



---

**Title VI of the Civil Rights Act of 1964**

Policy/Program

Adopted  
November 17, 2022

Amendment Adopted  
February 22, 2024

**Portage Area Regional Transportation Authority**  
**Title VI Policy/Program**  
**Table of Contents**

I.	INTRODUCTION	3
	Purpose	3
	Overview of Services	3
	Nondiscrimination Assurance	3
II.	TITLE VI POLICY STATEMENT & AUTHORITIES	4
III.	REQUIREMENT TO PREPARE & SUBMIT TITLE VI PROGRAM	5
IV.	ORGANIZATION & TITLE VI PROGRAM RESPONSIBILITIES	5
V.	GENERAL REPORTING REQUIREMENTS	6
	1. Notice to the Public	6
	2. Title VI Complaint Procedures	6
	3. Investigations, Complaints, & Lawsuits	7
	4. Public Participation Plan	8
	5. Limited English Proficiency (LEP) Plan	9
	6. Minority Representation on Planning & Advisory Bodies	11
	7. Effective Practices to Fulfill Subrecipient Monitoring	12
VI.	REQUIREMENTS OF TRANSIT PROVIDERS	13
	1. Service Standards	13
	2. Service Policies	14
VII.	APPENDICES	16
	A. Board Resolution	17
	B. Title VI Determination of Site or Location of Facilities; Equity Analysis	19
	C. Title VI Complaint Form	21
	D. Summary of Title VI Outreach	23
	E. Subrecipient Oversight	27
	F. Vehicle Load Calculations	28
	G. Vehicle Headway Calculations	29

# I. INTRODUCTION

## Purpose

Title VI of the Civil Rights Act of 1964 (Title VI) is a federal statute and provides that no person 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.

Title VI prohibits recipients of federal financial assistance from discriminating on the basis of race, color, or national origin in their programs or activities, and it obligates federal funding agencies to enforce compliance.

Recipients of public transportation funding from FTA are required to develop policies, programs, and practices that ensure federal transit dollars are used in a manner that is nondiscriminatory as required under Title VI.

## Overview of services

PARTA operates Demand Response, Fixed-Route, and ADA Complementary Paratransit service in Portage County, Ohio. PARTA's governing body is organized as a 14-member board of trustees. As of November 2022, PARTA's 133 employees operate 55 revenue vehicles to provide public transportation services Monday through Saturday. PARTA's Demand Response (DART) service is provided to the residents of Portage County. ADA Complementary Paratransit Service is a service provided to individuals with a disability who are prevented from using Fixed-Route service and live or are travelling within 3/4 of a mile from a Fixed Route.

## Nondiscrimination Assurance

PARTA is committed to ensuring that its transit programs and activities comply with Title VI and has established this program to accomplish the following:

- Ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner;
- Promote full and fair participation in public transportation decision-making without regard to race, color, or national origin;
- Ensure meaningful access to transit-related programs and activities by persons with Limited English Proficiency (LEP).

## II. TITLE VI POLICY STATEMENT & AUTHORITIES

### Title VI Policy Statement

It is PARTA's policy to maintain its Title VI program in accordance with FTA and DOT guidelines. PARTA is committed to ensuring that no person shall, on the grounds of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, whether those programs and activities are federally funded or not.

PARTA has designated a member of senior staff, the Communications and Public Advocacy Advisor, as the Title VI administrator. The administrator maintains current knowledge of Title VI requirements and attends Title VI training seminars. PARTA's Title VI administrator is responsible for initiating and monitoring Title VI activities, preparing required reports, and other responsibilities as required by Title 49 CFR Part 21 and FTA C 4702.1B.

### Authorities

STATUTORY AUTHORITY. Section 601 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 Civil Rights Restoration Act of 1987 clarified the broad, institution-wide application of Title VI. Title VI covers all the operations of covered entities without regard to whether specific portions of the covered program or activity are federally funded. The term "program or activity" means all the operations of a department, agency, special purpose district, or government; or the entity of such state or local government that distributes such assistance and each such department or agency to which the assistance is extended, in the case of assistance to a state or local government.

REGULATORY AUTHORITY. The U.S. Department of Justice ("DOJ") Title VI regulations can be found at 28 CFR § 42.401 et seq., and 28 CFR § 50.3. The U.S. Department of Transportation ("DOT") Title VI implementing regulations can be found at 49 CFR Part 21. All programs receiving financial assistance from FTA are subject to Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and DOT's implementing regulations.

ADDITIONAL DOCUMENTS. In addition to the above-listed statute and regulations, Federal Circular FTA C 4702.1B details requirements necessary for compliance and administration of a Title VI program and Title VI principles are also incorporated in the Department's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons ("DOT LEP Guidance"), 70 FR 74087 (December 14, 2005).

11-17-2022

Claudia Amrhein  
General Manager

Date

### **III. REQUIREMENT TO PREPARE & SUBMIT TITLE VI PROGRAM**

PARTA prepares its Title VI program in accordance with requirements of Title 49 CFR Section 21 as outlined in FTA C 4702.1B. Once completed, PARTA's Title VI program is submitted to the FTA regional civil rights officer every three (3) years, or as otherwise directed by the FTA. Prior to submission, the program is reviewed and approved by the PARTA Board of Trustees as required by federal regulation.

#### **Attachment A: Board Resolutions**

### **IV. ORGANIZATION & TITLE VI PROGRAM RESPONSIBILITIES**

PARTA has designated the following individual as its Title VI administrator:

Denise Baba, Communications and Public Advocacy Advisor

PARTA

2000 Summit Rd.

Kent, OH 44240

Phone: 330.678.7745

FAX: 330.676.6310

Email: dbaba@partaonline.org

The duties and responsibilities of the Title VI administrator include:

- Prepare/update and submit Title VI reports required by the FTA
- Provide the General Manager with regular updates on PARTA's Title VI program
- Monitor overall implementation of PARTA's Title VI efforts
- Ensure that employees are aware of Title VI requirements
- Develop Title VI information for distribution to the general public
- Provide outreach concerning PARTA's Title VI efforts
- Maintain current knowledge of Title VI requirements
- Attend Title VI training seminars

For the 2020-2022 reporting period, PARTA's services and activities:

- Did not meet the threshold for compliance requirements applicable to transit providers that operate 50 or more fixed route vehicles in peak service and are located in urbanized areas (UZA) of 200,000 or more people
- In 2020, PARTA constructed a vehicle storage building on its existing property. PARTA's Title VI Equity Analysis is included in this document as an attachment.

#### **Attachment B: Title VI Determination of Site or Location of Facilities; Equity Analysis**

## V. GENERAL REPORTING REQUIREMENTS

### 1. Notice to the Public

PARTA displays a notice to the public to inform customers of their rights under Title VI. See below.



## NOTICE

### Your Rights Under Title VI of the Civil Rights Act of 1964

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

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

Contact PARTA for more information on your Title VI rights or if you believe you have been discriminated against based on one or more of the characteristics noted above.

**To file a complaint please contact us:**  
**In person:** 2000 Summit Rd., Kent  
**Online:** [www.partaonline.org](http://www.partaonline.org)  
**By phone:** 1-877-RIDE-RTA



If assistance is needed in another language call 330.678.7745

PARTA posts its *Title VI Notice to the Public* in the following locations:

- on its website, at [www.partaonline.org/civil-rights](http://www.partaonline.org/civil-rights);
- in the lobby of its administration building;
- at its transit center;
- on all transit vehicles; and
- in its Passenger Information Manual.

### 2. Title VI Complaint Procedures

PARTA has established the following process for filing a Title VI discrimination complaint. Aggrieved persons may file a complaint:

- In-person at PARTA's administrative offices located at 2000 Summit Rd., in Kent, Ohio.
- By calling PARTA's Title VI administrator at 330-678-7745 or dialing PARTA's Customer Service line at 1-877-RIDE-RTA.
- By downloading and completing a complaint form available on PARTA's website [www.partaonline.org](http://www.partaonline.org). Complete forms may be returned by postal mail to the attention of the Title VI administrator, 2000 Summit Rd., Kent, OH 44240; by faxing the form to 330-676-6310; or scanned and emailed to [custservice@partaonline.org](mailto:custservice@partaonline.org).
- By completing a digital form at [www.partaonline.org/civil-rights](http://www.partaonline.org/civil-rights).
- By filing directly with the Department of Transportation by contacting:

U.S. Department of Transportation  
 Federal Transit Administration  
 1200 New Jersey Ave. S.E.  
 Washington, D.C. 20590

Phone: 866-377-8642 / 800-877-8339 (TTY)

PARTA engages in the following procedures for investigating and tracking Title VI complaints:

- All complaints regarding PARTA service received by phone and through PARTA's customer service email address ([CustService@PARTAonline.org](mailto:CustService@PARTAonline.org)), including those alleging Title VI violations, are initially forwarded to the operations manager.
- The operations manager forwards all complaints to the Title VI administrator. PARTA's Title VI administrator reviews and assesses all complaints for potential Title VI violations.
- Title VI complaints submitted through the Title VI complaint form on PARTA's website are forwarded directly to the Title VI administrator's email upon submission.
- After a complaint is received, PARTA contacts the complainant by phone or email.
- The administrator, or a designee, contacts the complainant and attempts to resolve any Title VI complaints within 30 business days.
- The Title VI administrator or a designee (usually the operations manager or assistant operations manager) investigates the complaint.
- Once the investigation is complete, the Title VI administrator reviews the results and makes a determination as to whether the complaint is substantiated or unsubstantiated. If substantiated, corrective action is taken.
- The complainant is informed of the outcome through the best available means of contact.
- Once the investigation has closed, the original complaint or a copy of the complaint and notes related to the complaint are maintained in a binder located in the office of the Title VI administrator. The binder is organized in chronological order by year and month.

**Attachment C: Complaint Form**

**3. Title VI Investigations, Complaints & Lawsuits**

PARTA's Title VI administrator reviews and assesses all complaints for potential Title VI violations. The administrator, or a designee, contacts the complainant and attempts to resolve any Title VI complaints within 30 business days. A person may also file a complaint directly with the FTA Office of Civil Rights. PARTA had no Title VI complaints in 2020, one (1) Title VI complaint in 2021, and two (2) Title VI complaints in 2022.

Complaint	Date	Summary	Status	Action Taken
1.	3/21/21	Acquaintance of rider sent email stating that rider believed she had been "racially profiled" while boarding <u>PARTA</u> 's Route 30 bus.	Video, including sound, of the incident was reviewed and no grounds for racial profiling were found. However, it was determined that the driver had acted in a manner that was less than professional.	Corrective action was taken with the driver to address his performance and tolerance.
2.	4/7/22 & 4/20/22	A rider called to allege a <u>PARTA</u> driver discriminated against her because she is white. The incident was reported to have taken place	On 4/11/22, a <u>PARTA</u> rep. called the rider. The call went unanswered, and it was not possible to leave a message. Before <u>PARTA</u> could follow-up	Video and audio of both incidents were reviewed (file numbers C220471656.9802 & C2204201222.8105).

		on the Interurban West Route 30 bus	a second time regarding the initial complaint, the same rider called PARTA on 4/20/22, at 12:25 pm to file another complaint. The second alleged incident again took place on the Route 30 bus with a different driver. The rider called again at 1:16 pm on 4/20/22 and stated she had contacted her attorney and said, "Do not call me back."	Allegations of discrimination and/or mistreatment by the bus operators were determined to be unsubstantiated.
3.	7/13/22	A rider called the PARTA customer service line and stated that the PARTA bus drove past her while she was standing at the bus stop. The rider said this driver has passed her by before and the rider stated she is "tired of [the driver's] racism."	Video of the incident was reviewed (file number C2207131451.8201). The rider was not standing at the bus stop. Instead, she was standing in the middle of the intersection between 2 restaurants. The bus operator would not have been permitted to pick her up in that location.	Allegations of discrimination and/or mistreatment by the bus operator was determined to be unsubstantiated.

There are no investigations or lawsuits pending against PARTA which allege Title VI discrimination on the basis of race, color, or national origin with respect to service or other transit benefits from January 1, 2020, through the present.

**4. Public Participation Plan**

PARTA solicits public input through a variety of activities and outlets, including, but not limited to use of its website, attendance at community meetings and events, surveys, mailings, and other outreach methods. In addition to these activities, PARTA also hosts regularly scheduled meetings of its Citizens Advisory Council (CAC).

The CAC was established to provide a non-binding source of opinion and advice on a wide variety of issues faced by PARTA's Board of Trustees and management. Participation of minority and low-income individuals in CAC meetings is promoted by networking with social service and government agencies that service those populations. In addition to these networking activities, PARTA conducts outreach to minority and low-income populations through attendance at public meetings and events specifically targeted to these groups. By engaging in networking and outreach activities aimed at minority and low-income individuals, PARTA seeks to better understand the needs of these populations, listens to their concerns, and communicates to them how to access and use PARTA's services to promote growth in ridership among these demographics.

PARTA rarely encounters Limited English Proficient (LEP) individuals as this demographic in Portage County is exceedingly small. Should PARTA encounter LEP individuals, it looks to engage Kent State University's (KSU) English as a Second Language Center to receive guidance and feedback on how best to meet the needs of this population.

**Attachment D: Summary of Outreach Efforts**



## 5. Limited English Proficiency Plan

As a recipient of federal funding, PARTA is required to take reasonable steps to ensure meaningful access to its programs and activities for individuals who may be Limited English Proficient (LEP) persons.

LEP refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, and understand English. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

PARTA has developed a Language Assistance Plan (LAP) detailing its responsibilities as a recipient of federal financial assistance related to the needs of LEP persons.

PARTA's LAP includes a *Four-Factor Analysis* consisting of an examination of 1.) LEP demographics, 2.) Contact Frequency, 3.) Importance of Service, and 4.) Resources and Costs to determine what specific services are appropriate.

### Four-Factor Analysis

To prepare this plan, PARTA undertook the U.S. Department of Transportation (U.S.DOT) four-factor LEP analysis, that considers the following factors:

#### **Factor 1. The number and proportion of LEP persons eligible to be served or likely to be encountered in the service area.**

PARTA's service area is Portage County, Ohio. According to the Census Bureau's 2020 Decennial Census the total population of the county is 161,791. The Census Bureau's 2020 American Community Survey (ACS) Languages Spoken at Home for the Population 5-years and Over Table shows the county population over the age of 5 years old is 155,065. The percentage of that population that speaks only English is 95.5%. The Census estimates that 4.5% of the population 5 years and over speak a language other than English at home. Of that population, 1.3% or 2,083 individuals are identified as speaking English "Less Than Very Well." The largest proportion of those who speak English less than very well are Chinese who comprise 26% of the population who speak English less than very well and Arabic speakers who comprise 20% of the population who speak English less than very well.

<b>Portage County - Languages Spoken at Home</b>			
	<i>Total Number</i>	<i>% of Population</i>	<i>Population Over Age 5</i>
Speak language other than English at home	6906	4.5%	155,065
Speak English Less than "Very Well"	2083	1.3%	155,065
Chinese	545	0.35%	155,065
Arabic	412	0.25%	155,065
Other Indo-European languages	367	0.24%	155,065

Source: ACS 2020: 5-year Estimates Detailed Tables (ACSDT5Y2020.C16001)

**Factor 2. The frequency with which LEP persons come into contact with the program.**  
PARTA has surveyed key program areas and assessed major points of contact with the public and determined that contact with LEP persons is infrequent following this examination.. However, should an LEP individual come into contact with PARTA and use its services, the transit stands ready to assist them in accessing the system equitably.

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

PARTA considers its transit service to be an essential service for the residents of Portage County. Every day that it operates, PARTA helps people get to work, school, medical appointments, grocery stores, and other essential activities. Therefore, PARTA is committed to providing meaningful access to all individuals including any LEP populations that may choose to use PARTA’s service.

**Factor 4. The resources available to PARTA and overall cost to provide LEP assistance.**

PARTA reviewed its available resources that could be used for providing LEP assistance and has budgeted sufficient funds to address the needs of its LAP.

### ***Results of the Four Factor Analysis***

PARTA’s four (4) factor analysis did not reveal a large enough population of LEP individuals in Portage County with a common language to warrant the translation of materials. Due to the very low number of LEP individuals in Portage County, PARTA has extremely limited to no interaction with this population. While there is a population of international students who attend Kent State University, they typically read, write, and understand English well even when their spoken English is difficult for native English speakers to understand. Further, it is a KSU requirement that students with LEP participate in English as a Second Language classes to enhance their communication skills. PARTA works with KSU’s English as a Second Language Center to address any specific issues their international students may have.

### ***Language Assistance Measures***

PARTA has instituted various measures to assist those who may have limited English proficiency. These measures are deemed appropriate based on the low percentage of LEP individuals in PARTA’s service area. Assistance includes:

- *Color-coded routes/schedules/signs* – Each route has a unique color that coordinates with a schedule, route, and sign; making it easier to identify which route a rider needs to get from point “A” to point “B.”
- *Simplified Route Numbering System* – Allows for easier use of our system.
- *Numbered Bus Bays at the KCG Transit Center* – Each route arrives and departs from an assigned numbered bay, which is identified on its corresponding schedule.
- *PASSIO GO* – A GPS AVL system activated in 2023 allows individuals to track the bus in real-time, and also plan a trip in a Google transit style trip planner.

- *EZFare* – Launched in the summer of 2019, this mobile ticketing application provides convenience and ease of use by allowing riders to purchase fare using a smartphone.
- *Interior Labeling of Buses* – English and Spanish are included on all interior signage of vehicles as new buses are acquired.

### **Notice to LEP Persons/Outreach Techniques**

*PARTA* does not have a formal practice of outreach techniques due to the lack of an LEP population and resources available in the service area. However, since KSU has been identified as the most likely location where LEPs may be encountered, *PARTA* works cooperatively with the KSU English as a Second Language Center. Additionally, notice of the availability of LEP assistance is posted in the following locations:

- On buses
- *PARTA* website

### **Monitoring and Updating the LAP**

At a minimum, *PARTA* will follow the Title VI Program update schedule for review and updating its LAP. This evaluation will consist of:

- Reexamining the Four Factor Analysis to determine if the composition and number of the LEP population have changed,
- Assessing the sufficiency of staff training and LEP assistance measures,
- Assessing the number of requests for language assistance since the implementation of the existing LAP, and
- Reviewing any complaints received from LEP persons since the implementation of the existing LAP.

### **Staff Training**

All *PARTA* staff is provided with the LAP and educated on procedures to follow when an LEP person is encountered. This information is also part of the *PARTA* staff orientation process for new hires and reviewed annually with all relevant employees. Training topics are listed below:

- Understanding Title VI, *PARTA*'s Title VI policy, and LEP responsibilities
- What language assistance services *PARTA* offers
- Procedures for providing LEP assistance

### **Vital Document Translation**

*PARTA* does not translate documents as it does not encounter any LEP groups consistent with the Safe Harbor Provision.

## **6. Minority Representation on Planning and Advisory Bodies**

*PARTA* has established a Citizens Advisory Council (CAC) to provide a non-binding source of opinion and advice on a variety of issues. Goals of *PARTA*'s CAC include:

- Provide an avenue of outreach to the community where first-hand information about *PARTA* services, initiatives, and goals can be shared
- Allow community members to provide feedback concerning *PARTA*'s services, initiatives, and goals

- Create an ongoing dialogue that strengthens PARTA's relationship with the community

<b><i>PARTA</i> Citizens Advisory Council</b>		
Race	Count	Percentage
American Indian/Alaskan Native	0	0%
Asian	0	0%
Black/African American	5	21%
Hispanic/Latino	0	0%
Native Hawaiian/Pacific Islander	0	0%
White	19	79%
<b>TOTAL MEMBERSHIP</b>	<b>24</b>	<b>100%</b>

### **7. Effective Practices to Fulfill Subrecipient Monitoring**

PARTA is a direct recipient of FTA funds. It has determined that any sub-recipient under PARTA receiving federal financial assistance in accordance with 49 USC Section 5310, must comply with Title VI of the Civil Rights Act of 1964 and U.S. DOT requirements.

One sub-recipient, Family & Community Services, receives federal financial assistance through PARTA. The following approach is applied to monitor PARTA's sub-recipient:

- Initial Assessment. Between June 2018 and May 2019, PARTA met with Family & Community Services to understand the sub-recipient's current knowledge of and compliance with Title VI requirements. The initial assessment was conducted with on-staff personnel through one-on-one meetings to discuss what PARTA would be monitoring and how PARTA would inspect the required documentation.
- Information Exchange. After the information was gathered from the initial assessment, we received policies to comply with Title VI and other programs. Once we received the sub-recipient's policies, we followed up through a conference call to review compliance.

<b>Schedule of Subrecipient Title VI Program Submissions</b>		
<i>Subrecipient</i>	<i>Policy</i>	<i>Date Received</i>
Family & Community Services	Title VI Plan	3/19/2019
Family & Community Services	Title VI Plan	11/18/2022

- On-site Review: PARTA will complete an on-site review annually for compliance. This review will require the sub-recipient to submit information regarding its Title VI program and demonstrate their compliance.
  - Due to COVID-19 restrictions, on-site reviews were suspended in 2020 & 2021, a virtual compliance meeting was held via Zoom video conferencing on Dec. 3, 2020.

- An in-person on-site review was conducted on Nov. 2, 2022.
- Compliance: PARTA will certify that the sub-recipient does or does not meet the requirements under Title VI and provide appropriate documentation for its decision. If the sub-recipient is not in compliance, PARTA will work with the sub-recipient to bring them into compliance.
- PARTA provides assistance and support to its subrecipient when needed through email, virtual training, and on-site visits.

**Attachment F: Subrecipient Oversight**

## **VI. REQUIREMENTS OF TRANSIT PROVIDERS**

### **1. Service Standards**

PARTA operates local and express Fixed Route bus services within the greater Portage County area. Local bus service operates within the immediate Portage County area, as well as contracted service provided to KSU’s main campus. Express service runs to Akron in Summit County and to Cleveland in Cuyahoga County.

- a. **Vehicle load for each mode.** PARTA provides two (2) modes of Fixed Route bus service – local and express within the greater Portage County area. Local includes service within the immediate Portage County area, as well as contracted service provided to Kent State University’s main campus. PARTA determines its service standard based on the average load per vehicle over a three (3) year period.

PARTA’s fleet includes buses of varying seating capacity, with the lowest capacity being 18 seats and the highest seating capacity being 32 seats. The average vehicle load for local buses is 0.3 for the years 2020-2022. PARTA also provides service to Akron and Cleveland through Express bus service. Vehicle load for an Express bus is 0.11 for years 2020-2022. **Attachment G: Vehicle Load Calculations**

- b. **Vehicle headway for each mode.** While PARTA does not track peak vs. non-peak service, we do monitor our headway and frequency. For the years 2020-2022, we averaged a local headway of 51.8 minutes and a frequency of 1.19 buses per hour. For the same time period, we averaged an Express headway of 105 minutes with a frequency of 0.57 buses per hour. An attached table shows the average headway across each of our local and Express routes. The one outlier is the Cleveland Express as it does two (2) trips per day – one (1) in the morning and one (1) in the evening. PARTA defines its standard vehicle headway based on averages for each mode.

<b>MODE</b>	<b>GUIDELINE</b>
Fixed Route	An average vehicle headway of 52 minutes is expected
Express Route	An average vehicle headway of 105 minutes is expected

## Attachment G: Vehicle Headway Calculations

- a. **On-time performance for each mode.** *PARTA*'s on-time performance is calculated based on departures from each bus stop as tracked by our Automatic Vehicle Location (AVL) system. A report is then generated for a specific time. *PARTA* follows a general rule of one (1) minute early up to five (5) minutes late to determine if a route is on-time. Our AVL system analyzes the on-time performance based on this same principle. Routes surveyed in years 2020-2022 include local Fixed Route service provided off KSU's main campus and express service. KSU routes were excluded because they run at a frequency of 9-15 minutes and the general public schedule reflects this frequency during the day rather than a traditional timetable. The average on-time compliance for the local service was 81.29% and for express was 61.5% with an overall performance of 78%. *PARTA* works to ensure that schedules are adjusted when necessary to ensure we are providing the most reliable service possible.

### On-Time Compliance

Route	2020 On-Time Compliance	2021 On-Time Compliance	2022 On-Time Compliance	Average by Route
30 - Interurban West	85%	78%	75%	79%
35 - Interurban East	80%	78%	80%	79%
40 - Suburban North	83%	81%	65%	76%
45 - Suburban South	83%	81%	79%	81%
46 - Downtowner	NA	NA	NA	NA
70 - Windham/Garrettsville	82%	83%	82%	82%
80 - Raven West	84%	80%	85%	83%
85 - Raven East	89%	90%	88%	89%
90 - Akron Express	77%	63%	69%	70%
100 - Cleveland Express	53%	NA	52%	53%
<b>Average On-Time Compliance</b>	<b>80%</b>	<b>79%</b>	<b>75%</b>	<b>78%</b>

## 2. Service Policies

*PARTA*'s service policies regarding service availability, distribution of service amenities, and vehicle assignment have been adopted by its board of trustees as part of its Title VI Program and are incorporated herein. These policies are as follows:

- a. **Service availability for each mode.** *PARTA* provides bus service to two (2) major cities in Portage County and several rural villages. Our goal is that no person should walk more than a quarter mile to a bus stop. There are stops at most intersections, as well as in front of major multi-family complexes.

*PARTA* determines stop locations utilizing AASHTO's standards as defined in the Guide for Geometric Design of Transit Facilities on Highways and Streets. These standards

are as follows: 400 ft apart in a CBD; 660 ft in an urban area; and 660-1320 ft in suburban areas. Most of PARTA's local fixed route service area is considered urban based on population density. PARTA does have one local route that operates through more rural communities. Stops in certain areas of this route are spaced further apart as the bus is traveling from village to village with each village hosting three (3) to seven (7) stops.

KSU routes generally have closer spacing as a result of the layout being determined by KSU through their contracted service. PARTA's Express route service maintains stops spaced further apart regardless of distance to support timing of the route. To provide reliable Express service, it is not feasible for the bus to make frequent stops between points of origin and termination.

- b. **Distribution of transit amenities for each mode.** PARTA does not have autonomous authority to determine the placement of transit amenities throughout the various political subdivisions in the greater Portage County service area. It is PARTA's policy that its staff work with local entities to place transit amenities in locations where transit services have been historically well utilized while being cognizant of and communicating to municipalities the requirement to distribute federally funded assets equitably. However, the final decision is made by the respective political subdivision.

In 2014, PARTA installed 10 new bus shelters by working cooperatively with the City of Ravenna, Ravenna Township, and Franklin Township at locations where transit service is well-utilized along the Interurban and Suburban Fixed Route service corridors. During the previous reporting period, PARTA installed three (3) new bus shelters at locations where transit service is well-utilized.

**Vehicle assignment for each mode.** PARTA operates its fleet from one maintenance and bus storage facility. Most Fixed Route buses are 35-feet long and are all within their useful life. It is PARTA's policy to rotate the assignment of buses in its fleet on a daily basis such that no bus is in service on the same route regularly from day to day.

## **VII. APPENDICES**



**RESOLUTION #2022-11-06**

**A RESOLUTION BY THE PORTAGE AREA REGIONAL TRANSPORTATION AUTHORITY (PARTA) BOARD OF TRUSTEES AMENDING THE TITLE VI POLICY/PROGRAM.**

**WHEREAS**, PARTA is a recipient of federal financial assistance and all recipients are required to comply with various non-discrimination laws and regulations, including Title VI and related statutes; and

**WHEREAS**, the purpose of this policy is to establish guidelines to effectively monitor and ensure that PARTA is in compliance with all FTA Title VI requirements and regulations in order to carry out the provisions of the Department of Transportation’s (DOT) Title VI Regulations at 49 CFR Part 21; and

**WHEREAS**, the policy outlines PARTA’s commitment to ensuring that transit programs and activities comply with Title VI; and

**WHEREAS**, PARTA adopted this policy in January 2017, amending the policy in October 2019, which is valid for three (3) years; and

**WHEREAS**, PARTA’s updated policy must be resubmitted to the FTA no later than December 1, 2022.

**NOW, THEREFORE, LET IT BE RESOLVED** by the Portage Area Regional Transportation Authority (PARTA) Board of Trustees that:

The Title VI Policy/Program, as set forth in the attached, has been accepted and adopted for use.

**CERTIFICATION:**

The undersigned duly qualified Board President, acting on behalf of the Portage Area Regional Transportation Authority (PARTA), certifies that the foregoing is a true and correct copy of a resolution adopted at a legally convened meeting of the Board of Trustees held November 17, 2022.

11-17-2022  
Date

Dave Gynn  
Dave Gynn, President  
Board of Trustees

Marciiah Fletcher  
Attested

**RESOLUTION #2024-02-03**

**A RESOLUTION BY THE PORTAGE AREA REGIONAL TRANSPORTATION AUTHORITY (PARTA) BOARD OF TRUSTEES AMENDING THE TITLE VI POLICY/PROGRAM.**

**WHEREAS**, *PARTA* is a recipient of federal financial assistance and all recipients are required to comply with various non-discrimination laws and regulations, including Title VI and related statutes; and

**WHEREAS**, Title VI prohibits recipients of federal financial assistance from discriminating on the basis of race, color, or national origin in their programs or activities, and it obligates federal funding agencies to enforce compliance; and

**WHEREAS**, the purpose of this policy is to establish guidelines to effectively monitor and ensure that *PARTA* is in compliance with all FTA Title VI requirements and regulations in order to carry out the provisions of the Department of Transportation's (DOT) Title VI Regulations at 49 CFR Part 21; and

**WHEREAS**, *PARTA* amended and timely submitted a Title VI Policy/Program in October 2019 and November 2022, as required by FTA; and

**WHEREAS**, FTA notified *PARTA* in 2023 of deficiencies in its 2019 Title VI Policy/Program, some of which were addressed in *PARTA*'s 2022 Title VI Policy/Program that has not yet been reviewed by FTA; and

**WHEREAS**, this 2024 Title VI Policy/Program seeks to incorporate deficiency corrections identified for the 2019 program into an amended Title VI Policy/Program for review by FTA during the 2024 Triennial Review.

**NOW, THEREFORE, LET IT BE RESOLVED** by the Portage Area Regional Transportation Authority (*PARTA*) Board of Trustees that:

The 2024 Title VI Policy/Program, as set forth in the attached, be accepted and adopted for use.

**CERTIFICATION:**

The undersigned duly qualified Board President, acting on behalf of the Portage Area Regional Transportation Authority (*PARTA*), certifies that the foregoing is a true and correct copy of a resolution adopted at a legally convened meeting of the Board of Trustees held February 22, 2024.

2-22-2024  
Date

Dave Gynn  
Dave Gynn, President  
Board of Trustees

Marisa Fletcher  
Attested



December 11, 2020

TO: Triennial Review File  
FROM: Claudia B. Amrhein, GM  
RE: Title VI Determination of Site or Location of Facilities; Equity Analysis

In 2020, PARTA constructed a vehicle storage building on its existing property located at 2000 Summit Road, Kent, OH 44240.

During 2019, PARTA staff and A&E consultants evaluated the planned location of the vehicle storage building during the early planning stages of building design. The location of the new facility was planned within our campus, behind the existing administration and maintenance facility.

The documents reviewed and factors considered are summarized below:

- FTA C 4702.1B;
- PARTA Campus Master Plan, November 17, 2009
- FTA Approval in Re: PARTA Main Facility Improvements, Kent, Portage County, Ohio – Environmental Review, dated July 28, 2010;
- Ohio Historical Preservation Office Concurrence Letter dated September 16, 2016;
- Ohio History Connection Concurrence Letter dated October 16, 2016;
- PARTA's Categorical Exclusion submission and all appendices, dated May 2017;
- FTA Approval in Re: Environmental Review Approval for the Compressed Natural Gas Fueling Facility, dated May 11, 2017.

The vehicle storage facility has been on PARTA's master plan since 2009 along with several other planned improvements located on our existing 14-acre site. In 2010, FTA provided PARTA NEPA Categorical Exclusion approval for all planned improvements projects. This included construction of a new vehicle storage building.

Over several years, PARTA added asphalt surface parking areas, constructed an automated bus wash facility, and converted a portion of the existing garage area into training offices, renovated maintenance bays to CNG-compliant standards, and constructed a CNG fueling facility open for public use.

During the planning phases constructing the CNG fueling station, PARTA prepared extensive environmental review documents as defined in FTA's 2010 CE document, and in 2017, received environmental review approval for the CNG fueling facility.

## Attachment B: Title VI Determination of Site or Location of Facilities; Equity Analysis

The CNG fueling station is located at the front of our property and is open for public use. The environmental review work performed included areas of study consistent with Title VI equity analysis requirements, including environmental justice, land use and zoning, state historical preservation analysis, noise and vibration studies, and other required measures to ensure no adverse impact would result from the construction of the CNG station.

Having acquired full approval of the CNG fueling compound, we reviewed the documentation listed above and determined the following factors met Title VI equity analysis requirements:

- We did not purchase new land and siting of the building was consistent with the location that received FTA approval in 2010 and 2017. Alternative sites were not considered for this project because we already owned adequate property that had already been thoroughly studied and approved for more impactful projects that also triggered Title VI equity analysis.
- The building is located behind the existing administration and maintenance building. It cannot be seen from the street.
- PARTA's 14-acre property is not located near any residential living areas. We are located across the street from Kent State University's Football Stadium and bordered by Summit Road, State Route 261, and undisturbed land owned by Kent State University.
- The storage facility location is compliant with the spirit and purpose of Title VI requirements. The building site was not selected with the purpose or effect of excluding any person from, denying them the benefits of, or subjecting them to discrimination under any program on the grounds of race, color, or national origin. The location does not, in fact, subject any person to or have the effect of excluding any person from benefits protected by Title VI.
- Construction of the storage facility did not require land acquisition and did not displace persons from their residences and businesses.
- Construction of the storage facility was considered in light of previous construction of the CNG fueling compound and no cumulative adverse impacts resulted.



# Title VI Complaint Form

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

If you feel that you have been discriminated against based on one of the characteristics noted above, you have the right to file a complaint.

To submit a Title VI complaint, please fill out this form and return it to: **PARTA, Attn: Title VI Administrator, 2000 Summit Rd., Kent, OH 44240.** You may also fax the form to our fax line: **330-676-6310, Attn: Title VI Administrator** or you may email the form to **CustService@PARTAonline.org**.

1. Full Name (Complainant): \_\_\_\_\_

2. Phone (with area code): \_\_\_\_\_

3. Home Address (Street #, City State, ZIP): \_\_\_\_\_

5. Which of the following best describes the reason you believe the discrimination took place?

- Race
- Color
- National origin

6. Date and location of the alleged incident (or date range if activity took place on more than one day). If applicable, name and title of person(s) who discriminated against you:

\_\_\_\_\_

7. In your own words, describe the alleged discrimination. Be sure to include how you believe you were treated differently. Please use additional paper if more space is required.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Please complete information on back.

**Attachment C – TITLE VI COMPLAINT FORM**

8. Please list any person(s) we may contact for additional information to support or clarify your complaint.

---

---

9. Have you filed this complaint with any other federal, state, or local agency: or with any federal or state court?

YES                       NO

If yes, please place a mark next to each agency that applies

Federal agency                       Federal court  
 State agency                               State court

10. Please provide the name and phone number of the contact person at the agency or court where the complaint was filed:

---

10. Please sign below. You may attach any written material or other information that you think is relevant to your complaint.

\_\_\_\_\_  
Complainant's Signature

\_\_\_\_\_  
Date

**FOR OFFICE USE ONLY:**

Date complaint received: \_\_\_\_\_

Investigator: \_\_\_\_\_

## 2020 Outreach Efforts Summary

DATE	EVENT
Monthly	<i>PARTA</i> Board of Trustee meetings – held the 4 <sup>th</sup> Thursday of each month and are open to the public with time set aside for public comment. In 2020, some meetings were held virtually. In these instances, the meetings were live streamed for the public and later posted to YouTube.
Monthly	<i>PARTA</i> Finance Committee meeting – held the 4 <sup>th</sup> Tuesday of each month and are open to the public with time set aside for public comment. In 2020, some meetings were held virtually. In these instances, the meetings were live streamed for the public and later posted to YouTube.
1-2-2020	Title VI Program distributed to area agencies <ul style="list-style-type: none"> <li>• Catholic Charities</li> <li>• Center of Hope</li> <li>• Coleman Professional Services</li> <li>• Community Action Council</li> <li>• Family and Community Services</li> <li>• Freedom House</li> <li>• The Haven</li> <li>• Housing and Emergency Support Services (HESS)</li> <li>• Job &amp; Family Services</li> <li>• Kent Free Library</li> <li>• Kent City Schools</li> <li>• Kent Social Services</li> <li>• King Kennedy Center</li> <li>• Maplewood Career Center</li> <li>• Miller Community House</li> <li>• NAACP</li> <li>• Neighborhood Development Services (NDS)</li> <li>• PASSAGES</li> <li>• Portage Area Recovery Center</li> <li>• Portage County Job &amp; Family Services</li> <li>• Portage Metropolitan Housing</li> <li>• Ravenna City Schools</li> <li>• Reed Memorial Library</li> <li>• Safer Futures</li> <li>• Salvation Army</li> <li>• Skeels Mathews Community Center</li> <li>• Townhall2</li> <li>• Veteran Services Commission</li> </ul>
1-14-2020	Travel Trainer on-site 'Q & A' at transit center
1-23-2020	Travel Trainer on-site 'Q & A' at transit center
1-26-2020	<i>PARTA</i> on-site Info table at Stow High School Fundraiser
2-6-2020	Travel Trainer on-site 'Q & A' at transit center
3-24-2020	"Ask the Travel Trainer" virtual info series introduced via Facebook (video)
4-22-2020	"Ask the Travel Trainer" Episode 1 – Fixed Route Service during Covid-19 (posted to Facebook & YouTube)
4-29-2020	"Ask the Travel Trainer" Episode 2 – Essential places <i>PARTA</i> passes (posted to Facebook & YouTube)
5-6-2020	"Ask the Travel Trainer" Episode 3 – How do I learn about <i>PARTA</i> during COVID-19 (posted to Facebook & YouTube)
5-13-2020	"Ask the Travel Trainer" Episode 4 – Which fixed route bus passes Ravenna Walmart (posted to Facebook & YouTube)

## Attachment D – SUMMARY OF TITLE VI OUTREACH

- 5-20-2020 "Ask the Travel Trainer" Episode 5 – What days are PARTA services closed (posted to Facebook & YouTube)
- 5-26-2020 "Ask the Travel Trainer" Episode 6 – How to use SPOT PARTA (posted to Facebook & YouTube)
- 5-27-2020 "Ask the Travel Trainer" Episode 7 – How to use EZfare (posted to Facebook & YouTube)
- 6-10-2020 "Ask the Travel Trainer" Episode 8 – KSU Students: How to use PARTA (posted to Facebook & YouTube)
- 6-17-2020 "Ask the Travel Trainer" Episode 9 – How to use SPOT PARTA texting feature (posted to Facebook & YouTube)
- 6-24-2020 "Ask the Travel Trainer" Episode 10 – How to use SPOT PARTA plan a trip feature (posted to Facebook & YouTube)
- 7-1-2020 "Ask the Travel Trainer" Episode 11 – What happens if I get on the wrong bus (posted to Facebook & YouTube)
- 7-8-2020 "Ask the Travel Trainer" Episode 12 – How much does it cost to ride a PARTA bus (posted to Facebook & YouTube)
- 7-15-2020 "Ask the Travel Trainer" Episode 13 – How long does PARTA run (posted to Facebook & YouTube)
- 7-29-2020 "Ask the Travel Trainer" Episode 14 – KSU students: What to expect this semester (posted to Facebook & YouTube)
- 8-12-2020 "Ask the Travel Trainer" Episode 15 – KSU campus transportation (posted to Facebook & YouTube)
- 8-19-2020 "Ask the Travel Trainer" Episode 16 – #90 Akron Express Route (posted to Facebook & YouTube)
- 8-26-2020 "Ask the Travel Trainer" Episode 17 – How to access PARTA bus maps & schedules (posted to Facebook & YouTube)
- 12-9-2020 "Ask the Travel Trainer" Episode 18 – PARTA Saturday Service (posted to Facebook & YouTube)
- 12-16-2020 "Ask the Travel Trainer" Episode 19 – What is Dial-A-Ride (posted to Facebook & YouTube)
- 12-17-2020 Title VI notice posted to Facebook & Twitter
- 12-23-2020 "Ask the Travel Trainer" Episode 20 – December 2020 early shutdown (posted to Facebook & YouTube)



## PARTA 2021 Outreach Efforts Summary

DATE	EVENT
Monthly	PARTA Board of Trustee meetings – held the 4 <sup>th</sup> Thursday of each month and are open to the public with time set aside for public comment. In 2021, some meetings were held virtually. In these instances, the meetings were live streamed for the public and later posted to YouTube.
Monthly	PARTA Finance Committee meeting – held the 4 <sup>th</sup> Tuesday of each month and are open to the public with time set aside for public comment. In 2021, some meetings were held virtually. In these instances, the meetings were live streamed for the public and later posted to YouTube.
1-29-2021	Title VI Program distributed to area agencies <ul style="list-style-type: none"> <li>• Catholic Charities</li> <li>• Freedom House</li> <li>• The Haven</li> <li>• Miller Community House</li> <li>• Neighborhood Development Services (NDS)</li> <li>• PASSAGES</li> <li>• Ravenna City Schools</li> <li>• Reed Memorial Library</li> <li>• Safer Futures</li> <li>• Salvation Army</li> <li>• Skeels Mathews Community Center</li> <li>• Townhall2</li> <li>• Veteran Services Commission</li> </ul>
1-13-21	“Ask the Travel Trainer” Episode 21 – How to stay up to date with PARTA service alerts (posted to FB & YouTube)
1-20-21	“Ask the Travel Trainer” Episode 22 – KSU spring ‘21 (posted to FB & YouTube)
1-27-21	“Ask the Travel Trainer” Episode 23 – Do you Qualify for Reduced Fare (posted to FB & YouTube)
2-3-21	“Ask the Travel Trainer” Episode 24 – The Kent Central Gateway (posted to FB & YouTube)
2-15-21	“Ask the Travel Trainer” Episode 25 – 5 Tips for new PARTA riders (posted to FB & YouTube)
2-24-21	“Ask the Travel Trainer” Episode 26 – The Ravenna service hub (posted to FB & YouTube)
4-9-21	“Ask the Travel Trainer” Episode 27 – KSU Summer ‘21 (posted to FB & YouTube)
5-20-21	Virtual refresher on how to ride with PARTA (posted to FB & YouTube)
6-9-21	Understanding PARTA service reductions (video posted to Facebook & YouTube)
6-24-21	Outreach at Senior Forum @ Ravenna High School
7-9-21	Outreach at Portage Metropolitan Housing HUD Strong Family Initiative event
7-21-21	Community outreach at Kent Central Gateway transit center
7-28-21	Outreach at Portage County Job & Family Services Health & Wellness Fair
7-30-21	Outreach at Portage County Housing Services Council Community Resource Connect
8-12-21	“Ask the Travel Trainer” Episode 28 – KSU Fall ‘21 (posted to FB & YouTube)
8-24 to 8-29	Outreach at 2021 Portage County Randolph Fair

## **PARTA 2022 Outreach Efforts Summary**

DATE	EVENT
Monthly	<i>PARTA</i> Board of Trustee meetings – held the 4 <sup>th</sup> Thursday of each month unless otherwise noted. Notice of upcoming meetings are posted at the <i>PARTA</i> administration building and on the <i>PARTA</i> website. Meetings are open to the public with time set aside for public comment.
Monthly	<i>PARTA</i> Finance Committee meeting – held the 4 <sup>th</sup> Tuesday of each month unless otherwise noted. Notice of upcoming meetings are posted at the <i>PARTA</i> administration building and on the <i>PARTA</i> website. Meetings are open to the public with time set aside for public comment.
2-4-2022	Community newsletter emailed
3-29-2022	Hosted information table at Akron Metro transit center during electric bus launch
4-5-2022	<i>PARTA</i> Citizen Advisory Council meeting held
4-7-2022	Hosted information table at Leadership Portage County Mental Health Conference
5-15-2022	Hosted online survey soliciting feedback on possible transit improvements to St. Rt. 59 in Franklin Twp.
6-22-2022	Hosted information table on Public Square in Cleveland as part of Greater Cleveland RTA event
8-23-2022	Hosted information booth at week-long Portage County Randolph Fair
9-8-2022	Attended open house/dedication of new facility at King Kennedy Community Center
9-22-2022	Hosted information table at Ravenna job fair hosted by Job & Family Services targeting low-income transit riders
10-26-2022	Hosted information table at Kent job fair hosted by Job & Family Services targeting low-income transit riders
11-3-2022	<i>PARTA</i> Citizen Advisory Council meeting held
11-12-2022	Hosted information table at Financial Wellness Fair sponsored by Portage County Treasurer

## Attachment F: Subrecipient Oversight

### Denise Baba

---

**From:** Denise Baba  
**Sent:** Wednesday, November 9, 2022 12:40 PM  
**To:** Leanna Berry  
**Cc:** Heather Laliberte (hlaliberte@fcsohio.org); Claudia Amrhein  
**Subject:** 2022 Title VI On-Site Review  
**Attachments:** Emerald Transportation Notice to the Public.docx; Emerald Transportation Notice to the Public.pdf

Leanne,

This email is a follow up to PARTA's on-site review of Title VI compliance conducted on Wednesday, November 2, 2022.

As indicated during the visit, please note that Family and Community Services (Emerald Transportation) should display a Title VI Notice to the Public in its office and in its vehicle.

For your convenience I have attached a sample notice. Once the notice is posted, you will be in compliance. I will follow up with you to ensure that this requirement is met.

If you have any questions, please feel free to reach out to me. My contact information is listed below.

Thank you,

Denise

*Denise Baba, M.Ed.*  
*Communications & Public Advocacy Advisor, [DBELO](#) & [Title VI](#)*  
*Portage Area Regional Transportation Authority ([PARTA](#))*  
*p 330.678.7745 x113*  
*e [dbaba@partaonline.org](mailto:dbaba@partaonline.org)*  
*w [PARTAonline.org](http://PARTAonline.org)*  
*2000 Summit Rd.*  
*Kent, OH 44240*



[Facebook](#) | [Twitter](#) | [YouTube](#)

**Attachment G – Vehicle load calculations**

	Ridership 2020	Revenue Hours 2020	Passengers per Revenue Hour 2020	Ridership 2021	Revenue Hours 2021	Passengers per Revenue Hour 2021	Ridership 2022	Revenue Hours 2022	Passengers per Revenue Hour 2022
County Fixed	172591	32099	5.38	155265	33477	4.64	130088	22579	5.76
Campus Fixed	202393	15216	13.30	177057	12734	13.90	224271	10364	21.64
<b>Total Local</b>	<b>374984</b>	<b>47315</b>	<b>7.9</b>	<b>332322</b>	<b>46211</b>	<b>7.19</b>	<b>354359</b>	<b>32943</b>	<b>10.76</b>
Express	6590	2222	2.97	7019	2965	2.37	9116	2246	4.06
<b>Total Express</b>	<b>6590</b>	<b>2222</b>	<b>2.97</b>	<b>7019</b>	<b>2965</b>	<b>2.37</b>	<b>9116</b>	<b>2246</b>	<b>4.06</b>
<b>Bus Local</b>	<b><u>2020 Seats</u></b>	<b><u>2021 Seats</u></b>	<b><u>2022 Seats</u></b>						
Tesco	30	30	30						
Orion	33	33	33						
Gillig LF 30'	26	26	26						
Gillig LF 35'	32	32	32						
Hometown Trolley	NA	NA	32						
LTV	18	18	18						
<b>Average Seats</b>	<b>28</b>	<b>28</b>	<b>29</b>						
<b>Bus Express</b>									
Tesco	30	30	30						
Orion	33	33	33						
Gillig LF 30'	26	26	26						
Gillig LF 35'	32	32	32						
Hometown Trolley	NA	NA	32						
LTV	18	18	18						
<b>Average Seats</b>	<b>28</b>	<b>28</b>	<b>29</b>						
						<b><u>Average Vehicle Load</u></b>			
<b>Vehicle Load - Local</b>	<b>0.28</b>	<b>0.25</b>	<b>0.37</b>			<b>0.3</b>			
<b>Vehicle Load - Express</b>	<b>0.11</b>	<b>0.09</b>	<b>0.14</b>			<b>0.11</b>			

**Attachment H – Vehicle headway calculations**

<b>Local Bus</b>	<b>2020 Local Headway</b>	<b>2020 Local Frequency</b>	<b>2021 Local Headway</b>	<b>2021 Local Frequency</b>	<b>2022 Local Headway</b>	<b>2022 Local Frequency</b>
30 - Interurban West	30	2.00	30	2.00	30	2.00
35 - Interurban East	30	2.00	30	2.00	30	2.00
40 - Suburban North	45	1.33	45	1.33	45	1.33
45 - Suburban South	45	1.33	45	1.33	45	1.33
46 - Downtowner	N/A	N/A	N/A	N/A	40	1.50
60 - Black Squirrel	N/A	N/A	N/A	N/A	N/A	N/A
70 -Windham/Garrettsville	105	0.57	105	0.57	105	0.57
80 - Raven West	60	1.00	180	0.33	180	0.33
85 - Raven East	60	1.00	60	1.00	60	1.00
51 - Campus Loop	30	2.00	30	2.00	30	2.00
53 - Reverse Loop	12	5.00	N/A	N/A	N/A	N/A
54 - Summit St. Express	N/A	N/A	N/A	N/A	N/A	N/A
55 - Allerton	12	5.00	N/A	N/A	15	4.00
57 - Stadium Loop	35	1.71	30	2.00	30	2.00
58 - Frnt Campus/Sum. East	36	1.67	40	1.50	40	1.50
<b>Average Headway</b>	<b>41.7</b>	<b>1.44</b>	<b>59.5</b>	<b>1.01</b>	<b>54.2</b>	<b>1.11</b>

**Local**  
Average Headway    Average Frequency  
**51.8**                    **1.19**

<b>Express Bus</b>	<b>2017 Express Headway</b>	<b>2017 Express Frequency</b>	<b>2017 Express Headway</b>	<b>2017 Express Frequency</b>	<b>2017 Express Headway</b>	<b>2017 Express Frequency</b>
90 - Akron Express	105	0.57	105	0.57	105	0.57
100 - Cleveland Express	2 Trips per day 6am and 4pm					
<b>Average Headway</b>	<b>105</b>	<b>0.57</b>	<b>105</b>	<b>0.57</b>	<b>105</b>	<b>0.57</b>

**Express**  
Average Headway    Average Frequency  
**105**                    **0.57**