes. CNY Centro meets these thresholds; therefore, a fare equity analysis is required for the proposed fare increases / service reductions.

The equity analysis in this report focuses on potential impacts to Title VI populations amid CNY Centro riders. CNY Centro provides transit services for the City of Syracuse and its surrounding communities in Onondaga County. CNY Centro operates 44 routes, including two inter-city routes connecting Syracuse with Auburn and Syracuse with Oswego. CNY Centro provides approximately 26,000 weekday passenger trips and logs 4.5 million vehicle revenue miles annually. CNY Centro also serves multiple colleges and universities within the region, which accounts for a large share of CNY Centro's ridership. CNY Centro's bus fleet consists of 162 full-sized fixed route vehicles and nearly 30 paratransit vehicles.

5. Disparate Impact and Disproportional Burden Analysis

Determining if the introduction of a Max Pass constitutes a Fare Increase:

The first step in our equity analysis is to determine if the Max Pass constituted a fare increase in actual usage. This analysis is derived from CNY Centro farebox data and is depicted in Fig. 1 below. CNY Centro charges \$20.00 per adult Max Pass and \$10.00 per reduced fare Max Pass. In the first six months, CNY Centro sold 6,851 Adult Fare May Passes and 1,676 Reduced Fare Max Passes. There were 109,460 rides taken on Adult Fare Max Passes and 31,380 rides taken on Reduced Fare Max Passes. Based on historical data, 25% of all Centro rides are provided by the use of free transfers. When that factor is applied to the rides used via Max Pass, it reduces the number of revenue generating rides to 82,095 Adult Fare Max Pass Revenue Rides and 23,535 Reduced Max Pass Revenue rides. When dividing the number of revenue generating rides by the number of passes sold, it is determined that the average Adult Fare Max Pass user receives approximately 11.98 rides per Max Pass and the average Reduced Fare Max Pass user receives 14.04 rides per Max Pass. When divided into the price of the pass, Adult Fare Max Pass users pay approximately \$1.67 per ride and Reduced Fare Max Pass users pay approximately \$0.71 per ride. Each of these fares is less than the current per ride cost of cash fares or multi-ride passes and therefore the introduction of the Max Pass does not constitute a fare increase.

Fig. 1

CNY Centro Day Pass Cost / Ride Analysis		
November 06, 2017 - May 31, 2018	Adult Fare Max Pass \$20.00	Reduced Fare Max Pass \$10.00
Number of Passes Sold	6,851	1,676
Number of Rides Taken	109,460	31,380
Revenue Rides (Less 25% for use as free transfer)	82,095	23,535
Revenue Rides taken per pass	11.98	14.04
Max Pass Cost / Ride	\$1.67	\$0.71
CNY Centro Cash Fare Cost / Ride	\$2.00	\$1.00
CNY Centro Multi-Ride pass Cost / Ride	\$1.80	\$0.90

6. **Ensuring Access to Day Pass for all populations.**

In an effort to ensure that all CNY Centro riders have access to the Max Pass, Max Passes may be purchased at all CNY Centro point of sale locations. CNY Centro performed an equity analysis of its locations to ensure that all individuals have equal access to point of sale locations. That analysis is as follows:

Demographic Data

Population data was determined to be the most appropriate source of data for both Minority and Low Income Analysis. CNYRTA's ridership data sample is not large enough to warrant it being used for this analysis.

- ***Minority Analysis*** - Centro defines a disparate impact as an adverse effect of service changes or fare change borne disproportionately by minority populations. Centro's Policy is that any time there is a difference in adverse impacts between minority and non-minority populations of plus or minus 20% for service changes, or any time there is a difference in adverse impacts between minority and overall populations of plus or minus 20% for fare changes, such difference in adverse impacts are disparate.

For this analysis, minorities are defined as any populations self-identified as any category other than white only per Census race classifications as well as those who consider themselves Hispanic (including those self-identified as white only with Hispanic ethnicity). The data was downloaded from the American Fact Finder website provided by the U.S. Census Bureau. Details of the demographic data source utilized are below.

Data source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates

Dataset: Hispanic or Latino by Race (table B03002)

Universe: total population

Geographic Level: Census block group

A census block group is designated as a minority block group if 49% or more of its population identified with the classifications detailed above.

- ***Low Income Analysis*** - Centro defines disproportionate burden as an adverse effect of service changes or fare change borne disproportionately by low-income populations. Centro's Policy is that any time there is a difference in adverse impacts between low-income and overall populations of plus or minus 20% for service changes, or any time there is a difference in adverse impacts between low-income and overall populations of plus or minus 20% for fare changes, such difference in adverse impacts are disparate.

For this analysis, low-income means a person whose individual income is at or below the U.S. Department of Health and Human Services poverty guidelines. The data was downloaded from the American Fact Finder website provided by the U.S. Census Bureau. The details of the demographic data source utilized are below.

Data source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates

Dataset: Poverty Status of Individuals in the Past 12 Months by Living Arrangement (table B17021)

Universe: population for whom poverty status is determined (total population with status determined is LESS than population with race data known)

Geographic Level: Census block group

A census block group is designated as a low-income block group if 35% or more of its population, for whom poverty status is determined, are deemed in poverty.

Table A-1: The below statistics represent the City of Syracuse based on the ACS 2011-2015 5-year estimate at the block level.

CNYRTA - City of Syracuse Population Data*

Total Population	Minority Population	Percent Minority	Population for Whom Poverty Status is Determined	Low-income Population	Percent Low-income
144,564	70,476	49%	130,954	45,568	35%

* Based on Census data

Fare Media Vendors and Minority Block Groups

There are **8** fare media vendors located within the **City of Syracuse**. The vendor network consists primarily of retail locations. Additionally, there are ticket vending machines located at the Centro Transit Hub. All 8 fare media vendors are within 1/2 mile of one or more minority block groups.

Centro Transit Hub (Syracuse), 599 S Salina St, Syracuse, NY 13202
CNYRTA (Centro) Main Office, 200 Cortland Ave, Syracuse, NY 13205

Regina Check Cashing Corporation, 105 E Jefferson St, Syracuse, NY 13202

Regina Check Cashing Corporation, 2209 Lodi St, Syracuse, NY 13208

Regina Check Cashing Corporation, 4141 S Salina St, Syracuse, NY 13205

SUNY Upstate, 750 E Adams St, Syracuse, NY 13210

The Great States News Co., 1 Walsh Cir, Syracuse, NY 13208

Tops Friendly Markets, 4141 S Salina St, Syracuse, NY 13205

There are 133 Census Block Groups in the City of Syracuse. Of those, **70** have a minority rate of 49% or more (53%) classifying them as a minority block group. **33** (47%) of the minority block groups are within 1/2 mile of fare media vendor. **37** (53%) of the minority block groups are more than 1/2 mile from a current fare media vendor but they are all within 1/4 mile of a bus line.

There are **63** non-minority block groups (47%). **28** (44%) are within 1/2 mile of fare media vendor. **35** (56%) of the non-minority block groups are more than 1/2 mile from a current fare media vendor but they are all within 1/4 mile of a bus line.

Table A-2: Percentage of Census Block Groups with Access to Fare Media Vendors

Block Group Category	Number of Block Groups	Number with Access to Vendors	Percent Access to Vendors
Minority	70	33	47%
Non-Minority	63	28	44%
Minority Impact: 3%			

There are a minimal number of potentially suitable locations for fare media sales in the block groups that are more than 1/2 mile from a current vendor location (10). Businesses categorized as either large retail store, drug store, or supermarket were identified. Businesses that are known to have closed or do not have a general appeal were eliminated from the list including Sam's Club, Radio Shack, Lowes, and Edward Joy Lighting. The **10** businesses listed below are located within **9** of the **36** unserved minority block groups.

Aldi, 1055 W Genesee St, Syracuse, NY 13204
Aldi, 2015 Erie Blvd E, Syracuse, NY 13224
Dominic's Market, 139 Gertrude St, Syracuse, NY 13203
Kinney Drugs, 104 Lafayette Rd, Syracuse, NY 13205
Lodi Market, 308 N Crouse Ave, Syracuse, NY 13203
Price Chopper, 2515 Erie Blvd E, Syracuse, NY 13224
Price Rite, 1625 Erie Blvd E, Syracuse, NY 13210
Rite Aid, 401 W Seneca Tpke, Syracuse, NY 13207
Save A Lot, 500 Butternut St, Syracuse, NY 13208
Southside Food Coop, 2327 S Salina St, Syracuse, NY 13205

**Data source: Syracuse-Onondaga County Planning Agency, Onondaga County Special Address File, 2016*

There are **4** fare media vendors **less than 1/2 mile** outside of the City of Syracuse. These vendors can serve Syracuse block groups that have a higher concentration of minorities (although they are under the 49% threshold).

Tops, 620 Nottingham Rd, Syracuse, NY 13224
Tops, 181 Shop City Plz, Syracuse, NY 13206
Tops, 2120 W Genesee St, Syracuse, NY 13209
Tops, 4410 E Genesee St, Syracuse, NY 13214

Fare Media Vendors and Low Income Block Groups

All 8 existing fare media vendors within the City of Syracuse are within 1/2 mile of one or more low income block groups.

There are 133 Census Block Groups in the City of Syracuse. Of those, **58** have a low income rate of 35% or more (44%). **31** (53%) of the low income block groups are within 1/2 mile of fare media vendor. **27** (47%) of the low income block groups are more than 1/2 mile from a current fare media vendor but they are all within 1/4 mile of a bus line.

There are **75** non-low income block groups (56%). **32** (43%) are within 1/2 mile of fare media vendor. **43** (57%) of the non-minority block groups are more than 1/2 mile from a current fare media vendor but they are all within 1/4 mile of a bus line.

Table A-3: Percentage of Census Block Groups with Access to Fare Media Vendors

Block Group Category	Number of Block Groups	Number with Access to Vendors	Percent Access to Vendors
Low Income	58	31	53%
Non-Low Income	75	32	43%
Low Income Impact: 10%			

There are a minimal number of potentially suitable locations for fare media sales in the block groups that are more than 1/2 mile from a current vendor location (7). Businesses categorized as either large retail store, drug store, or supermarket were identified. One business that does not have a general appeal was eliminated from the list: Edward Joy Lighting. The **7** businesses listed below are located within **6** of the **26** unserved low income block groups.

Aldi, 1055 W Genesee St, Syracuse, NY 13204

Aldi, 2015 Erie Blvd E, Syracuse, NY 13224

Dominic's Market, 139 Gertrude St, Syracuse, NY 13203

Lodi Market, 308 N Crouse Ave, Syracuse, NY 13203

Price Rite, 1625 Erie Blvd E, Syracuse, NY 13210

Save A Lot, 500 Butternut St, Syracuse, NY 13208

Southside Food Coop, 2327 S Salina St, Syracuse, NY 13205

**Data source: Syracuse-Onondaga County Planning Agency, Onondaga County Special Address File, 2016*

Of the **4** fare media vendors less than **1/2 mile** outside of the City of Syracuse, **3** can serve additional low income block groups and the fourth is able to serve Syracuse block groups that have a higher concentration of low income persons (although they are under the 35% threshold).

Conclusion

The difference between both minority and low income access to the vendor network compared to non-minority and non-low income is less than the threshold of 20%. For minority populations, the difference is **3%**; for low income populations the difference is **10%**. Based on the above analysis there is neither a disparate impact to the minority population nor a disproportionate burden to the low income population. In addition, all census block groups are within 1/4 mile of a Centro bus line giving both groups reasonable access to fare media vendors.

7. Determining Impact on Title VI Protected Individuals

Beginning in May 2018, CNY Centro began conducting rider surveys to determine usage of the Max Pass in an effort to identify potential disparate impacts and disproportionate burdens on minority and low-income riders as required under Title VI regulations outlined in FTA Circular 4702.1B. As stated in the policy above, Centro defines a fare related disparate impact as an

adverse effect of a fare change borne disproportionately by minority or low-income populations. A disproportionate impact is present if there is a difference in adverse impacts between minority and overall populations or low-income and overall populations of plus or minus 20%. The results of these surveys are displayed below in Fig. 2.

Fig. 2

	Customers Surveyed	%	MAX Pass	%	Total %
Minority	310	7.10%	22	7.10%	100%
Non-Minority	210	5.71%	17	8.10%	100%
<\$25,000	379	6.60%	23	6.07%	
>\$25,000	141	6.38%	16	11.35%	
Overall	520		39	7.50%	--

8. Impacts to Minority Ridership

Rider survey results indicate that 7.10% of minority bus riders have used a Max Pass since the pass was offered. This compares to 7.5% of overall bus riders who have used a Max Pass since its inception. This indicates that minority bus riders are using the Max Pass at a .04% lesser rate than all users. The .04% is well within CNY Centro's threshold of +/- 20%, and therefore does not represent a disparate impact.

9. Impacts to Low-Income Ridership

Rider survey results indicate that 6.07% of low-income bus riders have used a Max Pass since the pass was offered. This compares to 7.5% of overall bus riders who have used a Max Pass since its inception. This indicates that low-income bus riders are using the Max Pass at 1.43% lesser rate than all users. The 1.43% is well within CNY Centro's threshold of +/- 20%, and therefore does not represent a disproportionate burden.

10. Conclusion:

CNY Centro concludes that offering a Max Pass for sale at its current pricing levels for adult fare and reduced fare riders does not constitute a fare increase, nor does it create a disparate impact or disproportionate burden on minority or low-income populations.

Additionally, the creation of the Max Pass was instituted after suggestions from riders for a weekly pass that would offer unlimited rides and therefore a convenient and less expensive option for frequent riders. Although the Max Pass only accounts for approximately 6.5% of current ride payments, its usage is growing each month.

**MINUTES OF THE REGULAR MEETING OF
THE CENTRAL NEW YORK REGIONAL TRANSPORTATION AUTHORITY
HELD ON FRIDAY, JUNE 22, 2018 AT 10:00 A.M.
AT THE RTA OFFICES, 200 CORTLAND AVENUE
IN SYRACUSE, NEW YORK**

MEMBERS PRESENT: BRIAN SCHULTZ (Chairman); ROBERT CUCULICH; TINA FITZGERALD; JOSEPH HARDICK; NICHOLAS LAINO; DONNA REESE; LOUELLA WILLIAMS

MEMBER ABSENT: DARLENE LATTIMORE, JOHN RILEY (nonvoting)

STAFF ALSO PRESENT: RICHARD LEE (Chief Executive Officer); CHRISTINE LoCURTO; ROBERT LoCURTO; BARRY M. SHULMAN and BRADLEY J. MOSES of counsel

The Chairman opened the meeting noting a quorum was present. The next Board Meeting, he announced, is scheduled for July 27, 2018 with a Pension Committee Meeting at 9:00 a.m., the Audit and Finance Committee Meeting at 9:30 a.m., and the Board Meeting following thereafter. There may be a Legal Committee Meeting, to be announced.

APPROVAL OF MONTHLY MINUTES: The Chairman then requested approval of the monthly Minutes of the May 18, 2018 Board meeting. Adoption of these Minutes was moved, seconded and unanimously carried as Motion No. 2323.

CHIEF EXECUTIVE'S OFFICER REPORT: The Chairman then called upon Mr. Lee to give the Chief Executive Officer's Report.

NEW YORK LEGISLATIVE VISITS: Mr. Lee has recently held several meetings together with representatives of the Authority, including Mr. Schultz. Such meetings with the New York State Legislative Delegation were to update on them on what is happening at the Authority and throughout the region. Mr. Lee indicated that these include meetings with Senators DeFrancisco and Valesky as well as, Assemblymen Magnarelli and Stirpes. Several other meetings with elected representatives are scheduled. Meetings focus on the Authority's projected funding shortages for Fiscal Year 2019-2020 and the difficult times faced by the Authority, if not adequately funded.

Also, a part of these discussions were issues including the funding of a bus rapid transit system in the city of Syracuse which is detailed in the SMART 1 study, on a potential Route 81 park and ride system and its future development. The Regional Transportation Center activity was also discussed, as well upcoming federal transportation legislation.

WATERTOWN/JEFFERSON COUNTY PUBLIC TRANSPORTATION STUDY: Mr. Lee reported to the Board regarding a consulting firm recently hired by the Metropolitan Planning

CENTRAL NEW YORK REGIONAL TRANSPORTATION AUTHORITY MINUTES

Organization (MPO) in Jefferson County to conduct a study of the public transportation systems there, including in the city of Watertown. The Authority has been asked and has agreed to participate in any such study. This study will likely take 12-18 months.

BOARD SELF-EVALUATION: Mr. Lee was pleased to announce that all the Board's Self-Evaluation Reports have been returned to the Authority and will be filed with the Authority Budget Office.

AUDIT AND FINANCE COMMITTEE REPORT: The Chairman then called upon Mr. Laino, Chair of the Audit and Finance Committee, to give a report from its lengthy meeting, held earlier this morning.

INSURANCE REPORT: Mr. Jon Maloff was invited into the meeting, as he had been at the Audit and Finance Committee meeting earlier this morning, regarding property, liability, and garage-keeper's legal insurance for the Intermodal Transportation Center. Mr. Maloff gave a complete presentation recommending that the garage-keepers legal liability coverage be again awarded to Travelers. The package policy sets a legal limit of \$2 million with comprehensive deductible at \$250 per claim. The collision deductible is \$500 per claim. The premium of \$84,820 is virtually the same as last year. There was a small increase in the cost of construction and the value of personal property. Thereafter and upon Mr. Maloff's recommendation, it was moved, seconded, and unanimously carried as Motion No. 2324, that the Authority property, liability, and garage-keeper insurance for the Intermodal Transportation Center be contracted for, with Travelers.

Mr. Lee indicated to the Board that the Authority will be interviewing for a Risk-Management Consultant.

Mr. Maloff was then excused from the meeting.

MAX-PASS EQUITY ANALYSIS: Mr. Koegel, Vice-President of Communications and Business Planning, was invited into the meeting to present, as he had earlier this morning at the Audit and Finance Committee meeting, an analysis of the Max-Pass program. Mr. Koegel gave a detailed analysis to the Board including a written report dealing with an analysis of the Unlimited Ride Max-Pass. This report has been scheduled for when the Max-Pass had originally been piloted. During the first six-month of its usage the Authority sought to determine if its implementation complies with Title VI standards. It was then recommended that the Max-Pass program continue to be offered at no additional charge. Chairman Schultz asked regarding the impact of the Max-Pass on the Authority's systems, and increased ridership as well as its impact on Title VI requirements. Mr. Koegel discussed these issues as well as discussed the Authority's other passes for ridership. Thereafter, it was moved, seconded, and unanimously carried as Motion No. 2325, that the Title VI Equity Analysis of the Max Pass together with an equity analysis report were adopted. Secondly, it was moved, seconded, and unanimously carried as Motion No. 2326, that the Max Pass program will be continued indefinitely.

STATE FAIR CONTRACT: Mr. Koegel presented the salient points of the proposed New York State Fair Contract, the negotiations for which concluded yesterday. He described in detail the proposed Contract dealing with the Orange Lot at the New York State Fair. It is a five-year

Contract, which has been approved by Counsel, and represents a fifteen-month dialogue. Mr. Koegel reviewed rates into the future with the Board and was pleased to have this Contract resolved. Thereafter, and upon Motion duly made, seconded, and unanimously carried as Motion No. 2327. The State Fair Contract, as described by Mr. Koegel, including the reimbursements amounts for the Orange Lot was adopted.

Mr. Koegel was then excused from the meeting.

AUDIT REPORTS: AUDITED STATEMENTS AND RELATED REPORTS: Gregg Evans and Mary Polimino from the Bonadio Group, Auditors to the authority, presented a detailed and lengthy draft report. Mr. Evans was extremely pleased to inform the Board of an excellent report, no negatives.

Following the in-depth review and summarized Reports distributed to the Board it was reported that the following were adopted upon Motion made, duly seconded, and unanimously carried as Motion No. 2328.

These reports include:

- March 31, 2018 Draft Audited Consolidating Financial Statements
- March 31, 2018 Draft Reports Required under the Uniform Guidance
- March 31, 2018 Draft Reports Required under NY State Single Audit
- March 31, 2018 Draft Reports Required under NY State Public Authorities Law
- March 31, 2018 Draft Investment Report
- March 31, 2018 Draft Required Communication with Governing Bodies

SUMMARY FINANCIAL INFORMATION SECTION OF PAL 2800 ANNUAL REPORT: Ms. LoCurto next presented Summary Financial Information for compliance with Section 2800 of the Public Authorities Law and its Annual Report. Upon Motion duly made, seconded, and unanimously carried as Motion No. 2329, such Report was moved, seconded, and unanimously approved, as is required pursuant to Public Authorities Law 2800.

ANNUAL PUBLIC AUTHORITY LAW 2925 INVESTMENT REPORT: It was further moved, seconded, and unanimously carried as Motion No. 2330, that the Annual Public Authority Law 2925 Investment Report be approved.

ANNUAL PUBLIC AUTHORITY LAW 2879/2824(e) PROCUREMENT REPORT: Next a Motion was duly made, seconded, and unanimously carried as Motion No. 2331, approving of the Annual Public Authorities Law 2879/2824(e) Procurement Report.

CNYRTA PROCUREMENT MANUAL: Also, a Motion was duly made, seconded, and unanimously carried as Motion No. 2332, and approving of the CNYRTA Procurement Manual. The Manual unchanged, since last year's approval.

GUIDELINES REGARDING THE DISPOSITION OF PROPERTY: Lastly, a Motion was duly made, seconded, and unanimously carried as Motion No. 2333, approving of the Guidelines regarding the Disposition of Property in which Leases and their status were discussed. Leasing of property is considered disposition of property due to Federal and State guidelines.

Mr. Cuculich discussed the impact on Financial Statements of pension and other retirement options, whether or not presently accrued or required to be. ERISA requirements were reviewed.

Receivable and Payable lines were reviewed by Ms. LoCurto in the Financial Statements as well as the level of Federal Assistance for capital costs.

Mr. Evans and Ms. Polimino from the Bonadio Group were then excused with the thanks of the Board for such a detailed, well-organized report.

ANNUAL SUBSIDY PAYMENT: Next on the Agenda of the Audit and Finance Committee, was approval of the Annual Subsidy Payments to the Authority's various Subsidiary Corporations for the 2018-2019 fiscal year. These subsidiaries used to be approved monthly, but are now being approved annually. The following amounts are recommended:

CNY Centro	\$30,911,600
Centro Call-A-Bus	\$7,302,950
Centro of Oswego	\$3,213,460
Centro of Cayuga	\$3,187,910
Centro of Oneida	\$9,961,970

These are monies the Authority pays on a pro-rata monthly basis to the Authority's subsidiary corporations to help fund their operations. Thereafter Resolution No. 2360, made, seconded, and unanimously carried and approving of these Annual Subsidy Payments was adopted.

VENDING SERVICES CONTRACT: Ms. MacCollum was invited into the meeting, to present as she had at the Audit and Finance Committee meeting, a Contract for Vending Services awarded to American Food and Vending. Thereafter, Resolution No. 2361, appended to these Minutes, was moved seconded, and unanimously carried, approving of such Contract to American Food and Vending. Ms. MacCollum described to the Board the component of this requisition, which requires that 50% of the revenues from this Contract will be paid to the New York State Commission of the Blind, as required by law. Thereafter Resolution No. 2362, annexed to these Minutes was moved, seconded, and unanimously carried.

SECURITY SERVICES: Ms. MacCollum next presented, as she had at the Audit and Finance Committee meeting, a resolution for Security Services. This contract is paid for out of Operating funds. This contract was previously purchased off of New York State contract in July of 2017. Ms. MacCollum explained that New York State has extended its contract through January 23, 2019, therefore, CNYRTA is extending its contract with the incumbent vendor, Securitas Security, through January 23, 2019. Thereafter Resolution No. 2363, annexed to these Minutes was moved, seconded, and unanimously carried.

Ms. MacCollum was then excused from the meeting.

ANNUAL REPORT ON INTERNAL CONTROLS: As a part of the Audit and Finance Committee meeting, in future years to be included with the Governance Committee meeting, Suzanna

Levesque gave a detailed report and power-point demonstration to the Board as required by law on the adequacy of internal controls in the Authority. Ms. Levesque's report included every facet of the Transportation Authority and highlighted controls that were perceived as adequate and those on which more work needs to be accomplished. This is a report also to be filed in Albany, as required by governing law. The Board congratulated Ms. Levesque on the completeness of her presentation.

Ms. LoCurto expressed her thanks, as well as the thanks of the Authority to Ms. Levesque who created such a completed and important series of reports. Ms. LoCurto pointed out that Ms. Levesque preformed all of this "from scratch", she created this excellent analysis of all controls and indicated best-practices in a detailed setting. The Board congratulated Ms. Levesque on an excellent job.

Ms. Levesque was then excused from the meeting.

The Board then extended its thanks to Ms. LoCurto and her team for such a complete and positive Audit Report and for the excellence of the facts of the presentation, included but not limited to Linda Biata, Melissa Brim, E.J. Moses, and Lila MacDowell.

Mr. Schultz told the financial team "good job".


LEGAL COMMITTEE: The Chairman noted that the Legal Committee had met earlier this morning in Executive Session pursuant to New York Public Officer's law §105(1)(d) (matters dealing with pending, proposed or current litigation), and on Motion duly made, seconded, and unanimously carried as Motion No. 2334. After returning from Executive Session the Chairman noted that during Executive Session discussion was held regarding litigation, but no action was taken.

OPERATIONS/TRANSPORTATION REPORT: Mr. LoCurto gave the Operations/Transportation Report. He discussed the status of transportation to the New York State Fair, which is now only 60 days away. He discussed renovation to the upper-lot, which he believes will be completed by the opening of the fair. He also discussed the various park-and-ride sites including a new site at the New York State Fair. In this regard he discussed ingress and egress issues.

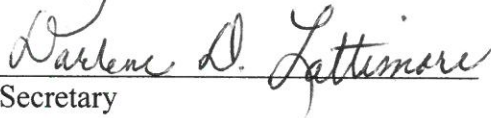
ROOF AT THE INTERMODAL TRANSPORTATION CENTER: The roof at the ITC is almost done and looks excellent. It should be completed by the end of this week.

Mr. LoCurto further noted that ten new buses will soon be one site, a great help for the New York State Fair.

With no further business to come before the Board, the CNYRTA Board meeting, was thereupon duly adjourned


Chairman

ATTEST:


Secretary

**MINUTES OF THE REGULAR MEETING OF
THE CENTRAL NEW YORK REGIONAL TRANSPORTATION AUTHORITY
HELD ON FRIDAY, SEPTEMBER 27, 2019 AT 10:00 A.M.
AT THE RTA OFFICES, 200 CORTLAND AVENUE
IN SYRACUSE, NEW YORK**

MEMBERS PRESENT: **BRIAN SCHULTZ (Chairman); ROBERT CUCULICH; JOSEPH HARDICK; NICHOLAS LAINO; DONNA REESE; LOUELLA WILLIAMS**

MEMBER ABSENT: **TINA FITZGERALD; DARLENE LATTIMORE**

STAFF ALSO PRESENT: **RICHARD LEE (Chief Executive Officer); LINDA BIATA; CHRISTOPHER TUFF; BARRY M. SHULMAN and IAN S. LUDD of counsel**

The Chairman called the meeting to order at 10:00 A.M., noting that a quorum was present. He announced that the next Authority monthly Board meeting will be held on October 25, 2019. On that date, there will be a Pension Committee meeting at 9:00 A.M., a Strategic Planning Committee meeting at 9:30 A.M., an Audit and Finance Committee at 10:00 A.M., with the Board immediately meeting thereafter.

APPROVAL OF MONTHLY MINUTES: A Motion was made, seconded and unanimously carried as Motion No. 2406, that the Minutes of the July 26, 2019 monthly CNYRTA Board meeting be adopted.

CHIEF EXECUTIVE OFFICER'S REPORT: Mr. Lee gave the Chief Executive Officer's report at the request of the Chairman. He began by reminding the Board that they will be soon be contacted, if they have not already been so, for Ethics training as mandated by law. Such training is currently scheduled to follow the next month's Board meeting.

NEW YORK STATE FAIR: Mr. Lee and Mr. Tuff reported on the recently held New York State Fair. It was a huge success. Mr. Tuff described the Fair, post-event. Mr. Tuff observed that this was another record year at the Fair, with total attendance growing from 1,279,010 in 2018 to 1,329,275 in 2019. This indicates growth, since 2015, of an astounding 46%. In response to questions posed by Board members, Mr. Tuff complimented all of the Centro personnel, both drivers, mechanics, buildings and grounds staff and administrative staff, who together worked to make this event such a success. Mr. Tuff also discussed Park-And-Ride operations adjustments that were made day by day at the Fair, based on continual assessment of attendance and traffic flow. Ms. Reese asked to be included in future planning sessions, regarding transportation and accessibility at the Fair. She complimented the Centro staff on-site, including for easing transportation for the disabled.

Mr. Tuff then reviewed various other changes in 2019, such as addition of the Willis Avenue lot. A detailed State Fair report had previously been distributed to each Board member. The Board congratulated Mr. Tuff and his staff.

CNG BUSES: Mr. Geoff Hoff then discussed CNG buses and their utility onsite as it relates to fuel economy. Mr. Hoff reviewed for the board the tremendous amount of savings over the last 10 years when the authority elected to continue with the technology as compared to other fuel typed vehicles such as diesel or diesel electric hybrid buses.

Mr. Hoff was excused from the meeting.

CONGRESSMAN KATKO – CYBER SECURITY ROUND TABLE: As part of the Chief Executive Officer's Report, Mr. Lee reported noted that he has been invited by Congressman Katko to represent public transportation at a Cyber Security Roundtable he hosted. Security experts and representatives from the United State Department of Homeland Security were present. Mr. Lee was able to share Centro's general security framework and what has been accomplished with improving Cyber Security. Our cyber security program is directed by Michael Fitzgibbons. It was a very informative meeting.

UPSTATE TRANSIT FEDERAL CENSUS PROMOTION: Representatives of Governor Cuomo's office recently met with leaders of the four Upstate Transit Authorities to discuss how they might participate in promoting the upcoming 2020 Federal Census. The intent is to remind citizens of the importance of participating in the upcoming Census. Crucial to this effort is educating all to the importance of the Census. Ms. Reese stressed the need for the inclusion of disabled individuals to enhance adequate governmental program funding.

TITLE VI POLICIES AND TITLE VI PROGRAM REPORT: Ms. Paula Cutrone was then invited into the meeting to give a report on Title VI. The Program Report, submitted to the Federal Transit Administration every three years, was prepared by the Centro Planning Department, Ms. Cutrone described Title VI Policies and the Title VI Program Report, in depth. Copies of these Policies and Reports had also been distributed earlier as part of the Board packet, prior to this meeting. Thereafter, and after much discussion, and upon Motion duly made, seconded and unanimously carried, approval of the Title VI Policies was adopted as Motion No. 2407. After discussion of its contents, the Title VI Program Report, as presented by Ms. Cutrone was likewise reviewed and unanimously carried as Motion No. 2408.

Ms. Cutrone was then excused from the meeting.

AUDIT AND FINANCE COMMITTEE REPORT: Mr. Laino, Chairman of the Audit and Finance Committee then reported on matters dealt with at the Audit and Finance Committee meeting, held earlier this morning.

INSURANCE REPORT: Mr. Maloff, Insurance Consultant to the Authority, was invited into the meeting. As he had at the Audit and Finance Committee, held earlier this morning, he presented a proposed renewal for Property Insurance, effective September 9, 2019. It is the same carrier as is currently serving the Authority, Factory Mutual Insurance Company. Last year, the premium cost was \$161,682. This year the cost is \$175,308. Otherwise the insurance contract is the same as last