

TITLE VI PROGRAM UPDATE 2025-2028

**SOUTHWEST OHIO REGIONAL TRANSIT AUTHORITY
(SORTA)
525 Vine St,
Suite 500
Cincinnati, OH 45202**

TABLE OF CONTENTS

INTRODUCTION	1
POLICY STATEMENT	2
 1.1. Title VI Policy and Complaint Procedure	3
General.....	3
Responsibility	4
Intake of Complaints	4
Investigation, Determination, and Recommendation	4
Communication of Findings and Complaint Resolution.....	5
Appeal	5
Record of Title VI Investigations, Complaints or Lawsuits	5
 1.2. Access to Services by Persons with Limited English Proficiency (LEP)	6
Factor 1: The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population.....	6
Exhibit 1 - Population and Ability to Speak English.....	7
Exhibit 2 - Service Area and Average LEP Population, Block Group.....	8
Exhibit 3 - Service Area and LEP Population Below or Above Median Average, Block Group.....	9
Exhibit 4 - Service Area and LEP Population Dot Map, Block Group – 1 dot = 25 persons	10
Factor 2: The Frequency with Which LEP Individuals Come into Contact with SORTA Programs, Activities, and Services.....	11
Factor 3: The Importance of SORTA Programs, Activities and Services to LEP Persons	12
Factor 4: Resources Available to SORTA and Costs.....	13
Language Assistance Plan	14
Notifying Beneficiaries of Their Rights under Title VI	15
 1.3. SORTA Sub-recipients	16
 1.4. Public Participation Process	16
Solicitation of comments	17
Public meetings.....	17
Consideration of public comments	18
Responsibilities	18

PART 2 -PROGRAM SPECIFIC REQUIREMENTS	20
2.1 Demographic Data and Maps.....	20
Exhibit 5 - Hamilton County Demographics, American Community Survey, 2023	20
2.2 Service Standards.....	20
Exhibit 6 - Service Standard: Average Vehicle Load.....	21
Exhibit 7 - Service Standard: Vehicle Headways (Weekdays)	22
Exhibit 8 - Service Standard: Vehicle Headways (Weekends).....	22
Exhibit 9 - Service Standard: On-Time Performance.....	22
Exhibit 10 - Service Standard: Recommended Service Availability in SORTA's Service Area	23
Exhibit 11 - Service Standards Table	23
2.3 Service Policies.....	23
Vehicle Assignment.....	24
Exhibit 12 - Recommended Amenities by Daily Boardings	25
Exhibit 13 - Percent of Bus Stops with Bench/Shelter by Route.....	26
Exhibit 14 - Service Area and Average Minority Population by Block Group	27
Exhibit 15 - Location of Bus Shelters and Block Groups with Average Minority Population	28
Exhibit 16 - Metro Facilities and Trip Generators and Average Minority Population, Block Group...	29
Exhibit 17 - Average Low-Income Population, Block Group	30
Exhibit 18 - Average Low-Income Population and Location of Bus Stops / Shelters, Block Group	31
Exhibit 19 - Average Low-Income Population, Trip Generators and Metro Facilities, Block Group...	32
Exhibit 20 - Average Hispanic/Latino Population, Block Group	33
Exhibit 21 - Average Hispanic/Latino Population and Location of Bus Stops and Bus Shelters, Block Group	34
Exhibit 22 - Metro Facilities and Trip Generators and Average Hispanic/Latino Population, Block Group	35
2.4 Disproportionate Burden & Disparate Impact Policy	35
Major Service Change Policy	35
Adverse Effect	36
Disparate Impact (DI) Policy.....	36
Disproportionate Burden (DB) Policy.....	37
Target Populations	37
Service and/or Fare Equity Analysis.....	37

Public Involvement.....	38
2.5 Monitoring.....	38
2.6 Public Notice of Title VI Program	40
PART 3 - APPENDICES.....	41
Appendix A: Notice to Beneficiaries, Complaint Procedure and Complaint Form	42
Responsibility	43
Intake of Complaints	43
Investigation, Determination, and Recommendation	44
Communication of Findings and Complaint Resolution.....	44
Appeal	45
Exhibit A-1 Complaint Form	46
Appendix B: SORTA Public Outreach Information	49
SORTA Public Outreach Record 2019-2021	49
Appendix C: Demographic Data and Maps.....	50
Demographic Data and Maps	50
Exhibit C-1 – Metro Service Area	50
Exhibit C-2 – Metro Service Area – Minority and Low Income Populations – Above Average.....	51
Appendix D: Minority/Low Income Ridership and Population	52
Minority and Low-Income Ridership and Population	52
Exhibit D-1 LEP, Low-Income, Minority, Hispanic Percentages by Route from February, 2025.....	53
Appendix E: Quality of Service Monitoring Analysis	54
Quality of Service Monitoring Analysis	54
Exhibit E-1 -- Headways and Load Factors of Minority / Non-Minority Routes from February, 2025	55
Exhibit E-2 -- Passengers Per Hour (PPH), Passengers Per Trip (PPT), and On-Time Performance (OTP) of Minority / Non-minority Routes from February 2025	56
Exhibit E-3 – Age of Bus by Garage of Minority / Non-minority Routes, 2024	57
Appendix F: SORTA Board Demographics and Title VI Program Resolution	59
Exhibit F-1 – SORTA Board Demographics	59
Exhibit F-4 – BOARD OF TRUSTEES RESOLUTION.....	60
Appendix G: May 2022 Major Service Changes	61
Appendix H: December 2022 Major Service Changes	61

Appendix I: August 2023 Major Service Changes.....	61
Appendix J: December 2023 Major Service Changes	61
Appendix K: August 2024 Major Service Changes	61
Appendix L: Determination of Site or Location of Facilities	61
Appendix M: Subrecipient Title VI Program Oversight.....	62
ALL MAPS FOR REFERENCE	63



Introduction

Southwest Ohio Regional Transit Authority (SORTA) is the primary transit authority of the Greater Cincinnati Area and provides about 14 million annual trips traveling over 9 million miles of revenue service. SORTA's mission is to be a regional transportation system connecting people and places, driving economic growth and expanding quality of life choices.

This document serves as SORTA's Title VI Program update from the previous document submitted in April of 2022. Every three years transit agencies receiving funds through the U.S. Department of Transportation must update their program to avoid, minimize or mitigate disparate impacts on minority populations and disproportionate burdens on low-income populations. SORTA's service has had minor changes since the last Title VI Program update. SORTA's service area and demographic makeup have remained relatively constant when comparing American Community Survey (ACS) 5-year estimates from the last update.

In terms of Limited English Proficiency (LEP) requirements, no significant changes have occurred since the last update. Currently 3.64% of the service area population (5 years and older) fall under LEP. Additionally, no actions were taken by SORTA (whether service changes, placement of amenities or infrastructure improvements) that caused disproportionate burden or disparate impact on minority or low-income populations.

This document is organized as follows:

Part 1 - General Requirements

- Title VI Policy and Complaint Procedure
- Limited English Proficiency (LEP)
- SORTA Sub-recipients
- Public Participation Process

Part 2 - Public Participation Process

- Demographic Data and Maps
- Service Standards
- Service Policies
- Disproportionate Burden & Disparate Impact Policy
- Monitoring
- Public Notice of Title VI Program

Part 3 - Appendices

Policy Statement

As a recipient of funds administered by the U.S. Department of Transportation, it is the policy of SORTA to effectuate Title VI of the Civil Rights Act of 1964 as amended. The Act requires that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination in any program or activity which is federally funded.

Prohibited practices include but are not limited to:

- Denying a person any service or benefit because of race, color, or national origin;
- Providing a different service or benefit, or providing services or benefits in a different manner; and
- Locating facilities in any way that would limit or impede access to a federally funded service or benefit.

The Environmental Justice component of Title VI guarantees fair treatment for people of all races, cultures, and incomes regarding the development of environmental justice laws, regulations and policies. Under Title VI, SORTA must:

- Ensure involvement of low-income and minority groups in the decision-making process (public involvement);
- Safeguard low-income and minority groups against disproportionately high and adverse human health or environmental impacts of its programs, policies and activities; and
- Ensure low income and minority groups receive their fair share of benefits.

Part 1. General Requirements

The general requirements of a Title VI Program discuss the various policies that pertain to Title VI, specifically as they relate to protecting individuals against discrimination in the way it delivers services. This section addresses the following policies:

1. Title VI Policy and Complaint Procedure
2. Access to Services by Persons with Limited English Proficiency
3. SORTA Sub-recipient
4. Public Participation Process

1.1. Title VI Policy and Complaint Procedure

This section outlines the Title VI complaint procedures related to providing programs, services, and benefits. However, it does not deny the complainant the right to file formal complaints with any local or state organization, the Federal Transit Administration (FTA), or seek private counsel for complaints alleging discrimination, intimidation or retaliation of any kind that is prohibited by law. Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs receiving federal financial assistance. Appendix A includes SORTA's Public Non-Discrimination Notice, the webpage containing the Title VI policy and complaint form. SORTA also displays its Public Non-Discrimination Notice on-board its buses, transit centers and ticketing office.

General

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin as noted below may file a written complaint with SORTA's Diversity, Equity & Inclusion Program Administrator at 525 Vine St, Suite 500, Cincinnati, Ohio, 45202. The DEI Administrator serves as SORTA's Title VI Coordinator for purposes of administering SORTA's Title VI program. Complainants have the right to complain directly to the appropriate federal agency. Every effort will be made to obtain early resolution of complaints. The option of informal meeting(s) between the affected parties and the Title VI Coordinator may be utilized for resolutions. The Title VI Coordinator will notify SORTA's General Manager/CEO of all Title VI related complaints as well as all resolutions.

This procedure does not preclude the right of any Complainant to file complaints directly with the Federal Transportation Administration (FTA), or to seek private legal representation. The time required to process investigations will vary depending on the complexity of the issue; however, every effort will be made to ensure a speedy resolution of all complaints at the lowest possible level within 90 business days. The option of informal mediation meeting(s) between the affected parties may be utilized for resolution.

Responsibility

The Title VI Coordinator is responsible for intake of Title VI complaints and ensuring that the complaints follow procedures listed herein to ensure resolution. The Title VI Coordinator is also responsible for reporting trends, action plans, and non-compliance to the executive management team and board of directors.

Intake of Complaints

The complaint shall either be in writing or electronically submitted by the Complainant(s). In cases where the Complainant is unable or incapable of providing a written statement, a verbal complaint may be made. The Title VI Coordinator will interview the Complainant and, if necessary, assist the person in converting verbal complaints to writing. Written complaints must be signed by the Complainant or his/her representative.

The complaint shall include the following as applicable: date of the alleged act of discrimination; the date when the Complainants became aware of the alleged act of discrimination; the date on which that conduct was discontinued; and/or the latest instance of conduct. The complaint shall present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complaint.

Investigation, Determination, and Recommendation

- The Complainant will be provided with a written acknowledgement that SORTA has either accepted or rejected the complaint. A complaint must meet the following criteria for acceptance:
 - The complaint must be filed within 180 days of the alleged occurrence.
 - The allegation must involve a covered basis such as race, color or national origin.
 - The allegation must involve a SORTA service of a Federal-aid recipient, sub-recipient or contractor.
- A complaint may be dismissed for the following reasons:
 - The Complainant requests the withdrawal of the complaint.
 - The Complainant fails to respond to repeated requests for additional information needed to process the complaint.
 - The Complainant cannot be located after three attempts.

Once SORTA's Title VI Coordinator decides to accept the complaint for investigation, the Complainant will be notified in writing of such determination. The complaint will receive a case number and will then be logged in a database identifying: Complainant's name, basis, alleged harm, and the race, color and national origin of the Complainant. They will then be forwarded to outside legal counsel for further investigation and determination of substantiation.

Communication of Findings and Complaint Resolution

A determination on the disposition of the complaint will be made after acceptance and investigation is completed and will be provided to the complainant via written communication. Dispositions will be stated as follows:

In the event SORTA is in noncompliance with Title VI regulations, remedial actions will be listed. In the event SORTA is found to be in compliance, the reasons for this finding will be clearly described.

Within 90 calendar days of the acceptance of the complaint, an investigative report will be prepared. The report will include a narrative description of the incident, identification of persons interviewed, findings and recommendations for disposition. The investigative report and its findings may be reviewed by the General Manager/CEO, and in some cases by SORTA's Legal Counsel. The report will be modified as needed.

Appeal

Within the notice of determination that will be mailed to the Complainant, information regarding appeal rights of Complainant and instructions for initiating such an appeal will be provided. SORTA will reconsider the determination if new facts come to light. If Complainant is dissatisfied with the determination and/or resolution set forth by SORTA, the same complaint may be submitted to the Federal Transit Administration at:

Federal Transit Administration Office of Civil Rights
Attention: Title VI Program Coordinator East Building, 5th Floor-TCR
1200 New Jersey Ave., SE
Washington, DC 20590

A copy of the complaint and SORTA's investigation report, compliance finding and final remedial action plan, if appropriate, will be issued to FTA within 120 days of the receipt of the complaint. A summary of the complaint and its resolution will be provided during the Triennial Review.

Recordkeeping Requirement

The Title VI Coordinator will ensure that all records relating to SORTA's Title VI Complaint Process are maintained and available for compliance review audits.

Record of Title VI Investigations, Complaints or Lawsuits

No Customer Title VI complaints have been received by SORTA during the review period. In the event of a complaint, all complaints are handled by SORTA's outside legal counsel.

1.2. Access to Services by Persons with Limited English Proficiency (LEP)

A Handbook for Public Transportation Providers (Federal Transit Administration Office of Civil Rights, April 13, 2007) describes a four-factor analysis that must be completed to determine the level of assistance required to provide Limited English Proficient (LEP) persons meaningful access to public transportation services.

The four factors are:

1. The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population
2. The Frequency with Which LEP Individuals Come into Contact with SORTA Programs, Activities, and Services
3. The Importance of SORTA Programs, Activities and Services to LEP Persons
4. Resources Available to SORTA and Costs

The following sections describe the analysis followed by SORTA.

Factor 1: The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population

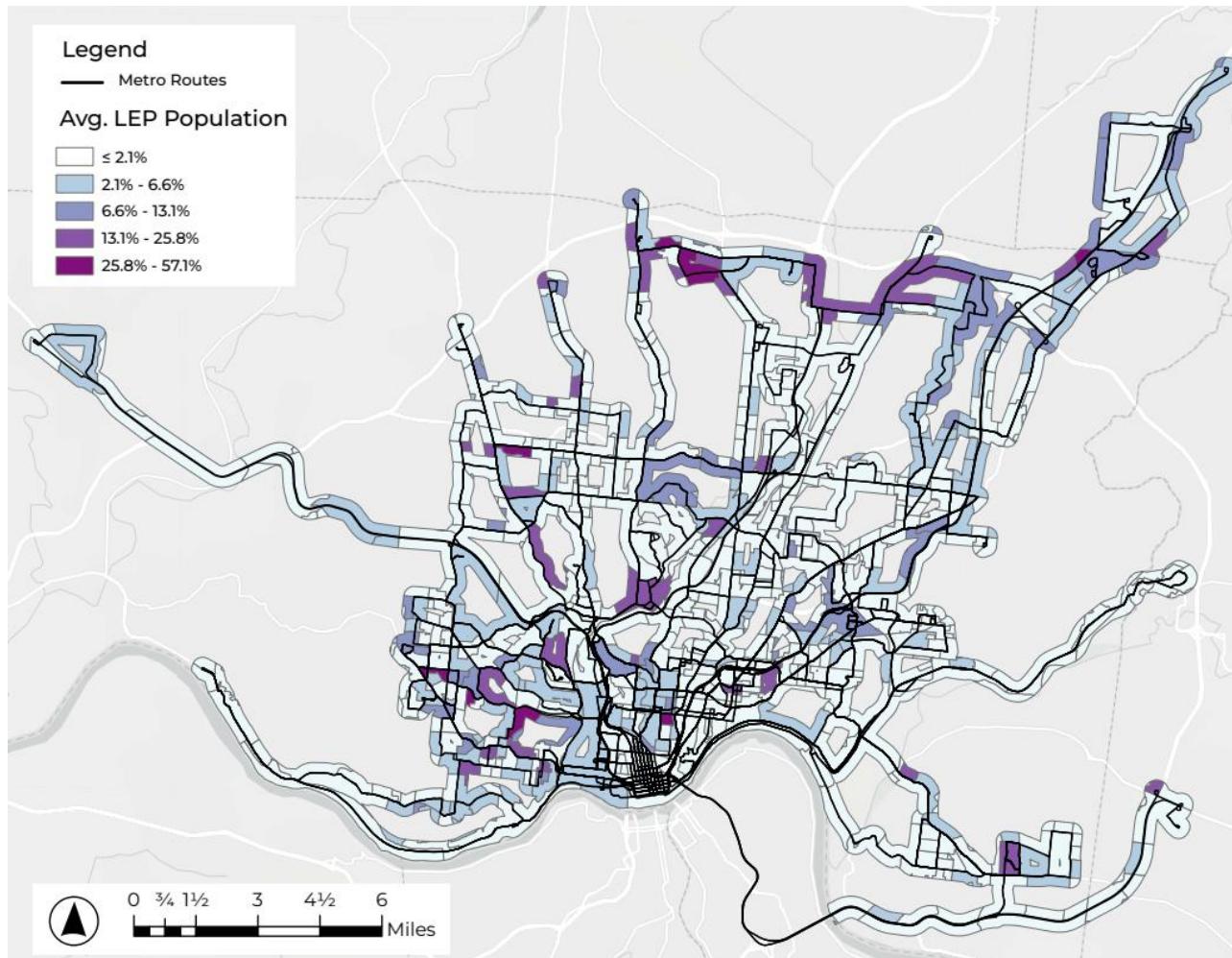
According to the most recent (2023) American Community Survey data (U.S. Census Bureau), SORTA's service area had an overall LEP population of 17,459 or 3.64% of the total population (5 years and older). The service area defined for this analysis was based on a quarter-mile buffer from all SORTA fixed-routes. Since many block groups are much larger than the size of the quarter-mile buffer, using the entire block group's population would have caused an overestimation. Thus, in order to use more accurate population figures, the staff (using GIS tools) calculated the ratio of each block group's area that is inside the service area buffer to the block group's total area and applied that ratio to the block group's population numbers. This provided an estimated population and its related attribute figures that are within the quarter-mile buffer. According to the handbook, the LEP population is comprised of persons that speak English "well," "not well," or "not at all." Several language categories from the ACS data had over 1,000 persons, but these included multiple languages aggregated together. Some of the ACS changes made since the last Title VI Program update have resulted in grouping languages into categories instead of listing them individually. The number and percentage for each language category are summarized in Exhibit 1 at the Census tract level for the SORTA quarter-mile service area.


 Exhibit 1 - Population and Ability to Speak English

2023 ACS Estimate		
Language Category	Population 5 Years and Older	Percent of Population 5 years and Older
English	436,704	90.9%
Spanish	15,240	3.2%
Other Indo-European	13,211	2.8%
Asian and Pacific Languages	8,917	1.9%
Other Languages	6,183	1.3%
Total	480,256	100.0%

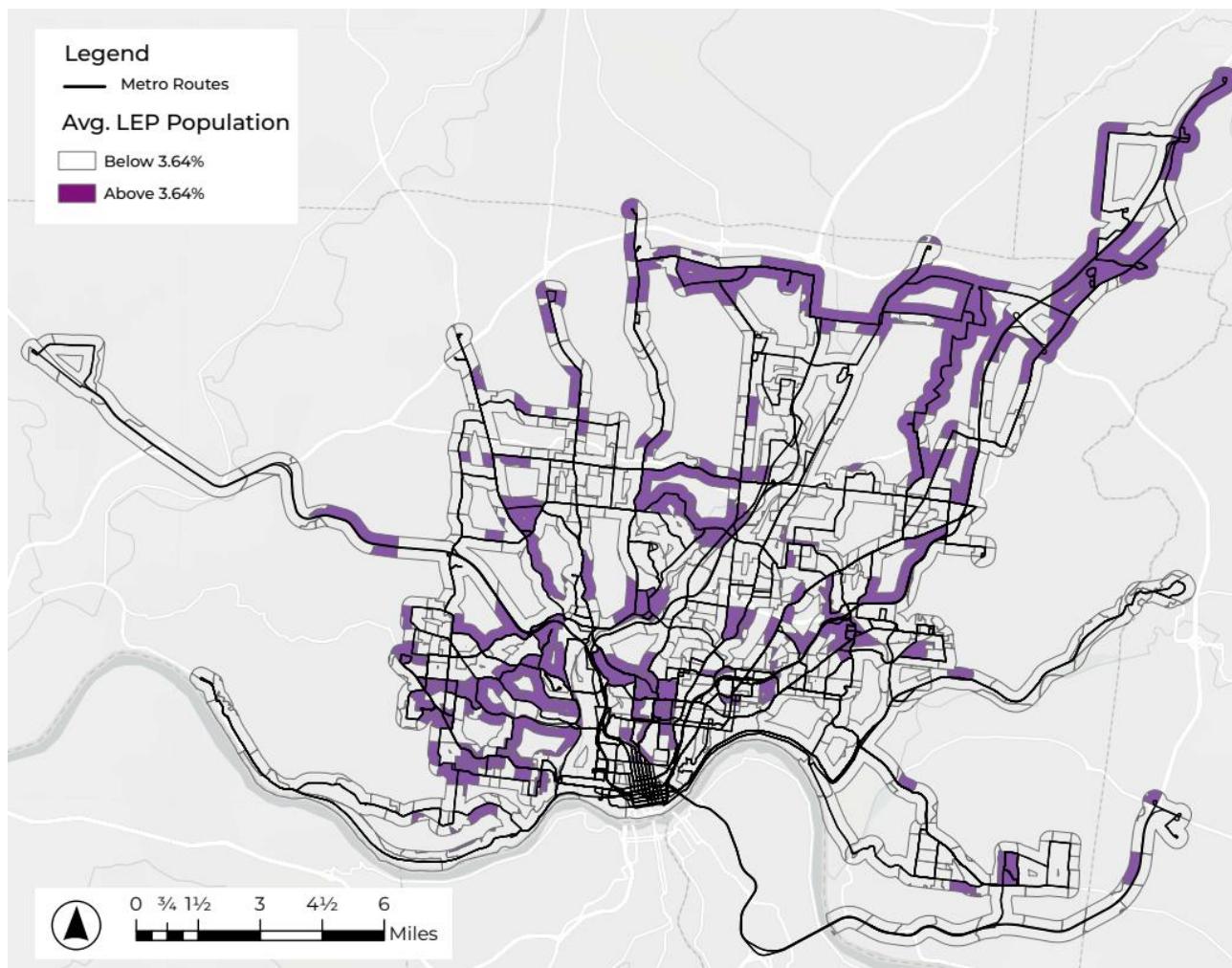
Exhibit 2 and Exhibit 3 are maps that help identify areas of concentrated LEP populations within SORTA's quarter-mile service area using ACS data. Exhibit 2 shows the percent of LEP population within service area. Exhibit 3 shows the areas where the LEP population exceeds the SORTA service area average (3.64% percent) to better identify areas of higher-than-average LEP populations. Exhibit 4 shows the population density of LEP population within a 1/4-mile service radius.

Exhibit 2 - Service Area and Average LEP Population, Block Group



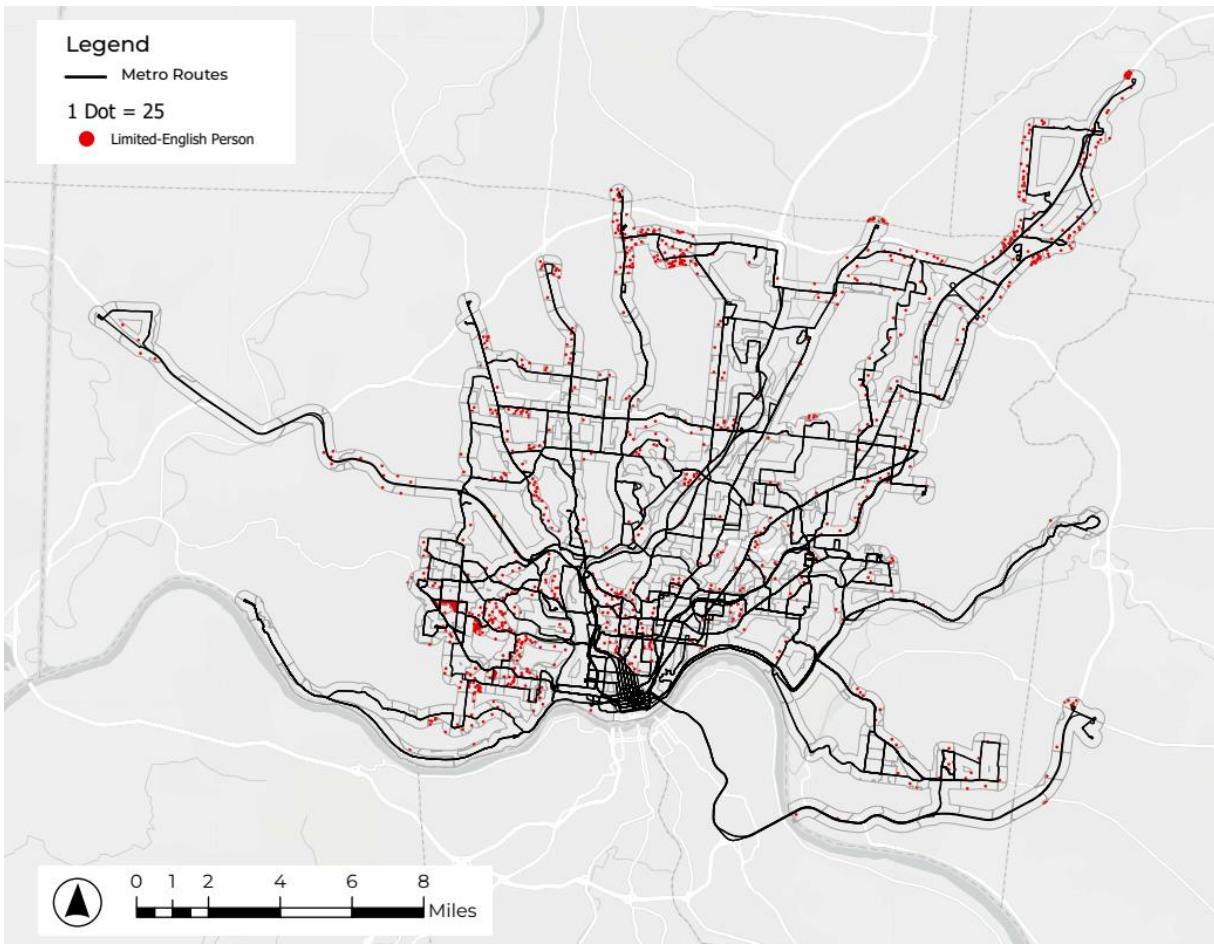
Source: 2023 American Community Survey (ACS) Estimate

Exhibit 3 - Service Area and LEP Population Below or Above Median Average, Block Group



Source: 2023 American Community Survey (ACS) Estimate

Exhibit 4 - Service Area and LEP Population Dot Map, Block Group – 1 dot = 25 persons



Source: 2023 American Community Survey (ACS) Estimate

The Limited English Proficiency population of SORTA's service area is about 3.64% of the total population and is distributed throughout the service area, primarily in the west, central, north, and northeastern portions of the service area. This population is any resident over the age of five who speaks another language besides English and has less than a "very well" knowledge of English. As SORTA's service area is the quarter-mile area surrounding each fixed-route bus line, the Exhibit 4 map shows those Block Groups within a quarter-mile of our fixed-route bus lines where the LEP population exceed 3.64% of the total population over the age of five in that block group. Several dozen languages are spoken throughout our service area, but the primary languages spoken by the LEP population are Spanish, Chinese, assorted West African languages and French.

Factor 2: The Frequency with Which LEP Individuals Come into Contact with SORTA Programs, Activities, and Services

The locations, programs, activities, and services where LEP persons most frequently come in contact with SORTA include:

- Onboard fixed-route buses.
- Government Square information booth.
- Downtown sales office.
- Customer Service information line.
- Route schedules, maps and other informational materials (Spanish info panel, Spanish fare brochure). Public meetings/legal notices (all info in Spanish, interpreter upon request);
- Newspapers.
- Website (Google Translate).
- Access (ADA Complementary Paratransit) vehicles, MetroNow! on demand vehicles, call center and training facility.
- Facebook, Instagram, X, and email; and
- SORTA's main office.

In order to understand the frequency with which LEP individuals come into contact with transit agency services, SORTA reviewed the number of surveys returned in Spanish during the onboard survey conducted in February 2024. Out of 4,164 surveys completed, only 17 were in Spanish. Additionally, SORTA reviewed the number of calls or visits made to our Customer Service Center by LEP individuals. According to the Senior Manager of Service Quality, the Customer Service office averages less than one request per month from LEP persons into SORTA's customer relations department which averages over 3,400 calls a month. During last year, the Downtown Sales Office staff did not receive any requests for information from LEP persons. Bus drivers are also in contact with passengers with limited English skills; however, they can usually communicate with them well enough to provide essential route and schedule information. SORTA has started to provide much of its public documentation in Spanish and now provides documents in Braille, when requested.

Over the past few years, SORTA has had intermittent contact with one of the key agencies that serves the largest group of LEP persons in the service area. Su Casa was founded in 1997 to focus on helping the Latino community. SORTA also utilizes Santa Maria Services as a sales outlet and outreach organization regarding service changes and communication. SORTA works with the Healing Center (that primarily serves Hispanic population for social services) and also partners with Esperanza Latino Center. Founded in 2021, Esperanza's bilingual service desk provides the local Latino/Hispanic community with a trustworthy point of contact to reach out to in order to receive assistance and get connected to needed help and resources. Cincinnati Public Schools (CPS) offers an English-Language Learners program out of its Burnet administration building for students. CPS allows every student to choose the high school they want to attend, so there are



LEP students at every school. CPS does have an Office of Second Language Acquisition which assists LEP students and families.

According to CPS, the three most common languages (other than English) spoken in the district are:

- Spanish
- Arabic
- Chinese

According to Su Casa, Santa Maria and CPS, LEP persons use SORTA on a frequent basis. The greatest need appears to be informational materials (e.g., route schedules, etc.) translated into Spanish that can be distributed to clients, at parent-teacher conferences, and in classrooms. SORTA already provides route schedules in Spanish.

Factor 3: The Importance of SORTA Programs, Activities and Services to LEP Persons

SORTA covers approximately 298 square miles with over 47 fixed-route routes as well as ADA complementary paratransit services. As a result, LEP persons may come into contact with SORTA services and personnel in a variety of ways.

One of the major areas where LEP persons might need assistance accessing SORTA service is trip planning and accessing bus service information. A limited ability to speak English could cause misidentification of the needed route or routes. Locating the proper bus stops at both ends of a trip and understanding the fare system are also important. SORTA's website currently has a Google Trip Planner which is available in Spanish and other languages. The ability to speak English is slightly less critical after daily travel patterns are established, but it could become important in the event of unexpected situations like route changes, mechanical problems, or other emergencies.

People who use the ADA complimentary paratransit service (Access) must apply for eligibility, obtain a picture identification card, and follow established procedures to make travel reservations. English skills or language assistance are required to complete these requirements, and social service agencies or friends and relatives usually are available to help existing and potential users obtain information and service.

Access personnel are more familiar with handling passengers with disabilities including some who cannot speak at all. Pick-up and drop-off locations are provided to the driver so an inability to speak and understand English should not prevent them from using Access once their eligibility is established and their reservations become routine. Mobility-on-demand services are also provided by Access personnel, which should not prevent individuals from utilizing the service.

The last area where LEP persons could possibly access information about SORTA is the public participation process. Public meetings are scheduled to collect public input if a major service



change or fare change is proposed. An ability to speak and understand English is needed to participate in these public meetings, but there are alternative ways to submit comments and suggestions including comment cards and e-mail. An interpreter is used to translate these comments upon request.

Factor 4: Resources Available to SORTA and Costs

The principal resources available to SORTA for LEP outreach are the SORTA website and the customer service phone line. SORTA considers a variety of factors when making language assistance determinations. SORTA has determined that translation services will be provided as needed for the Spanish speaking LEP population group. The Spanish speaking LEP group is identified as meeting the “Safe Harbor Threshold” per sources such as census data, surveys and community partners and will be provided translation services at no cost to the individual.

SORTA’s website translates SORTA’s route and schedule information into Spanish and 63 other languages. A Spanish version of the Title VI/EEO complaint process is also available on the SORTA web site (www.go-metro.com) in the default or English mode. Also, a fare summary brochure is available in both English and Spanish. SORTA’s fare media tickets and ticket vending machines (TVM) have both English and Spanish instructions on them. SORTA contracts with a language interpretation firm, Affordable Language Services, for translation and interpretation services in multiple languages. SORTA also provides periodic placement of transit cards on our fleet of buses

Su Casa, Santa Maria Service, and Healing Center are important resources since Spanish-speaking persons are the largest LEP population in the SORTA service area. In addition to aiding in various services like employment, housing, and legal assistance, they also help instruct individuals on how to use SORTA services and invite SORTA in for communication, outreach, and information. SORTA will continue to explore ways to work even more closely with them and other agencies to provide assistance to LEP persons.

The public also has access to mobile applications including (Transit App, Moovit, Cincy EZRide, and Cincy EZAlerts) that alert them when the next bus is arriving, provide a map of the route, and show the timetable. The applications can be set to communicate in the language that the mobile device is already set to.

Language Assistance Strategies

SORTA employs a variety of strategies to provide language assistance to LEP persons.

Based on the four-factor analysis, Spanish was identified as the primary language that SORTA needs to include in its Language Assistance Plan. It not only has over 1,000 persons in the LEP category, but it is the one language for which assistance is requested. Below are a number of actions that SORTA is currently taking to help improve access to SORTA information and services. These measures cover the five elements identified in the DOT LEP Guidance.



At a minimum, the LAP and four-factor analyses will be conducted when a Title VI Program update is due every three (3) years; if time and resources permit, the LAP will be reviewed annually when it is clear that higher concentrations of individuals are present in the SORTA service area. In addition, the LAP will be reviewed as part of any major SORTA fare and/or service change.

Language Assistance Plan

1. Identifying LEP Individuals who Need Language Assistance

SORTA is currently providing the following assistance:

- The Customer Service Department is responsible for recording requests for assistance from LEP persons. Compile contact dates, primary language, type of assistance requested and action taken by department. Our contract with Affordable Language Services provides translation services to those LEP persons calling in to our call center.
- Work with public and private agencies that assist LEP persons. Interview staff to solicit information about the locations and needs of LEP persons they serve. These include Su Casa, Santa Maria and the Healing Center.

2. Language Assistance Measures

SORTA is currently taking the following actions:

- Developing and distributing instructions to customer service and other staff members that are likely to encounter LEP persons on how to respond to oral and written requests for assistance or direct them to Affordable Language Services.
- Maintaining multilingual capabilities within SORTA's call-in information service to the extent possible.
- Utilizing the translation and interpretation service currently under contract with SORTA, on an as needed basis. Currently, when an LEP person contacts SORTA, the person is placed in a conference call with Affordable Language Services.
- Providing the SORTA route information on its website in Spanish and other languages including documents containing key information on how to access and use fixed route and paratransit services. Our Interactive Voice Response (IVR) system is also available in Spanish, which provides route and schedule information over the phone.



3. Staff Training

SORTA provides mandated training to employees who may have contact with LEP persons to ensure that individuals with limited English proficiency have equitable access to resources and transit the same as non-LEP persons. SORTA requires employees who may have contact with the public to attend LEP training when hired and receive refresher training bi-annually. The training includes the following:

- Identifying resources available for employees to assist limited English proficient persons, which includes the availability of Operators/Dispatchers/Road Supervisor to call Customer Service to receive additional information for language assistance.
- All new hire orientation includes information on LEP assistance and how staff can navigate contact with LEP persons.

4. Outreach Techniques

SORTA works with local agencies and organizations to meet the basic needs of LEP persons for oral and written information while new language assistance efforts and their costs are considered.

5. Monitoring and Updating the LEP Plan

SORTA is taking the following actions:

- Requesting continuous feedback from departments regarding contacts with the LEP population to identify changes in the frequency of contacts or language assistance requirements.
- Keeping an open channel of communication with major agencies that serve the LEP population to identify new needs and trends.
- Monitoring the relationship between existing and proposed transit services and the areas that contain LEP persons.

If important changes are detected through feedback from staff, outside agencies or from LEP persons, SORTA will reevaluate the LEP effort and the agency's financial situation to determine if the overall program needs to be modified.

Notifying Beneficiaries of Their Rights under Title VI

SORTA's website notification is provided in Appendix A. This is provided in both English and Spanish and includes the Title VI complaint form.



1.3. SORTA Sub-recipients

This section is no longer applicable. As of January 1, 2025, SORTA does not have any sub-recipients of FTA funds and does not plan nor anticipate taking on any subrecipients in the future. While in years past, SORTA previously had some degree of sub-recipients under the FTA Section 5310 Program, that is no longer the case.

1.4. Public Participation Process

It is the policy of SORTA to encourage the broadest possible public participation in major decisions that affect our service, our customers and our community. Sound policy and service delivery decisions need to take into consideration community sentiment and public opinion based on well-executed outreach efforts. The public outreach strategies described herein are designed to provide the public with effective access to information about SORTA services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to service, fare media, or fares. SORTA employs an aggressive public participation process for all major changes including but not limited to the following:

- Change in fare or fare media (except temporary or promotional changes).
- Major service change. This is defined as a change (either increase or decrease) that impacts **25 percent** or more of the service hours or miles on any route.
- Change in disparate impact, disproportionate burden, or major change in policies.

SORTA may also elect to hold public meetings or solicit public feedback on other proposed changes that affect service but do not meet the above criteria. SORTA recognizes the importance of many types of stakeholders in decision-making processes, including other units of governments, OKI (Ohio-Kentucky-Indiana Council of Governments), Community Based Organizations, major employers, passengers and the general public, including its low-income, minority and Limited English Proficiency (LEP) members.



Solicitation of comments

SORTA encourages the community to comment on proposed fare changes and major service changes in the following ways:

- At public meetings, announced through public meeting legal notices in the Cincinnati Enquirer and/or other news outlets such as Web or special interest publications as appropriate, fliers on affected bus routes, news releases/news coverage, notice on SORTA's Web site, and communications to elected officials. Community notification will occur not less than one week before the public meeting.
- Letters written to SORTA.
- Comments through SORTA's website and social media.

In addition to these, other mechanisms such as receiving comments through a telephone hotline or on-board surveys may also be used, if necessary, to gain a more complete overview of the public's opinion on the proposed change.

Public meetings

For fare changes and major service changes, a public meeting will be held with the intent of gathering broad public input about proposed changes.

The format of the meeting will vary, depending on the audience and the magnitude of the proposed changes. For example, an "open house" format that spans several hours or is available at several different venues might be preferred for broad changes in service or fares, while a facilitated public meeting might work best for changes that affect a smaller geographic area or group of customers. The exact format of each meeting will be structured to efficiently and effectively solicit comments.

SORTA's public meetings for fare changes and major service changes will meet the following criteria:

- SORTA staff will be always available to explain the proposed changes and allow the public to ask questions.
- All public comments will be captured for the record electronically using digital recording devices.
- Meeting materials will be available in ADA-compliant formats, such as Braille and Spanish language translation, on request at least five business days in advance of the meeting.
- A sign language interpreter or Spanish language interpreter will be available at the public meeting, on request at least five business days in advance of the meeting.
- SORTA will schedule the public meeting in an ADA-accessible location within the affected SORTA service area.



Consideration of public comments

All comments concerning fare changes and major service changes received through the public participation process will be reviewed and summarized by the Strategic Planning, Development and Innovation (SPDI) Department.

After consideration and consultation with other affected departments, SPDI will share the public participation results and staff's recommendation with SORTA's General Manager/CEO. The staff's recommendation will take into consideration the public comments and will itemize any changes that are being made based on public comments. All summaries of the public participation process will faithfully represent all comments and will be available, unedited, for review by the SORTA board, the General Manager/CEO and the public. The public participation results and any proposed changes will be presented to the SORTA board for action or acceptance.

Responsibilities

The primary responsibility for the public participation process for fare changes and major service changes rests with SORTA's Director of Transit Development, assisted by the External Affairs staff.

The Strategic Planning, Development, and Innovation department will:

- Develop plans and make decisions concerning proposed changes
- Convene the public participation team to assist in soliciting public comments
- Review and summarize the comments
- Make changes to the fare change or major service change proposals based on public comments, if appropriate
- Communicate the results to the General Manager/CEO for consideration and submission to the SORTA board



The External Affairs department will:

- Determine the best format for the public meeting to elicit the broadest public participation
- Maintain all documentation related to the public participation process
- Place public meeting legal notices in media outlets at least one week in advance of the public meeting and secure affidavits of their placement
- Issue a news release to all major media and special interest media at least one week in advance of the meeting
- Prepare a fact sheet to be used with the public, employees and media concerning the proposed change
- Create accessible format (Braille) or Spanish translation materials and/or retain interpreters, if requested at least five business days in advance.
- Make all arrangements for the public meeting
- Arrange for the official record of the meeting (digital electronic recording), including sign-in sheets
- Issue Web site notice of public meeting and establish mechanism to accept comments via the Web site
- Compile the public comments received through all venues, including the public record
- Issue audio records on the bus
- Use email and EZAlerts to communicate to customers who subscribe to those services

Part 2 - Program Specific Requirements

2.1 Demographic Data and Maps

Using the most up-to-date demographic and service data, maps were prepared for the 2025 - 2028 Title VI Program update. Exhibit 5 shows the racial demographics as of 2023, from the American Community Survey. The maps presented in Exhibits 14–22 illustrate the availability of fixed-route transit service to minority, Hispanic, and low-income populations within the SORTA service area. These maps show the number of bus stops and shelters located within each census block group served. Additionally, they highlight the proximity of these areas to Metro facilities and key transit generators, such as grocery stores and other essential destinations.

Exhibit 5 - Hamilton County Demographics, American Community Survey, 2023

Race	Population	Percentage
Total	827,878	100.00%
White	532,630	64.34%
Black	207,806	25.10%
Asian	22,577	2.73%
Other	13,166	1.59%
Indigenous	841	0.10%
Hawaiian	573	0.07%
Two or More	50,285	6.07%

2.2 Service Standards

The SORTA service standard program was updated and approved by the Board of Trustees in February 2025. Key Performance Indicators (KPI) have been determined for each type of service SORTA offers (Major / 24 Hour, Major / Non-24 Hour, Minor, Shuttle, Commuter, Express). Routes not meeting these standards will be reviewed for potential changes to service. Exhibit 6 shows the service standard KPIs for our different categories of service.



SORTA Key Performance Indicators

Exhibit 6 - Service Standard: Average Vehicle Load

Definition: Ratio of onboard passenger to total number of seats

Route Type	Peak	Off-Peak
Major / 24 Hour	1.2	1.2
Major / Non-24 Hour	1.2	1.2
Minor	1.2	1.0
Shuttle	1.2	1.0
Commuter	1.2	N/A
Express	1	N/A

Route Type Characteristics

Major / 24 Hour: High frequency, direct route serving multitude of major trip generators; 24-hour service

Major / Non-24 Hour: Moderate-to-high frequency route serving 3-4 major trip generators

Minor: Standard service, some peak service frequencies but typically lower frequencies, typically service 1-2 major trip generators

Shuttle: Short-distance route characterized by high frequency and longer span, slower travel speed and connecting one or more of major trip generators

Commuter: Peak-only, varying frequency with varying one-way distances on a mix of limited and local arterials traveled; stays in Hamilton County

Express: Peak-only, varying frequencies with varying one-way distances on primarily limited arterials, typically connecting to a park and ride; may serve suburban areas outside of Hamilton County.



Exhibit 7 - Service Standard: Vehicle Headways (Weekdays)

Definition: Frequency of service

Day of Week	Route Type	Peak	Off-Peak	Late Night
Weekdays	Major / 24 Hour	20"	30"	60"
	Major / Non-24 Hour	30"	45"	60"
	Minor	40"	45"	60"
	Shuttle	20"	20"	-
	Commuter	60"	-	-
	Express	60"	-	-

Exhibit 8 - Service Standard: Vehicle Headways (Weekends)

Definition: Frequency of service

Day of Week	Route Type	Throughout the day	Late Night
Weekends	Major / 24 Hour	30"	60"
	Major / Non-24 Hour	45"	60"
	Minor	45"	60"
	Shuttle	20"	-
	Commuter	-	-
	Express	-	-

Exhibit 9 - Service Standard: On-Time Performance

Definition: How often the bus is on time at a given stop

	Local Service	Express Service
On-time definition	-1 to +5.5 mins	-1 to +5.5 mins.
Standard	80%	80%



Exhibit 10 - Service Standard: Recommended Service Availability in SORTA's Service Area

Definition: Distribution of transit service within the Metro service area

Proposed Standard v. Current Conditions	All	Minority	Non-Minority	Low-Income	Non-Low-Income
Standard: Percent of Hamilton County residents living within a half mile of Metro stops or stations - targets	75%	75%	75%	75%	75%
Current Conditions: Percent of Hamilton County residents living within a half mile of Metro stops or stations	78%	86%	68%	87%	69%

Exhibit 11 - Service Standards Table

Definition: Overview of SORTA's service guidelines used to measure the performance of routes and types of service.

Key Performance Indicator	Metro Local	Metro Express
Passengers per Hour	17.8	7.3
Farebox Recovery	9.9%	4.8%
On-time Performance	80%	80%

2.3 Service Policies

SORTA has adopted systemwide policies that guard against service design and operational practices that have disparate impacts. Systemwide policies differ from service standards as they are not necessarily based on a quantitative threshold. They do, however, take Title VI requirements into consideration in that they are designed to buffer against any adverse impacts on minority and low-income riders. The primary systemwide service policies address vehicle assignment and passenger amenities.



Vehicle Assignment

Vehicle assignment will be equitable throughout the system at both the divisional and route/service levels. Vehicle and route assignments are determined based on factors such as ridership demand, vehicle age, and facility capacity. Routes and communities with the greatest need for and use of transit are generally served by newer vehicles. Fixed-route buses are housed at two maintenance facilities, with approximately 60% located at the Queensgate Facility and 40% at the Bond Hill Facility. All buses are equipped with Automated Passenger Counters (APCs). As new vehicle types and amenities are introduced to the fleet, they are assigned to minority and low-income routes at least as often as they are assigned to non-minority and non-low-income routes.

Transit Amenities

Passenger amenities include passenger shelters, benches, timetables, route maps, trash receptacles, lighting, and electronic signage. Standards for the installation of passenger amenities along bus routes are based on established criteria that include the number of passenger boardings that occur at the proposed location and existing transfer activities.

A number of amenities are considered at stops depending on the ridership and transfer activity. Below are suggested amenities for each range of stops. For the purpose of illustration, Exhibit 12 below shows the type of amenity recommended for stops based on their boarding activities. Exhibit 13 below shows the availability of bus stops and shelters by route according to minority or non-minority status.



Exhibit 12 - Recommended Amenities by Daily Boardings

Amenity	Daily Ridership (Boardings)				
	<25	25-49	50-99	100-250	>250
Bench	○	●	●	●	●
Passenger shelter	○	○	●	●	●
Timetable	○	○	○	●	●
Route map/info	○	○	○	●	●
Trash receptacle	○	○	○	●	●
Lighting	○	○	○	●	●
Electronic sign	○	○	○	○	●

- Standard
- Optional

21

SORTA has three divisions, two for fixed-route buses and one for paratransit service. The paratransit service, Access, also operates the mobility-on-demand service known as Metro Now.

The transit centers represent areas of high ridership, transfers, and in some cases layover locations. Transit Centers have amenities like real-time arrival signs, benches, shelters, lighting, and other details. Currently SORTA has five transit centers in use (Riverfront, Government Square, Northside, Glenway, and Oakley) with two additional (Walnut Hills, and North College Hill) being planned and/or programmed. All 3,800+ bus stops and amenities based on thresholds identified are shown in Exhibit 13 through Exhibit 22. To ensure that amenities are being distributed in an equitable manner, SORTA has prioritized some existing bus stop locations with similar ridership for infrastructure investment that might otherwise have been further down the prioritization list. In addition, SORTA, through the administration of its Metro Transit Infrastructure Fund (TIF), has incentivized applicants that will invest in better bus stop amenities as part of their grant proposals to improve streets, roads, and bridges.

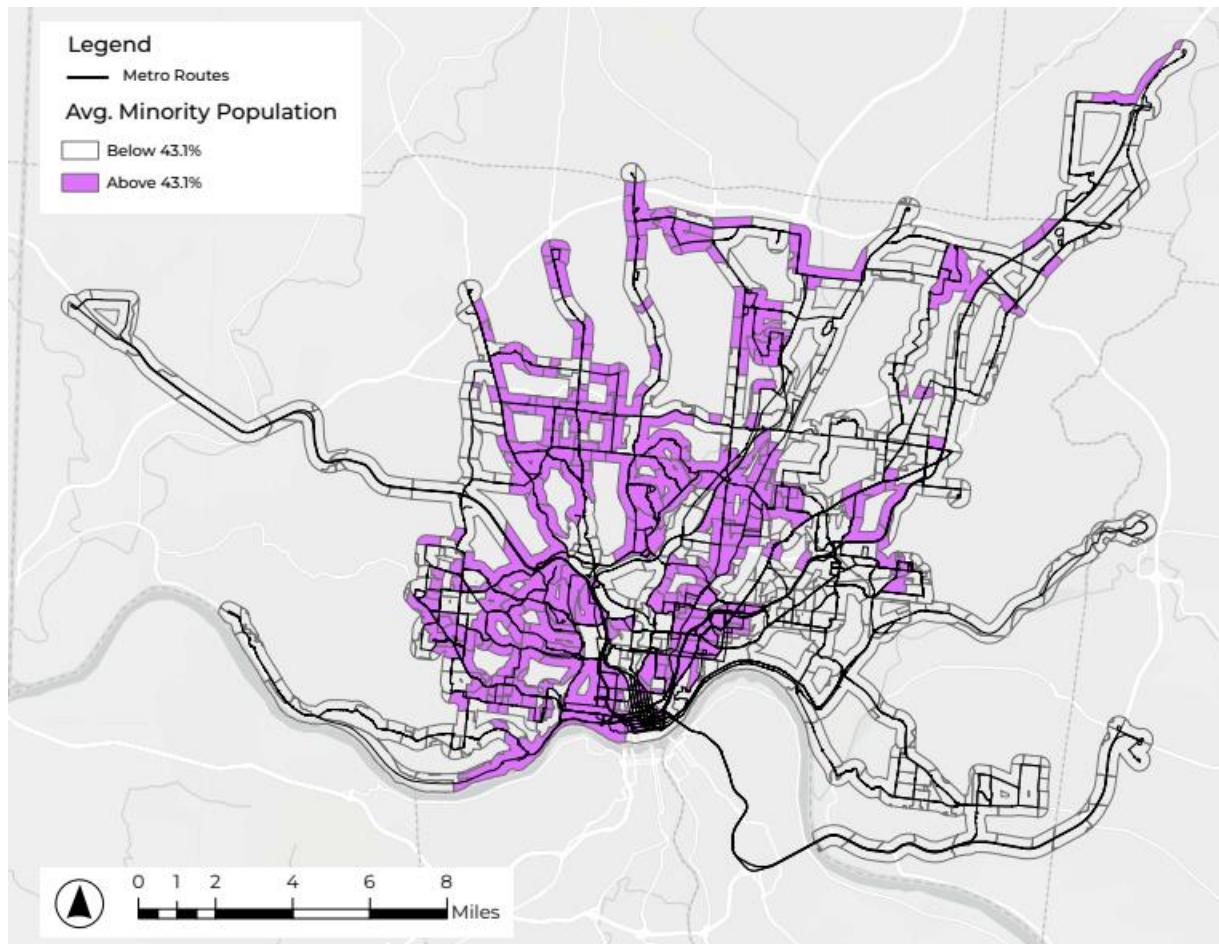


Exhibit 13 - Percent of Bus Stops with Bench/Shelter by Route

Route	Type of Route	Percentage of Benches	Percentage of Shelters
1	Minority	22%	16%
2	Minority	19%	9%
3	Minority	19%	11%
4	Minority	24%	13%
5	Non-Minority	13%	6%
6	Minority	26%	13%
11	Non-Minority	27%	11%
12	Minority	28%	16%
16	Minority	12%	6%
17	Minority	23%	11%
19	Minority	26%	10%
20	Minority	19%	10%
21	Minority	26%	17%
22	Minority	28%	15%
23	Minority	30%	22%
24	Non-Minority	24%	9%
25	Non-Minority	16%	9%
27	Minority	19%	13%
28	Non-Minority	20%	6%
29	Non-Minority	27%	10%
30	Non-Minority	19%	6%
31	Minority	31%	17%
32	Minority	22%	17%
33	Minority	35%	24%
36	Minority	25%	15%
37	Minority	14%	8%
38	Minority	28%	21%
40	Minority	30%	15%
41	Minority	14%	3%
43	Minority	30%	13%
46	Minority	20%	14%
49	Minority	18%	11%
50	Minority	13%	11%
51	Minority	26%	15%
52	Non-Minority	27%	18%
61	Minority	8%	1%
64	Minority	15%	10%
65	Minority	16%	5%
67	Minority	12%	8%
71	Non-Minority	9%	7%
72	Minority	33%	33%
74	Minority	16%	5%
75	Non-Minority	28%	22%
77	Non-Minority	16%	12%
78	Minority	21%	11%
81	Non-Minority	18%	9%
82	Non-Minority	29%	13%
90	Minority	60%	44%



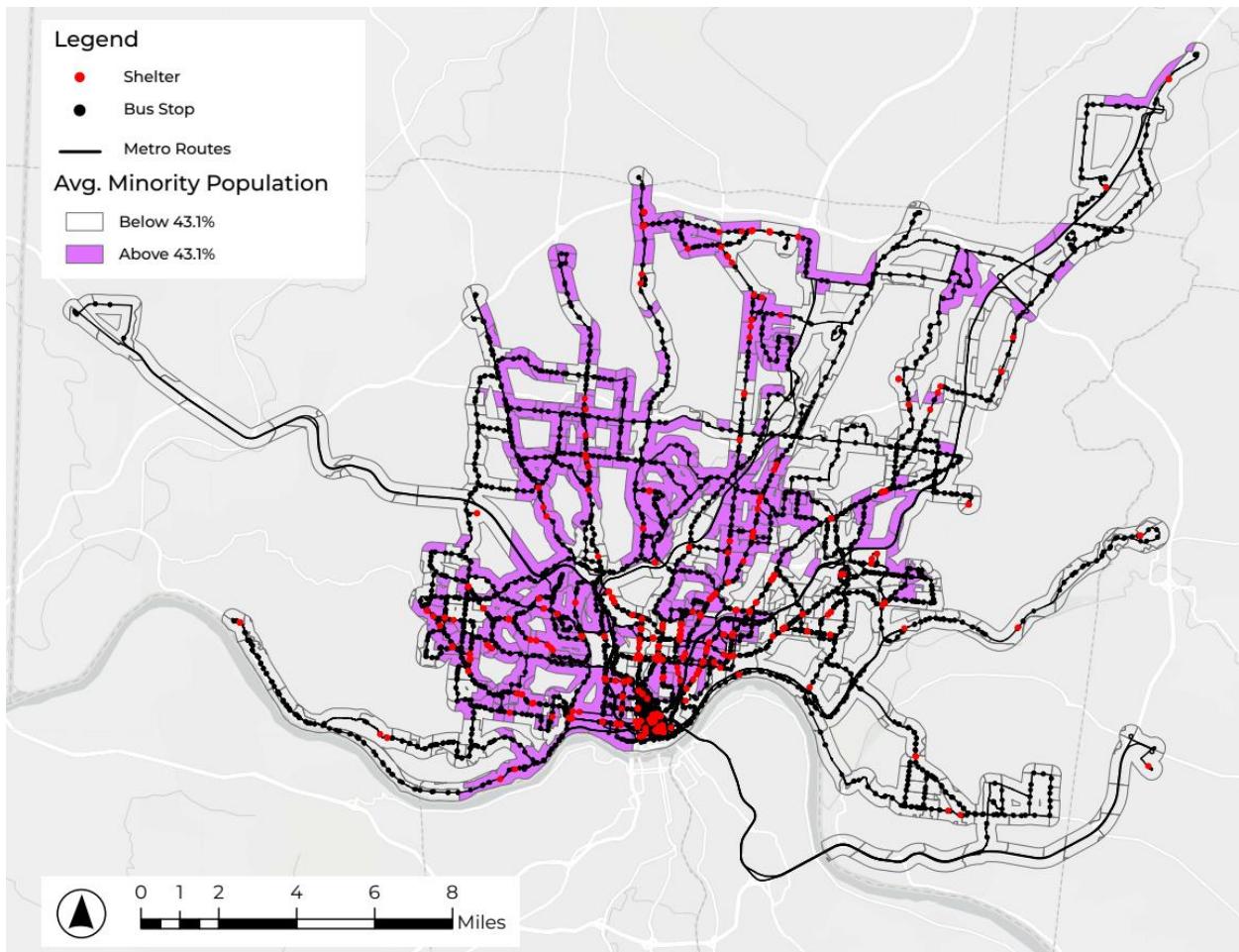
Exhibit 14 - Service Area and Average Minority Population by Block Group



Source: 2023 American Community Survey (ACS) Estimate



Exhibit 15 - Location of Bus Shelters and Block Groups with Average Minority Population



Source: 2023 American Community Survey (ACS) Estimate



Exhibit 16 - Metro Facilities and Trip Generators and Average Minority Population, Block Group

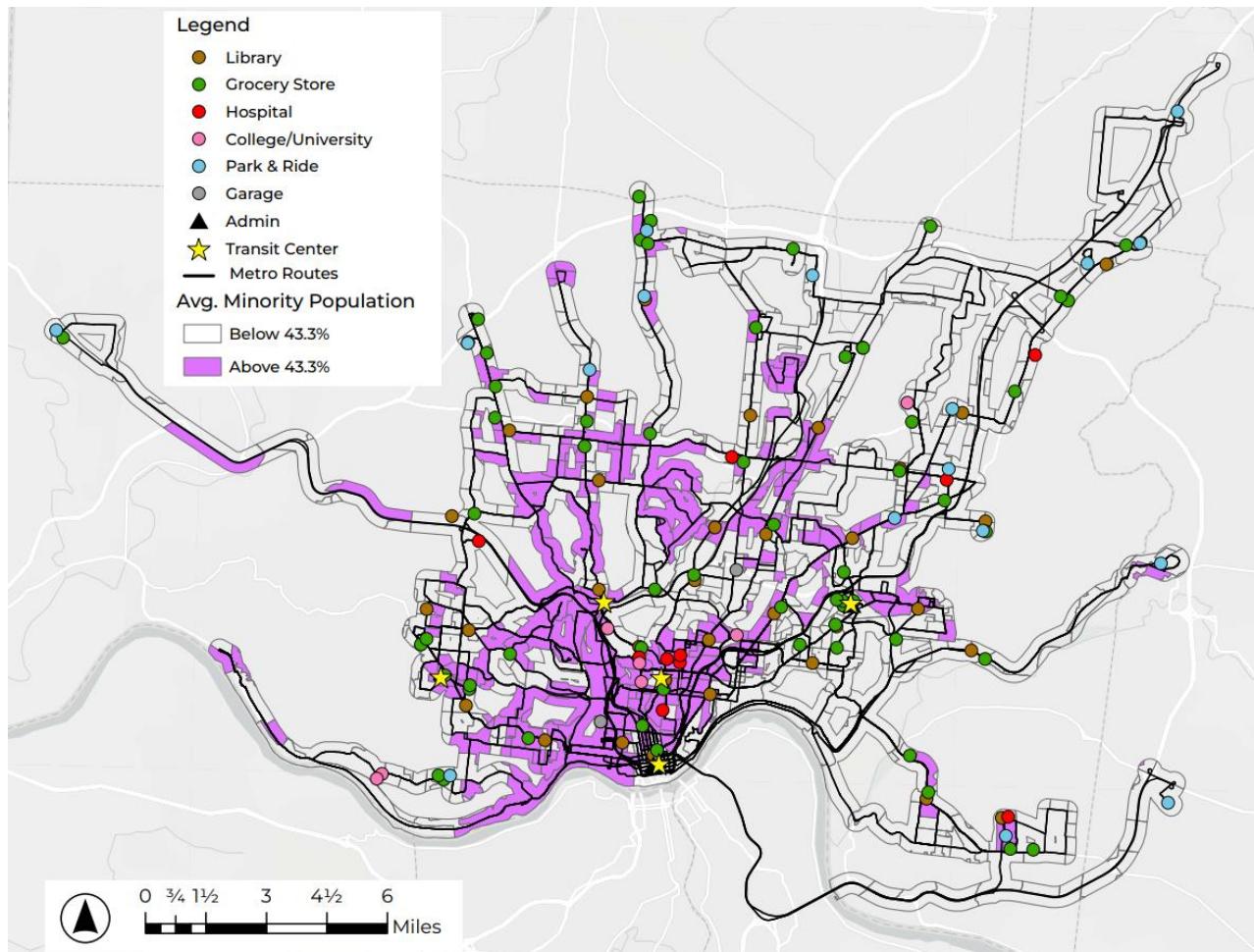
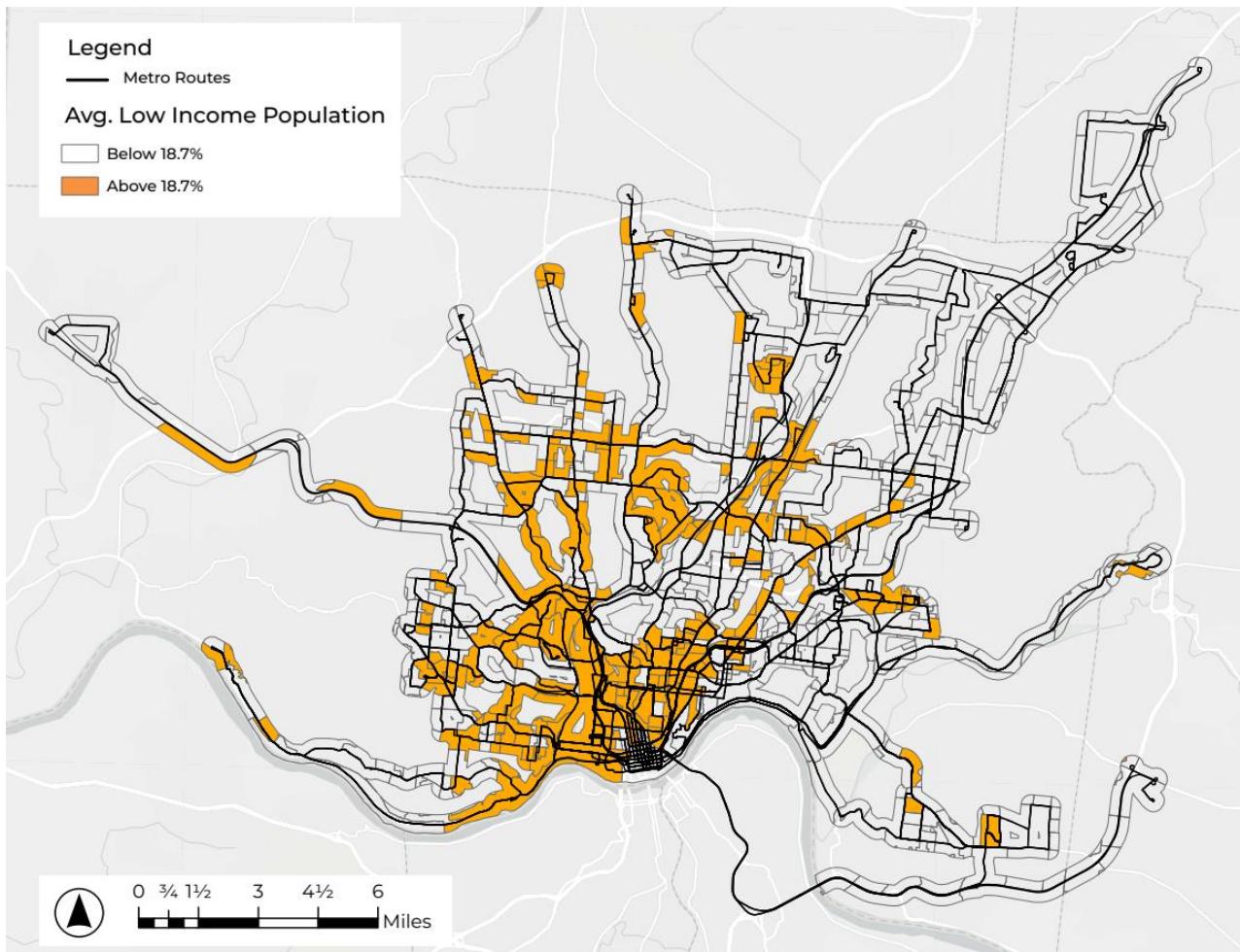


Exhibit 17 - Average Low-Income Population, Block Group

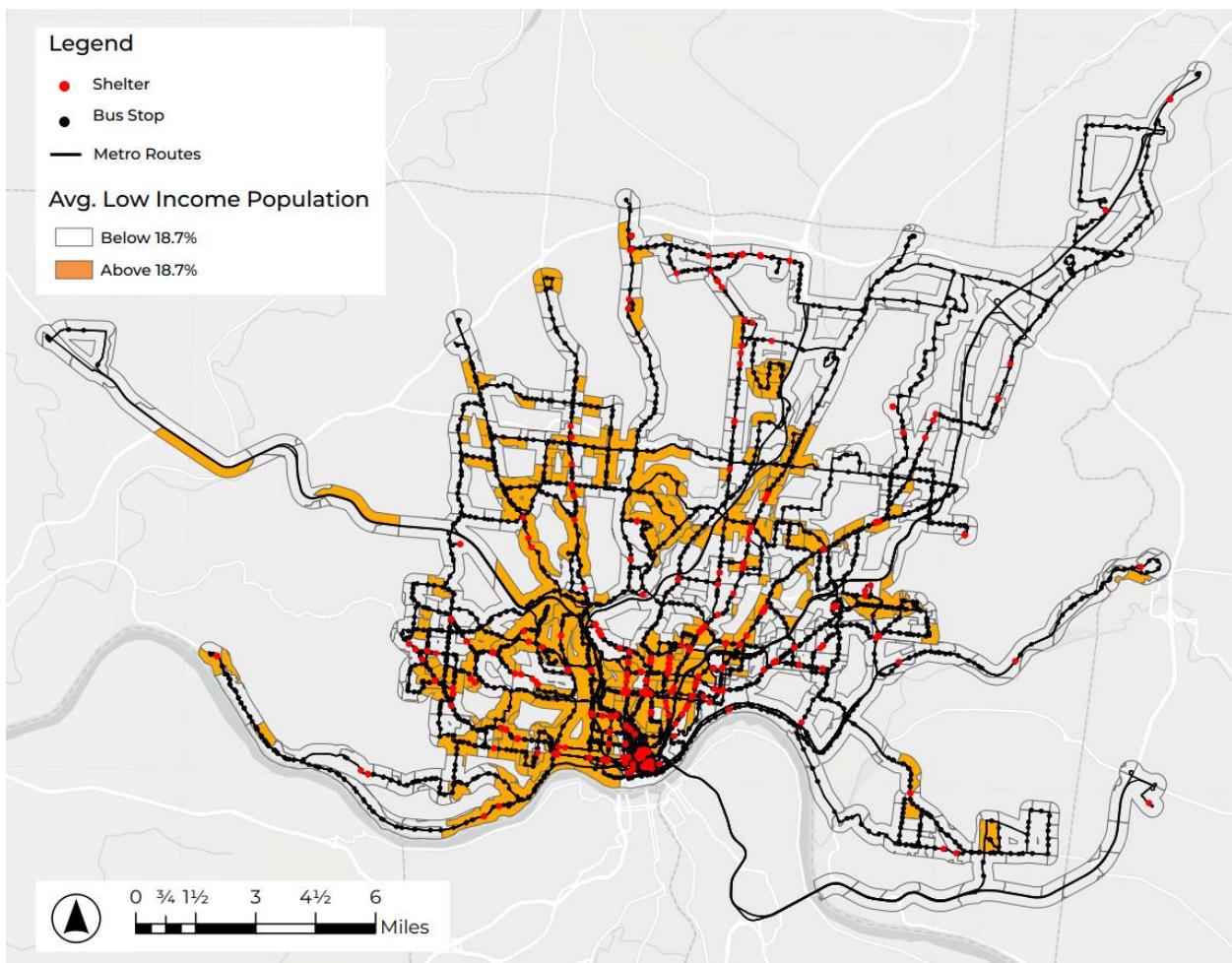


Source: 2023 American Community Survey (ACS) Estimate



SORTA 2025-2028 Title VI Update

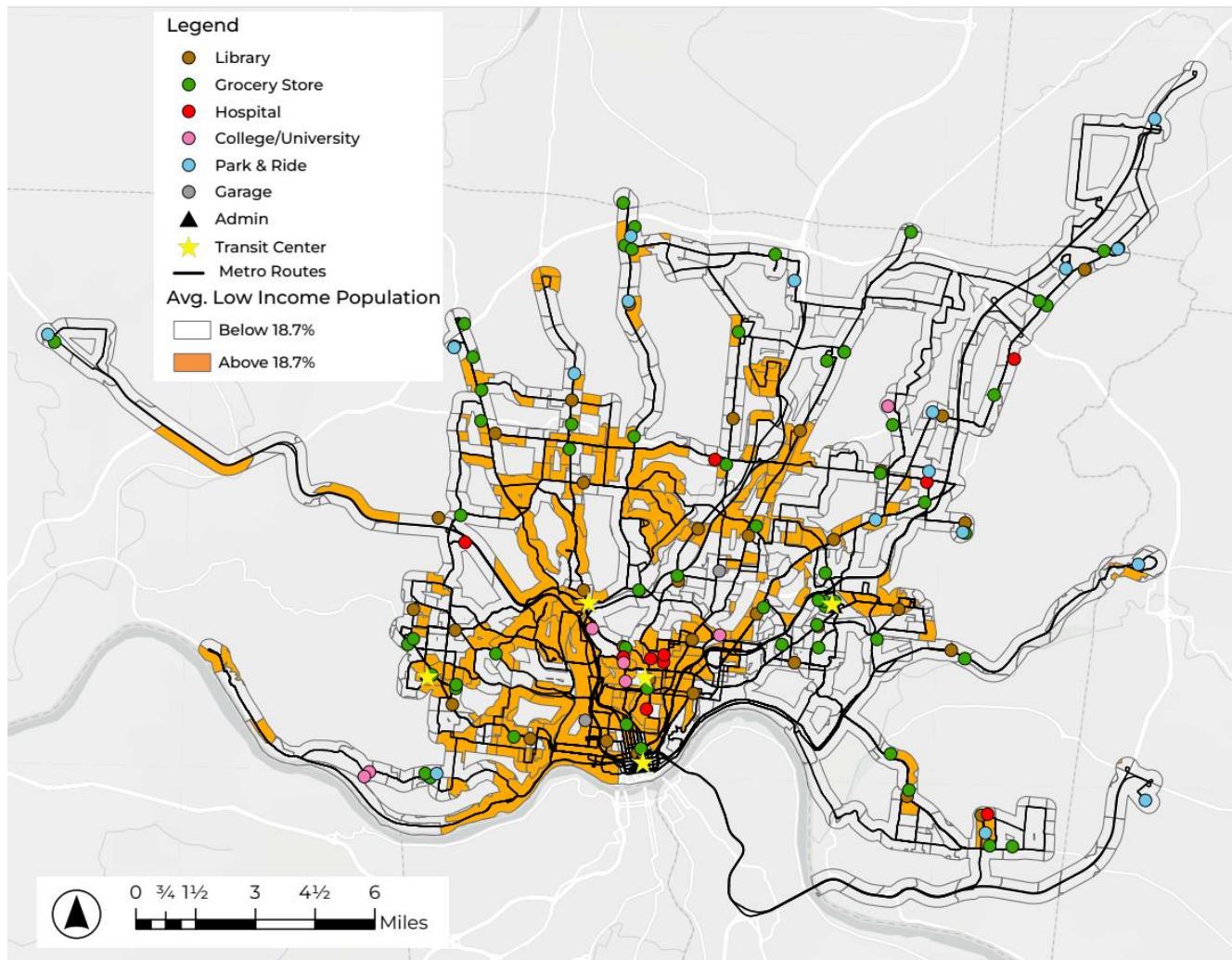
Exhibit 18 - Average Low-Income Population and Location of Bus Stops / Shelters, Block Group



Source: 2023 American Community Survey (ACS) Estimate



Exhibit 19 - Average Low-Income Population, Trip Generators and Metro Facilities, Block Group

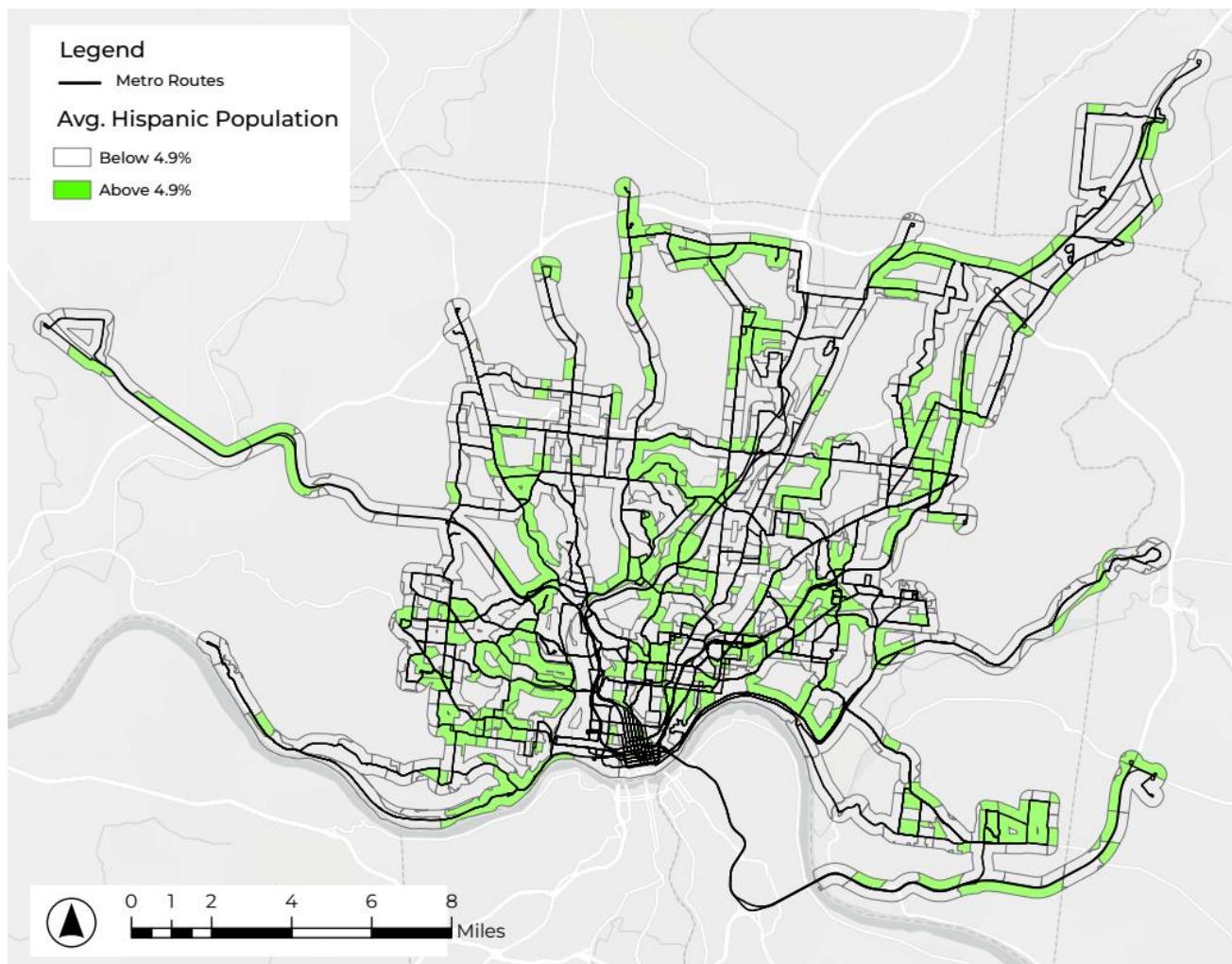


Source: 2023 American Community Survey (ACS) Estimate



SORTA 2025-2028 Title VI Update

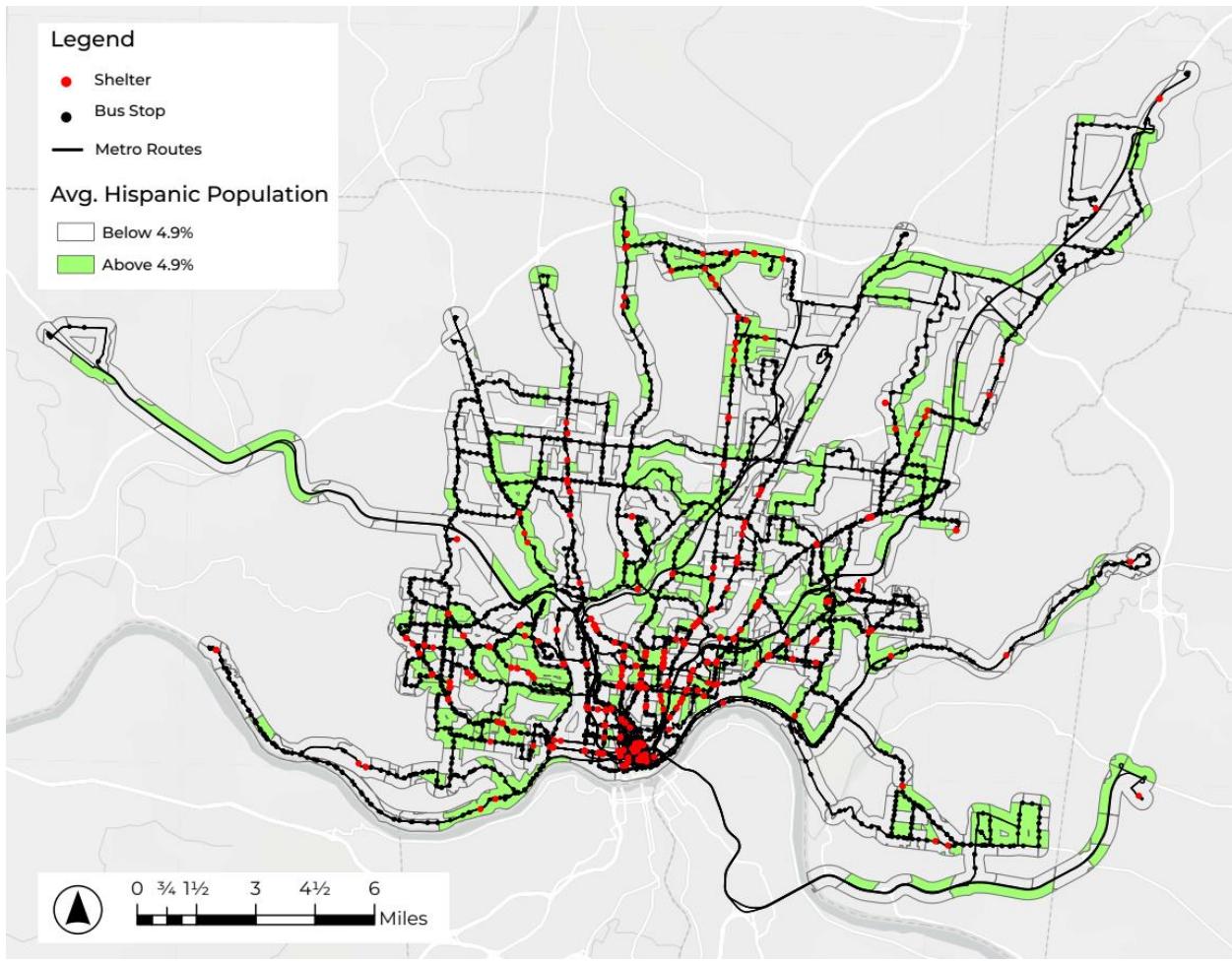
Exhibit 20 - Average Hispanic/Latino Population, Block Group



Source: 2023 American Community Survey (ACS) Estimate



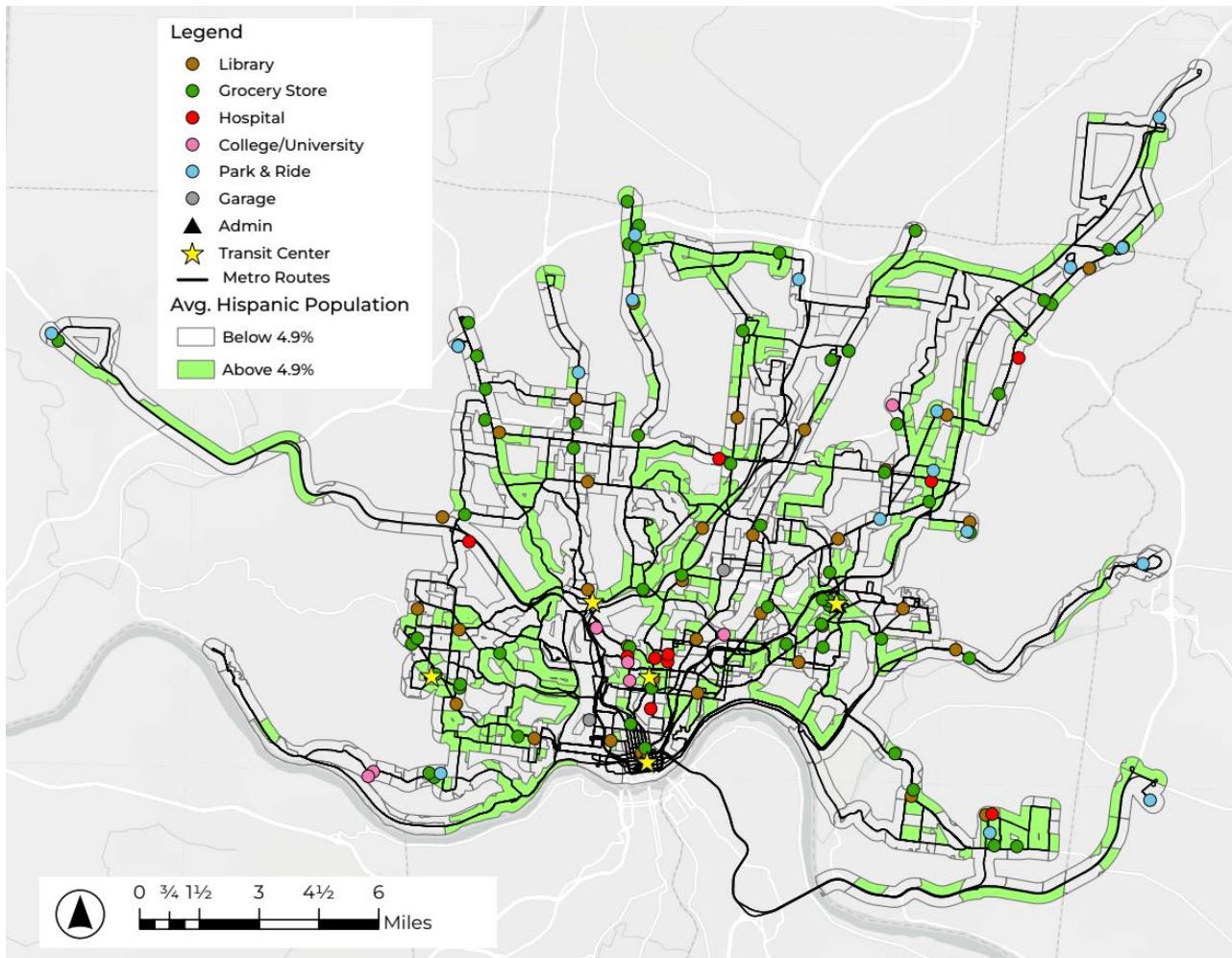
Exhibit 21 - Average Hispanic/Latino Population and Location of Bus Stops and Bus Shelters, Block Group



Source: 2023 American Community Survey (ACS) Estimate



Exhibit 22 - Metro Facilities and Trip Generators and Average Hispanic/Latino Population, Block Group



Source: 2023 American Community Survey (ACS) Estimate

2.4 Disproportionate Burden & Disparate Impact Policy

SORTA's major service change, disparate impact, and disproportionate burden policies appear in the following subsections. These policies are remaining unchanged since the previous update.

SORTA's policies appear in the following subsections.

Major Service Change Policy

A major service change is defined as any change in service on any individual route that would add or eliminate more than twenty-five percent of the route revenue miles or route revenue hours. In addition, adding a new route or reducing or eliminating service in jurisdictions where minority



and/or low-income populations exceed twenty-five percentage points of the transit system service area average will also be considered major service changes. All major service changes will be subject to an equity analysis which includes an analysis of adverse effects on minority and low-income populations.

The following types of services and modifications are not classified as major changes and shall not require a Service Equity Analysis:

- Temporary service changes required by construction or maintenance projects
- Special event or seasonal services
- Trial (pilot) services provided with or without external funding assistance
- Special service operated during emergencies

Adverse Effect

An adverse effect is defined as a reduction in service which includes but is not limited to:

- Reducing the span of service (hours of operation)
- Decreasing the frequency between buses
- Eliminating route segments
- Changing route alignment
- Eliminating a route(s)

Disparate Impact (DI) Policy

The purpose of this policy is to establish a threshold which identifies when adverse effects of service changes are borne disproportionately by minority populations as identified in the Major Service Change Policy, or any fare change have a greater impact on the **minority population**. The minority population includes everyone that self-reports their race as any category other than white in the U.S. Census.

A disparate impact occurs when the minority population is adversely affected by a fare or service change that is plus or minus twenty-five percentage points more than the average minority population of SORTA's service area.

Disparate impacts on routes with span of service and/or frequency changes will be determined by analyzing all routes with such changes together. Disparate impacts on routes with segment elimination, re-routing, or route elimination will be determined on a route-by-route basis. If SORTA discovers a potential disparate impact, the agency will explore ways to avoid, minimize or mitigate the impact and then reanalyze the modified service plan to determine if the impacts were removed. If SORTA decides not to alter the proposed changes, the agency may implement the service or fare change if there is substantial legitimate justification for the change and the agency can show that there are no alternatives that would have less of an impact on the minority population and would still accomplish the agency's legitimate program goals.



Disproportionate Burden (DB) Policy

The purpose of this policy is to establish a threshold which identifies when the effects of a major service change, as identified in the Major Service Change Policy, or any fare change have a disproportionate impact on the **low-income population**. The low-income population includes all people that are reported as being under the federal household poverty limit as defined by the U.S. Department of Health and Human Services.

A disproportionate burden occurs when the low-income population adversely affected by a fare or service change is twenty-five percentage points more than the average low-income population of SORTA's service area. Disproportionate burden on routes with either span of service changes and/or frequency changes will be determined by analyzing all routes with such changes together. Disproportionate burden on routes with segment elimination, re-routing, or route elimination will be determined on a route-by-route basis. If SORTA discovers a potential disproportionate burden, the agency will explore ways to avoid, minimize or mitigate impacts and then reanalyze the modified service plan to determine whether the impacts were removed. If SORTA decides not to alter the proposed changes, the agency may implement the service or fare change if there is substantial legitimate justification for the change and the agency can show that there are no alternatives that would have less of an impact on low-income population and would still accomplish the agency's legitimate program goals.

Target Populations

Certain population groups will be the subject of a special analysis whenever major service or fare changes are being considered. These are required under Title VI of the Civil Rights Act of 1964 and Environmental Justice regulations of the FTA. Title VI prohibits discrimination on the basis of race, creed or national origin. Environmental Justice regulations require public transit agencies (and other federally funded organizations) to identify and address disproportionately high impacts of fare or service changes on low-income populations. This Fare and Service Change Policy, therefore, incorporates Title VI and Environmental Justice requirements.

Service and/or Fare Equity Analysis

When a major service change or any fare change is contemplated, SORTA will conduct a Service and/or Fare Equity Analysis, as required by Title VI. This analysis involves a determination of whether the proposed action results in a disparate impact on minority populations and/or a disproportionate burden on low-income populations, which will be based on a quantifiable factor(s). A Service and/or Fare Equity Analysis will include all items listed:

- Description of the SORTA Service and Fare Change Policy
- Description of how the public was engaged in the development of the Service and Fare Change Policy
- Description of the datasets used in the Service and/or Fare Equity Analysis, including maps
- Analysis of the effects of the proposed service and/or fare changes on minority and low-

- income populations
- Assess alternatives to the proposed service and/or fare changes

Disparate impacts are acceptable under Title VI regulations if it can be shown that the proposed action is in the public interest or alternatives to the action would have more severe impacts on minority and/or low-income populations.

Service and fare equity analyses will adhere to the following three-step process:

1. Determine whether there are any minority and/or low-income populations potentially impacted by the proposed service or fare change
2. Determine the potential effects of the activity on the minority and/or low-income populations
3. Determine whether any disproportionately high effects of the proposed service or fare change on minority and/or low-income populations can be avoided, minimized or mitigate

Public Involvement

When a change is made to any of the three policies, SORTA follows the public participation process outlined in Section 1.4.

2.5 Monitoring

In order to comply with the requirement in Chapter 4 Section 6 of FTA C4702.1B, SORTA adopted quantitative systemwide service standards to guard against discriminatory service design and operation decisions. SORTA frequently evaluates its service based on the following information:

- **Passengers per Revenue hour** – This is expressed in terms of the number of passenger boardings per revenue hour for each individual route. When passenger productivity consistently exceeds 125 percent of the system average, SORTA should consider adding additional vehicle trips and improving headways. This metric is used as the passenger productivity measure for SORTA local routes.
- **Passengers per vehicle trip** – The number of passengers per trips is an indicator of how productive revenue service is by route. Similar to passengers per revenue hour, when a route consistently exceeds 125 percent of the system average, SORTA should consider improving service. This metric is used as the passenger productivity measure for SORTA express routes.
- **Average passenger loads** – The ratio of passengers carried versus the total seated passenger capacity of a given vehicle. If a trip, block, or route averages more than the service standard, SORTA should consider adding additional vehicle trips and improving headways.



- **Headway separation** - A measure that describes the time interval between vehicles operating in the same direction on a route.
- **On-time performance** – a bus is “on-time” within a window of one minute ahead of schedule to five and a half minutes behind schedule. The on-time performance is the percentage of time that a bus arrives at each time point where it is within the aforementioned window.
- **Distribution of transit amenities** – Installation of transit amenities are based on the number of passenger boardings with less weight given to whether the stop services a major destination such as a hospital, senior housing, education institution, or other. Anytime SORTA plans route improvements or gets a request from residents concerning transit amenities, staff analyzes the boardings at affected locations to determine whether additional amenities are needed.

Data is continuously collected, processed and used to assess route productivity. This assessment is actively used to evaluate the productivity of individual routes. A report will be provided to the SORTA Board of Directors at least every three years on the results of the Title VI monitoring activities. It will include the following:

- Using the designation of routes as either predominantly minority or non-minority routes, SORTA will evaluate and compare the performance of these routes to each other and to the service standards and service policies.
- For cases in which observed service for minority routes fails to meet the standard or policy, SORTA will analyze why the discrepancies exist, and take steps to reduce the potential effects.
- Any service reductions to minority routes that do not meet the 25-percentage point rule will be noted, and a determination will be made if there is a compelling reason for the service reduction and if it is in the public interest to do so.
- SORTA will evaluate its transit amenities policy to ensure amenities are being distributed throughout the transit system in an equitable manner

Exhibit E-1 compares the quality of service of minority and non-minority routes. The data is broken down into Weekday peak and off-peak, Saturday and Sunday service for the maximum passenger load and headway separation calculations. The routes classified as minority routes will also be subject to a disparate impact analysis or a disproportionate burden analysis if service changes are planned.

The analysis performed in appendix F indicates there are no significant disparities between the service standards in the routes where the number of low-income and minority residents



is higher than the overall service area average.

2.6 Public Notice of Title VI Program

SORTA provides the Title VI Beneficiary Notice at SORTA public facilities, sales offices, transit centers as well as on SORTA buses in order to communicate SORTA's commitment to non-discriminatory actions.



PART 3. APPENDICES



Appendix A: Notice to Beneficiaries, Complaint Procedure and Complaint Form

The following document can be found at SORTA's public facilities, sales offices, and transit centers, as well as on SORTA buses in order to communicate SORTA's commitment to non-discriminatory actions. The public non-discrimination notice and complaint form can also be found at SORTA's website

<p style="text-align: center;">Notifying the Public of Rights Under Title VI</p> <p style="text-align: center;"></p> <p>Metro operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Metro.</p> <ul style="list-style-type: none">For more information on Metro's civil rights program and the procedures to file a complaint, contact 513-632-9207 or visit the Metro office located at 525 Vine St., Suite 500, Cincinnati, OH 45202.For more information visit: www.go-metro.com/accessibility/title-vi/A compliant may be filed directly with the Federal Transit Administration, Office of Civil Rights, Attention: Civil Rights Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave. SE, Washington, DC 20590.If more information is needed in another language, contact 513-632-9207. <hr/> <p style="text-align: center;">Aviso al público de los derechos según el Título VI</p> <p>Metro opera sus programas y servicios sin importar la raza, el color y la nacionalidad, según el Título VI de la Ley de Derechos Civiles. Cualquier persona que crea que ha sido tratada injustamente debido a cualquier práctica discriminatoria ilegal según el Título VI, puede presentar una queja ante Metro.</p> <ul style="list-style-type: none">Para obtener más información sobre el Programa de Derechos Civiles de Metro y los procedimientos para presentar una queja, llame al 513-632-9207 o visite la oficina de Metro ubicada en 525 Vine St., Piso 5, Cincinnati, OH 45202.Para obtener más información, visite: www.go-metro.com/accessibility/title-vi/Se puede presentar una queja directamente ante la Oficina de Derechos Civiles de la Administración Federal de Tránsito, dirigiendo la queja a: Civil Rights Coordinator (Coordinador de Derechos Civiles), East Building, 5th Floor-TCR, 1200 New Jersey Ave. SE, Washington, DC 20590.Si necesita más información en otro idioma, llame al 513-632-9207.
--



Title VI Complaint Procedure

Purpose

This procedure covers all formal complaints and informal complaints filed by an individual or group of individuals under Title VI of the Civil Rights Act of 1964 and Civil Rights Restoration Act of 1987. Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin as noted below may file a written complaint with the SORTA's Title VI Coordinator at 525 Vine St, Suite 500, Cincinnati, Ohio, 45202. Complainants have the right to complain directly to the appropriate federal agency. Every effort will be made to obtain early resolution of complaints. The option of informal meeting(s) between the affected parties and the Title VI Coordinator may be utilized for resolutions. The Title VI Coordinator will notify SORTA's General Manager/CEO of all Title VI related complaints as well as all resolutions.

This procedure does not preclude the right of any Complainant to file complaints directly with the Federal Transportation Administration (FTA), or to seek private legal representation. The time required to process investigations will vary depending on the complexity of the issue; however, every effort will be made to ensure a speedy resolution of all complaints at the lowest possible level within 90 business days. The option of informal mediation meeting(s) between the affected parties may be utilized for resolution.

Responsibility

The Title VI Coordinator is responsible for intake of Title VI complaints and ensuring that the complaints follow procedures listed herein to ensure resolution. The Title VI Coordinator is also responsible for reporting trends, action plans, and non-compliance to the executive management team and board of directors.

Intake of Complaints

The complaint shall either be in writing or electronically submitted by the Complainant(s). In cases where the Complainant is unable or incapable of providing a written statement, a verbal complaint may be made. The Title VI Coordinator will interview the Complainant and, if necessary, assist the person in converting verbal complaints to writing. Written complaints must be signed by the Complainant or his/her representative.

The complaint shall include the following as applicable:

- The date of the alleged act of discrimination;
- The date when the Complainants became aware of the alleged act of discrimination;
- The date on which that conduct was discontinued; and/or the latest instance of conduct.
- The complaint shall present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complaint.



Investigation, Determination, and Recommendation

The Complainant will be provided with a written acknowledgement that SORTA has either accepted or rejected the complaint. A complaint must meet the following criteria for acceptance:

- The complaint must be filed within 180 days of the alleged occurrence.
- The allegation must involve a covered basis such as race, color or national origin.
- The allegation must involve a SORTA service of a Federal-aid recipient, sub-recipient or contractor.

A complaint may be dismissed for the following reasons:

- The Complainant requests the withdrawal of the complaint.
- The Complainant fails to respond to repeated requests for additional information needed to process the complaint.

The Complainant cannot be located after three attempts. Once SORTA's Title VI Coordinator decides to accept the complaint for investigation, the Complainant will be notified in writing of such determination. The complaint will receive a case number and will then be logged in a database identifying:

- Complainant's name
- Basis of alleged harm
- Complainant's race
- Complainant's color
- Complainant's national origin

They will then be forwarded to outside legal counsel for further investigation and determination of substantiation.

Communication of Findings and Complaint Resolution

A determination on the disposition of the complaint will be made after acceptance and investigation is completed and will be provided to the complainant via written communication. Dispositions will be stated as follows:

- In the event SORTA is in noncompliance with Title VI regulations, remedial actions will be listed.
- In the event SORTA is found to be in compliance, the reasons for this finding will be clearly described.

Within 90 calendar days of the acceptance of the complaint, an investigative report will be prepared. The report will include a narrative description of the incident, identification of persons interviewed, findings and recommendations for disposition. The investigative report and its findings may be reviewed by the General Manager/CEO, and in some cases by SORTA's Legal Counsel. The report will be modified as needed.

Appeal

Within the notice of determination that will be mailed to the Complainant, information regarding appeal rights of Complainant and instructions for initiating such an appeal will be provided. SORTA will reconsider the determination if new facts come to light.

If Complainant is dissatisfied with the determination and/or resolution set forth by SORTA, the same complaint may be submitted to the Federal Transit Administration at:

Federal Transit Administration Office of Civil Rights
Attention: Title VI Program Coordinator East Building, 5th Floor-TCR
1200 New Jersey Ave., SE
Washington, DC 20590

Exhibit A-1 Complaint Form

Civil Rights - Title VI Complaint



Title VI of the Civil Rights Act of 1964 states "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."

The American with Disabilities Act (ADA) gives civil rights protections to individuals with disabilities similar to the Civil Rights Act of 1964. The ADA is a clear national mandate for the elimination of discrimination against individuals with disabilities.

The Environmental Justice component of Title VI guarantees fair treatment for all people. SORTA is required to identify and address, as appropriate, disproportionately high and adverse effects of its programs, policies, and activities on minority and low-income populations. SORTA is also required to take reasonable steps to ensure that Limited English Proficiency (LEP) person have meaningful access to the programs, services, and information SORTA provides.

If you feel that you have been discriminated against, a formal complaint may be filed with SORTA physically located at, 525 Vine Street, Suite 500, Cincinnati OH, 45202, or by phone at 513-632-7614 (voice) or 1-800-750-0750 for Ohio Relay within **180 days** after the date of the alleged discrimination. These procedures do not deny you the right to file formal complaints with other state or federal agencies, or to seek private counsel. Intimidation or retaliation of any kind is prohibited by law. Should you require assistance in completing this form, please let us know. Once completed, return a signed copy via mail or hand delivery to:

Southwest Ohio Regional Transit Authority (SORTA)
c/o Title VI Coordinator
525 Vine St, Suite 500, Cincinnati, OH 45202

Any person who believes himself, herself or any specific class of persons to be subjected to discrimination may also file a written complaint with the Federal Transit Administration (FTA), Office of Civil Rights, at 1200 New Jersey Avenue SE, Washington, DC 20590.

Note: To protect your rights, your complaint must be filed with 180 days of the occurrence. Failure to file within **180** days may result in dismissal of the complaint.

1. Complainant's Name: _____
2. Address: _____
3. City: _____ State: _____ Zip Code: _____
4. Telephone # (Home): _____ (Work) _____ (Cell) _____

5. Person discriminated against (if someone other than Complainant)

Name: _____ Address: _____

City, State, Zip Code: _____

Telephone # (Home): _____ (Work) _____ (Cell) _____

6. Upon what premise is your discrimination complaint based? (check all that apply)

Race/Color

Religion

Disability

National Origin

Gender

Limited English Proficiency (LEP)

Other _____

Not applicable

7. Date of alleged discrimination or alleged violation: _____

8. Describe the alleged discrimination or alleged violation. Explain what occurred and who you believe was responsible. (For additional space, attach additional sheets of paper or use back of the form) _____

9. Where did the incident take place? Please provide location, time, bus number etc.? _____

10. Witnesses? Please provide their contact information.

11. Name: _____ Address: _____

12. City, State, Zip Code: _____

13. Telephone # (Home): _____ (Work) _____ (Cell) _____



14. How can this complaint be resolved (how can the problem be corrected)? _____

15. Did you file this complaint with another federal, state, or local agency or with a federal or state court?

(check the appropriate space) Yes No

If your answer is yes, check each agency with which a complaint was filed:

Federal Agency Federal Court State Agency
 State Court Local Agency Other

Please provide contact information for the agency you also filed the complaint with: _____

Date Filed: _____

16. If you need any special accommodations for communication regarding this complaint, please specify which alternative format you require.

Braille Large Print (specify the font size) _____
 CD

Sign Language Interpreter (specify language) _____

Language Interpreter (specify language) _____

Other _____

Sign the complaint in space below. Attach any documents you believe
supports your complaint.

Complainant's Signature

Date



Appendix B: SORTA Public Outreach Information

SORTA Public Outreach Record 2019-2021

SORTA PUBLIC OUTREACH RECORD 2022-2024				
Neighborhood	Location	Date of Meeting	Public SORTA Representative	Meeting Topic
Virtual	Zoom	7/12/2022, 5- 7p	Steve Anderson, Nick Keeling, Tara Walker	Title VI Service Standards Update
Virtual	Zoom	7/13/2022, 11:30a-1:30p	Steve Anderson, Nick Keeling, Tara Walker	Title VI Service Standards Update
College Hill	College Hill Library	8/15/2022, 5p- 7p	Steve Anderson, Madison Jeffries, Kara Doersam, Nick Keeling	Reinventing Metro Phase 2
Blue Ash	Blue Ash Library	8/16/2022, 5p- 7p	Madison Jeffries, Mark Samaan, Nick Keeling	Reinventing Metro Phase 2
Downtown	Huntington Center	8/18/2022, 5p- 7p	Matt Moorman, Madison Jeffries, Jackson Thurnquist	Reinventing Metro Phase 2
Forest Park	Forest Park Senior Center	8/22/2022, 530p- 7p	Matt Moorman, Madison Jeffries, Mark Samaan	Reinventing Metro Phase 2
Sharonville	Sharonville Library	8/23/22, 5p- 7p	Mark Samaan, Kara Doersam	Reinventing Metro Phase 2
Virtual	Zoom	8/24/2022, 5p-7p	Steve Anderson, Mark Samaan	Reinventing Metro Phase 2
Blue Ash	UC Blue Ash Campus	8/25/2022, 5p- 7p	Mark Samaan, Madison Jeffries, August Schweitzer	Reinventing Metro Phase 2
Sedamsville	Sedamsville Qvic Association, 260 Fairbanks St	2/8/2023, 630p-730p	Nick Keeling, Cam Hardy	Reinventing Metro Phase 3
Forest Park	Forest Park City Admin HQ, 1201 Kemper Rd	6/20/2023, 745p- 845p	Emi Randall, Troy Miller	MetroNow
Colerain Township	Colerain Township Board of Trustees Building	9/12/2023, 630p-9p	Emi Randall, Troy Miller	MetroNow
Downtown	Huntington Center	10/2/2023, 5p-7p	Dave Etienne, Emi Randall, Nick Keeling, Jackson Thurnquist	Reinventing Metro Phase 3
Virtual	Zoom	10/5/2023, 11a-1p	Dave Etienne, Mark Samaan, Nick Keeling	Reinventing Metro Phase 3
Virtual	Zoom	10/5/2023, 5p-7p	Emi Randall, Mark Samaan	Reinventing Metro Phase 3
West Price Hill	Price Hill Library	5/29/2024, 5p - 7p	Emi Randall, Nick Keeling	Reinventing Metro Phase 4
Virtual	Zoom	5/28/2024, 12p - 1p	Emi Randall, Nick Keeling	Reinventing Metro Phase 4
All	Huntington Center	5/28/2024, 5p - 7p	Dave Etienne, Emi Randall, Jacob Sheridan	Reinventing Metro Phase 4
Springdale	Springdale Recreation Center	5/30/2024, 5p - 7p	Mark Samaan, Alex Osborne	Reinventing Metro Phase 4

Appendix C: Demographic Data and Maps

Demographic Data and Maps

The following maps show SORTA's service area, routes, and demographic information based on American Community Survey 2023 5-year estimates. Exhibit C-1 shows the service area with a quarter-mile buffer around all 47 fixed routes. The demographic data was taken from ACS 5-year estimates at the Census block group level. For block groups that fell both inside and outside of the service area, the percentage of the area inside the service area was used as the ratio for the population of that block group. Based on this methodology, the percentage of minority population is 43.1 and the percentage of low-income population is 18.7% within the service area. Exhibit C-2 shows areas that are above the average service area's minority population, low-income population or both minority and low-income populations. For example, if a block group has a minority percentage of 45% it would be considered a minority block group because it higher than than the service area average of 43.1. A block group with 40% minority population would not be classified as a minority block group susceptible to a disparate impact.

Exhibit C-1 – Metro Service Area

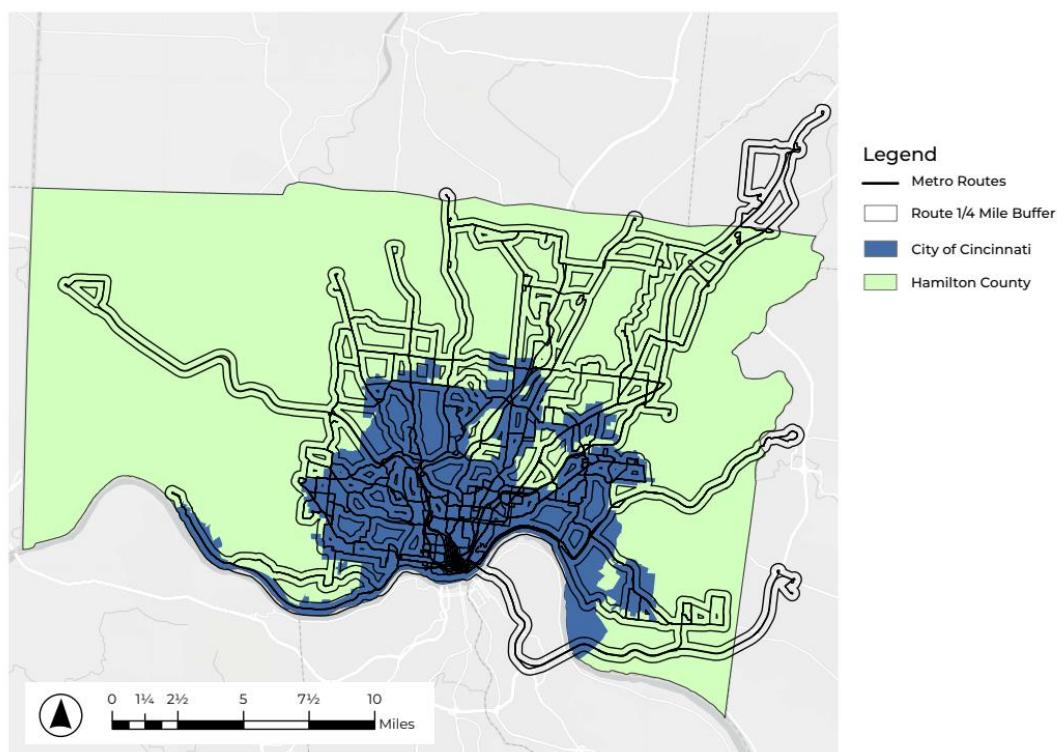
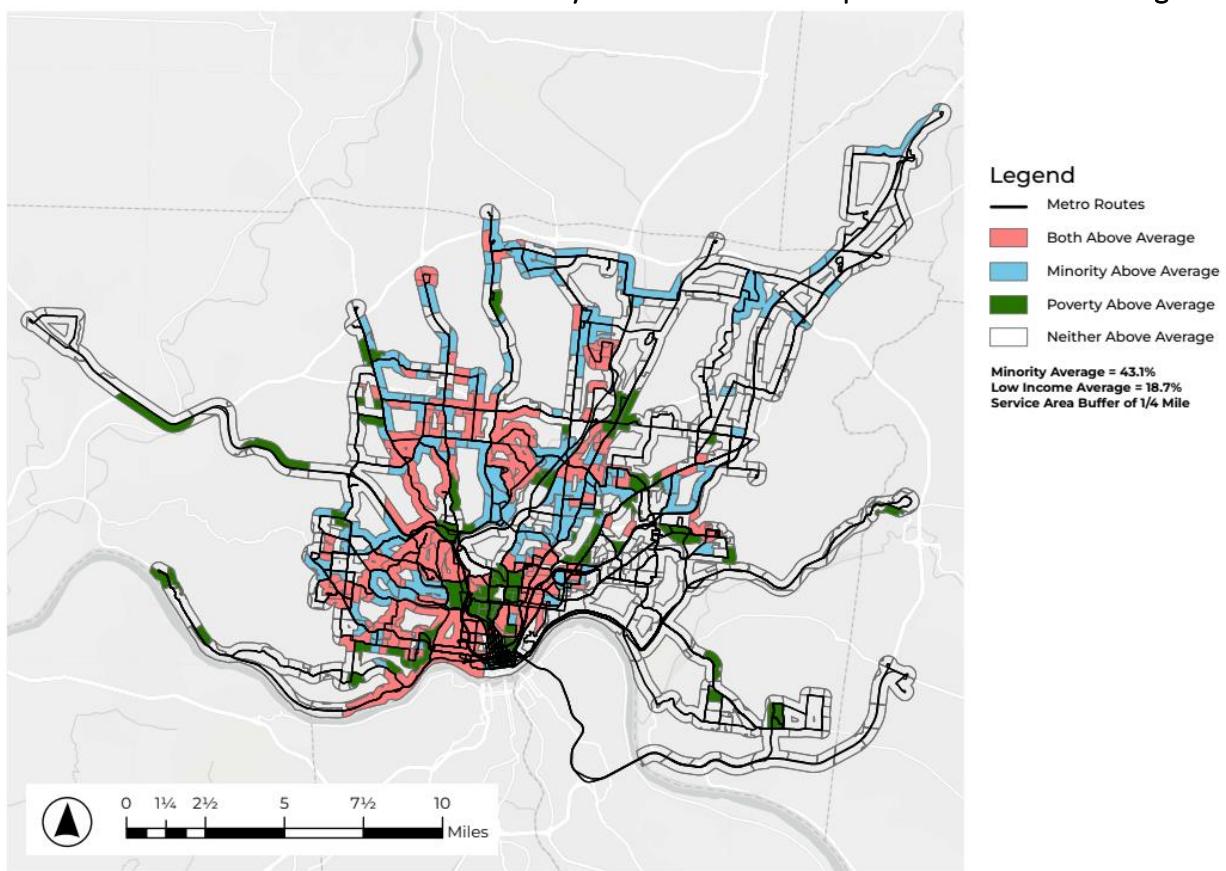


Exhibit C-2 – Metro Service Area – Minority and Low Income Populations – Above Average



The map shown in Exhibit C-2 shows the block groups in the SORTA service area where the percentage of the total population that is non-white exceeds the service area average of 43.1% and where the percentage of the total population that is low-income exceeds the service area average of 18.7%. As SORTA's service area is the 1/4-mile buffer around its fixed-route bus lines, those block groups with their non-white and low-income populations are shown on the map.



Appendix D: Minority/Low Income Ridership and Population

Minority and Low-Income Ridership and Population

To determine the demographic composition of SORTA's routes, two methodologies were employed, utilizing American Community Survey data and an onboard survey. Both methods compared demographic information at a route level to the demographics of the SORTA service area. The service area is defined as a quarter of a mile from any SORTA route, and those areas are completely surrounded by the quarter-mile corridors. The demographics of these areas were obtained through block group data, available from the American Community Survey 5-year estimate 2023. Using ArcGIS, the total population of block groups within the service area was identified. The population of the block groups that were partially within the service area was calculated based on the percentage of the area within SORTA's service area. This information was then overlaid with block group data to obtain an estimate of low-income and minority populations based on the percent of the low-income and minority populations based on the percent of the population in the service area. The analysis indicates a total population of 512,364 is within the SORTA service area, when measuring based on minority individuals. Of this population, an estimated 221,027 persons, or 43.1 percent, are minority individual minorities. When examining low-income riders, the total population is 497,601, and 93,231 persons, or 18.72 percent, are low-income individuals.

SORTA's Onboard Rider Survey, conducted in February 2024 was compared against the identified service area demographics. For each route the percent of minority and low-income riders were determined based on the total number of riders surveyed for that route. These results were compared to the overall service area's average low income and minority populations. Those routes equal to or above the service area's average were noted. Route 72 is a seasonal express route and was not in operation during the latest onboard survey, therefore it does not have survey data. The second methodology utilized GIS analysis to calculate the demographics within one-quarter mile of each route. All SORTA routes were analyzed using this methodology. As with the first methodology, these numbers were compared to the service area's average minority and low-income populations. Routes equal to or above the service area's average were noted. Individual route demographics were calculated by identifying the census block groups within one-quarter of a mile of each route. The total population, minority population, and low-income population of each census block group was calculated based on the square miles of each census block group that fell within a quarter of a mile of a route. Block groups partially within the route's service area were calculated based on the percent of area within the route's service area. Additionally, block groups served by multiple routes were calculated separately for each route because it is not possible to determine which route these individuals might chose to utilize.



Exhibit D-1 LEP, Low-Income, Minority, Hispanic Percentages by Route from February 2024

Route	Average Total Daily Riders	Hispanic Percentage	Minority Percentage	Low Income Percentage	LEP Percentage
1	33	0.00%	13.15%	25.68%	0.15%
2	39	0.00%	13.35%	13.35%	2.51%
3	100	0.00%	56.75%	33.47%	2.81%
4	1,834	7.03%	71.23%	61.31%	2.60%
5	261	0.00%	68.48%	74.58%	4.54%
6	1,019	2.79%	66.21%	74.55%	5.87%
11	1,655	3.13%	63.51%	60.60%	1.21%
12	18	0.00%	64.00%	66.67%	1.81%
16	1,282	0.79%	72.79%	63.76%	1.57%
17	3,061	3.80%	68.79%	66.37%	2.92%
19	1,747	2.92%	68.26%	78.86%	1.66%
20	903	0.72%	56.13%	53.09%	4.07%
21	1,504	1.80%	70.43%	71.89%	4.82%
22	121	0.00%	41.93%	10.28%	0.50%
23	61	1.75%	80.22%	0.00%	4.85%
24	616	0.87%	53.04%	68.07%	5.41%
25	25	0.00%	20.05%	0.00%	3.73%
27	615	5.79%	73.60%	68.68%	4.42%
28	185	24.21%	71.24%	56.07%	3.21%
29	78	0.00%	17.82%	19.62%	2.10%
30	86	5.62%	32.27%	69.49%	3.31%
31	1,116	2.83%	81.54%	76.52%	5.23%
32	863	3.98%	49.81%	55.68%	5.05%
33	2,762	6.28%	67.08%	60.41%	8.58%
36	398	2.80%	76.50%	65.33%	3.46%
37	739	4.57%	82.63%	61.53%	2.49%
38	81	0.00%	78.00%	71.10%	3.56%
40	70	0.00%	81.00%	20.29%	2.56%
41	1,100	8.75%	77.85%	55.08%	6.89%
43	3,165	2.61%	78.96%	78.52%	3.74%
46	1,386	0.94%	80.64%	78.58%	5.89%
49	248	0.00%	78.02%	49.96%	8.78%
50	50	0.00%	29.37%	27.97%	1.56%
51	1,616	5.68%	61.91%	68.21%	2.89%
52	16	0.00%	81.80%	54.59%	2.04%
64	1,131	0.50%	83.63%	65.16%	5.69%
65	172	6.12%	89.60%	64.54%	9.89%
67	156	0.00%	92.46%	91.00%	3.71%
71	136	34.92%	54.14%	4.50%	3.15%
74	76	0.00%	41.41%	22.01%	2.69%
75	34	0.00%	0.00%	0.00%	2.05%
77	50	5.00%	22.27%	17.83%	3.64%
78	1,730	2.61%	73.70%	63.39%	8.92%
81	12	100.00%	100.00%	0.00%	3.23%
82	35	0.00%	16.86%	16.86%	1.89%
90	675	0.73%	72.12%	73.60%	5.91%



Appendix E: Quality of Service Monitoring Analysis

Quality of Service Monitoring Analysis

As part of Title VI requirements SORTA is required to maintain a list of Minority and Non-Minority routes to track the equitable distribution of service and amenities as well as compare the distribution of amenities to SORTA's service standards. A Minority route is defined as a route in which 1/3 of the total revenue miles are in census block groups where the percentage of Minority population is above the service area average. SORTA's service area minority population comprises 43.1% of the total population, so block groups with more than 43.1% of the population identifying as non-white are categorized as minority Block Groups.

SORTA is required by Title VI to track the distribution of service and amenities and compare those to our stated service standards and goals. Every three years SORTA assesses the performance of minority vs non-minority routes to see how they adhere to our service standards and policies. To meet this FTA requirement SORTA has tracked the following for comparisons between minority and non-minority routes and our stated service standards and goals:

- Average Peak Headway
- Average Off-Peak Headway
- Average Saturday Headway
- Average Sunday Headway
- Average Weekday Load
- Average Saturday Load
- Average Sunday Load
- On-Time Performance
- Bench Distribution
- Shelter Distribution
- Age of Buses on Routes

SORTA's stated service standards are referenced in **Part 2.2**



The below chart shows the averages for Minority and non-Minority routes between Local and Express service in 2024. Exhibits E-1 and E-2 show the performance by route in terms of different monitoring metrics.

Exhibit E-1 -- Headways and Load Factors of Minority / Non-Minority Routes from February, 2025

	Average Headway				Average Load Factor		
	Weekday Peak (minutes)	Weekday Off-peak (minutes)	Saturday (minutes)	Sunday (minutes)	(Weekday)	(Saturday)	(Sunday)
<i>System Average</i>	28"	29"	37"	37"	0.18	0.16	0.13
<i>Minority Route Average</i>	28"	28"	36"	35"	0.19	0.17	0.14
<i>Non-minority Route Average</i>	28"	35"	45"	48"	0.14	0.13	0.11



Exhibit E-2 -- Passengers Per Hour (PPH), Passengers Per Trip (PPT), and On-Time Performance (OTP) of Minority / Non-minority Routes from February 2025

Route	Route Type	Ridership	PPH	PPT	On-Time (%)
1	Minority	1,750	5.3	2.1	72.40%
2	Minority	1,213	8.0	7.6	61.60%
3	Minority	3,553	10.4	9.6	52.30%
4	Minority	79,066	17.7	20.3	70.20%
5	Non-Minority	11,609	7.4	5.4	71.60%
6	Minority	36,413	19.7	12.9	70.00%
11	Non-Minority	71,953	20.3	14.5	69.80%
12	Minority	564	7.7	6.3	61.70%
16	Minority	51,308	17.8	23.0	68.20%
17	Minority	126,028	23.2	21.4	66.40%
19	Minority	76,655	24.8	26.6	60.70%
20	Minority	39,708	15.3	15.5	73.80%
21	Minority	65,518	20.7	18.6	68.00%
22	Minority	5,369	17.8	23.3	65.10%
23	Minority	1,980	6.0	5.7	54.10%
24	Non-Minority	29,076	14.4	12.7	64.10%
25	Non-Minority	546	7.1	6.0	57.40%
27	Minority	27,209	18.9	12.0	63.30%
28	Non-Minority	6,513	7.7	4.6	70.90%
29	Non-Minority	1,820	7.8	6.1	66.20%
30	Non-Minority	2,683	10.3	6.9	56.90%
31	Minority	44,790	16.5	11.7	69.60%
32	Minority	29,237	18.0	11.7	71.80%
33	Minority	107,442	28.7	22.5	67.80%
36	Minority	30,272	14.9	17.8	67.40%
37	Minority	27,422	29.2	36.1	68.20%
38	Minority	2,385	13.9	13.0	66.50%
40	Minority	1,720	11.7	8.3	62.10%
41	Minority	47,758	19.9	24.6	65.30%
42	Minority	x	x	x	63.20%
43	Minority	127,251	23.1	24.2	59.90%
46	Minority	50,526	18.0	19.1	60.60%
49	Minority	11,819	11.5	6.3	70.70%
50	Minority	1,465	7.7	5.3	72.40%
51	Minority	67,958	17.8	25.6	69.60%
52	Non-Minority	765	8.6	5.5	59.60%
61	Minority	10,107	5.4	5.1	69.70%
64	Minority	45,624	20.0	20.1	71.70%
65	Minority	7,239	15.4	13.7	67.60%
67	Minority	7,805	5.3	5.5	72.00%
71	Non-Minority	3,977	14.3	13.3	60.80%
72	Minority	2,437	10.0	10.1	43.10%
74	Minority	2,202	11.3	8.7	60.50%
75	Non-Minority	874	12.0	6.3	73.50%
77	Non-Minority	11,463	10.1	8.2	72.30%
78	Minority	68,825	15.8	18.3	66.20%
81	Non-Minority	461	7.1	5.0	64.50%
82	Non-Minority	754	6.8	4.7	66.80%
90	Minority	22,542	11.3	14.0	67.60%

Exhibit E-3 – Age of Bus by Garage of Minority / Non-minority Routes, 2024

Title VI Vehicle Assignment Summary Report									
Average Age of Buses in Operation by Division by Quarter - 2024									
Weekdays		January - March 2024		April - June 2024		July - September 2024		October - December 2024	
Division	Title VI	# Buses	Avg. Age	# Buses	Avg. Age	# Buses	Avg. Age	# Buses	Avg. Age
Bond Hill	minority	534	6.0	495	5.7	527	6.0	570	5.1
Bond Hill	non-minority	405	6.3	399	6.1	406	6.7	412	6.1
Bond Hill	Total	939	6.1	894	5.9	933	6.3	982	5.5
Queensgate	minority	1,268	6.1	1,239	6.1	1,148	6.4	1,232	6.5
Queensgate	non-minority	205	6.6	209	6.9	221	7.4	203	7.5
Queensgate	Total	1,473	6.2	1,448	6.2	1,369	6.6	1,435	6.7
System Totals	minority	1,802	6.1	1,734	6.0	1,675	6.3	1,802	6.1
	non-minority	610	6.4	608	6.4	627	7.0	615	6.6
	Total	2,412	6.2	2,342	6.1	2,302	6.5	2,417	6.2
Weekends		January - March 2024		April - June 2024		July - September 2024		October - December 2024	
Division	Title VI	# Buses	Avg. Age	# Buses	Avg. Age	# Buses	Avg. Age	# Buses	Avg. Age
Bond Hill	minority	257	5.4	252	5.3	265	4.9	284	3.8
Bond Hill	non-minority	188	6.4	184	5.0	186	5.9	184	4.2
Bond Hill	Total	445	5.8	436	5.2	451	5.4	468	4.0
Queensgate	minority	430	4.8	448	5.4	453	4.9	439	4.8
Queensgate	non-minority	12	5.0	22	5.1	47	4.7	34	5.5
Queensgate	Total	442	4.8	470	5.4	500	4.9	473	4.9
System Totals	minority	687	5.0	700	5.4	718	4.9	723	4.4
	non-minority	200	6.4	206	5.0	233	5.7	218	4.4
	Total	887	5.3	906	5.3	951	5.1	941	4.4

As shown in Exhibit E-1, Minority routes for both service types—Local and Express—generally have better headways compared to Non-Minority routes. This means that passengers on Minority routes experience shorter wait times between buses, leading to improved service availability.

Regarding average load factor, both Minority and Non-Minority routes operate well within SORTA's maximum service standard, ensuring that buses are not overcrowded. However, when comparing Local routes specifically, Minority routes exhibit a slightly higher load factor on weekdays than their Non-Minority counterparts. While this suggests higher ridership demand on Minority routes, the levels remain comfortably within service capacity limits.

According to Exhibit E-2, On-Time Performance (OTP) for Local routes is slightly better on Minority routes than on Non-Minority routes. This indicates that Minority routes are operating with relatively fewer delays and are more likely to adhere to the published schedule.

In terms of ridership efficiency, both Passengers-Per-Hour (PPH) and Passengers-Per-Trip (PPT) are higher on Minority routes compared to Non-Minority routes. This suggests that Minority routes are more productive, carrying more passengers per unit of service provided. Higher PPH and PPT values may indicate that these routes are serving denser areas with greater transit demand, further reinforcing the importance of maintaining frequent and reliable service on these corridors.

As shown in Exhibit E-3, the average age of buses assigned to Minority routes is approximately one year newer than those operating on Non-Minority routes. This trend is observed across the entirety of 2024 and applies to both of SORTA's operational divisions, Queensgate and Bond Hill. The assignment of newer vehicles to Minority routes may be the result of recent fleet procurement strategies, efforts to improve service quality on high-ridership corridors, or routine fleet rotation practices. Newer buses often contribute to improved service reliability, passenger comfort, and operational efficiency.

Overall, the data indicates that Minority routes generally receive frequent service, maintain ridership productivity, and benefit from newer vehicles, while also performing similarly to or better than Non-Minority routes in key service metrics such as On-Time Performance. These findings provide useful insights for service planning, equity considerations, and future investment decisions to ensure transit resources are distributed equitably across the system.



Appendix F: SORTA Board Demographics and Title VI Program Resolution

Exhibit F-1 shows the demographic makeup of SORTA's Board of Trustees as of January 2022, Metro Futures Task Force and Metro Riders Advisory Committee. Exhibit F-2 is the Board of Trustees' resolution to approve the Title VI Program for years 2022-2025.

Exhibit F-1 – SORTA Board Demographics

Name	Appointment	Ethnicity	Gender	Representing
Blake Etheridge	Chair	African-American	Male	Hamilton County
Gwen L. Robinson	Vice Chair	African-American	Female	City of Cincinnati, Deceased
Tianay Amat	Board Trustee	African-American	Female	City of Cincinnati
Jay Bedi	Board Trustee	Asian- American	Male	Hamilton County
Tony Brice, Jr.	Board Trustee	African-American	Male	Hamilton County
Chelsea Clark	Board Trustee	African-American	Female	Hamilton County
Dan Driehaus	Board Trustee	White	Male	Hamilton County
Trenton Emeneker	Board Trustee	White	Male	Hamilton County
Kala Gibson	Board Trustee	African-American	Male	City of Cincinnati
Neil Kelly	Board Trustee	White	Male	Hamilton County
Briana Moss	Board Trustee	White	Female	Hamilton County
Pete Metz	Board Trustee	White	Male	City of Cincinnati
Sara Sheets	Board Trustee	White	Female	City of Cincinnati
Greg Simpson	Board Trustee	White	Male	Hamilton County
Kazava "KZ" Smith	Board Trustee	African-American	Male	Hamilton County
Sonja Taylor	Board Trustee	African-American	Female	Hamilton County

Exhibit F-4 – BOARD OF TRUSTEES RESOLUTION



BOARD OF TRUSTEES
SOUTHWEST OHIO REGIONAL TRANSIT AUTHORITY
RESOLUTION NO. 2025-9

APPROVAL OF 2025-2027 TITLE VI PROGRAM UPDATE

WHEREAS:

1. As a recipient of Federal Transit Administration (FTA) financial assistance, SORTA must carry out U.S. Department of Transportation (DOT) Title VI regulations. It is the policy of the Southwest Ohio Regional Transit Authority to follow Title VI of the Civil Rights Act of 1964 as amended.
2. All recipients of FTA funds must submit an updated Title VI Program approved by the board of directors to their FTA regional civil rights officer once every three years.
3. The last Title VI report was submitted to the FTA in March 2022 and was approved by the board under Resolution 2022-09. SORTA staff has completed the analysis and documented the results for the 2025 update that follows the revised rules described in FTA Circular 4702.1B dated October 1, 2012.
4. To comply with the requirement of Chapter 4, Section 6 of the FTA Circular C4702.16, the Board adopted quantitative systemwide service standards to guard against discriminatory service design and operation decisions at the February 25, 2025 board meeting and are part of the overall 2025-2027 Title VI Program submission to the FTA.
5. Staff recommends the Board adopt the 2025-2027 Title VI Update and authorize staff to submit the Triennial Program Update to the FTA which is due April 1, 2025.

THEREFORE, BE IT RESOLVED:

6. The Board hereby adopts the 2025 Triennial VI Program Update as developed by staff and authorizes and directs the CEO/General Manager/Secretary-Treasurer or Director of Diversity, Equity and Inclusion, EOE/Title VI Officer to submit the program update to the Federal Transit Administration (FTA) on behalf of SORTA, in substantially the form attached hereto.

MOVED BY: Blake Ethridge SECOND BY: Tony Brice

BOOK REVIEWS

VOTE Aye: Ms. Amat, Mr. Brice, Mr. Dinehaus, Mr. Ethridge, Kala Gibson, Mr. Metz, Ms. Moss and Mr. Smith

Nay: None

Abstain: None

**ABSENT AT
THE TIME:** Ms. Clark, Neil Kelly, Ms. Sheets and Ms. Taylor

PRESENT
NON-VOTING MEMBERS: Greg Simpson

ABSENT NON-VOTING MEMBERS AT THE TIME: Jay Bedi and Trent Emeneker

APPROVED: March 25th, 2025



Appendix G: May 2022 Major Service Changes

No disparate impact or disproportionate burden were found in this analysis, and the changes were implemented.

Appendix H: December 2022 Major Service Changes

No disparate impact or disproportionate burden were found in this analysis, and the changes were implemented.

Appendix I: August 2023 Major Service Changes

No disparate impact or disproportionate burden was found in this analysis, and the changes were implemented.

Appendix J: December 2023 Major Service Changes

No disparate impact or disproportionate burden was found in this analysis, and the changes were implemented.

Appendix K: August 2024 Major Service Changes

No disparate impact or disproportionate burden was found in this analysis, and the changes were implemented.

Appendix L: Determination of Site or Location of Facilities

A Title VI Equity Analysis regarding determination of Site or Location of Facilities was not required due to SORTA not acquiring any real property and/or constructing a facility requiring an analysis. If SORTA in the future requires an analysis to be done, SORTA shall comply with all requirements in FTA Circular 4702.1B and shall complete a Title VI equity analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin, and shall engage in outreach to persons potentially impacted by the siting of facilities.



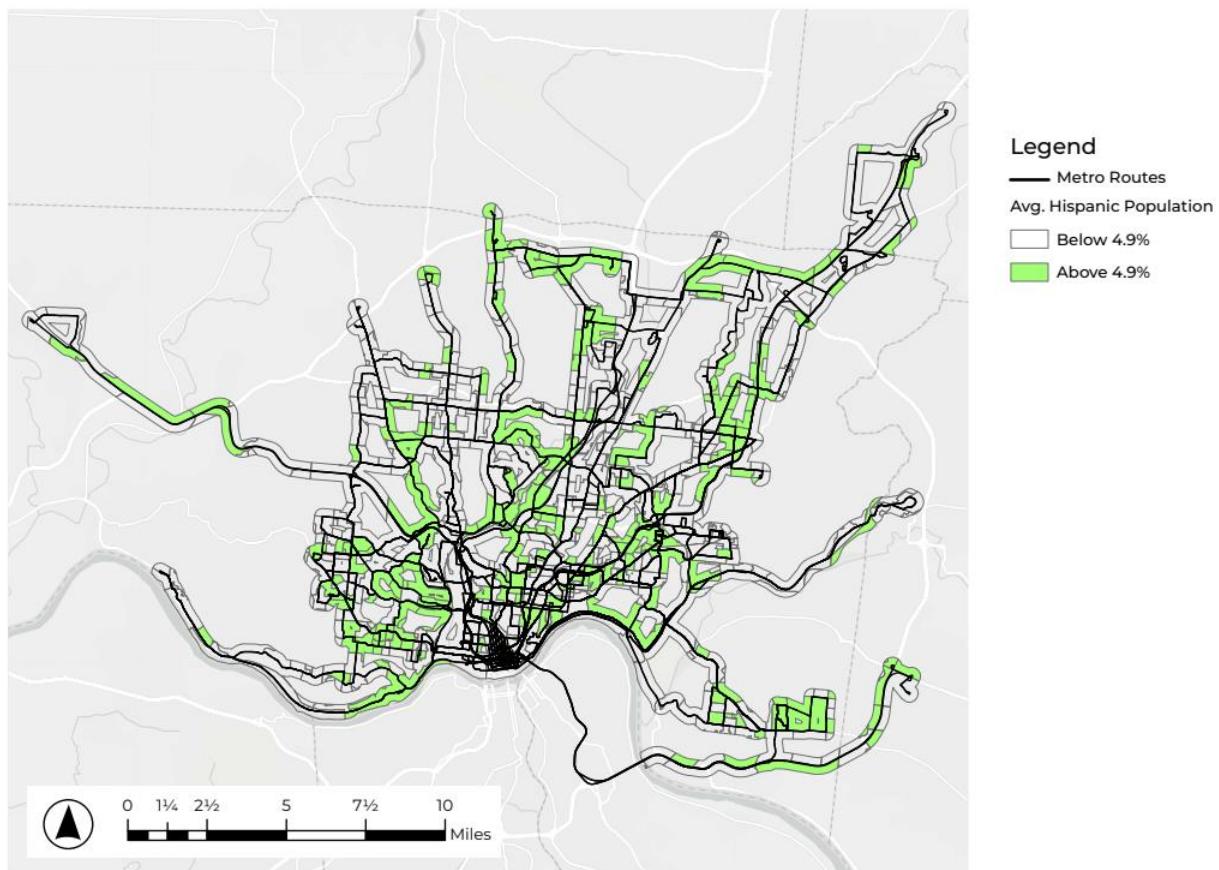
Appendix M: Subrecipient Title VI Program Oversight

This section is no longer applicable. As of January 1, 2025, SORTA does not have any sub-recipients of FTA funds; and does not plan nor anticipate taking on any subrecipients in the future. While in years past, SORTA previously had some degree of sub-recipients under the FTA Section 5310 Program, that is no longer the case.

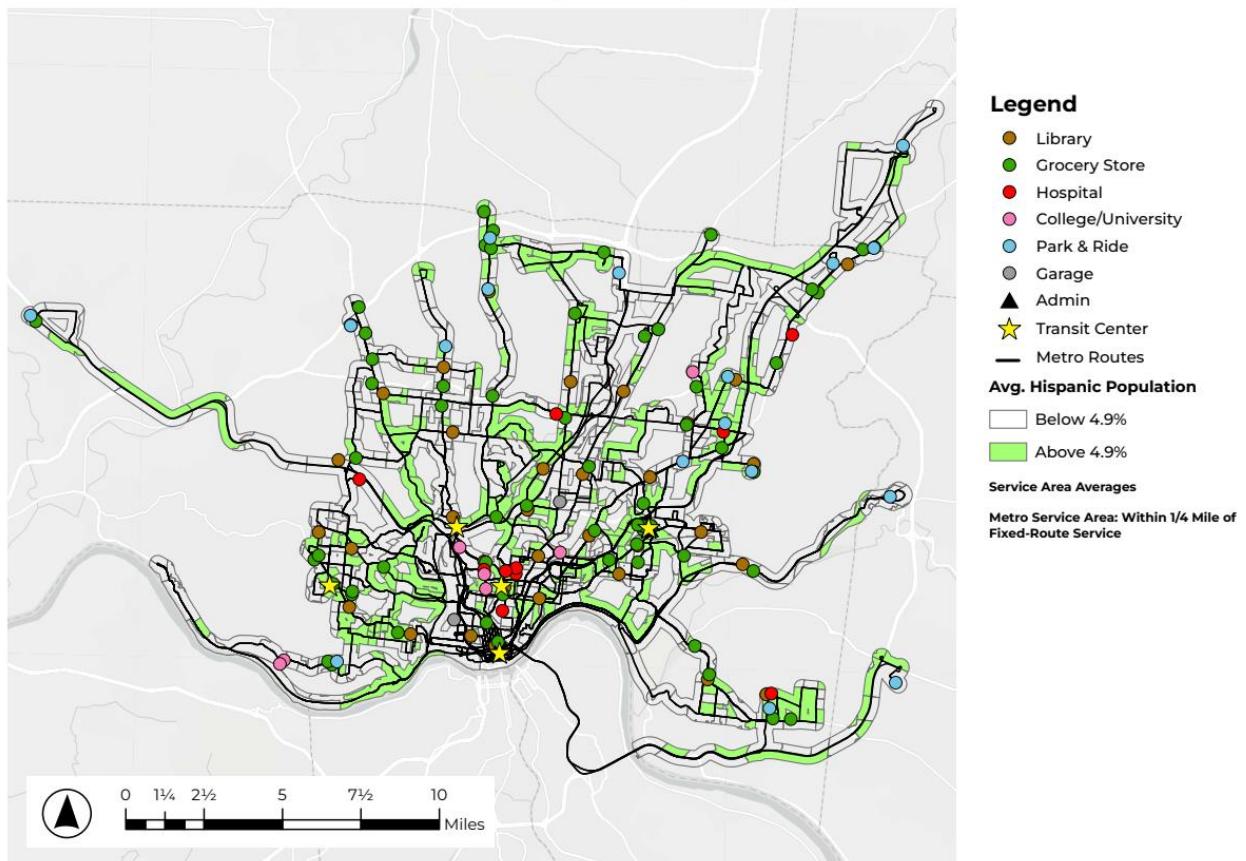


ALL MAPS FOR REFERENCE

Metro Service Area - Hispanic Population



Metro Service Area - Hispanic Population Metro Administration, Facilities, and Trip Generators

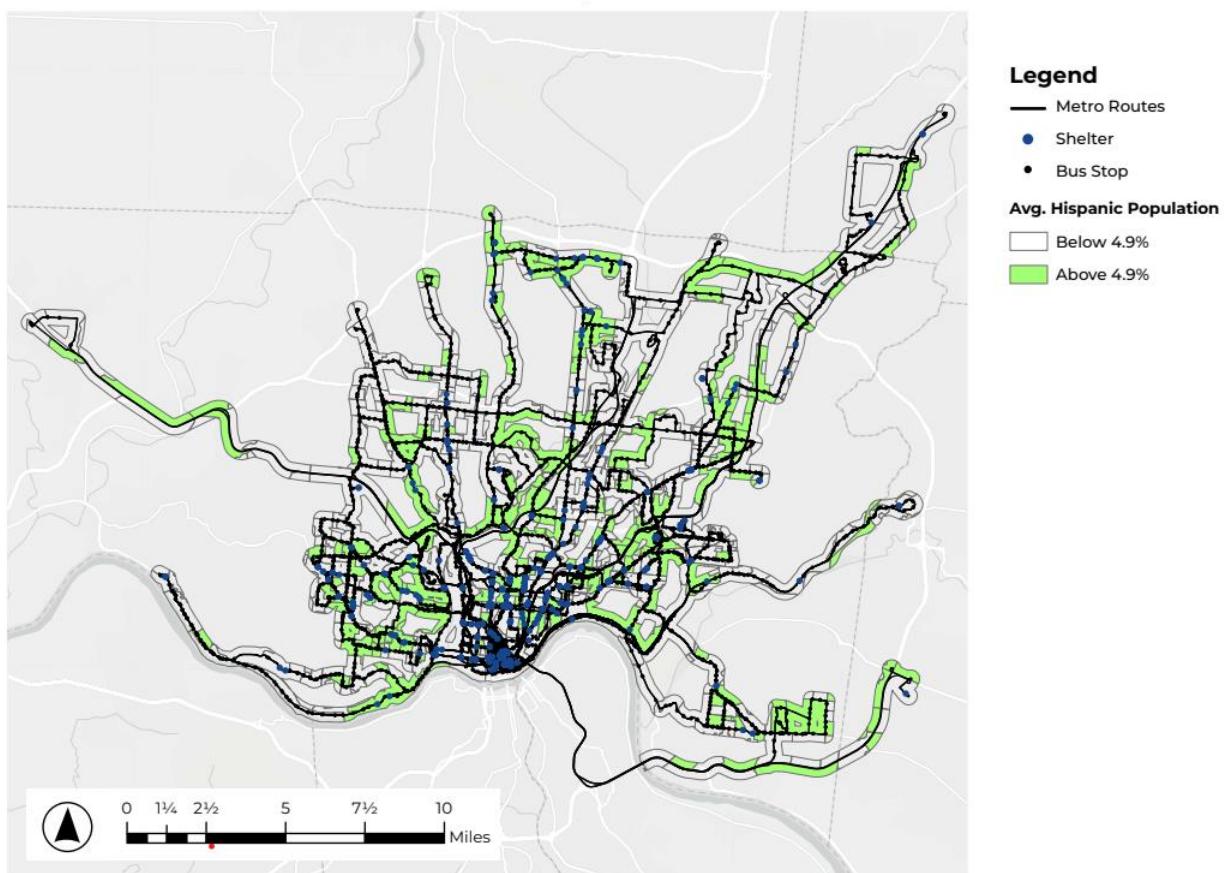


Source: 2023 American Community Survey (ACS) Estimate



Metro Service Area - Hispanic Population

Metro Stops and Shelters

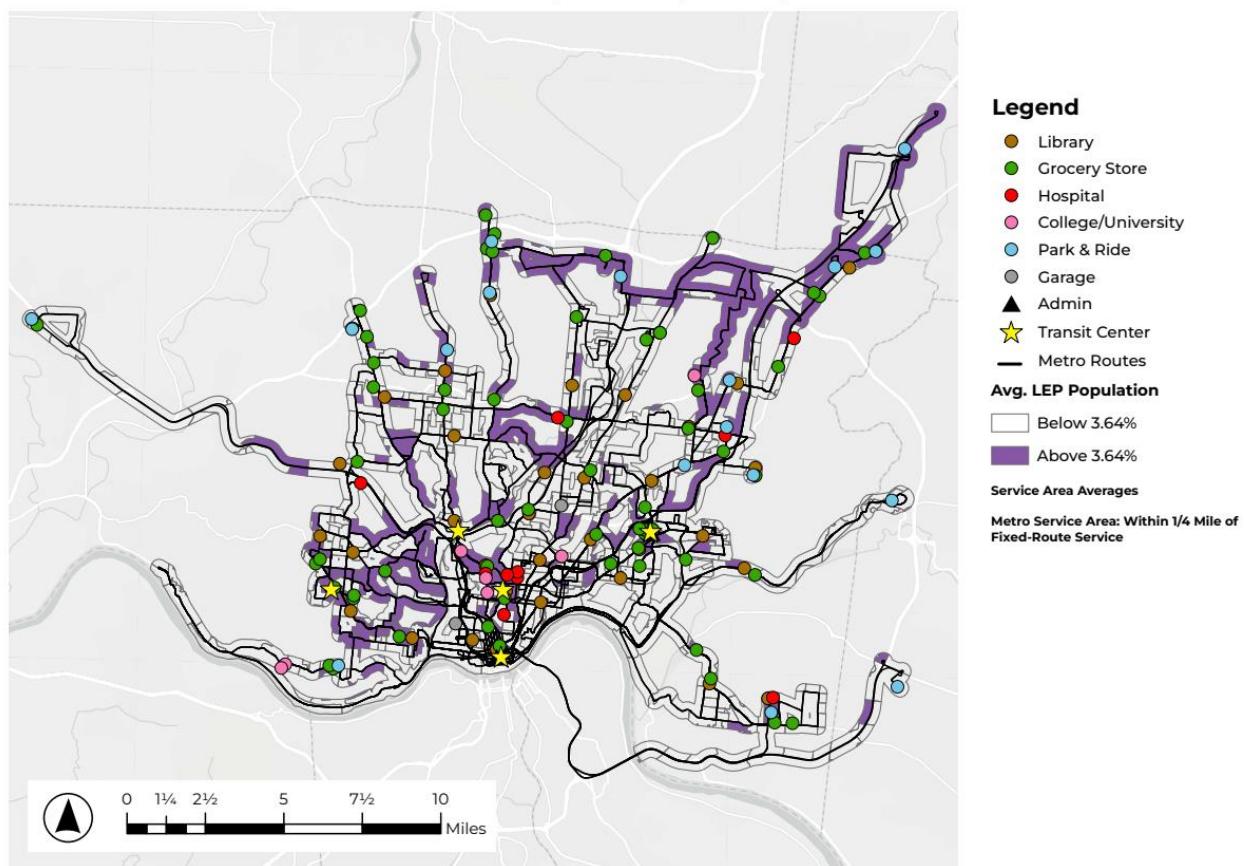


Source: 2023 American Community Survey (ACS) Estimate



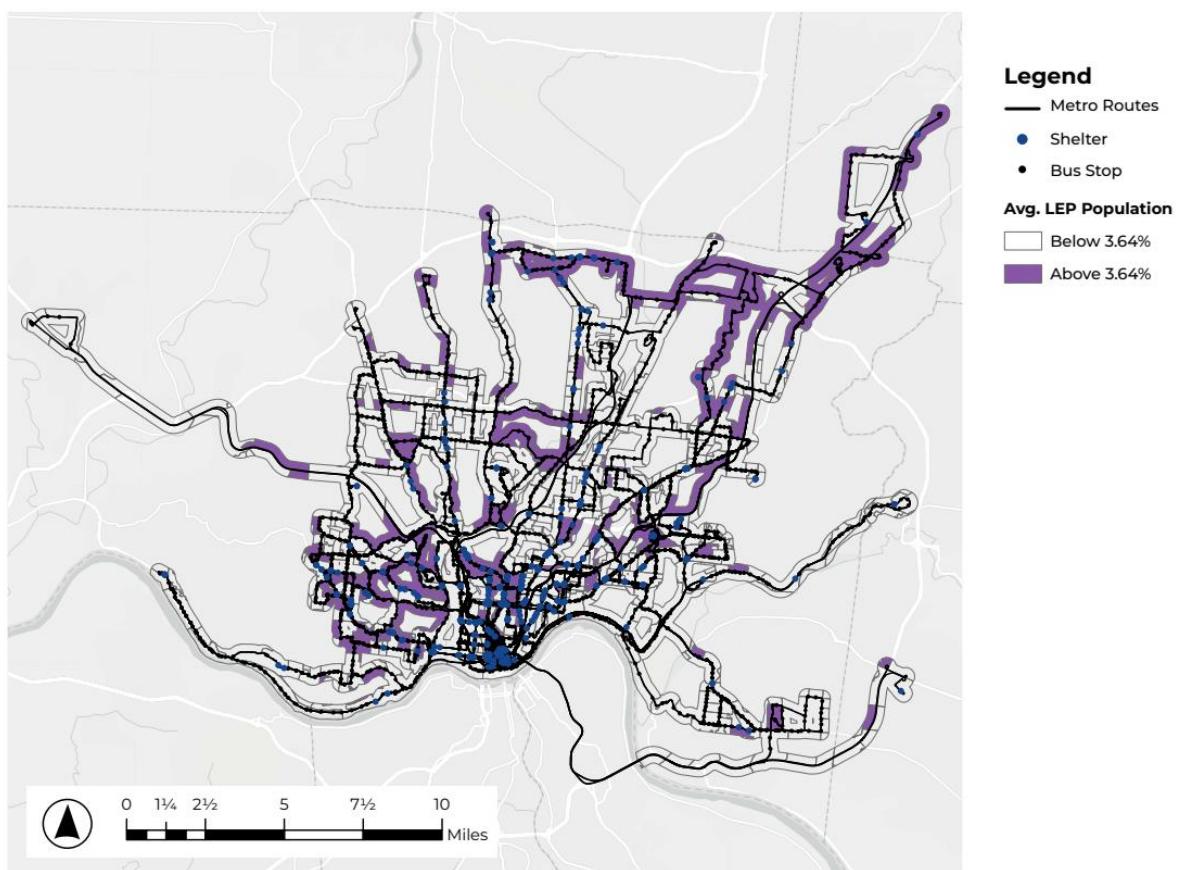
SORTA 2025-2028 Title VI Update

Metro Service Area - Limited English Proficiency (LEP) Population Metro Administration, Facilities, and Trip Generators



Metro Service Area - Limited English Proficiency (LEP) Population

Metro Stops and Shelters

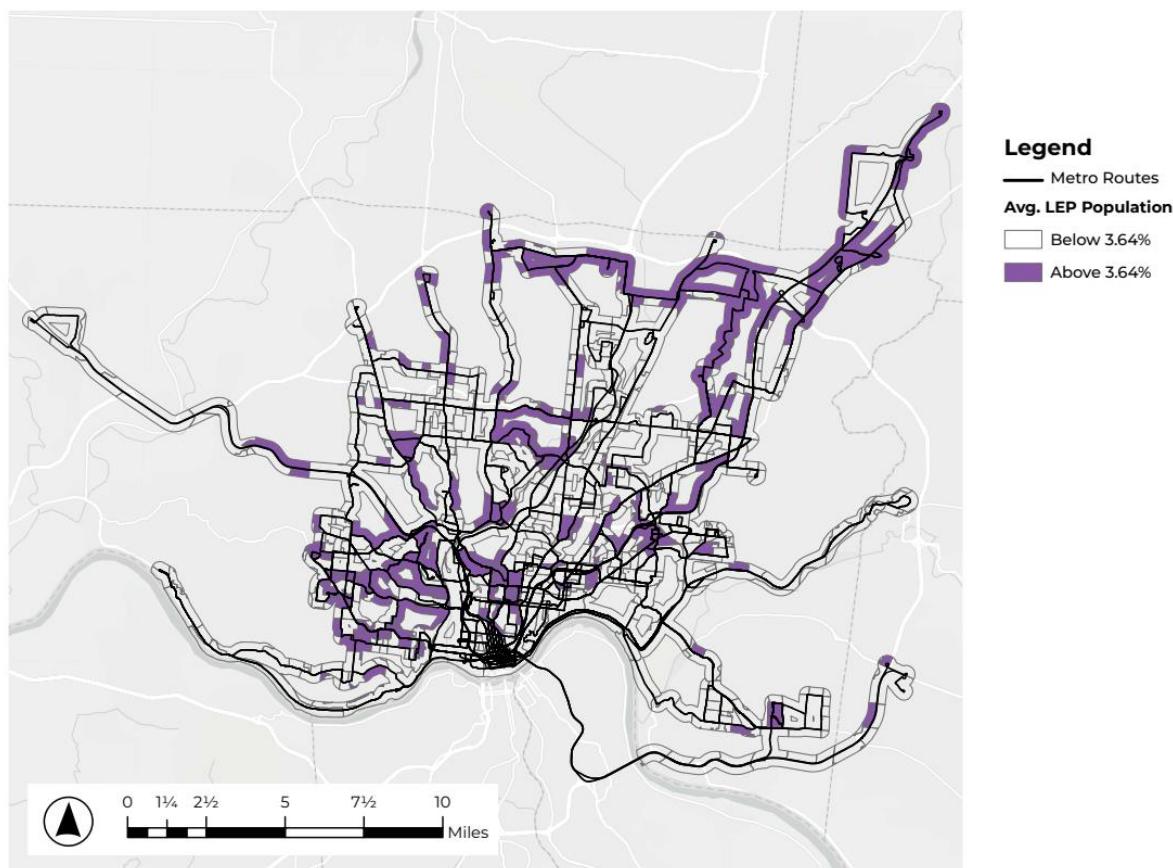


Source: 2023 American Community Survey (ACS) Estimate



SORTA 2025-2028 Title VI Update

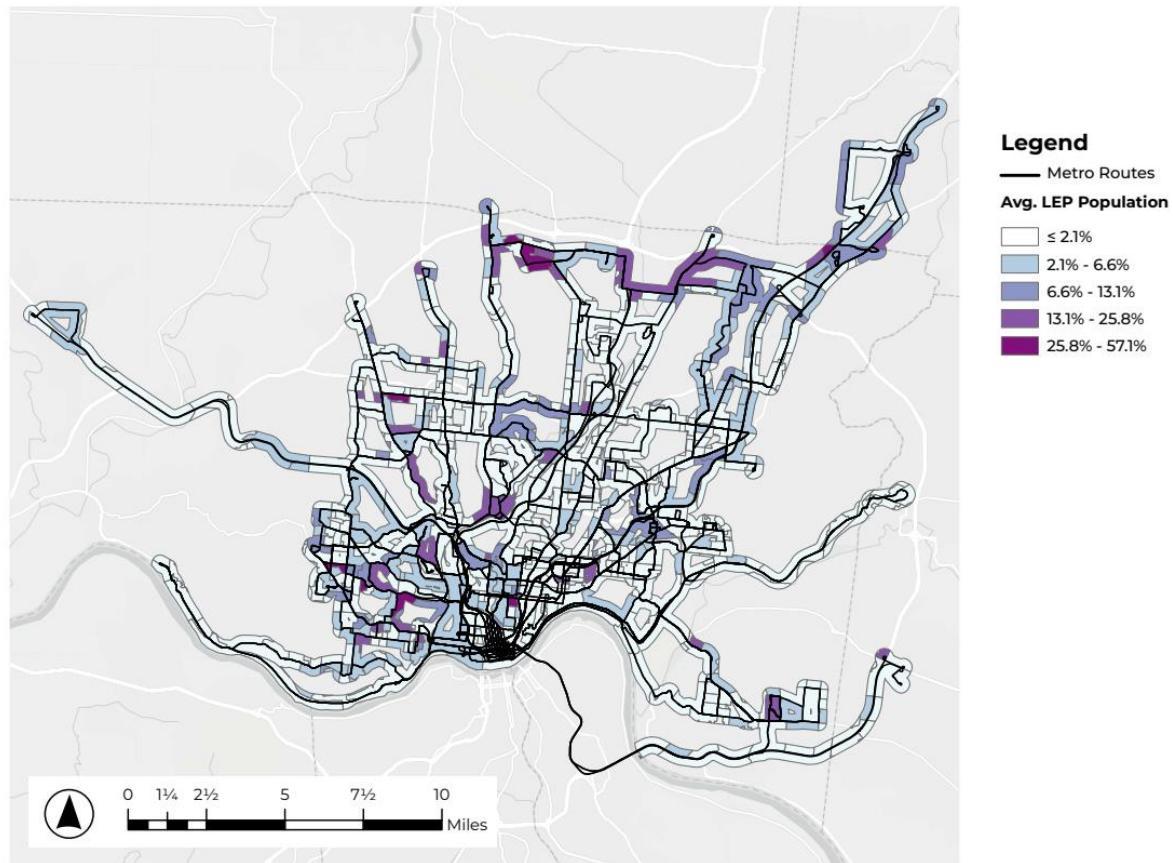
Metro Service Area - Limited English Proficiency (LEP) Population
Population Exceeds Average



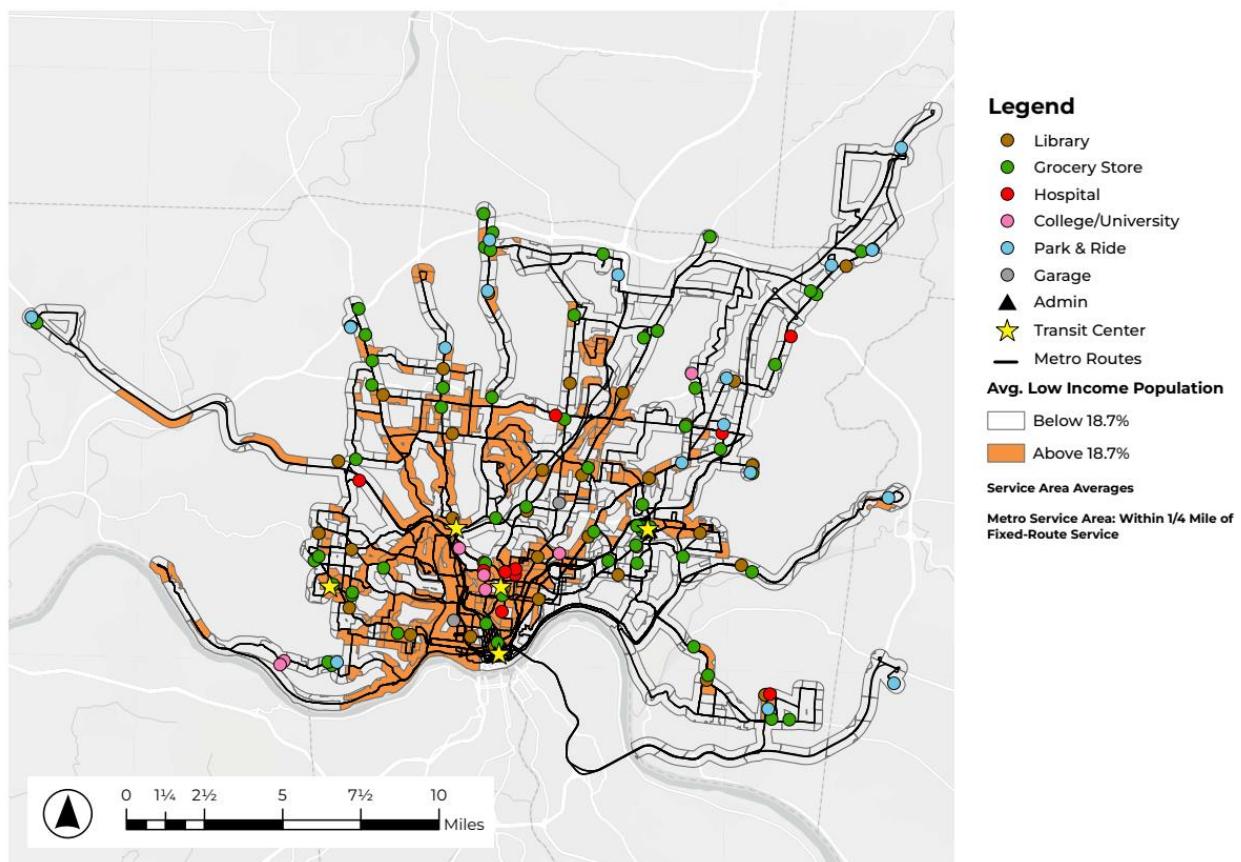
Source: 2023 American Community Survey (ACS) Estimate



Metro Service Area - Limited English Proficiency (LEP) Population



Metro Service Area - Low Income Population Metro Administration, Facilities, and Trip Generators

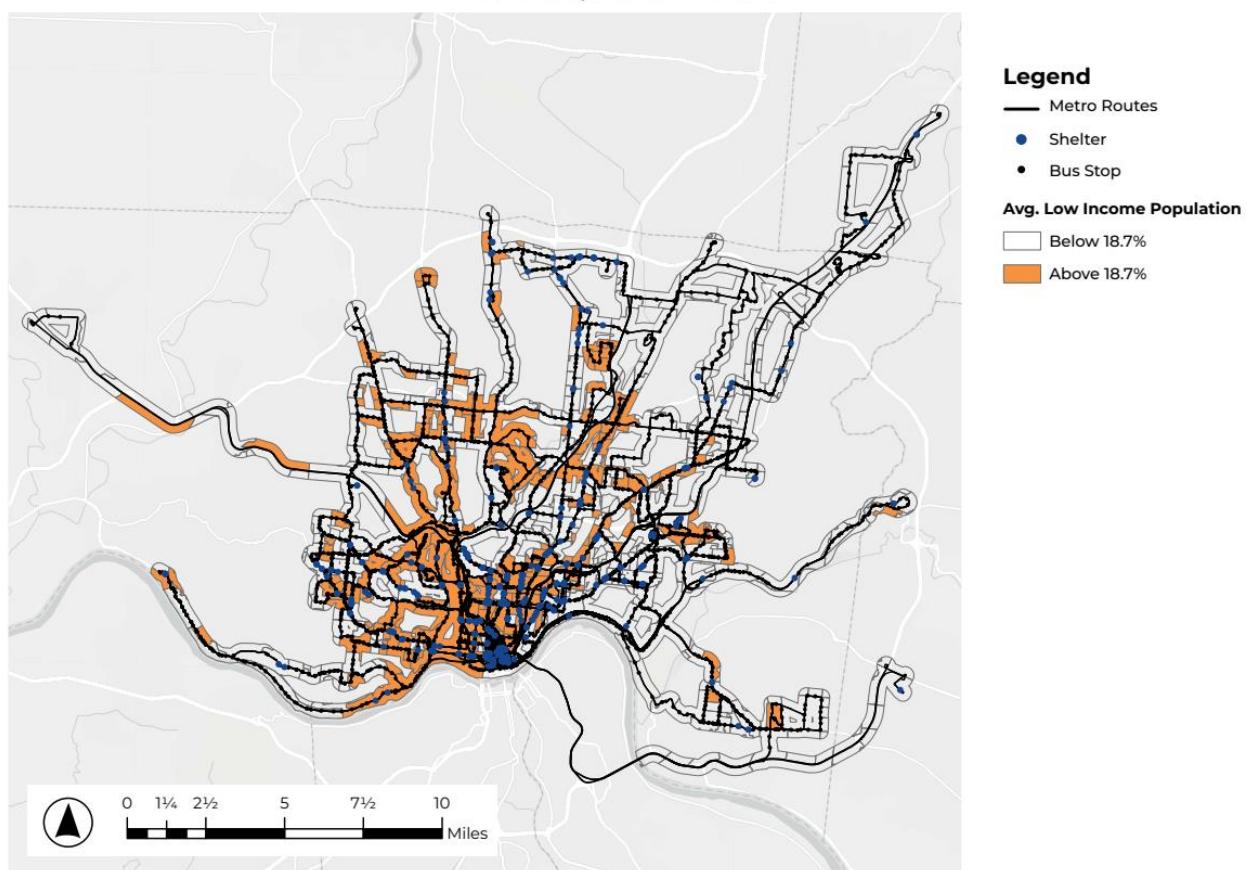


Source: 2023 American Community Survey (ACS) Estimate

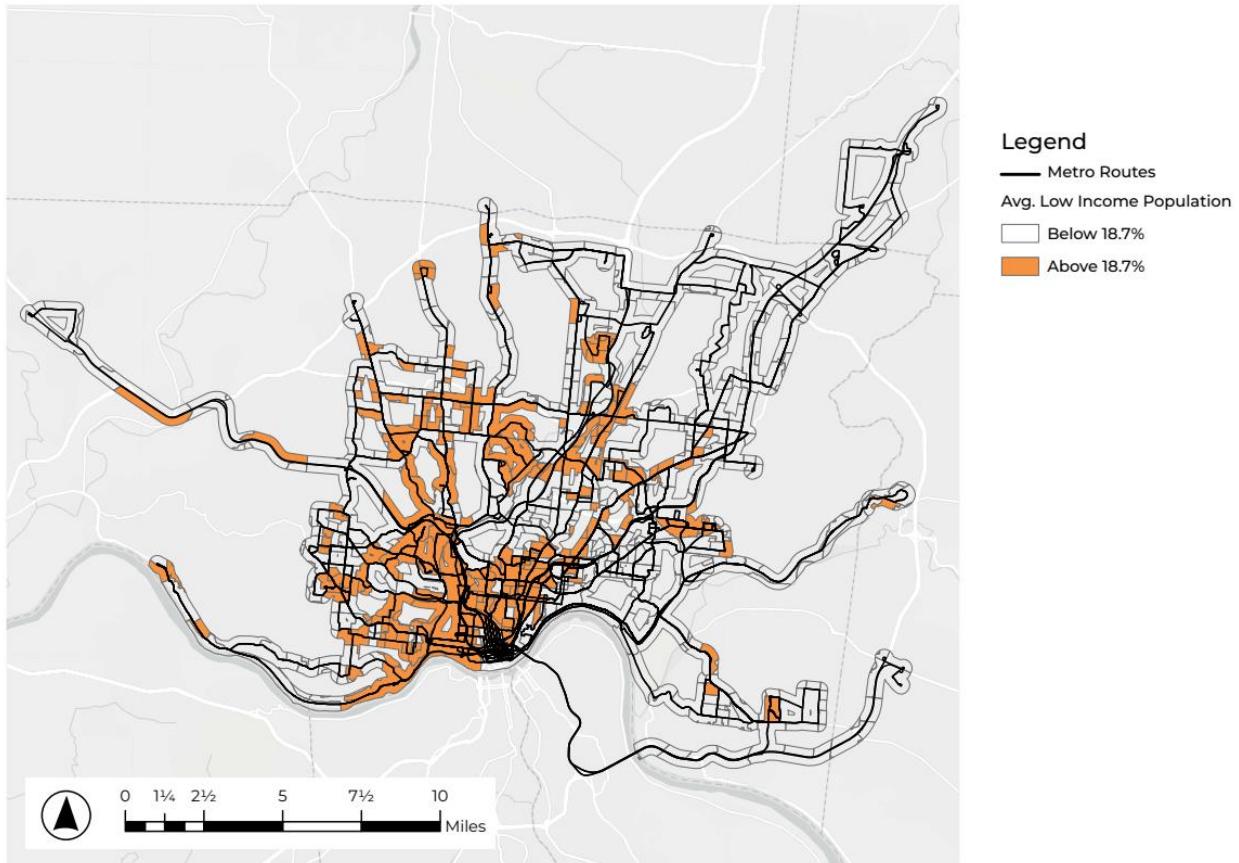


Metro Service Area - Low Income Population

Metro Stops and Shelters

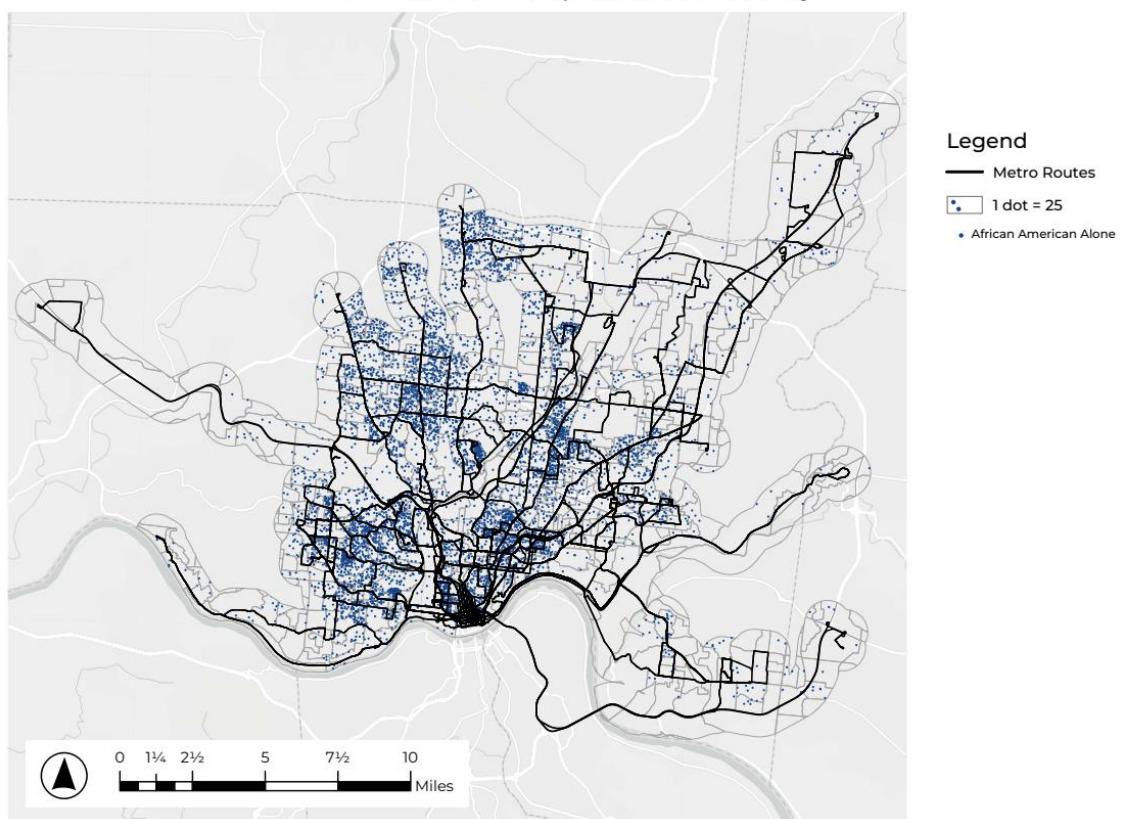


Metro Service Area - Low Income Population



Metro Service Area - African American Population

3/4 Mile Buffer Population Dot Density



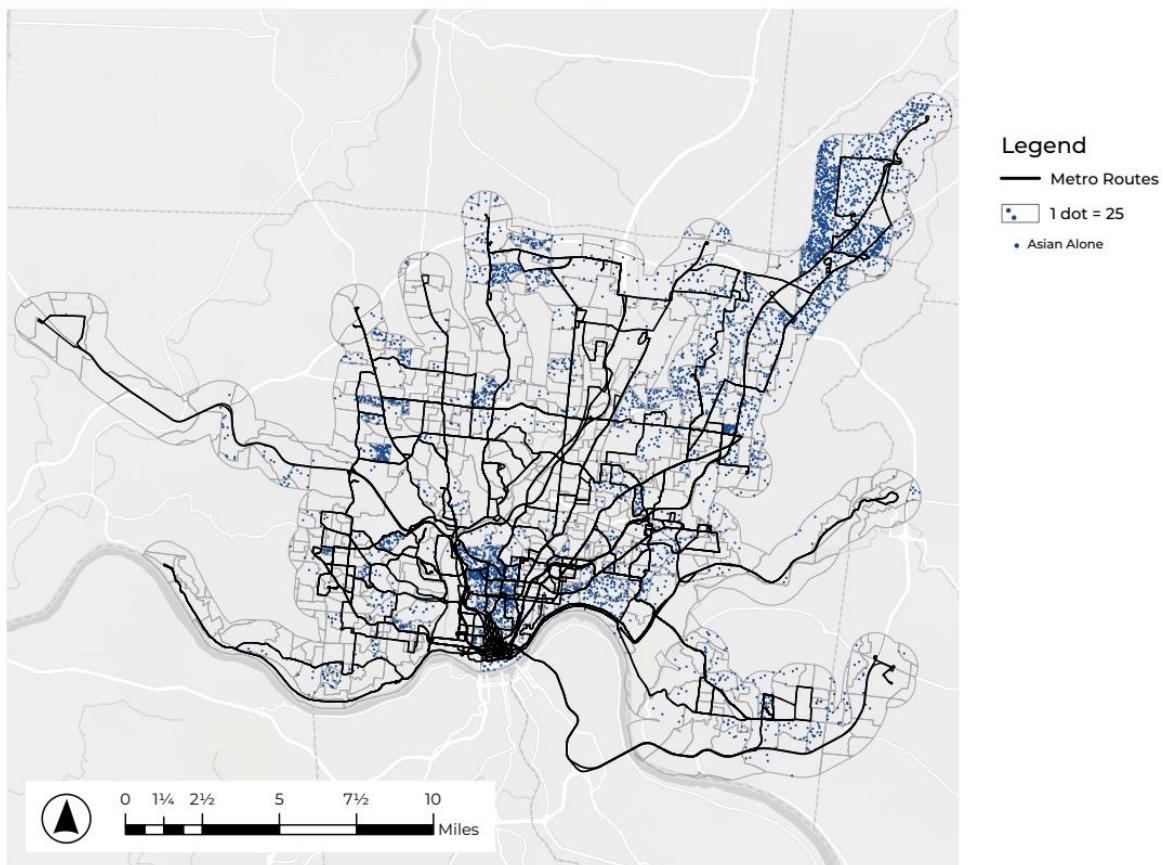
Source: 2023 American Community Survey (ACS) Estimate



SORTA 2025-2028 Title VI Update

Metro Service Area - Asian Population

3/4 Mile Buffer Population Dot Density



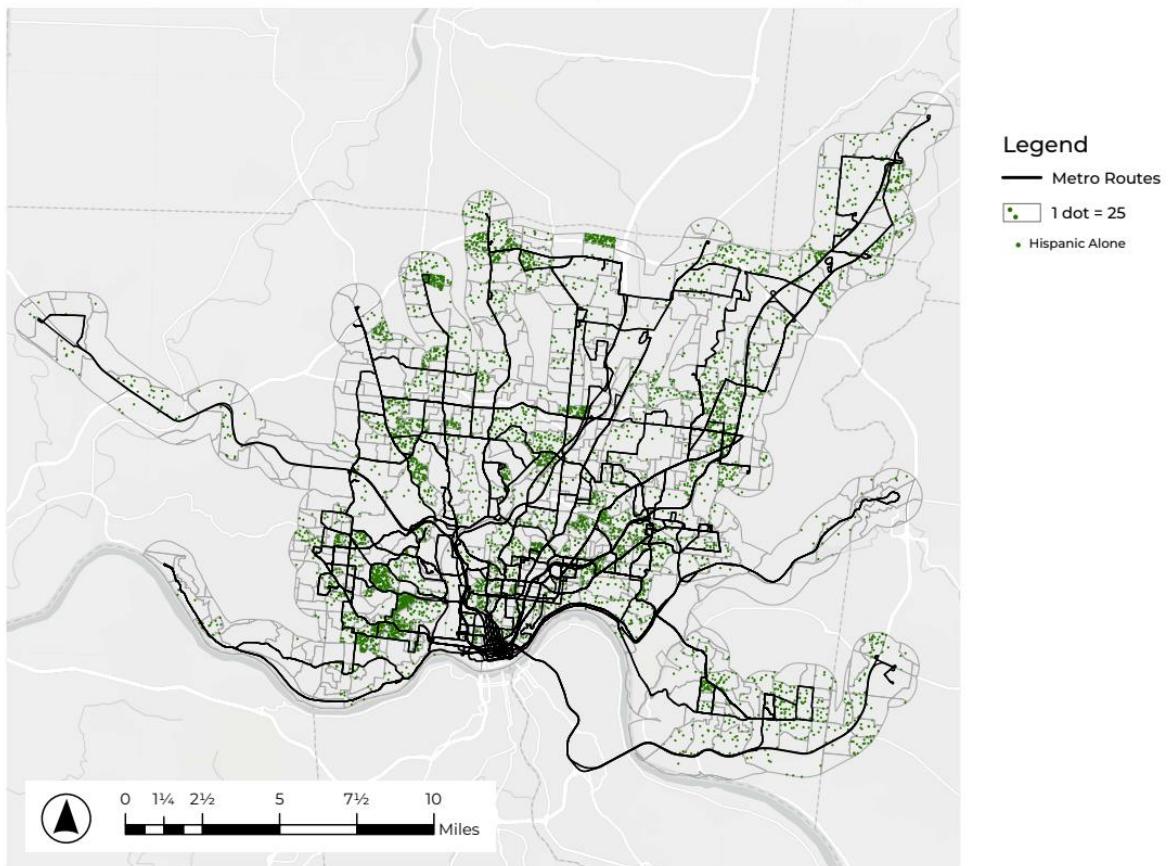
Source: 2023 American Community Survey (ACS) Estimate



SORTA 2025-2028 Title VI Update

Metro Service Area - Hispanic Population

3/4 Mile Buffer Population Dot Density

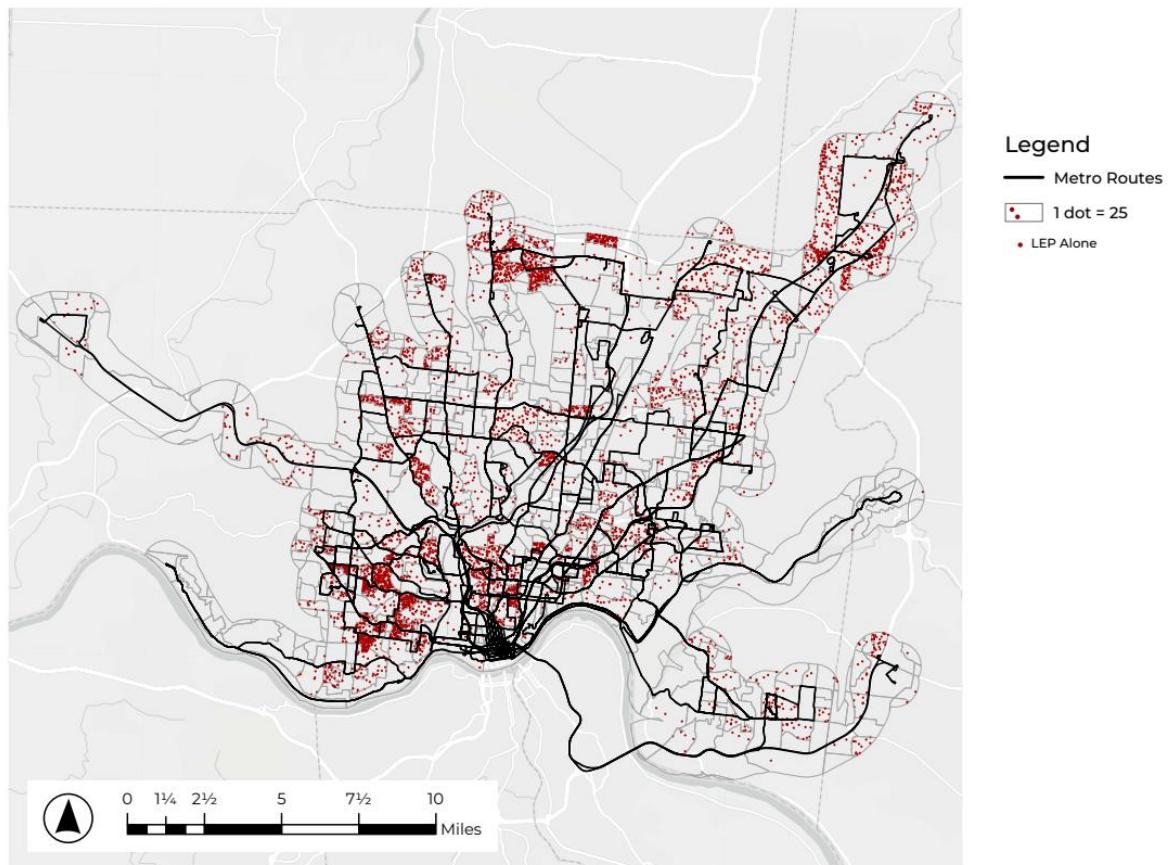


Source: 2023 American Community Survey (ACS) Estimate



SORTA 2025-2028 Title VI Update

Metro Service Area - Limited English Proficiency (LEP) Population 3/4 Mile Buffer Population Dot Density

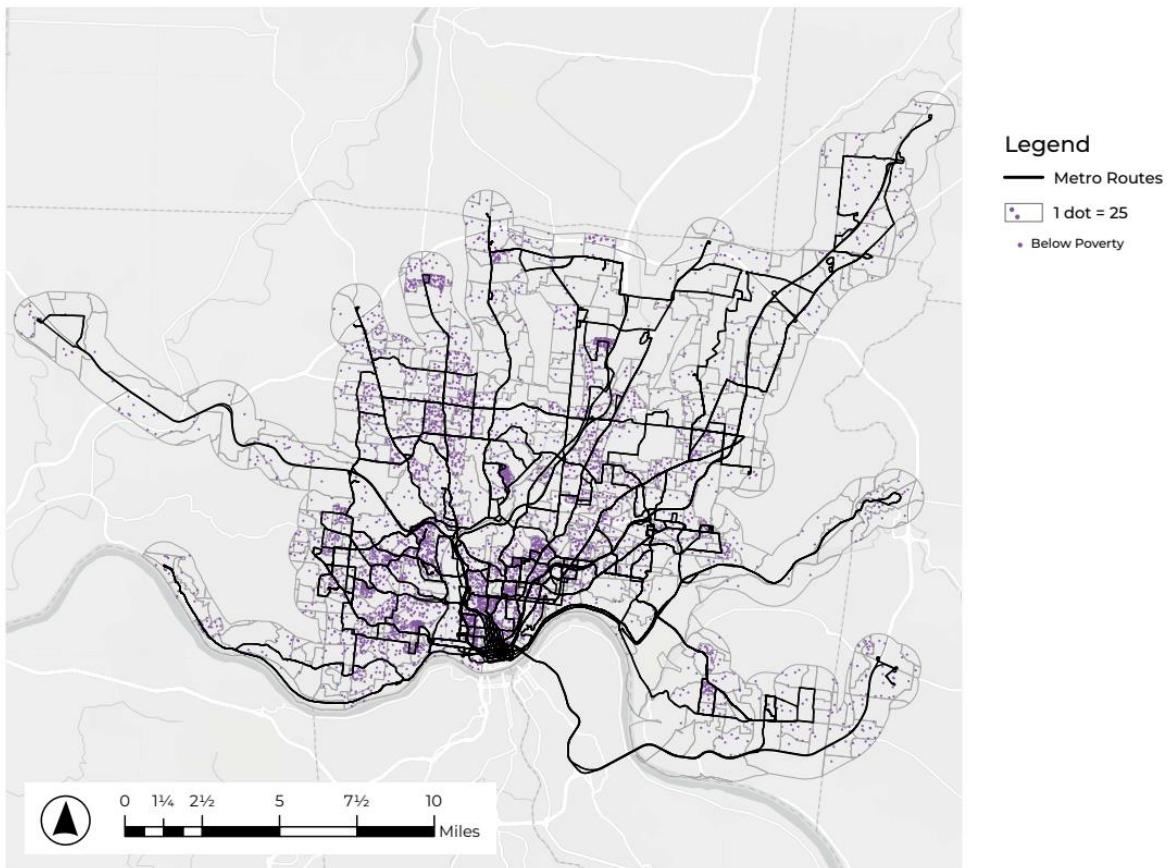


Source: 2023 American Community Survey (ACS) Estimate



SORTA 2025-2028 Title VI Update

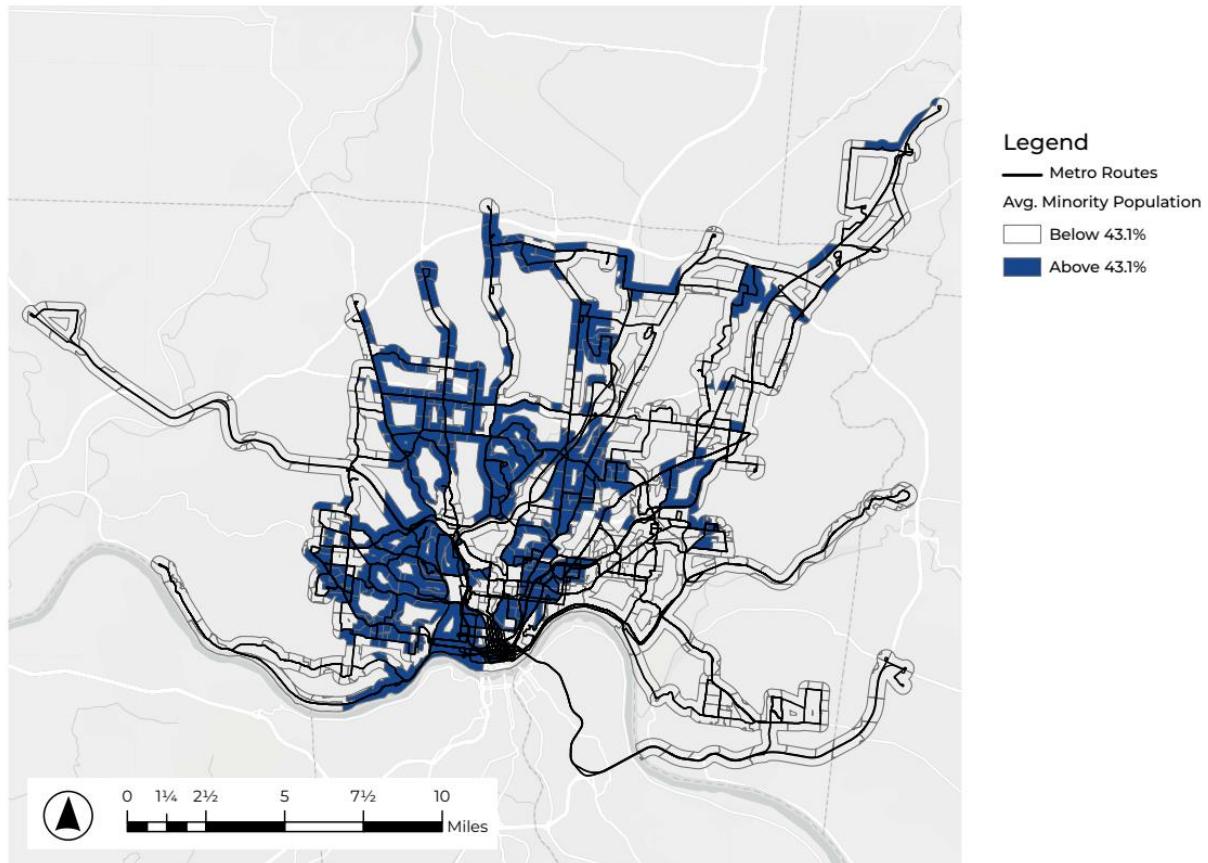
Metro Service Area - Low Income Population 3/4 Mile Buffer Population Dot Density



Source: 2023 American Community Survey (ACS) Estimate

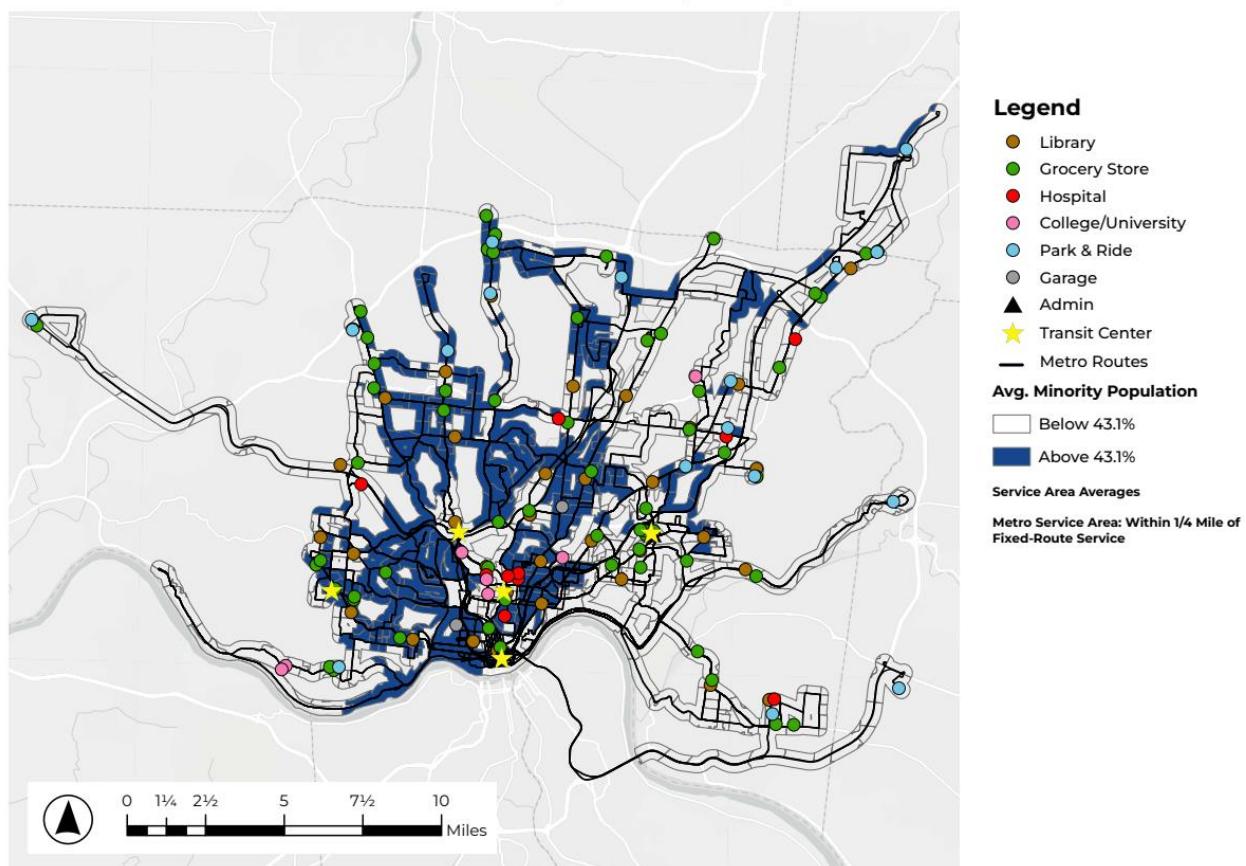


Metro Service Area - Minority Population



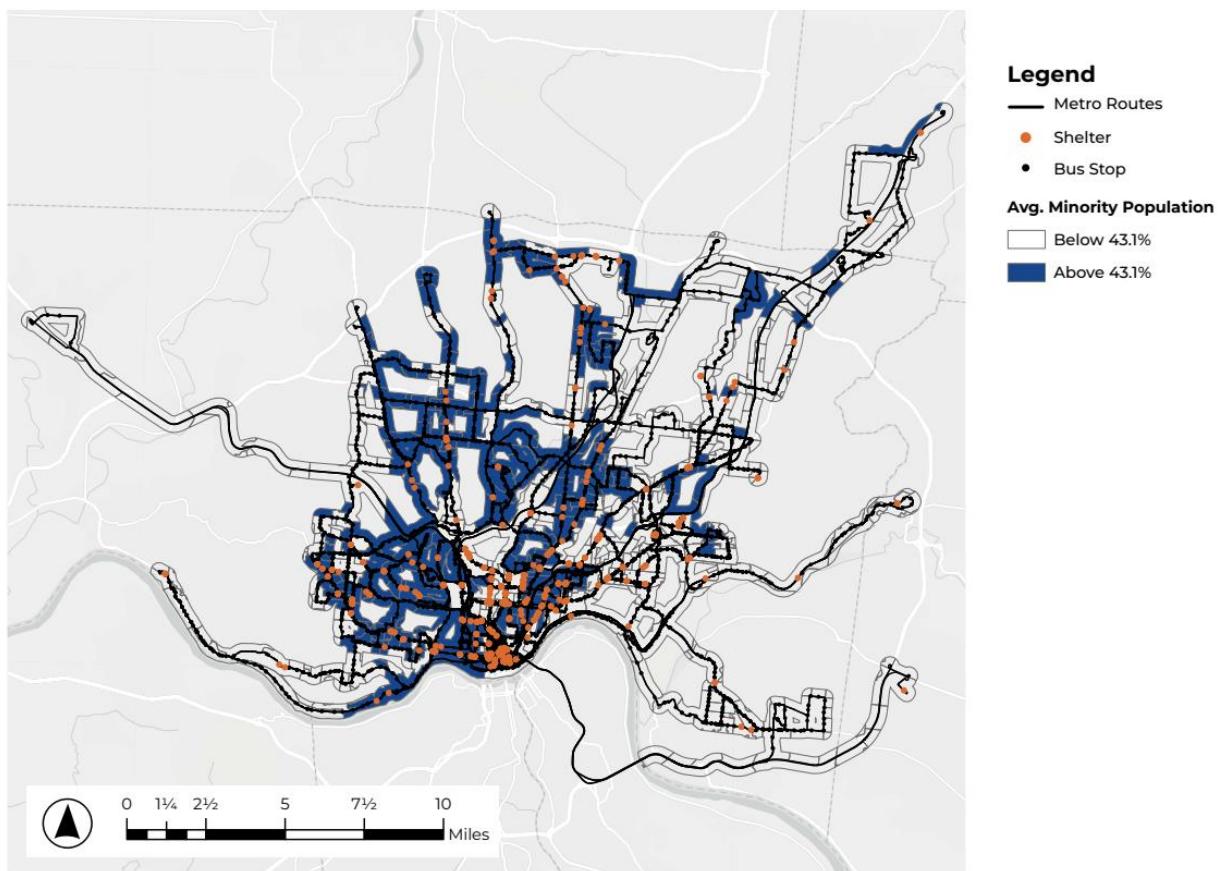
Metro Service Area - Minority Population

Metro Administration, Facilities, and Trip Generators



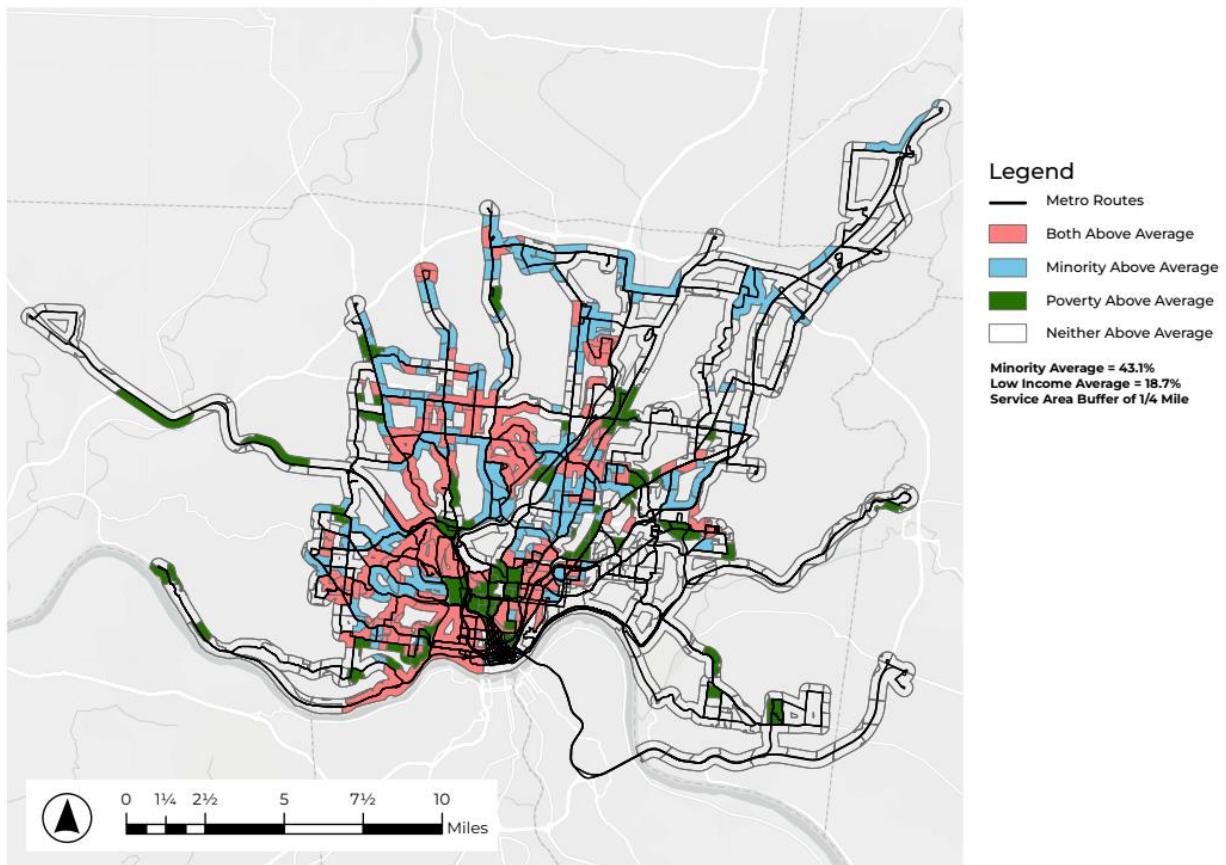
Metro Service Area - Minority Population

Metro Stops and Shelters



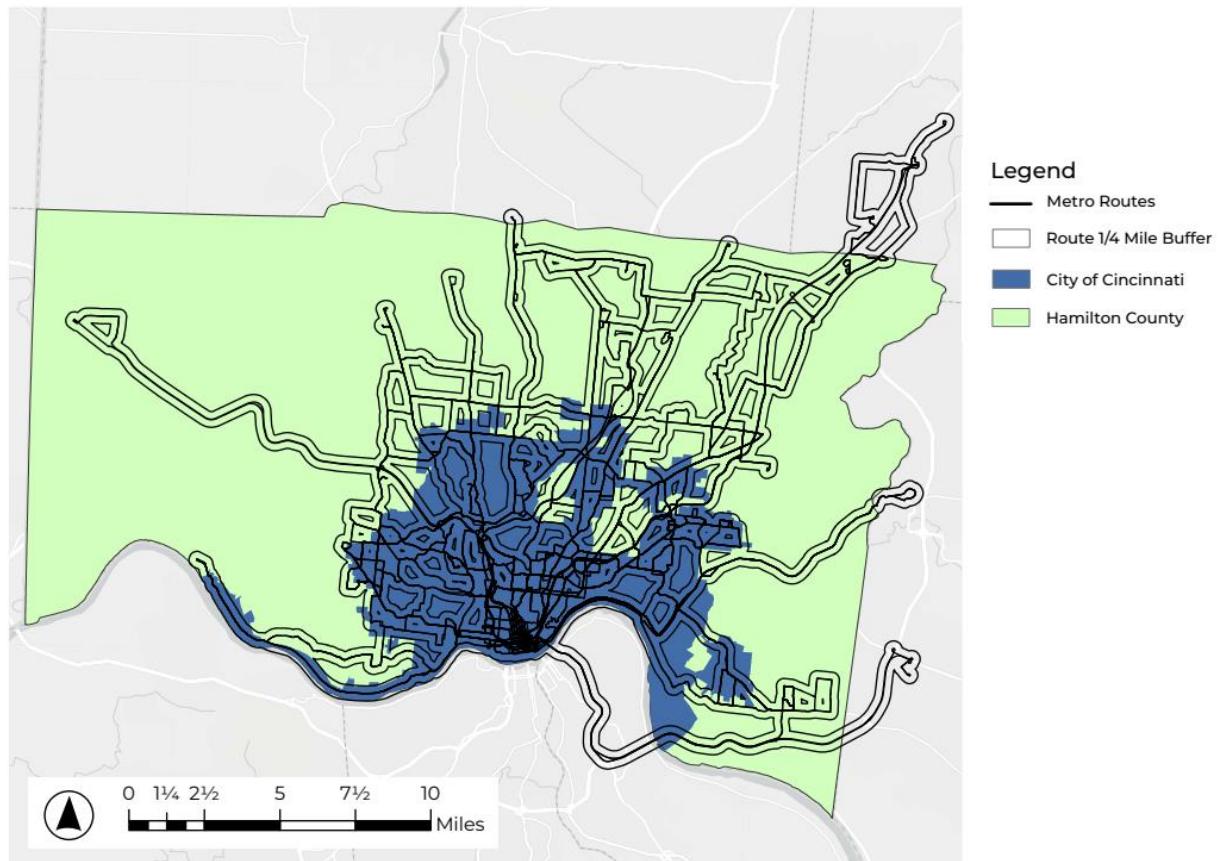
Metro Service Area

Minority and Low Income Populations - Above Average



Source: 2023 American Community Survey (ACS) Estimate

Metro Service Area



Source: 2023 American Community Survey (ACS) Estimate