

RESOLUTION NO. 023-24R

A RESOLUTION APPROVING AND ADOPTING AN UPDATED TITLE VI CIVIL RIGHTS PLAN FOR THE SANDUSKY TRANSIT SYSTEM AS REQUIRED BY THE FEDERAL TRANSIT ADMINISTRATION; AND DECLARING THAT THIS RESOLUTION SHALL TAKE IMMEDIATE EFFECT IN ACCORDANCE WITH SECTION 14 OF THE CITY CHARTER.

WHEREAS, Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color, and national origin in programs and activities receiving federal financial assistance and the Federal Transit Administration (FTA) works to ensure nondiscriminatory transportation in support of their mission to enhance the social and economic quality of life for all Americans and the FTA Office of Civil Rights is responsible for monitoring FTA recipients' Title VI programs and ensuring their compliance with Title VI requirements; and

WHEREAS, as a condition of receiving grant funding, the FTA requires that recipients have a Title VI Plan adopted by its governing body every three (3) years; and

WHEREAS, the City Commission approved and adopted an updated Title VI Civil Rights Plan for the Sandusky Transit System by Resolution No. 005-23R, passed on February 13, 2023; and

WHEREAS, as a result of the Census Bureau's publication of new urban area boundaries based on 2020 Census data, the City was notified by the Federal Transit Administration that the federal funding for the Sandusky Transit System would be transitioning from the Formula Grants for Rural Areas (Section 5311) to the Urbanized Area Formula Grants (Section 5307) Small Urban (UZA) Grant funding and as a direct recipient of FTA funding, the City's Title VI Civil Rights Plan must be updated to comply with FTA requirements; and

WHEREAS, this Resolution should be passed as an emergency measure under suspension of the rules in accordance with Section 14 of the City Charter in order to immediately adopt the updated Title VI Civil Rights Plan so it can be submitted to the FTA as required and to be in compliance with Title VI requirements; and

WHEREAS, in that it is deemed necessary in order to provide for the immediate preservation of the public peace, property, health, and safety of the City of Sandusky, Ohio, and its citizens, and to provide for the efficient daily operation of Municipal Departments, including the Sandusky Transit System, of the City of Sandusky, Ohio, the City Commission of the City of Sandusky, Ohio, finds that an emergency exists regarding the aforesaid, and that it is advisable that this **Resolution** be declared an emergency measure which will take immediate effect in accordance with Section 14 of the City Charter upon its adoption; and NOW, THEREFORE,

BE IT RESOLVED BY THE CITY COMMISSION OF THE CITY OF SANDUSKY, OHIO, THAT:

Section 1. This City Commission hereby approves and adopts the updated Title VI Plan for the Sandusky Transit System, in coordination with the Federal Transportation Administration, a copy of which is marked Exhibit "A" and is

PAGE 2 - RESOLUTION NO. 023-24R

attached to this Ordinance and is specifically incorporated as if fully rewritten herein, together with such revisions or additions thereto as are approved by the Law Director as not being substantially adverse to the City and as being consistent with carrying out the City's public purpose.

Section 2. The City Manager is authorized to execute and file with the City's Plan any assurances, or any other documentation required by the Federal Transportation Administration and to furnish such additional information as the Federal Transportation Administration may require in connection with the City's Plan.

Section 3. If any section, phrase, sentence, or portion of this Resolution is for any reason held invalid or unconstitutional by any Court of competent jurisdiction, such portion shall be deemed a separate, distinct, and independent provision, and such holding shall not affect the validity of the remaining portions thereof.

Section 4. This City Commission finds and determines that all formal actions of this City Commission concerning and relating to the passage of this Resolution were taken in an open meeting of this City Commission and that all deliberations of this City Commission and of any of its committees that resulted in those formal actions were in meetings open to the public in compliance with the law.

Section 5. That for the reasons set forth in the preamble hereto, this Resolution is hereby declared to be an emergency measure which shall take immediate effect in accordance with Section 14 of the City Charter after its adoption and due authentication by the President and the Clerk of the City Commission of the City of Sandusky, Ohio.



RICHARD R. BRADY
PRESIDENT OF THE CITY COMMISSION



ATTEST:

CATHLEEN A. MYERS
CLERK OF THE CITY COMMISSION

Passed: May 13, 2024



COMMUNITY DEVELOPMENT

Division of Transit

240 Columbus Ave
Sandusky, Ohio 44870

419.627.5715

www.ci.sandusky.oh.us

Subject: Title VI – Civil Rights

Effective Date: May 13, 2024

Replaces: All previous

Purpose:

To ensure that Sandusky Transit System (STS) is in compliance with state and federal laws relating to Title VI of the Civil Rights ~~Act~~.Act.

Responsibilities:

The Transit Administrator will ensure that STS complies with law and completes all reporting requirements.

Related Documents:

Attachment 1 Title VI Complaint Procedure

Attachment 2 Title VI Complaint Form

Attachment 3 Language Assistance Plan

Attachment 4 Notice to the Public

Attachment 5 Public Outreach Activities

Attachment 6 Title VI List of Investigations, Complaints and Lawsuits

Attachment 7 Service Standards

Attachment 8 On-time Performance Standards

Attachment 9 Annual certs and Assurances

Attachment 10 Title VI Plan Approval & Compliance Requirements

Policy:

STS adheres to Title VI of the Civil Rights Act of 1964 as amended, Section 601, FTA Circular 4702.1B, ODOT Public transportation requirements as specified in the Master Grant Agreement, and the State Management Plan. This section 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.” STS submitted the Title VI Assurances to the ODOT Office of Transit with the initial application for federal funding and will submit updates annually to the Office of Transit with an update to FTA every three years.

In accordance with Title VI regulations, STS will not:

- Deny any protected individual service, financial aid, or benefit under the program
- Provide any service, financial aid, or benefit that is different for protected individuals from that provided to others
- Subject a protected individual to segregation or separate treatment
- Restrict a protected individual in the employment of any advantage or privilege enjoyed by others
- Treat protected individuals differently in terms of whether they satisfy admission, eligibility, or membership requirements
- Deny a protected individual the opportunity to participate in the provision of services

- Deny a protected individual the opportunity to participate as a member of a planning or advisory body
- Use criteria or methods of administration that have the effect of subjecting individuals to discrimination
- Make decisions in regard to facility location with the purpose of subjecting persons to discrimination
- Discriminate with regard to the routing, scheduling, or quality of transit service
- Use race, color, or national origin as a basis for determining frequency of service, age and quality of vehicles assigned to routes, quality of stations serving different routes, and location of routes

In accordance with Title VI regulations, STS will take affirmative action to assure non-discrimination including the following eight required actions:

1. Develop Title VI Complaint Procedures.
2. Record Title VI investigations, complaints, and lawsuits
 - a. Maintain a list of active investigations conducted by entities other than FTA, lawsuits or complaints alleging discrimination
 - i. Date filed
 - ii. Summary of allegation
 - iii. Current status
 - iv. Actions taken in response
 - b. Notify ODOT immediately in the case of a lawsuit or complaint alleging discrimination
3. Provide meaningful access to persons with Limited English Proficiency – benefits, services, information, and other important portions of their programs.
4. Notify beneficiaries of Title VI protections
 - i. Disseminate information to the public. STS will include a statement on all printed materials indicating that we will operate programs without regard to race, color, national origin, sex, age, income, or disability
 - b. Use a variety of dissemination methods
 - c. General notification
 - d. Document translation
5. Provide additional information upon request
6. Prepare and submit a Title VI program and report information as part of our ODOT grant
7. Analyze impact of construction projects in accordance with the National Environmental Policy Act (NEPA) and ODOT procedures.
8. Promote inclusive public participation by conducting public outreach and involvement activities with minority and low-income individuals.

Attachment 1: Title VI Complaint Procedure

STS Title VI Complaint Procedure

Sandusky Transit System's Title VI Complaint Procedure is made available in the following locations:

- Agency website, if available: www.cityofsandusky.com
- Hard copy in City Hall located at 240 Columbus Avenue Sandusky, Oh 44870.
- Hard copy in STS Operations Hub at 1230 N. Depot St. Sandusky, Oh 44870.

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the Sandusky Transit System (hereinafter referred to as "STS") may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. The Sandusky Transit System investigates complaints received no more than 180 days after the alleged incident. STS will process complaints that are complete.

Once the complaint is received, STS will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

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

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has 30 days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Ohio Department of Transportation, at ODOT Office of Equal Opportunity, Attention: Title VI Coordinator, 1980 West Broad St., Columbus, OH 43223.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

Attachment 2: Title VI Complaint Form

Sandusky Transit System’s Title VI Complaint Procedure is made available in the following locations:

- Agency website, if available: www.cityofsandusky.com/departments/sandusky_transit_system
- Hard copy in City Hall located at 240 Columbus Avenue Sandusky, Oh 44870.
- Hard copy in STS Operations Hub at 1230 N. Depot St. Sandusky, Oh 44870.

STS TITLE VI COMPLAINT FORM

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

Section IV:		
Have you previously filed a Title VI complaint with this agency?	Yes	No
Section V:		
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?		
<input type="checkbox"/> Yes <input type="checkbox"/> No		
If yes, check all that apply:		
<input type="checkbox"/> Federal Agency: _____		
<input type="checkbox"/> Federal Court _____	<input type="checkbox"/> State Agency _____	
<input type="checkbox"/> State Court _____	<input type="checkbox"/> Local Agency _____	
Please provide information about a contact person at the agency/court where the complaint was filed.		
Name:		
Title:		
Agency:		
Address:		
Telephone:		
Section VI:		
Name of agency complaint is against:		
Contact person:		
Title:		
Telephone number:		

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below

Signature Date

Please submit this form in person at the address below, or mail this form to:
 STS Transit Administrator
 240 Columbus Ave.
 Sandusky, OH 44870

Attachment 3 – Language Assistance Plan

Plan Components

As a recipient of federal US DOT funding, **Sandusky Transit System** is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

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

Sandusky Transit System's Language Assistance Plan includes the following elements:

- Item #1: The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.
- Item #2: A description of how language assistance services are provided by language
- Item #3: A description of how LEP persons are informed of the availability of language assistance service
- Item #4: A description of how the language assistance plan is monitored and updated
- Item #5: A description of how employees are trained to provide language assistance to LEP persons

Four Factor Analysis Methodology

To determine if an individual is entitled to language assistance and what specific services are appropriate, **Sandusky Transit System** has conducted a *Four Factor Analysis* of the following areas: 1) Limited-English Proficient (LEP) Speaker Demography, 2) Contact Frequency, 3) Importance of Service, and 4) Resources and Costs.

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient. In addition to the number or proportion of LEP persons served, Sandusky Transit System will identify:

- (a) How LEP persons interact with the recipient's agency;
- (b) Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language;
- (c) The literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice; and
- (d) Whether LEP persons are underserved by the recipient due to language barriers.

Factor 2: The frequency with which LEP persons come into contact with the program: Sandusky Transit System's staff comes into contact with LEP persons in the following ways:

- (a) Use of bus service;
- (b) Purchase of tickets through vending machines, outlets, websites, and over the phone;
- (c) Participation in public meetings;
- (d) Customer service interactions;
- (e) Ridership surveys;
- (f) Operator surveys.

Factor 3: The nature and importance of the program, activity, or service provided by the program to people’s lives. Sandusky Transit System provides a critical service to the residents of Sandusky and Erie County. STS provides access to health care facilities, employment opportunities, food access, educational institutions, and social events, directly contributing to the overall wellbeing of the community and the local economy.

Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach. Resource and cost issues can often be reduced by technological advances, reasonable business practices, and the sharing of language assistance materials and services among and between recipients, advocacy groups, LEP populations and Federal agencies. Large entities and those entities serving a significant number of LEP persons should ensure that their resource limitations are well substantiated before using this factor as a reason to limit language assistance.

Item #1 – Results of the Four Factor Analysis *(including a description of the LEP population(s) served)*

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered.

Of the 70,615 residents, over the age of 5 years old, in **Sandusky Transit System’s Erie County** service area, 1,539 residents describe themselves as speaking English less than “very well”. People of Spanish descent are the primary LEP persons likely to utilize Sandusky Transit System’s services. For Sandusky Transit System’s service area, the latest U.S. Census Bureau data shows that among the area’s population 2.6% speak English “*less than very well.*” **For these groups** who speak English “less than very well”, 327 or 1.3% that speak Spanish.

Erie County – Languages Spoken at Home

	Total Number	Percent of Population	Total Population of County 5 years and older
Speak Language other than English	2278	3.2%	70,615
Speak English Less than Very Well	1539	2.6%	70,615
Spanish – Speak English Less than Very Well	327	1.3%	70,615
Other Indo-European Languages – Speak English Less than Very Well	180	1.0%	70,615
Asian and Pacific Island Languages – Speak English Less than Very Well	197	0.07%	70,615
Other Languages – Speak English Less than Very Well	54	0.02%	70,615

Factor 2: The frequency with which LEP persons come into contact with the program.

Sandusky Transit System assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. Sandusky Transit System provides approximately 400,000 passenger trips per year. If an individual has speech limitations, the dispatcher or driver will work with the Ohio Department of Transportation, if needed, to ensure the individual receives access to the transit services.

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

All of Sandusky Transit System’s programs are important; however, those related to safety, public transit, nondiscrimination, and public involvement are among the most important. Sandusky Transit System is committed to providing meaningful access and will provide written translation for any of its documents, when reasonable, effective and with the available resources. In other cases, Sandusky Transit Systems will strive to provide alternative but meaningfully accessibility. Moreover, Sandusky Transit System continually evaluates its programs, services, and activities to ensure that persons who may be LEP are always provided with meaningful access.

Factor 4: The resources available for LEP outreach, as well as the costs associated with that outreach.

Sandusky Transit System makes every effort to make its programs, services, and activities, accessible to LEP individuals. Sandusky Transit System will use available resources, both internal and external to accommodate reasonable requests for translations.

Item # 2 – Description of how Language Assistance Services are Provided, by Language

Sandusky Transit System has identified, developed, and uses the following:

- a) Individuals who have contact with the public are provided with “I Speak” language cards to identify language needs in order to match them with available services. Language cards verified and distributed by the Director as need.
- b) Sandusky Transit System has developed partnerships with local agencies, organizations, law enforcement, colleges/universities, local school districts and social service agencies that are available to assist with it LEP responsibilities.
- c) A list of web-based translation services can be provided by contracting the Human Resources Department.

Item # 3 – Description of how LEP Persons are Informed of the Availability of Language Assistance Service

In order to ensure that LEP individuals are aware of Sandusky Transit System’s language assistance measures, Sandusky Transit System provides the following:

- Title VI Program including the Language Assistance Plan is made available on website, if applicable, and hard copy in central office.

- Drivers and dispatchers are provided “I Speak” language cards to identify language needs in order to match them with available services.

Item # 4 – Description of how the Language Assistance Plan is Monitored and Updated

Sandusky Transit System will continue to update the LEP plan as required by U.S. DOT. At a minimum, the Title VI Plan will continue to be reviewed and updated every three (3) years in conjunction with the Title VI submission and use data from the U.S. Decennial Census or the American Community Survey as available, or when it is clear that the concentrations of LEP individuals are present in Sandusky Transit System service area.

Updates will continue to include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether Sandusky Transit System’s financial resources are sufficient to fund language assistance resources needed.
- Determine whether Sandusky Transit System has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning Sandusky Transit System’s failure to meet the needs of LEP individuals

Item # 5 - Description of how Employees are Trained to Provide Language Assistance to LEP Persons

The following training will continue to be provided to Sandusky Transit System staff:

- Information on the Sandusky Transit System Title VI Procedures and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of “I Speak” language cards (used to identify language preference).
- Documentation of language assistance requests.
- Use of web-based interpreter services (over the phone interpretation provider).
- How to handle a potential Title VI / LEP complaint.

Limited English Proficient (LEP) Resource Materials:

LEP Policy

Sandusky Transit System shall provide for communication for limited English proficient riders to ensure them equal opportunity to benefit from services. Family members or friends of limited English proficient riders will not be used as translators unless specifically requested by that individual. The agency will utilize web-based translator programs if available.

"I Speak" Language Identification Card

Note: For additional languages visit the US Census Bureau website <http://www.lep.gov/ISpeakCards2004.pdf>

Mark this Box if you speak...	Language Identification Chart	Language
	Mark this box if you read or speak English	English
	Marque esta casilla si lee o habla español	Spanish
	Kos lub voj no yog koj paub twm thiab hais lus Hmoob	Hmong
	如果说中国在方框内打勾	Chinese
	Xin ñaùnh daáu vaøo oâ naøÿ neáu quyù vò bieát ñoïc vaø nouì ñöôic Vieät Ngöõ.	Vietnamese
	당신이한국어말할경우이 상자를표시	Korean
	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	Tagalog
	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen	German
	Отметить этот флажок, если вы говорите по-русски	Russian
	Означите ову кућицу ако говорите српски	Serbian
	आप हिंदी बोलते हैं तो इस बक्से को चिह्नित करें	Hindi
	پر نشان لگائیں تو اس باکس بولتے ہیں اردو اگر آپ	Urdu

Log of LEP Encounters

Date	Time	Language Spoken By Individual <i>(if available)</i>	Name and Phone Number of Individual <i>(if available)</i>	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes

Title VI Notice to the Public

Sandusky Transit System's Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

Sandusky Transit System

- **Sandusky Transit System** 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 the **Sandusky Transit System**.

For more information on the **Sandusky Transit System's** civil rights program, the procedures to file a complaint, or to file a complaint, please contact James Stacey, Transit Administrator at (419) 627-5715 email jstacey@cityofsandusky.com; or visit our administrative office at 240 Columbus Avenue, Sandusky, Ohio 44870. For more information, visit www.cityofsandusky.com

- For transportation-related Title VI matters, a complaint may also be filed directly with the:

Ohio Department of Transportation, Attn: Office of Opportunity, Diversity, and Inclusion, Title VI Coordinator, [1980](http://www.ohio.gov) West Broad Street, Mailstop 3270, Columbus, Ohio 43223

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

- If information is needed in another language, contact (419) 627-5715.

Sandusky Transit System's Notice to the Public is posted in the public areas of the office and inside the transit vehicles.

1. Sandusky Transit Operations Hub at 1230 N. Depot St. Sandusky, Oh 44870.
2. City of Sandusky Administrative Building at City Hall 240 Columbus Avenue Sandusky, Oh 44870

Attachment 5 - Public Outreach Activities

The public outreach and involvement activities conducted by **Sandusky Transit System** since the last Title VI Program submission are summarized in the table below.

Specific Public Participation activities are listed in the table below:

Event Date	Insert Agency Name Staffer(s) or Department	Activity	Communication Method (Public notice, posters, social media)	Notes
04/25/24	MPO Combined TAC/ Policy Meeting	Review, select, and recommend to the Policy Committee Transportation Plans and other recommendations	Social media, MPO/ County website	Agenda on MPO/ County website
03/28/24	MPO Combined TAC/ Policy Meeting	Review, select, and recommend to the Policy Committee Transportation Plans and other recommendations	Social media, MPO/ County website	Agenda on MPO/ County website
02/22/24	MPO Combined TAC/ Policy Meeting	Review, select, and recommend to the Policy Committee Transportation Plans and other recommendations	Social media, MPO/ County website	Agenda on MPO/ County website
02/06/24	City of Sandusky, Mobility Management	Q5 Erie County Transportation Stakeholder and Planning Committee Meeting	posters	Discussed transportation barriers, goals and strategies on coordinating transportation
01/25/24	MPO Combined TAC/ Policy Meeting	Review, select, and recommend to the Policy Committee Transportation Plans and other recommendations	Social media, MPO/ County website	Agenda on MPO/ County website
12/28/23	MPO Combined TAC/ Policy Meeting	Review, select, and recommend to the Policy Committee Transportation Plans and other recommendations	Social media, MPO/ County website	Agenda on MPO/ County website
11/9/23	City of Sandusky, Mobility Management	Q4 Erie County Transportation Stakeholder and Planning Committee Meeting	posters	Discussed transportation barriers, goals and strategies on coordinating transportation
9/28/23	MPO Combined TAC/ Policy Meeting	Review, select, and recommend to the Policy Committee Transportation Plans and other recommendations	Social media, MPO/ County website	Agenda on MPO/ County website
07/27/23	MPO Combined TAC/ Policy Meeting	Review, select, and recommend to the Policy Committee Transportation Plans and other recommendations	Social media, MPO/ County website	Agenda on MPO/ County website
6/8/23	City of Sandusky, Mobility	Q2 Erie County Transportation Stakeholder and Planning Committee	posters	Discussed transportation barriers, goals and strategies on coordinating

	Management	Meeting		transportation
3/23/23	MPO Combined TAC/ Policy Meeting	Review, select, and recommend to the Policy Committee Transportation Plans and other recommendations	Social media, MPO/ County website	Agenda on MPO/ County website
3/9/23	City of Sandusky, Mobility Management	Q1 Erie County Transportation Stakeholder and Planning Committee Meeting	posters	Discussed transportation barriers, goals and strategies on coordinating transportation
2/23/23	MPO Combined TAC/ Policy Meeting	Review, select, and recommend to the Policy Committee Transportation Plans and other recommendations	Social media, MPO/ County website	Agenda on MPO/ County website
01/26/23	MPO Combined TAC/ Policy Meeting	Review, select, and recommend to the Policy Committee Transportation Plans and other recommendations	Social media, MPO/ County website	Agenda on MPO/ County website
01/03/2023	City of Sandusky	Proposed Service Changes	Public Hearing	Consolidation of Orange and Yellow Fixed Route Lines Introduction of Peak Season and Off-Season Service Hours
2/24/2022	City of Sandusky, Mobility Management	Q1 Erie County Transportation Stakeholder and Planning Committee Meeting	Posters	Discussed transportation barriers, goals and strategies on coordinating transportation
04/08/2022	Mobility Management	Senior Wellness Expo	Posters, social media	Attended community event to promote transportation options
05/05/2022	City of Sandusky, Mobility Management	Q2 Erie County Transportation Stakeholder and Planning Committee Meeting	Posters	Discussed transportation barriers, goals and strategies on coordinating transportation
07/18/2022	City of Sandusky, Mobility Management	Erie County Public Hearing	Public Hearing	TDP Public Hearing
08/04/2022	City of Sandusky, Mobility Management	Q3 Erie County Transportation Stakeholder and Planning Committee Meeting	Posters	Discussed transportation barriers, goals and strategies on coordinating transportation
09/24/2022	Mobility Management	Erie County Regional Employee Wellness Fair	Social media, posters	
11/3/2022	City of Sandusky, Mobility Management	Q4 Transportation Stakeholder and Planning Committee Meeting	Posters	Discussed transportation barriers, goals and strategies on coordinating transportation
3/18/2021	City of Sandusky, Mobility Management	Q1 2021 Erie County Transportation Stakeholder and Planning Committee	Posters	Discussed transportation barriers, goals and strategies on coordinating transportation
06/17/2021	City of Sandusky, Mobility	Q2 Erie County Transportation Stakeholder	Posters	Discussed transportation barriers, goals and strategies

	Management	and Planning Committee		on coordinating transportation
07/12/2021	Mobility Management	Focus Group	Posters	Garnered feedback on transportation within the county
08/19/2021	City of Sandusky, Mobility Management	2021 Q3 Transportation Stakeholder and Planning Committee Meeting	Posters, social media	Discussed transportation barriers, goals and strategies on coordinating transportation
10/14/2021	City of Sandusky, Mobility Management	2021 Q4 Transportation and Stakeholder Planning Committee	Posters	Discussed transportation barriers, goals and strategies on coordinating transportation
10/28/2021	Mobility Management	Erie County Coordinated Plan Public Hearing	Public Hearing	Public hearing for approval of 2022-2026 Public Coordinated Transportation Plan
07/21/2020	City of Sandusky, Mobility Management	2020 Q3 Erie County Transportation Planning Committee Meeting	Posters	Discussed transportation barriers, goals and strategies on coordinating transportation
10/8/2020	City of Sandusky, Mobility Management	2020 Q4 Erie County Transportation Planning Committee Meeting	Posters	Discussed transportation barriers, goals and strategies on coordinating transportation

Sandusky Transit System’s (STS) LEP Outreach Efforts

All hearings and meetings are held in an accessible location at times that are convenient for minority and Limited English Proficiency (LEP) communities. STS participates in speaking engagements. If the staff is presenting a topic that could be of potential importance to an LEP person or hosts a meeting/workshop in a concentration of LEP person, an ~~interpreter~~ interpreter can be available. STS’s key printed materials such as rider guides, maps and Title VI information are available in English and alternative formats upon request.

Sandusky City staff attends the Sandusky Community Relations Commission quarterly meeting and is active in neighborhood programs and outreach. STS also works closely with other agencies that serve minority, low-income, and LEP populations daily to assure that public outreach and involvement efforts are effective.

As a public service agency, STS is eager to ensure that it is meeting the needs of the public to the best of its ability.

STS will encourage public participation in advisory boards and councils to aid in public transportation decision-making without regard to race, color, or national origin.

Below is a breakdown of STS’s elected governing body as well as the population of the county in which we serve categorized by race according to the United State Census Bureau ACS Demographic and Housing Data.

Erie County	Caucasian	Latino	African American	Asian American	Native American and Other
Population	90.1%	4.9%	8.2%	0.8%	2.7
Governing Body	85.7%	0%	14.2%	0%	0%

Attachment 6: Transit Related Title VI Investigations, Complaints, and Lawsuits

STS's LIST OF TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

Period: January 1, 2012 – May 1, 2023

	Date (Month, Day, Year)	Summary (Include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1. NONE	N/A	N/A	N/A	N/A
Lawsuits				
1. NONE	N/A	N/A	N/A	N/A
Complaints				
1. NONE	N/A	N/A	N/A	N/A

Attachment 7: Service Standards

SERVICE STANDARDS (REQUIREMENT FOR ALL FIXED ROUTE TRANSIT PROVIDERS)

Background FTA requires all fixed route transit providers of public transportation to develop quantitative standards for the following indicators. Individual public transportation providers will set these standards; therefore, these standards will apply to each individual agency rather than across the entire transit industry.

- Vehicle load for each mode: Generally expressed as the ratio of passengers to the number of seats on a vehicle, relative to the vehicle's maximum load point. Transit providers can specify vehicle loads for peak vs. off-peak times, and for different modes of transit.
- Vehicle headways for each mode: The amount of time between two vehicles traveling in the same direction on a given line or combination of lines.
- On-time performance for each mode: A measure of runs completed as scheduled.
- Service availability for each mode: A general measure of the distribution of routes within an agency's service area.

STS Service Standards

The average of all loads during the peak operating period should not exceed vehicles' achievable capacities, which are 32 passengers for a 35' Medium Duty Bus, 18 passengers for Cutaway Buses and 8 passengers for vans. All vehicles are ADA compliant with at least 2 wheelchair securements in each vehicle.

Vehicle Type Maximum Load Seated Total Factor Average Passenger Capacities Standing: 35' Medium Duty Bus 32, 0, 32, 1.0; Cutaway Bus 18, 0, 18, 1.0; Sprinter Van 8, 0, 8, 1.0.

STS Vehicles' Average Passenger Capacities for Fixed Routes, Paratransit, and On Demand Service

Vehicle Type	Seating Passengers	Standing Passengers	Total	Maximum Load Factor
Medium Duty 35' Vehicles	32	0	32	1.0
Cutaway Buses	18	0	18	1.0
Sprinter Vans	8	0	8	1.0

Vehicle Headway Standards

Fixed Service hours are varied among the different fixed route lines. All fixed route lines are designed to be completed within 1 hour. The Blue line is the only line that operates multiple vehicles (2 per hour) to service each stop every 30 minutes. Every other line operates only one vehicle and the designed frequency per stop is every 60 minutes. The Blue line, Red Line and Yellow Line, in Peak Season, operate 7 days a week, whereas the Green and Purple Line only operate six. In the Off Season, the only change

made to schedule is that the Yellow line reduces hours to match Green and Purple and does not operate on Sundays. No matter weekday or weekend, Peak Season or Off Season, fixed route frequency is 30 minutes (Blue Line) or 60 minutes on all other lines service should begin no later than 5:00 a.m. and continue until 12:30 a.m. (or until time displayed in graph). Scheduling involves the consideration of a number of factors including: ridership productivity, transit/pedestrian friendly streets, density of transit-dependent population and activities, relationship to the Regional Transportation Plan, relationship to major transportation developments, land use connectivity, and transportation demand management.

Policy Headways and Period of Operation (in minutes) for STS Fixed Routes and Paratransit Service

Peak Season May 1- Nov. 1

Weekdays	Peak	Base	Evening	Night
Blue Line	30	30	30	30
Red Line	60	60	60	60 Stops at 10pm
Yellow Line	60	60	60	60
Purple Line	60	60	60	N/A
Green Line	60	60	60	N/A

**peak hours 7-9am and 4-6pm, base hours 9am-4pm, evening hours 6-8pm, night 8pm-12:30am*

*** N/A means no service provided at that time*

Policy Headways and Period of Operation (in minutes) for STS Fixed Routes and Paratransit Service

Off Season Nov. 1 - May 1

Weekdays	Peak	Base	Evening	Night
Blue Line	30	30	30	30
Red Line	60	60	60	60 Stops at 10pm
Yellow Line	60	60	60	N/A
Purple Line	60	60	60	N/A
Green Line	60	60	60	N/A

**peak hours 7-9am and 4-6pm, base hours 9am-4pm, evening hours 6-8pm, night 8pm-12:30am*

*** N/A means no service provided at that time*

Policy Headways and Period of Operation (in minutes) for STS Fixed Routes and Paratransit Service

Peak Season May 1- Nov. 1

Saturday	Peak	Base	Evening	Night
Blue Line	30	30	30	30
Red Line	60	60	60	60 Stops at 10pm
Yellow Line	60	60	60	60
Purple Line	60	60	60	N/A
Green Line	60	60	60	N/A

**peak hours 7-9am and 4-6pm, base hours 9am-4pm, evening hours 6-8pm, night 8pm-12:30am*

*** N/A means no service provided at that time*

Policy Headways and Period of Operation (in minutes) for STS Fixed Routes and Paratransit Service

Off Season Nov. 1 - May 1

Saturday	Peak	Base	Evening	Night
Blue Line	30	30	30	30
Red Line	60	60	60	60 Stops at 10pm
Yellow Line	60	60	60	N/A
Purple Line	60	60	60	N/A
Green Line	60	60	60	N/A

**peak hours 7-9am and 4-6pm, base hours 9am-4pm, evening hours 6-8pm, night 8pm-12:30am*

*** N/A means no service provided at that time*

Policy Headways and Period of Operation (in minutes) for STS Fixed Routes and Paratransit Service

Peak Season May 1- Nov. 1

Sunday	Peak	Base	Evening	Night
Blue Line	30	30	30	30
Red Line	60	60	60	60 Stops at 10pm
Yellow Line	60	60	60	60
Purple Line	N/A	N/A	N/A	N/A
Green Line	N/A	N/A	N/A	N/A

**peak hours 7-9am and 4-6pm, base hours 9am-4pm, evening hours 6-8pm, night 8pm-12:30am*

*** N/A means no service provided at that time*

Policy Headways and Period of Operation (in minutes) for STS Fixed Routes and Paratransit Service

Off Season Nov. 1 - May 1

Sunday	Peak	Base	Evening	Night
Blue Line	30	30	30	30
Red Line	60	60	60	60 Stops at 10pm
Yellow Line	N/A	N/A	N/A	N/A
Purple Line	N/A	N/A	N/A	N/A
Green Line	N/A	N/A	N/A	N/A

**peak hours 7-9am and 4-6pm, base hours 9am-4pm, evening hours 6-8pm, night 8pm-12:30am*

*** N/A means no service provided at that time*

Attachment 8: On-Time Performance Standards

On-Time Performance Standards

An STS vehicle is considered on time if it departs at a scheduled timepoint no more than 1 minute early and no more than 8 minutes late. The Sandusky Transit System's on-time performance objective is 90% or greater. The Sandusky Transit System continuously monitors on-time performance and system results are administratively documented as part of monthly performance reports covering all aspects of operations.

Service Availability Standards

The Sandusky Transit System will distribute transit service so that 90% of all residents in the service area are within a ¼ mile walk of bus service.

SERVICE POLICIES (REQUIREMENT FOR ALL FIXED ROUTE TRANSIT PROVIDERS)

Background FTA requires that all providers of fixed route public transportation develop qualitative policies for the following procedures. These policies are to be set by individual transit providers; therefore, these policies will apply to individual agencies rather than across the entire transit industry.

- Vehicle Assignment
- Transit Amenities

Vehicle Assignments

Vehicles will be assigned to the STS Operations Hub located at 1230 N. Depot St., Sandusky, Ohio. Due to the current state of the vehicle inventory, we have extended the average age of the fleet not to exceed 13 years. High passenger capacity buses are deployed on frequent service fixed routes and other high-ridership lines, so these buses carry a higher share of ridership than their numerical proportion of the overall bus fleet. All buses are also equipped with air conditioning. Bus assignments consider the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route. Local routes with lower ridership may be assigned Cutaway buses rather than Medium Duty sized buses. Some routes requiring tight turns on narrow streets are operated with Sprinter Vans rather than Cutaways or Medium Duty buses.

Transit Amenities Policy

Installation of transit amenities along bus and rail routes are based on the number of passenger boardings at stops along those routes.

Attachment 9: Annual Certifications and Assurances

Annual Certifications and Assurances

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances. Primary recipients will collect Title VI assurances from sub-recipients prior to passing through FTA funds.

Sandusky Transit System will remain in compliance with this requirement by annual submission of certifications and assurances as required by NHDOT.

The date of last submission of these certifications and assurances (at the time of this Plan’s approval) is: January 9, 2023

Title VI Plan Revision Log

Date Month/day/year	Section Revised	Summary of Revisions
1-9-23	Creation of document	All document updates and creation
5-13-24	Revised for FTA transition into direct recipient 5307 funding	All documents revised

Attachment 10: Title VI Plan Approval & Compliance Requirements

Title VI Plan
Adopted on: (05/13/2024)

Adopted by: City of Sandusky Commissioners

Signature(s): _____

Approval:

