



Title VI of the Civil Rights Act of 1964
Policy/Program

Adopted
October 23, 2025

**Portage Area Regional Transportation Authority
Title VI Policy/Program
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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 July 2025, PARTA's 146 employees operate 59 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).

Claudia Amrhein
General Manager

10-23-2025

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 Resolution

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 2023-2025 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.

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
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;
- 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. 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.
- By completing a digital form at 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), 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 B: 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 two (2) complaints alleging Title VI discrimination in 2023, two (2) complaints alleging Title VI discrimination in 2024, and two (2) complaints alleging Title VI discrimination in 2025. Details are provided below.

Complaint Date	Complaint Summary	Investigation	Outcome
3/7/2023	A complaint was received through PARTA's online Title VI complaint form. Complainant stated that he believed his son was being discriminated against (Door-to-Door trips denied) because of his reduced fare status due to disability.	Title VI Administrator called and spoke with complainant. Trips requested were not ADA trips, they were Door-to-Door trips. It was explained that D-to-D trips are sometimes denied due to capacity issues as this is a shared ride service. PARTA cannot always accommodate everyone who requests a trip,	Allegations of discrimination based on Title VI were found to be unsubstantiated.

		especially during high demand days/times. Complainant said he understood but was still disappointed.	
7/6/2023	A complaint was received through PARTA's online Title VI complaint form. The complainant indicated that PARTA's provided bad service but did not describe alleged discrimination or different treatment. One response on the complaint form did indicate the alleged discrimination was based on age.	Title VI Administrator called the phone number provided on the complaint form. There was no answer, so a message was left. An email was also sent to the email address provided on the form providing information on how to follow up with the Title VI administrator.	Since the complainant did not respond to outreach efforts and because the alleged discrimination did not fall within a Title VI protected class (race, color, or national origin) the complaint was determined to be unsubstantiated.
6/10/2024	A passenger left a voicemail requesting a call back. In the voicemail he said he felt discriminated against by the driver of the route 100 bus. Complainant states that he has been on the bus twice with the same driver. Complainant doesn't understand the fare structure and indicates that driver is not helpful.	PARTA's Operations Manager placed a call and spoke with the complainant. During the call the complainant indicated that he appreciated the follow-up call and was pleased with PARTA's response.	Following contact with the complainant it was determined that he was not treated differently or denied service. The allegation of discrimination was found to be unsubstantiated.
11/23/2024	A complaint was received through PARTA's online Title VI complaint form. The complaint – a Kent State University student – alleged her companion, also a KSU student, was discriminated against based on race while attempting to ride an off-campus bus using a student ID required to obtain a free ride.	Video with sound of the incident was reviewed by the Title VI Administrator, Operations Manager, Chief of Staff, and Chief Operations Officer. Service was not denied to the person in question. However, the student was told that because her ID was faded and not legible, she would have to pay the \$1 fare to ride and could not ride for free using the ID presented. Additionally, video showed that at a previous stop black/African American KSU students showed their ID as required and were permitted to ride fare free because the IDs were legible.	The allegation of discrimination based on race was determined to be unsubstantiated.
2/5/2025	The complainant sent an email to PARTA's Operations Manager alleging discrimination based on age and disability. Complainant subsequently forwarded the email to the Title VI Administrator. The complainant's discrimination claim is based on a specific bus driver requiring him to show his reduced fare card each time he boards the bus even though he rides frequently and states the driver should be aware of his reduced fare status. The complaint went on to describe an encounter between the bus driver and the complainant which resulting in a road supervisor being dispatched to the bus.	The Title VI Administrator called the complainant and left a voicemail message. Additionally, an email was sent to the complainant as another method of follow-up. Additionally, the Title VI Administrator and the Operations Manager reviewed video with sound of the encounter referenced in the complaint. The video showed that the complainant did not in fact show his reduced fare card to the driver. Further no discrimination was observed based on race, color, or national origin. The driver followed policy in requiring a reduced fare card to be displayed on boarding.	The allegation of discrimination based on Title VI was found to be unsubstantiated.
7/30/2025	Complainant called PARTA and stated that he was discriminated against because of his race. Complainant stated that he was	The transit center manager stated that the complainant was in the lobby of the transit center for nearly three hours and made	The allegation of discrimination based on Title VI was found to be unsubstantiated.

	asked to leave the Kent Central Gateway Transit Center by a PARTA employee. He states that he was the only black person in the lobby area and the only person asked to leave.	no attempt to catch a bus. She approached the complainant and informed him that PARTA had a "No Loitering" policy and that he would have to board a bus or otherwise leave the transit center. PARTA's Operation's Manager phoned the complainant and discussed PARTA's loitering policy with him. The conversation ended with the complainant stating that he planned to sue. PARTA's Transit Property Visitor Policy states that, "Persons utilizing transit property or facilities with no obvious business purpose, or whose behavior is deemed inappropriate, unsafe, hostile or potentially illegal, will be asked to leave the premises."	
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There are no current 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, 2023, 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 C: 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.

Portage County - Languages Spoken at Home			
	<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

<u>PARTA</u> Citizens Advisory Council		
Race	Count	Percentage
American Indian/Alaskan Native	0	0%
Asian	0	0%
Black/African American	2	14%
Hispanic/Latino	0	0%
Native Hawaiian/Pacific Islander	0	0%
White	12	86%
TOTAL MEMBERSHIP	14	100%

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 (organization changed name to Axxess Family Services, Inc.), receives federal financial assistance through PARTA. The following approach is applied to monitor PARTA's sub-recipient:

- 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.

Subrecipient On-Site Review Meetings			
<i>Subrecipient</i>	<i>Meeting Date</i>	<i>Title VI Policy Received</i>	<i>Title VI Requirements Met</i>
Family & Community Services	June 16, 2023	Yes	Yes
Family & Community Services	October 23, 2024	Yes	Yes
Axxess Family Services, Inc.	June 18, 2025	Yes	Yes

- 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 D: Subrecipient Oversight Documentation

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 14 seats and the highest seating capacity being 32 seats. The average vehicle load for local buses is .75 for the years 2023-2025. PARTA also provides service to Akron and Cleveland through Express bus service. Vehicle load for an Express bus is .17 for years 2023-2023.

Attachment E: 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 2023-2025, we averaged a local headway of 47.2 minutes and a frequency of 1.28 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.

MODE	GUIDELINE
Fixed Route	An average vehicle headway of 47 minutes is expected
Express Route	An average vehicle headway of 105 minutes is expected

Attachment F: 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 2023-2025 include local Fixed Route service provided off KSU's main campus. 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. Express routes were also excluded as these routes include a significant amount of highway travel time through unpredictable traffic. The average on-time compliance for the local service was 72%. *PARTA* works to ensure that schedules are adjusted when necessary to ensure we are providing the most reliable service possible.

On-Time Compliance				
Route	2023 On-Time Compliance	2024 On-Time Compliance	2025 On-Time Compliance	Average by Route
30 - Interurban West	77%	80.34%	82.57%	80%
35 - Interurban East	78%	69.32%	69.50%	72%
40 - Suburban North	59%	74.92%	70.66%	68%
45 - Suburban South	83%	84.89%	67.54%	78%
46 - Downtowner	21%	52.23%	63.65%	46%
70 - Windham/Garresttsville	81%	78.43%	82.61%	81%
80 - Raven West	74%	77.76%	75.67%	76%
85 - Raven East	90%	79.96%	82.63%	84%
90 - Akron Express	73%	65.93%	62.70%	67%
100 - Cleveland Express	59%	68.66%	69.16%	66%
51 - Campus Loop	72%	57.41%	67.38%	66%
55 - Allerton	26%	59.15%	50.91%	45%
57 - Stadium Loop	81%	54.95%	60.69%	66%
58 - Summit East	64%	58.84%	55.87%	60%
Average On-Time Compliance	70%	73%	73%	72%

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 of a 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.

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 #2025-10-01

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 adopted this policy in November 2022, which is valid for three (3) years; and

WHEREAS, PARTA's updated policy must be resubmitted to the FTA no later than December 1, 2025

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 October 23, 2025.

10/23/2025
Date

Marvin Woods
Marvin Woods, President
Board of Trustees

Sony L. Richardson-Gail
Attested



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.

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: _____

PARTA 2023 Outreach Efforts Summary

DATE	EVENT
Monthly	PARTA Board of Trustee meetings – held the 4 th Thursday of each month and are open to the public with time set aside for public comment.
Monthly	PARTA Finance Committee meeting – held the 4 th Tuesday of each month and are open to the public with time set aside for public comment.
Ongoing	PARTA regularly posts information and updates to its social media accounts (Facebook, Instagram, & Twitter), the PARTA website, and passenger information displays (PIDs) to provide access to minority and low-income populations as well as the wider community.
1-14-23	MLK Prayer Breakfast hosted by Portage County NAACP
1-16-23	MLK Breakfast and Program hosted by Keels Mathews Community Center
2-8-23	PARTA Citizen Advisory Council Meeting
3-14-23	Maplewood Option 4 Advisory Committee
3-16-23	Ohio Means Jobs Citizen Circle meeting
3-9-23	Individual meeting w/Christina West, Service Support Admin. At Portage County DD
3-29-23	Individual meeting w/ Robert Young, Director of Clinical Services for Townhall II
3-30-23	Individual meeting w/Anne Marie Noble, Ex. Dir. Of The Haven homeless shelter
4-5-23	Individual meeting w/LaJoyce Harris, Program Manager at the Center of Hope hot meal site
4-6-23	Individual meeting w/Rick Squier, Ex. Dir. Of Portage County Catholic Charities
4-10-23	Individual meeting w/Rebecca Abbot, Portage Job & Family Services Public Assistance Administrator
4-12-23	Group meeting w/staff of the Portage County Board of Developmental Disabilities
4-18-23	Individual meeting w/Allison Westover, Program Director of Portage Area Recovery Center & current residents
4-21-23	Hosted information table at Skeels Community Center Health Fair
4-24-23	Met with Family & Community Services staff members that oversee various program to explain new fare system
4-28-23	Participated in transportation panel discussion for the Akron Canton Area Agency on Aging & Disabilities
5-4-23	Represented PARTA at Maplewood Option 4 Recognition program for DD students that use PARTA services
5-10-23	PARTA Citizen Advisory Council meeting
5-12-23	Met with staff at Portage County Adult Probation to discuss PARTA's new fare system
5-17-23	PARTA began conducting outreach with a link from the PARTA website to an online survey and a phone survey of riders in cooperation with AMATS and Akron KETRO as part of the process to develop a revised regional Coordinated Public Transit – Human Services Transportation Plan
5-18-23	Hosted information table at the Ohio Means Jobs Re-Entry Resource Fair for formerly incarcerated individuals
5-25-23	Hosted information table at grand opening for Brightview, a drug rehabilitation & recovery center
6-1-23	Met with case workers at Portage Metropolitan Housing Authority
6-15-23	Ohio Means Jobs Citizen Circle meeting
June 2023	Through the month of June, PARTA held 14 outreach sessions at its transit center in Kent and hub in Ravenna to inform riders about the launch of its new account-based ticketing system
6-20-23	Portage 50 Plus Support Committee meeting
7-18-23	Portage 50 Plus Support Committee meeting
8-3-23	Hosted information table at Ohio Means Jobs Back-to-School resource fair
8-9-23	PARTA collaborated with the Portage County Health District and Job & Family Services to offer a workshop to provide information to agencies to learn what they could do to help low-income and minority families and clients access healthcare and other important resources in Portage County
8-17-23	Ohio Means Jobs Citizen Circle meeting
8/22 to 8/27	Hosted booth at Portage County Randolph Fair
10-10-23	Presentation to AmeriCorps Seniors
10-14-23	Attended NAACP Freedom Fund scholarship event
10-17-23	Portage 50 Plus Support Committee meeting

PARTA 2024 Outreach Efforts Summary

DATE	EVENT
Monthly	PARTA Board of Trustee meetings – held the 4 th Thursday of each month and are open to the public with time set aside for public comment.
Monthly	PARTA Finance Committee meeting – held the 4 th Tuesday of each month and are open to the public with time set aside for public comment.
Ongoing	PARTA regularly makes posts and provides updates to its social media accounts (Facebook, Instagram, & Twitter), the PARTA website, and passenger information displays (PIDs) to provide access to relevant information for minority and low-income populations as well as the wider community.
1-18-24	Ohio Means Jobs Citizens Circle
2-14-24	PARTA Citizen Advisory Council meeting
2-15-24	Ohio Means Jobs Citizens Circle
2-20-24	J&FS 50 Plus Support Team meeting
3-19-24	Hosted information table at Portage Metropolitan Housing Authority (PMHA) Resource Fair (Eastown Apartments)
3-21-24	Ohio Means Jobs Citizen Circle meeting
3-26-24	Hosted information table at PMHA Resources Fair (Etna House)
4-3-24	Hosted information table at Portage County Health District Health Fair & Open House
4-11-24	Met with staff at Center of Hope (Deb Stewart) to train on EZfare
4-16-24	J&FS 50 Plus Support Team meeting
4-18-24	Hosted information table at Re-Entry Resource Fair for formerly incarcerated individuals
4-19-24	Hosted information table at Skeels Mathews Community Center Health Fair
5-2-24	Represented PARTA at Maplewood Option 4 Recognition program for DD students that use PARTA services
5-16-24	Ohio Means Jobs Citizen Circle meeting
7-9-24	Presentation to AmeriCorps Seniors group
7-16-24	Portage 50 Plus Support Team meeting
7-18-24	Ohio Means Jobs Citizen Circle meeting
8-14-24	PARTA Citizens Advisory Council meeting
8-20-24	Portage 50 Plus Support Team meeting
8/20-8/24	PARTA hosts information booth at the Portage County Randolph Fair
9-19-24	Ohio Means Jobs Citizen Circle meeting
9-26-24	PARTA community resource fair hosted at the Kent Central Gateway Transit Center
12-17-24	Portage 50 Plus Support Team meeting

Attachment C – SUMMARY OF TITLE VI OUTREACH

PARTA 2025 Outreach Efforts Summary

DATE	EVENT
Monthly	PARTA Board of Trustee meetings – held the 4 th Thursday of each month and are open to the public with time set aside for public comment.
Monthly	PARTA Finance Committee meeting – held the 4 th Tuesday of each month and are open to the public with time set aside for public comment.
Ongoing	PARTA regularly makes posts and provides updates to its social media accounts (Facebook, Instagram, & Twitter), the PARTA website, and passenger information displays (PIDs) to provide access to relevant information for minority and low-income populations as well as the wider community.
1-16-25	Ohio Means Jobs Citizens Circle meeting
1-20-25	Attended MLK Breakfast and program at Skeels Mathews Community Center
2-4-25	JFS 50 Plus Support Team meeting
2-12-25	PARTA Citizen Advisory Council meeting
2-20-25	Ohio Means Jobs Citizen Circle meeting
3-18-25	JFS 50 Plus Support Team meeting
4-8-25	AmeriCorps Seniors presentation
4-9-25	Hosted information table at Portage County Health District Community Health Fair
4-17-25	Hosted information table at Ohio Means Jobs Re-Entry Resource Fair
4-25-25	Hosted information table at Skeels Mathews Community Center Health Fair
4/28-5/2	Multiple public engagement/outreach sessions conducted for Transit Feasibility Study
5/14/25	PARTA Citizen Advisory Council meeting
5-15-25	Ohio Means Jobs Citizen Circle meeting
5-31-25	Hosted information table at PMHA Resource Fair
6-4-25	PARTA 50 th Anniversary Celebration and Open House event
6-21-25	Hosted information table at Kent City Health Department Resource Fair
6-24-25	JFS 50 Plus Support Team meeting
7-15-25	JFS 50 Plus Support Team meeting
7-16-25	Presentation to visitors to the Center of Hope hot meal site
7-17-25	Ohio Means Jobs Citizen Circle meeting
8-11-25	Hosted information table at J&FS Back to School Resource Fair
8-13-25	PARTA Citizen Advisory Council meeting
8/19-8/24	PARTA hosts information booth at the Portage County Randolph Fair
9-4-25	Hosted information table at Portage County Health District Pop-Up Food Pantry event
9-11-25	Hosted information table at JFS Senior Forum at UH Portage Medical Center
9-18-25	PARTA hosts community resource fair at Kent Central Gateway Transit Center
10-8-25	Presentation to visitors/clients of Shepards House homeless shelter

Denise Baba

From: Denise Baba
Sent: Tuesday, June 20, 2023 11:26 AM
To: Ron Hawkins; Ashley Forbes; Heather Laliberte; Krista Foy; Phil Miller
Cc: Heather Burkholder; Sandy Allen
Subject: RE: PARTA & F&CS Meeting for 5310 Funded Vehicle #20

Hello Ron,

I also want to thank you and Krista for meeting with me on Friday as part of the 5310 oversight review with PARTA for vehicle #20.

Regarding Title VI compliance, thank you for the opportunity to visit bus #20 and see the Title VI Notice posting. As I indicated during our meeting, I have also reviewed the Emerald & FCS Transportation Title VI Plan and have the following recommendations:

- In addition to posting your Title VI notice to the public in bus #20, post a copy of the notice in a visible location in the transportation office.
- Include a copy of your Title VI Notice to the Public in your Title VI Plan/Policy document.
- The Title VI Complaint Form is a vital document. The FTA requires that, "A recipient's Title VI Complaint Form *shall specify the three classes protected by Title VI—race, color, and national origin*—and allow the complainant to select one or more of those protected classes as the basis/bases for discrimination." Please update your complaint form to reflect this requirement. A sample complaint form can be found in Appendix D of the FTA 4702.1B Circular (https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf).

Finally, as we discussed, the Emerald & FCS Title VI policy must be submitted to PARTA every three (3) years. Your last submission was in 2022. You will need to re-submit your Title VI Plan/Policy to PARTA in 2025. Please make any necessary revisions to the plan/policy, then have your governing board review and approve the updated document before submission. Be sure to incorporate documentation of board approval within the plan/policy.

If you have any questions or need clarification, please feel free to contact me.

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
w PARTAonline.org
2000 Summit Rd.
Kent, OH 44240

Attachment D: Subrecipient Oversight Documentation

Denise Baba

From: Denise Baba
Sent: Monday, October 28, 2024 11:13 AM
To: Heather Laliberte (hlaliberte@fcsohio.org)
Cc: Ashley Forbes; Kathryn Billings; Jennifer Weaver; Tara Reed
Subject: Emerald Transportation Subrecipient Oversight - Title VI Program

Hello Heather,

This email is a follow up to our subrecipient oversight meeting on Wednesday, October 23 held at Family and Community Services (F&CS) offices located at 705 Oakwood in Ravenna. My colleague Ashley Forbes and I appreciate the opportunity to discuss oversight requirements for Emerald Transportation bus #20 with you, Grant Specialist Kathryn (Billings) Dalessandro, Emerald Transportation Manager Jennifer Weaver, and Emerald Scheduler Tara Reed.

Thank you for providing me with a copy of Emerald Transportation's current Title VI Program approved by the F&CS board in July of this year. I have reviewed the program you shared with me during our meeting. It appears to meet Federal Transit Administration (FTA) requirements and addresses those concerns I shared with you prior to receiving the current program. As a reminder, please update the Emerald website by posting the current program to the site as we discussed.

Regarding Emerald's Title VI Notice to the Public, it was good to see it prominently displayed in the transportation office and on bus #20 for which PARTA is providing oversight.

In closing, if you have any questions or concerns regarding PARTA's oversight responsibilities related to Emerald's Title VI Program, please feel free to reach out to me by phone or email. My contact information is listed below.

Sincerely,

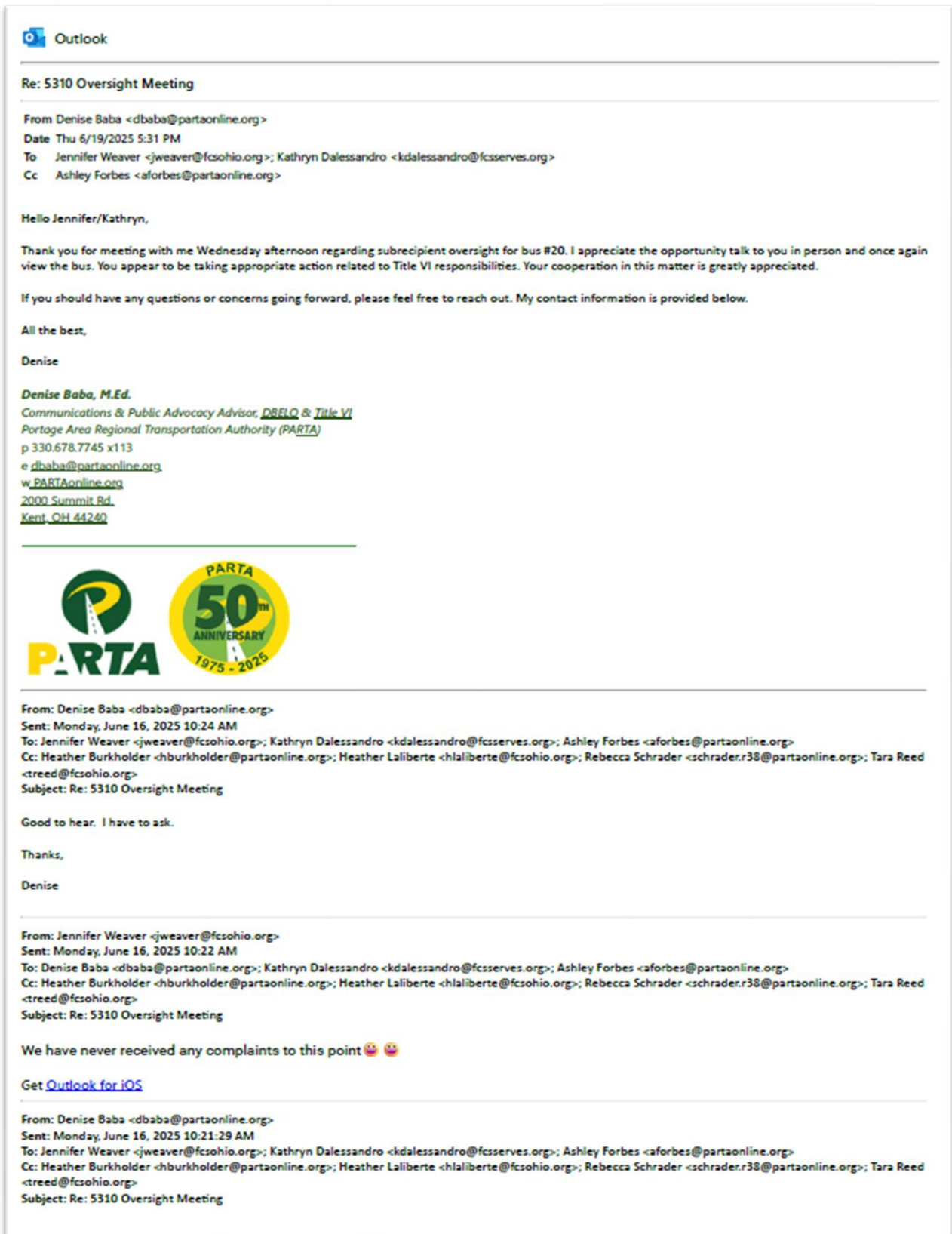
Denise

Denise Baba, M.Ed.
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Kent, OH 44240



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Attachment D: Subrecipient Oversight Documentation



Attachment E: Vehicle Load Calculations

	Ridership 2023	Revenue Hours 2023	Passengers per Revenue Hour 2023	Ridership 2024	Revenue Hours 2024	Passengers per Revenue Hour 2024	Ridership 2025*	Revenue Hours 2025*	Passengers per Revenue Hour 2025*
County Fixed	273606	27873.31	9.82	318630	25557.49	12.47	218278	22480.17	9.71
Campus Fixed	567857	17061.66	33.28	787920	17004.39	46.34	431789	12412.05	34.79
Total Local	841463	44934.97	18.73	1106550	42561.88	26.00	650067	34892.22	18.63
Expresses	17332	3980.06	4.35	23837	4380.9	5.44	13435	3298.56	4.07
Total Expresses	17332	3980.06	4.35	23837	4380.9	5.44	13435	3298.56	4.07
							<i>*Numbers through September 2025</i>		
Bus Local	2023 Seats	2024 Seats	2025 Seats						
Tesco	30	30	30						
Orion	33	33	33						
Gillig LF 35'	32	32	32						
Gillig Ph	32	32	32						
LTV	14	14	14						
Average Seats	28	28	28						
BusExpress									
Tesco	30	30	30						
Orion	33	33	33						
Gillig LF 35'	32	32	32						
Gillig Ph	32	32	32						
LTV	14	14	14						
Average Seats	28	28	28						
					Average Vehicle Load				
Vehicle Load - Local	0.67	0.93	0.67		0.75				
Vehicle Load - Express	0.16	0.19	0.15		0.17				

Attachment F: Vehicle Headway Calculations

Local Bus	2023 Local Headway	2023 Local Frequency	2024 Local Headway	2024 Local Frequency	2025 Local Headway	2025 Local Frequency
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	40	1.50
45 - Suburban South	45	1.33	45	1.33	35	1.71
46 - Downtowner	40	1.5	40	1.5	40	1.50
60 - Black Squirrel	40	1.5	40	1.5	40	1.5
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
55 - Allerton	15	4.00	15	4	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
59 - Stadium Night Loop	15	4.00	15	4.00	15	4.00
Average Headway	41.9	1.43	50.4	1.19	49.3	1.22
Express Bus	2023 Express Headway	2023 Express Frequency	2024 Express Headway	2024 Express Frequency	2025 Express Headway	2025 Express Frequency
90 - Akron Express	105	0.57	105	0.57	105	0.57
100 - Cleveland Express	2 Trips per day 6am and 4pm					
Average Headway	105	0.57	105	0.57	105	0.57
		Local				
		Average Headway		Average Frequency		
			47.2		1.28	
		Express				
		Average Headway		Average Frequency		
			105		0.57	