

Federal Transit Administration
Title VI Program
Version 0924

Struthers Senior Transportation Program

Effective Date of Plan:
November 1, 2025

Title VI Contact Information

Contact (Position): Mayor
Contact Phone Number: 330-755-2181
Contact Email: mayor@cityofstruthers.com

Mailing Address: 6 Elm Street, Struthers, OH 44471
Website: <https://www.cityofstruthers.com/>

Language Interpretation Assistance

Interpretation Services Provided By the City of Struthers: No-Cost Interpreter Services (via qualified contracted provider arranged upon request)

For Interpreter Services Individuals Will Call (Phone Number): 330-755-2181 (Safety Service Director / Title VI & Language Access)

TTY/TTD (Hearing/Speech): 711 (Ohio Relay Service)

Title VI Plan Table of Contents

The The City of Struthers Title VI plan includes the following elements:

1. Plan Approval, Annual Certifications and Assurances, Revision Log
2. Policy Statement
3. Notice to the Public
4. Complaint Procedure
5. Complaint Form
6. List of transit related Title VI Investigations, Complaints and Lawsuits
7. Public Participation Plan
8. Language Assistance Plan
9. Minority Representation Table and Description
10. Providing Assistance to and Monitoring Subrecipients
11. Title VI Equity Analysis for Facility Acquisition
12. Fixed Route Transit Provider Requirements
13. MPO Requirements

Section 1: Title VI Plan Approval & Compliance Requirements

Title VI Plan
Adopted on: INSERT DATE

Adopted by: Struthers City Council

Signature(s): _____

Approval:

**CITY OF STRUTHERS, OHIO
RESOLUTION NO. _____**

A RESOLUTION ADOPTING THE CITY OF STRUTHERS TITLE VI PROGRAM FOR TRANSIT-RELATED ACTIVITIES UNDER FTA SECTION 5310, AUTHORIZING SUBMISSION TO THE OHIO DEPARTMENT OF TRANSPORTATION, DESIGNATING A TITLE VI COORDINATOR, AND AUTHORIZING THE EXECUTION OF ALL REQUIRED CERTIFICATIONS, ASSURANCES, AND RELATED DOCUMENTS.

WHEREAS, the City of Struthers ("City") receives and/or may receive Federal Transit Administration ("FTA") financial assistance through the Ohio Department of Transportation ("ODOT") under 49 U.S.C. §5310 (Enhanced Mobility of Seniors & Individuals with Disabilities); and

WHEREAS, as a condition of receiving federal financial assistance, the City must comply with Title VI of the Civil Rights Act of 1964 and U.S. Department of Transportation regulations at 49 C.F.R. Part 21, as further guided by FTA Circular 4702.1B; and

WHEREAS, the City has prepared a Title VI Program for its transit-related activities, including required notices, complaint procedures and forms, public participation and language assistance plans, and related compliance elements; and

WHEREAS, adoption of the Title VI Program by the City Council and authorization to submit the Program to ODOT are required to document compliance and maintain eligibility for FTA assistance.

NOW, THEREFORE, BE IT RESOLVED by the Council of the City of Struthers, Ohio:

Section 1. Adoption. The City Council hereby adopts the **City of Struthers Title VI Program for Transit-Related Activities**, with an effective date of _____, 2025, including all exhibits and appendices, as the City's official Title VI Program. The Program is incorporated herein by reference as if fully rewritten.

Section 2. Title VI Coordinator. The **Safety-Service Director** is designated as the City's **Title VI Coordinator** for transit-related activities, responsible for implementing the Program; posting and disseminating the Notice to the Public; receiving, tracking, and addressing Title VI complaints; maintaining required records; coordinating public participation and language assistance measures; and preparing updates and reports required by FTA/ODOT.

Section 3. Submission and Assurances. The **Mayor** and/or **Safety-Service Director** are authorized to submit the adopted Title VI Program to ODOT; execute and submit the **FTA Annual Certifications and Assurances** and any additional documents, agreements, or updates required by ODOT/FTA; and take all actions necessary to carry out and enforce the Program.

Section 4. Administrative Updates. The Title VI Coordinator may make non-substantive administrative updates to the Program (e.g., contact names, titles, phone numbers, email, mailing address, web links, formatting) to keep information current, and shall promptly provide updated copies to ODOT/FTA as required. Substantive policy changes shall be brought to Council for approval.

Section 5. Conflict Repealer. All resolutions or parts of resolutions in conflict herewith are hereby repealed to the extent of such conflict.

Section 6. Effective Date. This Resolution shall take effect and be in force from and after the earliest period allowed by law.

PASSED: _____, 2025.

Roll Call: Ayes: ___ Nays: ___ Abstain: ___ Absent: ___

President of Council

ATTEST:

Clerk of Council

APPROVED:

Mayor

Approved as to form:

Law Director

Clerk's Certification

I hereby certify that the foregoing is a true and correct copy of Resolution No. _____ duly adopted by the Council of the City of Struthers, Ohio, on the ____ day of _____, 2025.

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.

The City of Struthers will remain in compliance with this requirement by annual submission of certifications and assurances as required by ODOT.

The date of last submission of these certifications and assurances (at the time of this Plan's approval) is: **Month, day, year**

Title VI Plan Revision Log

Date Month/day/year	Section Revised	Summary of Revisions

Section 2: Title VI Policy Statement

Policy Statement

The Struthers Senior Transportation Program, operating demand response transit provider, as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Ohio Department of Transportation (ODOT), will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the U.S. Department of Transportation implementing regulations, FTA Circular 4702.1B, and ODOT Public Transportation requirements as specified in Master Grant Agreement, and State Management Plan. The Struthers Senior Transportation Program operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

Section 3: Notice to the Public

Title VI Notice to the Public

The City of Struthers Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

City of Struthers

- The Struthers Senior Transportation Program 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 City of Struthers.
- For more information on the City of Struthers's civil rights program, the procedures to file a complaint, or to file a complaint, please contact the Safety Services Director at 330-755-2181; email safety@cityofstruthers.com; or visit our administrative office at 6 Elm Street, Struthers, OH 44471. For more information, visit <https://www.cityofstruthers.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 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 330-755-2181.

FTA states that: *agencies shall inform the public of their rights under Title VI through such measures as posting the Title VI notice on posters, comment cards, or flyers placed at stations, bus shelters, and in transit vehicles. The type, timing, and frequency of these measures are at the recipient's discretion, as long as the type, timing, and frequency are sufficient to notify passengers and other interested persons of their rights under DOT's Title VI regulations with regard to the recipient's program.* As such, the City of Struthers Notice to the Public can be found at the following locations (check all that apply):

- In public areas of the office, including reception room and meeting rooms.
- On the agency website.
- In the agency brochure.
- In the agency vehicles.
- At stations and/or stops.
- Other: _____

Sample Title VI Notice to the Public in Spanish

Note: The translation of vital documents must be verified for accuracy. You cannot assume that what is written in this template accurately conveys the rights included in your Title VI notice. You also cannot rely on Google Translate without additional verification such as a language translator.

Note: Follow this template below for any additional languages required by your Language Assistance Plan.

Notificación al público de derechos bajo el Título VI

- El City of Struthers opera sus programas y servicios sin distinción de raza, color y origen nacional, según el Título VI de la Ley de Derechos Civiles. Cualquier persona que cree o que ha sido perjudicada por una práctica discriminatoria ilegal bajo el Título VI puede presentar una queja con el Struthers.
- Para obtener más información sobre el programa de derechos civiles de City of Struthers, o para obtener más información sobre los procedimientos para presentar una queja, por favor llame a Safety Services Director 330-755-2181, safety@cityofstruthers.com, o visite nuestra oficina administrativa en 6 Elm Street, Struthers, OH 44471.
- Un demandante puede presentar una queja directamente a la el Departamento de Transporte del estado de Ohio, Attn: Office of Opportunity, Diversity and Inclusion 1980 West Broad Street, Mailstop 3270, Columbus, OH 43223.
- Un demandante puede presentar una queja directamente a la Administración Federal de tránsito, Office of Civil Rights, Atención: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- Si se necesita información en otro idioma, comuníquese con 330-755-2181..

Section 4: Title VI Complaint Procedure

The City of Struthers Title VI Complaint Procedure is made available in the following locations (check all that apply):

- Agency website at: <https://www.cityofstruthers.com/>
 - Hard copy in the central office
 - Agency Title VI Plan
 - Other: _____
-

Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color, or national origin by the City of Struthers may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

Any individual having filed a complaint or participated in the investigation of a complaint shall not be subjected to any form of intimidation or retaliation. Individuals who have cause to think that they have been subjected to intimidation or retaliation can file a complaint of retaliation following the same procedure for filing a discrimination complaint.

A complaint must be filed with the City of Struthers no later than 180 days after the following:

1. The date of the alleged act of discrimination; or
2. The date when the person(s) became aware of the alleged discrimination; or
3. Where there has been a continuing course of conduct, the date on which that conduct was discontinued of the latest instance of the conduct.

Once the complaint is received, the City of Struthers will review it to determine if our office has jurisdiction. A copy of each Title VI complaint received will be forwarded to the Ohio Department of Transportation within ten (10) calendar days of receipt. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

The City of Struthers has 45 days to investigate the complaint. If more information is needed to resolve the case, the City of Struthers may contact the complainant requesting further information. The complainant has **14** 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 **14** business days, the City of Struthers can administratively close the case.

After the investigator reviews the complaint, the agency will issue one of two (2) 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.
- ✓ A letter of finding (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 it must direct the appeal to the agency initially. The complainant has **14** days after the date of the closure letter or the letter of finding to do so. If there is

outstanding concern, the appeal may be directed to the state DOT or FTA. The appeal process information will be included in the letter.

A person may also file a complaint directly with the: Ohio Department of Transportation, Attn: Office of Opportunity, Diversity and Inclusion 1980 West Broad Street, Mailstop 3270, Columbus, OH 43223
Or

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, then contact 330-755-2181.

Section 5: Title VI Complaint Form

City of Struthers's Title VI Complaint Procedure is made available in the following locations:

Agency website, if available: <https://www.cityofstruthers.com/>

Hard copy in the central office

Agency Title VI Plan

Other: _____

Title VI Complaint Form

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Email Address:				
Accessible Requirements?	Format	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 Origin				
Date of Alleged Discrimination (Month Day, Year) _____				
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please 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

If information is needed in another language, contact 330-755-2181.

Please submit this form to:

City of Struthers
Safety Service Director
6 Elm Street, Struthers, OH 44471
330-755-2181
safety@cityofstruthers.com

Section 6: List of Transit Related Title VI Investigations, Complaints and Lawsuits

The City of Struthers maintains a list or log of all Title VI investigations, complaints, and lawsuits, pertaining to its transit-related activities.

Check One:

There have been no investigations, complaints, and/or lawsuits filed against The City of Struthers since the last plan submission.

There have been investigations, complaints, and/or lawsuits filed against The City of Struthers. See list below. Additional information is to be attached as needed.

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
	Click or tap to enter a date.			
	Click or tap to enter a date.			
Lawsuits				
	Click or tap to enter a date.			
	Click or tap to enter a date.			
Complaints				
	Click or tap to enter a date.			
	Click or tap to enter a date.			

Section 7: Public Participation Plan

Strategies and Desired Outcomes

To promote inclusive public participation, the City of Struthers will employ the following strategies, as appropriate (make these determinations based on a demographic analysis of the population(s) affected, type of plan, program and/or service under consideration, and the resources available):

- ✓ Provide for early, frequent and continuous engagement by the public
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Use social media in addition to other resources as a way to gain public involvement
- ✓ Use radio, television or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.
- ✓ Expand traditional outreach methods by visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, local festivals, etc.

Public Outreach Activities

The public outreach and involvement activities conducted by the City of Struthers 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
9/10/25	Struthers City Council	Regular Meeting	Public Notice Social Media	
10/8/25	Struthers City Council	Regular Meeting	Public Notice Social Media	
11/12/25	Struthers City Council	Regular Meeting	Public Notice Social Media	
12/10/25	Struthers City Council	Regular Meeting	Public Notice Social Media	

Section 8: Language Assistance Plan

Plan Components

As a recipient of federal US DOT funding, the City of Struthers 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.

The City of Struthers 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, the City of Struthers 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, The City of Struthers 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: Identifies and assesses the frequency The City of Struthers's staff comes into contact with LEP persons. Examples of contact could include:

- (a) Use of bus and rail 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. Generally speaking, the more important the program, the more frequent the contact and the likelihood that language services will be needed.

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 9,995 residents in the City of Struthers service area, 550 residents describe themselves as speaking English less than "very well". People of hispanic descent are the primary LEP persons likely to utilize the City of Struthers services. For the City of Struthers service area, the latest U.S. Census Bureau data shows that among the area's population 1-2% speak English "less than very well." **For these groups** who speak English "less than very well", 100% speak Spanish.

Mahoning County – Languages Spoke at Home

	Total Number	Percent of Population	Total Population of County
Speak Language other than English	9,031	4%	225,786
Speak English Less than Very Well	4,290	1.9%	225,786
Spanish	4,516	2%	225,786
Other Indo-European Languages	3,838	1.7%	225,786
Asian and Pacific Island Languages	0	0%	225,786
Other Languages	542	0.24%	225,786

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

The City of Struthers assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. The City of Struthers provides approximately 156 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 the City of Struthers programs are important; however, those related to safety, public transit, nondiscrimination and public involvement are among the most important. The City of Struthers 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, the City of Struthers will strive to provide alternative but meaningful accessibility. Moreover, the City of Struthers continually evaluates its programs, services, and activities to ensure that persons who may be LEP are always provided with meaningful access. The Title VI policy, complaint form, and LEP policy are available in Spanish upon request.

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

The City of Struthers makes every effort to make its programs, services, and activities, accessible to LEP individuals. The City of Struthers 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

The City of Struthers 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) The City of Struthers 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 the City of Struther's language assistance measures, the City of Struthers 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

The City of Struthers 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 the City of Struthers 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 the City of Struthers financial resources are sufficient to fund language assistance resources needed.
- Determine whether the City of Struthers has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the City of Struthers 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 The City of Struthers staff:

- Information on the City of Struthers 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

The City of Struthers 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. Arrangements have been made with Language Services Inc. to obtain translators. The agency will also utilize web-based translator programs if available.

If you need help with English, please call 330-755-2181.

Si usted necesita ayuda con el inglés, por favor llame 330-755-2181.

"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 vaø oâ naøy neáu quyù vò bieát ñoïc vaø noùi ñoõic 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 (N/A for 2025)

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

Section 9: Minority Representation Information

Recipients that have **transit-related**, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

***Guidance:** Elected transit-related board, committee, or council, do not need to complete the table below, and write in section B that there are no non-elected transit-related boards, committees, or councils.

A. Minority Representation Table

Table Depicting Membership of Board, Committees, Councils, Broken Down by Race

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
(Insert service area total population racial breakdown)						
[Insert Name of Committee/Board]						

Note: insert the number of people and % of total board membership

B. Efforts to Encourage Minority Participation

To encourage participation on its boards, committees, and councils, the The City of Struthers will make every effort to encourage minority participation on the boards. Detail any further efforts below.

**The City of Struthers only has an elected City Council committee and no non-elected transit related boards, committees, and councils.*

Section 10: Providing Assistance to and Monitoring Subrecipients

1. Does agency provide funding to subrecipients?

No, the agency does not have subrecipients.

Yes. If yes, list the subrecipient names: Click or tap here to enter text.

The City of Struthers monitors subrecipients using the following process:

1. The City of Struthers uses the following process for ensuring all subrecipients are complying with the general reporting requirements of FTA Circular 4702.1B:
Click or tap here to enter text.
2. The City of Struthers collects Title VI programs from the subrecipients listed above and reviews programs for compliance by doing the following:
Click or tap here to enter text.

Section 11: Title VI Equity Analysis for Facility Acquisition

Title 49 CFR, Appendix C, Section (3)(iv) requires “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. Has the agency built a facility? Check a response below.

No, the City of Struthers has not built a facility.

Yes, the City of Struthers has built a facility and completed a Title VI equity analysis to compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site. Include at the end of the Title VI plan a copy of the Title VI equity analysis.

Section 12: Fixed Route Transit Providers Service Standards and Policies (N/A)

FTA Circular 4702.1B, Chapter III, Paragraph 10: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.

X The City of Struthers is not a fixed route transit provider. As such, the remainder of Section 12 is not applicable to the City of Struthers and may be deleted from this document.

The City of Struthers is a fixed route transit provider. As such, the remainder of Section 12 is applicable to the City of Struthers and is to be filled out completely.

All Fixed Route Transit Providers must submit:

- All requirements set out in Chapter III (General Requirements)
 - Service standards
 - Vehicle load for each mode
 - Vehicle headway for each mode
 - On time performance for each mode
 - Service availability for each mode
 - Service policies
 - Transit Amenities for each mode
 - Vehicle Assignment for each mode

The City of Struthers has adopted the following system-wide standards and policies to ensure service design and operations practices do not result in discrimination on the basis of race, color, or national origin. Service policies differ from service standards in that they are not necessarily based on a quantitative threshold.

Service Standards

FTA requires that all fixed route transit providers develop quantitative standards for all fixed route modes of operation for the following indicators. The City of Struthers has prepared standards for all modes it operates including **Insert modes of transportation.**

a. Vehicle Load

Vehicle Type	Average Passenger Capacities			
	Seated	Standing	Total	Maximum Load Factor
15' Mini-Bus	28	2	30	1.1
40' Low Floor Bus	39	12	51	1.3
40' Standard Bus	43	17	60	1.4
Light Rail Vehicle	64	69	133	2.1

b. Vehicle Headway

POLICY HEADWAYS AND PERIODS OF OPERATION
--

<u>WEEKDAY</u>	<u>Peak</u>	<u>Base</u>	<u>Evening</u>	<u>Night</u>
Regional Trunk	10	15	15	30
Urban Radial	15	15	30	60
Cross-Town	15	15	30	--
Secondary Radial	30	30	60	--
Feeder	30	30	60	--
Peak Express	30	--	--	--
Employer Feeder	60	--	--	--
<p>* Peak: 7-9 am and 4-6 pm; Base 9am - 4pm; Evening: 6-9:30 pm; Night: 9:30pm-Midnight; "--" means no service is provided during that time period.</p>				

<u>SATURDAY</u>	<u>Day</u>	<u>Evening</u>	<u>Night</u>
Regional Trunk	15	30	30
Urban Radial	30	60	--
Cross-Town	15	30	--
Secondary Radial	60	60	--
Feeder	60	60	--
Peak Express	--	--	--
Employer Feeder	--	--	--
<p>* Day 7am - 6pm; Evening: 6-9:30 pm; Night: 9:30pm - Midnight; "--" means no service is provided during that time period.</p>			

<u>SUNDAY</u>	<u>Day</u>	<u>Evening</u>	<u>Night</u>
Regional Trunk	30	60	--
Urban Radial	30	60	--
Cross-Town	30	--	--
Secondary Radial	--	--	--

Feeder	--	--	--
Peak Express	--	--	--
Employer Feeder	--	--	--
<p>* Day 7am - 6pm; Evening: 6-9:30 pm; Night: 9:30pm-Midnight;</p> <p>-- " means no service is provided during that time period.</p>			

- c. On-Time Performance
A vehicle is considered on time if it departs a scheduled time point no more than **one (1)** minute early and no more than **five (5)** minutes late. The Insert Agency Name on-time performance objective is **90%** or greater. Insert Agency Name continuously monitors on-time performance and system results are published and posted as part of monthly performance reports covering all aspects of operations.
- d. Service Availability
The City of Struthers will distribute transit service so that **90%** of all residents in the service area are within a **¼ mile** walk of bus service or within a **½ mile** walk of rail service.

Service Policies

FTA requires fixed route transit providers to develop a policy for service indicators. The City of Struthers has prepared the following policies for its transit system.

- a. Distribution of Transit Amenities
Installation of transit amenities along bus and rail routes are based on the number of passengers boarding at stops and stations along those routes.
- b. Vehicle Assignment
Vehicles will be assigned to the South, North, and East depots such that the average age of the fleet serving each depot does not exceed "x" years. Low-floor buses are deployed on frequent service and other high-ridership lines, so these buses carry a higher share of ridership than their numerical proportion of the overall bus fleet. Low-floor buses are also equipped with air conditioning and automated stop announcement systems.
Bus assignments take into account 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 30-foot buses rather than the 40-foot buses. Some routes requiring tight turns on narrow streets are operated with 30-foot rather than 40-foot buses.

All MPOs must meet the following requirements if the agency is included in the MPO constituency.

MPO Requirements (Ref: FTA Circular 4702.1B Chapter VI)	Status
1) Does the plan contain a demographic profile of the metropolitan area that includes identification of the locations of minority populations in the aggregate?	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> Y <input type="checkbox"/> N
2) A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process?	<input type="checkbox"/> Y <input type="checkbox"/> N
3) Demographic maps that overlay the percent minority and non-minority populations as identified by Census or American Community Survey (ACS) data, at the Census tract or block group level, and charts that analyze the impacts of the distribution of State and Federal funds in the aggregate for public transportation purposes, including federal funds managed by the MPO as a designated recipient?	<input type="checkbox"/> Y <input type="checkbox"/> N
4) Analysis of disparate impacts on the basis of race, color, or national origin, and, if so, determines whether there is a substantial legitimate justification for the policy that resulted in the disparate impacts, and if there are alternatives that could be employed that would have a less discriminatory impact.	
Comments:	