



**METROPOLITAN TULSA TRANSIT AUTHORITY
BOARD of TRUSTEES MEETING**

To Be Held 12:00 p.m. Tuesday, March 22, 2022
10th Floor North Conference Center, City Hall
175 East 2nd Street, Tulsa, Oklahoma

Please register for MTTA Board of Trustees Meeting (March 22, 2022) on Mar 22, 2022, 11:50 AM CDT at:
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AGENDA

INTRODUCTION AND NOTICE TO THE PUBLIC: The Board of Trustees will consider, discuss, and may take action on, adopt, amend, reject, or defer action on any item listed on this Agenda.

- I. CALL TO ORDER and BOARD MEMBER ROLL CALL**
- II. INTRODUCTIONS**
- III. APPROVAL OF THE FEBRUARY 22, 2022, MEETING MINUTES** Page 4
- IV. PUBLIC COMMENTS**

Anyone wishing to comment on an agenda item shall notify the board secretary of their wish to speak, as well as the specific agenda item that they wish to speak about. Each speaker will be allowed three minutes to present. No person shall be allowed to comment without registering with the board secretary.

V. COMMITTEE BUSINESS and REPORTS

A. Finance/Budget Committee – James Wagner, Committee Chair

Consideration and possible approval, adoption, denial, amendment of revision of the FY2022 budget, including, adding, deleting, increasing, or decreasing programs, appropriations, expenditures and amounts thereof.

1. Review and approval of February 2022, Financial Statements – Rebecca Walner/Scott Bosen (Action) Page 8
2. Review of Scott Marr Submitted Expenses- Rebecca Walner (Action) Page 27
3. Upcoming Procurements – Jack Van Hooser Page 28
4. MTTA Link Tulsa MOU- Rebecca Walner (Action) Page 29



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5. Authorization of Free Fares – Scott Marr (Action)
Authorize the General Manager to provide free fares for the Fixed Route Service as a promotion from April 4th thru May 30th. This will be to offset the current increase in gas prices and give our community another option for transportation. The gas prices are currently 22% higher nationwide.

B. Operating/Marketing Committee - Ann Domin, Committee Chair

1. Renewal of Office 365 Licensing- Michael McClister (Action)
Authorize the General Manager to renew the Microsoft Office 365 licensing for \$32,079.45 for April 2022 through April 2023, and then renew annually for a further 4 years with an expected annual increase of 3%, not to exceed \$175,000 for the 5-year term. [Page 32](#)
2. Update on Ridership and Upcoming Changes/Public Meetings- Chase Phillips/Liann Alfaro (Information) [Page 33](#)
3. Approve Tulsa Transit’s updated Title VI Program and authorize the Title VI Officer to submit the document on behalf of Tulsa Transit to the Federal Transit Administration (FTA) Region 6 Office- Liann Alfaro (Action) [Page 37](#)

C. Executive Committee -Adam Doverspike, Committee Chair

1. Report of Commissioners in the Condemnation Case – Randy Cloud/Scott Marr (Action)
Discussion and possible action regarding *MTTA v. Rusted Truck Property Company, LLC, et al.*, Tulsa County Case #CJ-2021-3580, and possible vote to enter executive session with attorney regarding same. 25 O.S. 307(B)(4).
2. Claims and Cost of the Purchase and Acquisition of Property – Randy Cloud/Scott Marr (Action)
Discussion and possible action regarding claims and costs related to the purchase and acquisition of real property located at 1332-1428 E. 5th Place, Tulsa, Oklahoma, and possible vote to enter executive session with attorney regarding same. 25 O.S. 307(B)(3) and (4).

VI. TRUSTEES AND GENERAL MANAGER COMMENTS

Members of the Board of Trustees and the General Manager will have an opportunity to comment on Tulsa Transit, its services and/or other issues related to Tulsa Transit. Action will not be taken by the Board of Trustees on these comments.



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VII. NEW BUSINESS

Pursuant to the Oklahoma Open Meetings Act, new business is any matter not known about or which could not have been reasonably foreseen prior to the time of posting the agenda. Title 25 O.S. sec. 311(A)(9).

VIII. ADJOURN

The next regularly scheduled meeting of the
Tulsa Transit Board of Trustees will be held on
Tuesday, April 26, 2022, at 12:00 PM

METROPOLITAN TULSA TRANSIT AUTHORITY

Minutes of the Meeting of the Board of Trustees

Tuesday, February 22, 2022

10th Floor North Conference Center, City Hall

175 East 2nd Street, Tulsa, Oklahoma

CALL TO ORDER/ROLL CALL

Trustee	In-Person	Absent
Emily Hall, Chair		✓*
Adam Doverspike, Vice Chair	✓	
Tina Peña	✓	
Ann Domin	✓	
James Wagner	✓	
Emeka Nnaka		✓
Phyllis Joseph		✓
Totals	4	3

*Emily Hall arrived 12:05

OTHERS PRESENT:

Lori Soderstrom, Secretary to the Board of Trustees; by Video -Jean Ann Hudson, City-Appointed Attorney.

IN ATTENDANCE: Scott Mar, General Manager; Rachel Wells, MTTA CFO; Chase Phillips, MTTA Assistant Director of Service Development; Jack Van Hooser, MTTA Accounting & Grants Manager.

In accordance with the Oklahoma Open Meetings Act, the meeting was preceded by advance notice of the date, time, and place filed with the Municipal City Clerk’s office on December 3, 2020. An announcement was also given at least twenty-four (24) hours in advance by posting notice of the date, time and place and agenda of the meeting on February 17, 2022, 4:01 pm at the Municipal City Clerk’s office and on the entry door at Tulsa Transit Administrative offices on February 17, 2022.

I. CALL TO ORDER

Adam Doverspike called the meeting to order at 12:01 pm.

II. INTRODUCTIONS

Scott Marr introduced the MTTA Staff, Chase Phillips, Jack Van Hooser and Rachel Wells.

III. APPROVAL OF THE January 25, 2022, MEETING MINUTES

James Wagner and **Ann Domin** moved to approve the January 25, 2022, meeting minutes.

Yeas 4 Nays 0 Abstained 0 Absent 3 -- Motion Carried.

IV. PUBLIC COMMENTS

None

V. COMMITTEE BUSINESS and REPORTS

A. Executive Committee – Emily Hall, Committee Chair

1. Board Officer Elections

Officer nominations for Vice-Chair and Chair

Ann Domin made the nomination for **Adam Doverspike** for Chair.

Ann Domin and **Tina Peña** made the motion to appoint **Adam Doverspike** to Chair.

Yeas 4 Nays 0 Abstained 0 Absent 3 -- Motion Carried

Adam Doverspike made the nomination for **James Wagner** for Vice-Chair.

Adam Doverspike and **Ann Domin** made the motion to appoint **James Wagner** to Vice-Chair.

Yeas 4 Nays 0 Abstained 0 Absent 3 -- Motion Carried

Adam Doverspike appointed **James Wagner** to the Finance/Budget committee and **Ann Domin** will stay on the Operating/Marketing committee.

2. TSE Nexus Training in May of 2022 for the General Manager.

Ann Domin and **James Wagner** made the motion to approve the General Manger to attend the TSE Nexus Training held May 15, 2022, to May 20, 2022, in Washington, D.C. cost of travel, food, lodging, and training not to exceed \$7,500.00.

Yeas 4 Nays 0 Abstained 0 Absent 3 -- Motion Carried

Emily Hall arrived.

B. Finance/Budget Committee – James Wagner, Committee Chair

1. Review and approval of January 2022 Financial Statements – Rachel Wells

Rachel presented the January financials; Advertising revenue is up by 60%, Fixed ridership is 7.3% less than YTD projections; Lift ridership is 69% more than YTD projections; BRT is just under the original 105 route projections.

Emily Hall and **Ann Domin** moved to approve January Financial statements.

Yeas 5 Nays 0 Abstained 0 Absent 2 -- Motion Carried

2. Upcoming Procurements – Jack Van Hooser

Jack informed the Board that the procurements in the packet are not updated, due to him being off. There will not be that much on the March agenda. Most items listed at 1st QTR will be in the 2nd Qtr. In March possibly the OPS module and a consulate renewal.

C. Operating/Marketing Committee

1. Discussion of and possible vote to suspend WEN route service effective April 4, 2022 – Scott Marr

Scott updated the Board with the WEN ridership not meeting the ridership projections. A town public meeting was held on February 8th, 2022, and the comments has been given to the Board. A virtual meeting was held with District 3 Councilor Patrick over her concerns. **James Wagner** asks that the “why” is presented on the notifications of the suspended route public notices. **James Wagner** asked if all Federal requirements have been met? Chase Phillips: yes, they have been.

Adam Doverspike and **James Wagner** moved to suspend the WEN route as of April 4, 2022.

Yeas 5 Nays 0 Abstained 0 Absent 2 -- Motion Carried

2. Ridership Presentation – Chase Phillips

Chase presented ridership numbers for pre-covid and post-covid; trend ridership and revamping the Broken Arrow routes. Deploying more APC counters to routes to get more detailed ridership counts. Scott Marr gave the Board the data for drivers, it takes 123 drivers for full service, 101 drivers for Saturday service, currently we have 88 active drivers. We don’t know if it is possible to hire the required number of drivers for full service anytime soon. We need to look at making route changes on the low ridership routes, put buses on routes that could help bring back ridership. **James Wagner** would like to see cost per hour/trips per hour/per passenger by routes. **Adam Doverspike** asked if the Board could see any APC data for ridership counts; ridership benchmarks/targets for each route.

3. Discussion on making service level changes to go into effective in August 2022 – Scott Marr

Scott informed the Board of the difference in weekday and Saturday service. Weekday routes there are five 30-minute routes the rest are 60-minute routes. Saturday service all routes are 60 minutes, we start later and end sooner. The Board will be updated each month with the timeline. **Adam Doverspike** would be interested in knowing what similar sized cities ridership has declined, any comebacks, ideas of what they have done, any use of free fares worked or didn’t, did any adjust service, if so by how much.

4. Monday thru Saturday Service starting April 4th, 2022. – Scott Marr

Scott is trying to change the narrative of service, calling it a Monday thru Saturday service. Changing the name to move forward, instead of calling a reduced service. This would also give us a base line.

VI. TRUSTEES AND GENERAL MANAGER COMMENTS

Emily Hall thanked everyone for their support while she was Board Chair.

VII. NEW BUSINESS

None

VIII. ADJOURN

Adam Doverspike adjourned meeting at 12:45 pm.

Sincerely,

Lori Soderstrom
Secretary to the Board of Trustees

**METROPOLITAN TULSA TRANSIT AUTHORITY
BOARD MEETING
February 22, 2022
Finance/Audit Committee**

To: Board of Trustees
From: Rebecca Walner, Senior Accountant
Subject: FY22 Financial Statement Summary through Feb 28, 2022.

Recommendation:

Review and approve the FY22 February Financial Statement Summary.

Analysis:

February operating expenses of \$1.7M were \$388K or 20% less projections based on the FY2022 budget.

YTD we have a zero surplus with total expenses of \$15M which are \$1.2M or 9.3% less than projected. The FY22 underspending of \$1.2M to budget is reflected in the following areas: Lift Program 230K, Repair Parts 422K, Shop and Equipemnt 108K, and Planning/Marketing \$340K. Below is a summary of our YTD FY22 operating results before audit:

**FY2022 Financial Summary
YTD February 2022**

<i>Item</i>	<i>Actual</i>	<i>Budget</i>	<i>Variance %</i>	<i>Prior Year</i>	<i>Variance %</i>
Revenue					
Revenue from Operations	\$1,415,826	\$1,264,006	12.01%	\$1,347,135	5.10%
Operating Grant Funding	\$14,405,411	\$17,448,625	(17.44%)	\$12,717,567	13.27%
Total Operating Revenues	\$15,821,237	\$18,712,631	(15.45%)	\$14,064,702	12.49%
Operating Expenses					
Labor and Fringe	\$9,196,891	\$9,272,539	(0.82%)	\$7,955,473	15.60%
Transportation Services	\$2,149,297	\$2,332,825	(7.87%)	\$1,926,687	11.55%
Administrative Services	\$1,054,717	\$1,055,315	(0.06%)	\$1,010,074	4.42%
Materials and Supplies	\$2,198,220	\$2,517,982	(12.70%)	\$2,024,470	8.58%
Utilities	\$426,452	\$401,893	6.11%	\$386,957	10.21%
Insurance	\$265,526	\$367,200	(27.69%)	\$408,713	(35.03%)
Marketing and Planning	\$530,135	\$1,509,772	(64.89%)	\$352,328	50.47%
Total Operating Expenses	\$15,821,238	\$17,457,526	(9.37%)	\$14,064,702	12.49%
Budget Surplus (Deficit)	(\$1)	\$1,255,105	(100.00%)	\$0	(222.73%)



FY22 Executive Summary
For the Eight Months Ending Feb 28, 2022

Summary of Activities*	Actual	Budget	Var%
Revenues From Operations	\$ 1,416	\$ 1,264	12%
Grant Revenues	14,405	17,449	-17%
Total Operating Revenues	15,821	18,713	-15%
Total Expenses	(15,821)	(17,458)	-9%
Surplus (Deficit)	\$ (0)	\$ 1,255	0%

Operating Revenues*	Actual	Budget	Var%
City of Tulsa	\$ 6,215	\$ 7,243	-14%
Federal Grants	7,044	9,176	-23%
State Grants	767	733	5%
Other Grants	380	296	28%
Fare Revenues	880	895	-2%
Advertising Revenues	510	338	51%
Other Revenues	26	31	-15%
Total Operating Revenues	\$ 15,821	\$ 18,713	-15%

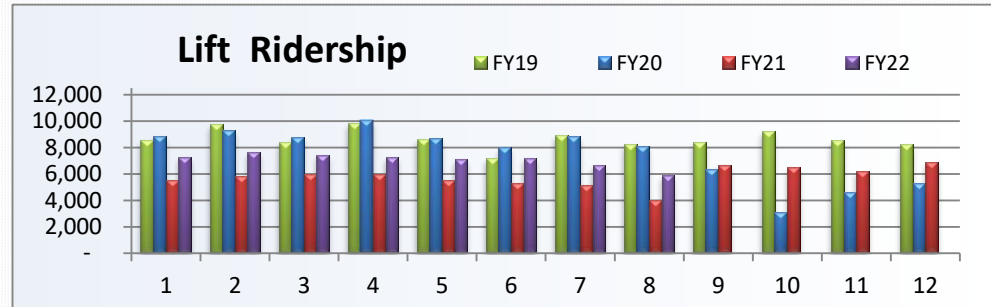
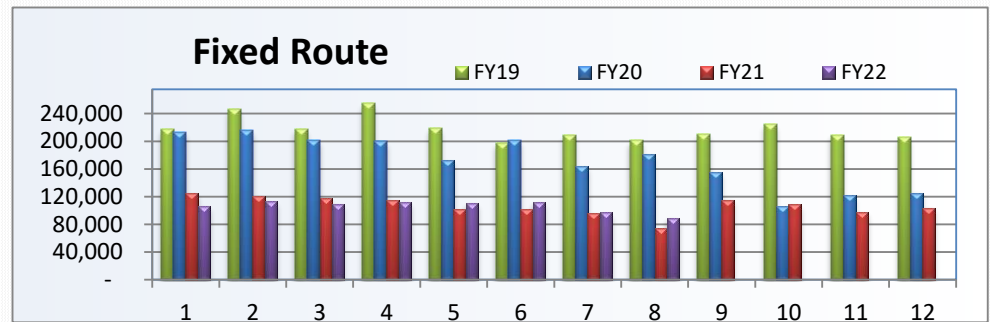
Operating Expenses*	Actual	Budget	Var%
Payroll & Fringe	\$ 9,197	\$ 9,273	-1%
Transportation Services	2,149	2,333	-8%
Administrative Services	1,055	1,055	0%
Materials & Supplies	2,198	2,518	-13%
Utilities	426	402	6%
Insurance	266	367	-28%
Marketing & Planning	530	1,510	-65%
Total Expenses	\$ 15,821	\$ 17,458	-9%

Ridership	Current Year	Prior Year	Change
Fixed Route **	849,951	852,328	0%
Lift Program	56,564	43,214	31%

Tulsa Transit connects people to progress and prosperity.

* Numbers shown in thousands

** Includes Nightline



Goal 1. Operate a Safe Transit System

Accidents (Per 100K miles)	FY22	FY21	Change	Target
Fixed Route	1.35	1.91	-29%	1.80
Lift Program	3.42	2.39	43%	1.20

Goal 2. Meet and Exceed Customer Expectations

Complaints	FY22	FY21	Change	Target
Fixed Route	4.59	4.12	11%	4.35
Lift Program	32.18	24.99	29%	23.00

Goal 3. Maintain a Quality Workforce

Absences (Per weekday)	FY22	FY21	Change	Target
Operators	18	18	0%	9
Total	21	20	5%	12

Goal 4. Operate an Effective Transit System

Passengers Per Hour	FY22	FY21	Change	Target
Fixed Route	7.91	7.19	10%	14.00
Lift Program	2.03	1.92	6%	2.00

Goal 5. Operate an Efficient Transit System

Cost Per Trip	FY22	FY21	Change	Target
Fixed Route	\$ 14.56	\$ 12.43	17%	\$ 6.16
Lift Program	\$ 53.08	\$ 68.80	-23%	\$ 50.91

- Consistent with or better than target
- ✓ Inconsistent with or worse than target

Fixed Route and Nightline Preventable Accidents - FY22								
	\$0 to \$500	\$500 to \$1,000	\$1,000 to \$2,500	\$2,500 to \$5,000	\$5,000 to \$10,000	\$10,000 to \$20,000	Over \$20,000	Total
MONTH								
July	3							3
August	2							2
September	0	1	3					4
October	2		3	1				6
November	3							3
December	3							3
January	0	1	1					2
February	2							2
March								0
April								0
May								0
June								0
TOTAL	15	2	7	1	0	0	0	25
Percent of Total	60%	8%	28%	4%	0%	0%	0%	100%

Fixed Route and Nightline Preventable Accidents - FY21								
	\$0 to \$500	\$500 to \$1,000	\$1,000 to \$2,500	\$2,500 to \$5,000	\$5,000 to \$10,000	\$10,000 to \$20,000	Over \$20,000	Total
MONTH								
July	2	1						3
August	2		2					4
September	3		1				1	5
October	3							3
November	1							1
December	1	1		1				3
January		1	2	1				4
February	11							11
March	1							1
April	3	1						4
May	2							2
June	6							6
TOTAL	35	4	5	2	0	0	1	47
Percent of Total	74%	9%	11%	4%	0%	0%	2%	100%

Lift Preventable Accidents - FY22								
	\$0 to \$500	\$500 to \$1,000	\$1,000 to \$2,500	\$2,500 to \$5,000	\$5,000 to \$10,000	\$10,000 to \$20,000	Over \$20,000	Total
<i>Month</i>								
July	5							5
August	4							4
September	1							1
October	4							4
November	4							4
December	0							0
January	4							4
February	3							3
March								0
April								0
May								0
June								0
Total	25	0	0	0	0	0	0	25
Percent of Total	100%	0%	0%	0%	0%	0%	0%	0%

Lift Preventable Accidents - FY21								
	\$0 to \$500	\$500 to \$1,000	\$1,000 to \$2,500	\$2,500 to \$5,000	\$5,000 to \$10,000	\$10,000 to \$20,000	Over \$20,000	Total
<i>Month</i>								
July			1					1
August		1	1					2
September					1			1
October		4						4
November						1		1
December								0
January			1	1				2
February	1							1
March	3							3
April	2							2
May	5							5
June	2							2
Total	13	5	3	2	0	1	0	24
Percent of Total	54%	21%	13%	8%	0%	4%	0%	100%

SUMMARY OF OPERATING BUDGET VARIANCE ANALYSIS

Projected expenses within +/- \$1,000 and +/- 5% YTD variance are considered consistent with projections.

Operating Revenues	YTD \$	YTD Var\$	YTD Var%	Details
Fixed Route Revenues	699,771.00	(52,929.00)	-32%	YTD Revenues are \$-52K or 32% less than projected. Fare revenues are effected by COVID-19.
Advertising Revenue	509,719.00	171,566.00	51%	YTD Ad sales of \$509K are \$171K or 51% more than projected.
Lift Program Revenues	179,950.00	37,997.00	27%	YTD Lift revenues of \$179K are \$37K or 27% more than projected.
Expenses	YTD \$	YTD Var\$	YTD Var%	Details
Payroll and Fringe	9,196,891.00	(75,648.00)	-1%	YTD Payroll & Fringe expenses of \$9.1M are \$75K or 1% less than projected.
Transportation Services	2,149,297.00	(183,528.00)	-8%	YTD Transportation Services of \$2.1M are 183K or 8% less than projected.
Advertising Commissions	232,405.00	80,236.00	53%	YTD Commission expenses of \$232K are 80K or 52% more then projected.
Legal	50,170.00	21,068.00	72%	YTD legal expenses of \$50K are \$21K or 72% more than projections.
Audit Fees	26,733.00	(1,881.00)	-7%	We accrue \$3.3K each month for our FY22 annual financial audit fees. Audit fees of \$26,733 are 7% less than projected.
Bldg. & Facility Services	100,599.00	(10,733.00)	-10%	Various facility expenses (janitorial services, lawn care services, station power washing, etc.). YTD expenses of \$100K and are 10% less than projected.
Professional and Technical	626,260.00	(98,231.00)	-14%	Various P&T services (software support, insurance consulting, ADA certification, recruitment, special studies, etc.). YTD expenses of \$626K are \$98K or 14% less than projected.
Fuel	549,181.00	247,242.00	82%	YTD expenses of \$549K are \$247K or 82% more than projected.
Gasoline	56,919.00	16,727.00	42%	Gasoline expenses are \$56K or 42% more then projected.
Oil & Lubricants	82,481.00	(34,092.00)	-29%	YTD expenses of \$82K are \$34K or 20% less than projected.
Tires & Tubes	88,915.00	(23,288.00)	-21%	YTD expenses of \$88K are \$23K or 21% less than projected.
Facility Repairs	451,368.00	150,286.00	50%	YTD expenses of \$451K are \$150K or 50% more than projected.
Service & Shop Equipment	24,943.00	(108,277.00)	-81%	YTD expenses of \$24K are \$108K or 81% less than projected.
Other Shop & Garage	43,353.00	(28,014.00)	-39%	YTD expenses of \$43K are \$28K or 39% less then projections.

Repair Parts	845,828.00	(422,822.00)	-33%	YTD expenses of \$845K are \$422K or 33% less than projected.
Servicing Supplies	32,075.00	(59,535.00)	-65%	YTD expenses of \$32K are \$59K or 65% less than projected.
Utilities	426,452.00	24,559.00	6%	YTD expenses of \$426K or \$24K and 6% more than projected.
Insurance	265,526.00	(101,674.00)	-28%	YTD expenses of \$265K are \$101K or 28% less than projected.
Planning	242,545.00	(340,788.00)	-58%	Planning expenses are reimbursed 80% with FTA Planning grant funds and consist of administration and support, special projects, and training. YTD expenses of \$242K are 340K or 58% less than projected.
Marketing/Public Outreach	34,099.00	(344,931.00)	-91%	YTD expenses of \$34K are 344K or 91% less than projected.
General Office Expense	105,763.00	4,009.00	4%	Primarily consists of office supplies, computer supplies, and printing. YTD expenses of \$105K and are 4% higher.
Grant Revenues	YTD \$\$		YTD Var%	Details
Other Operational Assistance	380,115.00	83,798.00	28%	These revenues represent contracts with the City of Broken Arrow, Jenks, and Sand Springs. YTD revenues of \$380K are \$83K or 28% more than projected. This increase represents the TTC lease of MMS.
Oklahoma State Funding	766,664.00	33,327.00	5%	Our FY22 annual ODOT apportionment is \$95K per month and is consistent with projections.
FTA Planning	425,988.00	147,025.00	53%	YTD planning revenues of \$425K are \$147k or 53% more than projected.
FTA Audit/Leases	4,000.00	(20,102.00)	-83%	YTD Audit/Lease revenues of \$4K are \$20K or 83% less than projected.
FTA ADA Lift	277,602.00	128,301.00	86%	YTD ADA Lift revenues of \$277K are 128K or 86% more than projected. Actual totals includes both 5310 and CARES revenues.
FTA - CARES	3,943,228.00	(3,232,837.00)	-45%	YTD CARES is 3.9M are 3.2M or 45% less than projected.
FTA Preventive Maintenance	2,392,822.00	845,333.00	55%	YTD Preventative Maintenance is 2.3M or 845L or 55% more than projected.
FTA Operations	3,943,228.00	(3,506,052.00)	-23%	YTD Operations revenues of \$3.9M are \$3.5M or 23% less than projected.

METRO TULSA TRANSIT AUTHORITY
Income Statement
For the Eight Months Ending Monday, February 28, 2022

	Actual	Budget	Var %	PY	PY %	Act YTD	Bgt YTD	Var%	PY YTD	PY %
Operating Revenues										
Passenger	\$131,006	\$84,542	54.96%	\$58,065	125.62%	\$686,441	\$730,496	(6.03%)	\$695,164	(1.25%)
Nightline	\$856	\$1,524	(43.88%)	\$550	55.60%	\$7,700	\$13,172	(41.54%)	\$8,973	(14.18%)
Sunday Service	\$614	\$1,045	(41.28%)	\$773	(20.55%)	\$5,630	\$9,032	(37.67%)	\$7,357	(23.48%)
Advertising	\$36,671	\$42,269	(13.24%)	\$42,052	(12.80%)	\$509,719	\$338,153	50.74%	\$512,392	(0.52%)
Investments	\$880	\$200	340.22%	\$248	255.40%	\$5,505	\$1,600	244.04%	\$2,653	107.47%
Lift Program - ADA	\$11,267	\$16,800	(32.93%)	\$6,892	63.48%	\$179,950	\$141,953	26.77%	\$112,178	60.41%
Other Revenue	\$933	\$3,700	(74.78%)	\$173	441.00%	\$20,881	\$29,600	(29.46%)	\$8,418	148.05%
Total Operating Revenues	\$182,227	\$150,080	21.42%	\$108,753	67.56%	\$1,415,826	\$1,264,006	12.01%	\$1,347,135	5.10%
Operating Expenses										
Labor:										
Operators	\$336,721	\$417,533	(19.35%)	\$296,206	13.68%	\$3,118,628	\$3,340,265	(6.64%)	\$2,639,340	18.16%
Transportation Administration	\$87,818	\$64,521	36.11%	\$58,452	50.24%	\$657,444	\$516,165	27.37%	\$480,833	36.73%
Maintenance	\$112,320	\$115,587	(2.83%)	\$80,414	39.68%	\$935,115	\$924,697	1.13%	\$805,184	16.14%
Maintenance Administration	\$29,514	\$28,555	3.36%	\$24,768	19.16%	\$234,242	\$228,440	2.54%	\$196,383	19.28%
Administration & Accounting	\$110,915	\$151,612	(26.84%)	\$108,075	2.63%	\$892,825	\$1,212,899	(26.39%)	\$931,531	(4.16%)
Total Labor	\$677,288	\$777,808	(12.92%)	\$567,915	19.26%	\$5,838,254	\$6,222,466	(6.17%)	\$5,053,271	15.53%
Fringe Benefits:										
FICA Taxes	\$52,379	\$63,025	(16.89%)	\$45,572	14.94%	\$564,584	\$504,201	11.98%	\$410,306	37.60%
Pension Plan Expense	\$87,843	\$95,042	(7.57%)	\$71,262	23.27%	\$643,747	\$760,333	(15.33%)	\$588,062	9.47%
Health & Dental Insurance	\$105,231	\$95,415	10.29%	\$100,977	4.21%	\$895,518	\$763,322	17.32%	\$885,681	1.11%
Life & Disability Insurance	\$16,100	\$8,372	92.30%	\$10,434	54.30%	\$71,141	\$66,979	6.21%	\$64,217	10.78%
Sick Leave	\$16,887	\$28,384	(40.51%)	\$18,660	(9.50%)	\$284,831	\$227,074	25.43%	\$236,209	20.58%
Holiday Pay	(\$20,354)	\$27,679	(173.54%)	\$4,182	(586.67%)	\$345,927	\$221,432	56.22%	\$279,070	23.96%
Vacation Pay	\$22,803	\$34,296	(33.51%)	\$19,200	18.76%	\$374,549	\$274,365	36.52%	\$295,382	26.80%
Uniform Allowance - Drivers	\$922	\$3,154	(70.77%)	\$3,549	(74.02%)	\$51,567	\$25,233	104.36%	\$31,774	62.29%
Clothing/Tool Allowance - Mechanics	\$1,550	\$3,150	(50.79%)	\$2,212	(29.92%)	\$24,709	\$25,200	(1.95%)	\$19,942	23.90%
Unemployment Compensation	\$2,157	\$1,206	78.79%	\$2,000	7.85%	\$5,753	\$9,652	(40.40%)	\$36,581	(84.27%)
Other Fringe Benefits	\$11,745	\$21,535	(45.46%)	\$8,375	40.23%	\$96,311	\$172,282	(44.10%)	\$54,978	75.18%
Total Fringe Benefits	\$297,263	\$381,258	(22.03%)	\$286,423	3.78%	\$3,358,637	\$3,050,073	10.12%	\$2,902,202	15.73%
Total Loaded Payroll	\$974,551	\$1,159,066	(15.92%)	\$854,338	14.07%	\$9,196,891	\$9,272,539	(0.82%)	\$7,955,473	15.60%
Transportation Services:										
Fixed Route	\$44,987	\$46,723	(3.72%)	\$43,903	2.47%	\$385,751	\$373,785	3.20%	\$371,833	3.74%
Sunday Service	\$21,521	\$24,214	(11.12%)	\$21,195	1.54%	\$178,100	\$193,711	(8.06%)	\$179,685	(0.88%)
Lift Program - ADA	\$180,431	\$220,666	(18.23%)	\$154,056	17.12%	\$1,535,004	\$1,765,329	(13.05%)	\$1,344,584	14.16%
Circulator Service-Downtown/Midtown	-	-	0.00%	-	0.00%	\$43,242	-	0.00%	-	0.00%
Lift Services - Meals On Wheels	-	-	0.00%	-	0.00%	\$7,200	-	0.00%	\$30,585	(76.46%)
Total Transportation Services	\$246,939	\$291,603	(15.32%)	\$219,154	12.68%	\$2,149,297	\$2,332,825	(7.87%)	\$1,926,687	11.55%

Administrative Services:

Advertising	\$16,502	\$19,021	(13.24%)	\$80,724	(79.56%)	\$232,405	\$152,169	52.73%	\$255,241	(8.95%)
Legal Fees	\$1,773	\$3,638	(51.25%)	\$8,732	(79.69%)	\$50,170	\$29,102	72.39%	\$29,165	72.02%
Audit Fees	\$3,342	\$3,577	(6.57%)	\$3,208	4.16%	\$26,733	\$28,614	(6.57%)	\$25,667	4.16%
Office Equipment / Computers	\$2,387	\$469	408.95%	\$149	1501.97%	\$15,802	\$3,752	321.17%	\$4,314	266.29%
Building & Facility Services	\$10,371	\$13,917	(25.48%)	\$11,128	(6.80%)	\$100,599	\$111,332	(9.64%)	\$96,415	4.34%
Professional & Technical Services	\$32,933	\$29,721	10.81%	\$33,841	(2.68%)	\$353,597	\$237,765	48.72%	\$421,467	(16.10%)
Software Maintenance & Service	\$31,457	\$60,841	(48.30%)	\$23,823	32.04%	\$272,663	\$486,726	(43.98%)	\$176,428	54.55%
Security Services	-	\$732	(100.00%)	-	0.00%	\$2,748	\$5,855	(53.07%)	\$1,377	99.59%
Total Administrative Services	\$98,765	\$131,916	(25.13%)	\$161,605	(38.89%)	\$1,054,717	\$1,055,315	(0.06%)	\$1,010,074	4.42%

Total Services

Total Services	\$345,704	\$423,519	(18.37%)	\$380,759	(9.21%)	\$3,204,014	\$3,388,140	(5.43%)	\$2,936,761	9.10%
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Materials & Supplies:

Fuel	\$122,464	\$37,742	224.47%	\$55,778	119.56%	\$549,181	\$301,939	81.88%	\$284,963	92.72%
Gasoline	\$6,757	\$5,024	34.50%	\$7	99122.76%	\$56,919	\$40,192	41.62%	\$17,191	231.10%
Oil & Lubricants	\$9,285	\$14,572	(36.28%)	\$6,182	50.19%	\$82,481	\$116,573	(29.25%)	\$87,730	(5.98%)
Tires & Tubes	\$3,633	\$14,025	(74.10%)	\$8,853	(58.97%)	\$88,915	\$112,203	(20.75%)	\$89,871	(1.06%)
Facility Repairs & Maintenance	\$55,604	\$37,635	47.75%	\$45,863	21.24%	\$451,368	\$301,082	49.92%	\$468,046	(3.56%)
Service & Shop Equipment	\$1,636	\$16,653	(90.18%)	\$4,914	(66.72%)	\$24,943	\$133,220	(81.28%)	\$29,988	(16.82%)
Other Shop & Garage Expense	\$3,510	\$8,921	(60.65%)	\$4,778	(26.54%)	\$43,353	\$71,367	(39.25%)	\$38,221	13.43%
Repair Parts	\$112,587	\$158,581	(29.00%)	\$79,160	42.23%	\$845,828	\$1,268,650	(33.33%)	\$922,222	(8.28%)
Servicing Supplies	\$2,674	\$11,451	(76.65%)	\$2,357	13.46%	\$32,075	\$91,610	(64.99%)	\$40,432	(20.67%)
Transportation & Safety	\$582	\$4,049	(85.62%)	\$1,665	(65.04%)	\$10,083	\$32,396	(68.88%)	\$16,702	(39.63%)
Schedules	-	\$3,805	(100.00%)	-	0.00%	\$3,525	\$30,440	(88.42%)	\$13,378	(73.65%)
Passes & Transfers	\$424	\$2,289	(81.46%)	\$3,630	(88.31%)	\$9,549	\$18,310	(47.85%)	\$15,726	(39.28%)
Total Materials & Supplies	\$319,156	\$314,747	1.40%	\$213,187	49.71%	\$2,198,220	\$2,517,982	(12.70%)	\$2,024,470	8.58%

Utilities:

Light, Heat, Power, and Water	\$35,834	\$28,588	25.35%	\$23,981	49.43%	\$238,626	\$228,701	4.34%	\$222,398	7.30%
Communications	\$19,407	\$21,649	(10.36%)	\$18,679	3.89%	\$187,826	\$173,192	8.45%	\$164,559	14.14%
Total Utilities	\$55,241	\$50,237	9.96%	\$42,660	29.49%	\$426,452	\$401,893	6.11%	\$386,957	10.21%

Insurance:

Insurance Premiums	\$37,615	\$45,900	(18.05%)	\$42,265	(11.00%)	\$241,545	\$367,200	(34.22%)	\$330,501	(26.92%)
Self Insurance	\$4,167	-	0.00%	\$7,037	(40.79%)	\$23,981	-	0.00%	\$78,212	(69.34%)
Total Insurance	\$41,782	\$45,900	(8.97%)	\$49,302	(15.25%)	\$265,526	\$367,200	(27.69%)	\$408,713	(35.03%)

Miscellaneous:

Planning & Rideshare	\$11,305	\$72,917	(84.50%)	-	0.00%	\$242,545	\$583,333	(58.42%)	\$29,518	721.68%
Dues & Subscriptions	\$7,372	\$3,022	143.89%	\$13	56647.73%	\$21,696	\$24,180	(10.27%)	\$19,901	9.02%
Travel & Meetings - Staff	\$6,032	\$14,624	(58.75%)	\$758	696.15%	\$37,813	\$116,993	(67.68%)	\$13,241	185.58%
Travel & Meetings - Board	-	\$576	(100.00%)	-	0.00%	\$396	\$4,610	(91.40%)	\$621	(36.21%)
Marketing & Advertising	\$6,169	\$47,379	(86.98%)	\$10,066	(38.71%)	\$34,099	\$379,030	(91.00%)	\$126,096	(72.96%)
General Office Expense	\$15,044	\$12,719	18.28%	\$15,911	(5.45%)	\$105,763	\$101,754	3.94%	\$120,791	(12.44%)
Other Miscellaneous Expenses	\$3,253	\$15,121	(78.49%)	(\$1,021)	(418.43%)	\$21,217	\$120,967	(82.46%)	\$13,581	56.22%
Bank & Credit Card Fees	\$6,338	\$2,750	130.45%	\$4,528	39.98%	\$31,898	\$22,001	44.99%	\$16,584	92.34%
Leases & Rentals	\$1,567	\$19,613	(92.01%)	\$1,522	3.00%	\$34,708	\$156,904	(77.88%)	\$11,995	189.35%

Total Miscellaneous	\$57,080	\$188,721	(69.75%)	\$31,777	79.64%	\$530,135	\$1,509,772	(64.89%)	\$352,328	50.47%
Total Expenses	\$1,793,514	\$2,182,190	(17.81%)	\$1,572,023	14.09%	\$15,821,238	\$17,457,526	(9.37%)	\$14,064,702	12.49%
Net Operating Loss	(\$1,611,287)	(\$2,032,110)	(20.71%)	(\$1,463,270)	10.12%	(\$14,405,412)	(\$16,193,520)	(11.04%)	(\$12,717,567)	13.27%
Operational Grant Funding										
Operating Assistance - Other	\$51,704	\$37,040	39.59%	\$34,616	49.36%	\$380,115	\$296,317	28.28%	\$321,780	18.13%
Oklahoma State Funding	\$95,833	\$91,667	4.55%	\$95,833	0.00%	\$766,664	\$733,337	4.54%	\$766,664	0.00%
FTA - Planning Assistance	\$44,045	\$34,870	26.31%	\$31,364	40.43%	\$425,988	\$278,963	52.70%	\$186,909	127.91%
FTA - Leases / Audit	-	\$3,013	(100.00%)	\$36,130	(100.00%)	\$4,000	\$24,102	(83.40%)	\$114,705	(96.51%)
FTA - ADA LIFT	-	\$18,663	(100.00%)	\$73,692	(100.00%)	\$277,602	\$149,301	85.93%	\$568,412	(51.16%)
FTA - CMAQ	-	-	0.00%	-	0.00%	-	-	0.00%	\$144,434	(100.00%)
FTA - Preventative Maintenance	-	\$193,436	(100.00%)	\$154,319	(100.00%)	\$2,392,822	\$1,547,489	54.63%	\$2,471,686	(3.19%)
FTA - Operations	\$467,919	\$897,008	(47.84%)	\$225,942	107.10%	\$3,943,228	\$7,176,065	(45.05%)	\$2,594,056	52.01%
COT - Vision Assistance	\$463,564	\$273,215	69.67%	\$335,804	38.05%	\$2,309,256	\$2,185,718	5.65%	\$1,744,337	32.39%
COT - Operating Assistance	\$488,217	\$632,167	(22.77%)	\$475,573	2.66%	\$3,905,736	\$5,057,333	(22.77%)	\$3,804,584	2.66%
Total Operational Grant Funding	\$1,611,282	\$2,181,079	(26.12%)	\$1,463,273	10.11%	\$14,405,411	\$17,448,625	(17.44%)	\$12,717,567	13.27%
Budget Surplus (Deficit)	(\$5)	\$148,969	(100.00%)	\$3	(92.31%)	(\$1)	\$1,255,105	(100.00%)	-	(222.73%)
Capital Revenues										
Capital Assistance - FTA	\$80,388	\$65,832	22.11%	-	0.00%	\$1,663,307	\$526,653	215.83%	-	0.00%
Capital Assistance - COT	\$600,000	\$181,920	229.82%	\$157,500	280.95%	\$715,000	\$1,455,356	(50.87%)	\$299,091	139.06%
Capital Assistance - Other	-	-	0.00%	-	0.00%	-	-	0.00%	-	0.00%
Gain (Loss) on Sale of Assets	(\$47,015)	-	0.00%	-	0.00%	(\$29,375)	-	0.00%	\$24,795	(218.47%)
Total Capital Revenues	\$633,373	\$247,752	155.65%	\$157,500	302.14%	\$2,348,932	\$1,982,009	18.51%	\$323,886	625.24%
Depreciation	\$327,437	\$310,000	5.62%	\$329,174	(0.53%)	\$2,769,403	\$2,480,000	11.67%	\$2,696,586	2.70%
Debt Service	-	-	0.00%	-	0.00%	-	-	0.00%	-	0.00%
COT Pass Through	-	-	0.00%	-	0.00%	-	-	0.00%	-	0.00%
Change in Net Assets	\$305,931	\$86,721	252.79%	(\$171,671)	(278.21%)	(\$420,472)	\$757,114	(155.54%)	(\$2,372,700)	(82.28%)

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**Metropolitan Tulsa Transit Authority
Summary Balance Sheet
For the Eight Months Ending Feb 28, 2022**

Assets

Current Assets:

Cash and Cash Equivalents		\$2,943,349
Restricted Cash		\$3,584,882
Trade Accounts Receivable	\$166,915	
COT Operating & Capital Grants Receivable	\$56,225,497	
		<u>\$56,392,412</u>
Inventories		\$980,628
Prepaid Expenses		<u>\$570,701</u>
Total Current Assets		<u>\$64,471,973</u>

Capital Assets, at cost:

Revenue Equipment	\$37,972,171	
Service Equipment	\$620,415	
Security Equipment	\$895,871	
Buildings & Improvements	\$12,233,311	
Passenger Shelters	\$2,091,138	
Shop and Garage Equipment	\$3,086,242	
Computers & Other Equipment	\$5,179,621	
Office Furniture and Fixtures	\$364,971	
Land & Improvements	\$3,233,707	
Construction in Progress	\$102,066	
Less: Accumulated Depreciation	<u>(\$41,214,943)</u>	
Total Capital Assets		\$24,564,570

Total Assets		<u><u>\$89,036,542</u></u>
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Deferred outflows of resources, pension related amounts		<u>\$1,775,085</u>
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Liabilities

Current Liabilities:

Trade Accounts Payable	\$720,080	
Accrued Wages & Withholdings	\$667,579	
Accrued Insurance	\$118,401	
Deferred Grant Revenues	\$72,957,516	
Other Current Liabilities	<u>\$117,844</u>	
Total Current Liabilities		\$74,581,421

Noncurrent Liabilities:

Advance Payable to COT	\$326,674	
Net Pension Liability	\$12,818,422	
Accrued Compensated Absences	<u>\$883,129</u>	
Total Noncurrent Liabilities		<u>\$14,028,224</u>

Total Liabilities		\$88,609,645
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Deferred inflows of resources, pension related amounts		<u>\$1,460,756</u>
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Net Position:

Invested in Capital Assets	\$24,564,570	
Restricted for Capital Acquisitions	\$1,026,833	
Restricted for Workmen's Comp.	\$181,742	
Unrestricted	<u>(\$25,346,247)</u>	
Total Net Assets		\$426,897

Total Liabilities & Net Assets		<u><u>\$89,036,542</u></u>
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For the Eight Months Ending Feb 28, 2022

**METROPOLITAN TULSA TRANSIT AUTHORITY
PERFORMANCE INDICATOR SUMMARY**

Fixed Route	Month	YTD	Target	Details	
Preventable accidents per 100,000 miles	1.01	1.35	1.80	There were 1.01 preventable accidents in Feb VS 1.35 in prior year. YTD accidents are 1.35 vs. 1.91 in prior year.	•
*Total Complaints per Per 10,000 boarding's	2.91	4.59	4.35	There were 26 total complaints in Feb vs. 35 in prior year. The current month breakdown is as follows: DA-11, Discrimination-0, II-0, Maintenance-0, No Show-0, Not on Time-2, Other-4, Pass Up-4, RD-3, RDW-1, Scheduling/On-Board Time-0, CC-1	•
*Total Valid Complaints Per 10,000 boarding's	2.91	4.70	2.00	Of the 26 total complaints, 3 were classified as valid complaints with the current month breakdown as follows: DA-0, Discrimination-0, II-0, Maintenance-0, No Show-0, Not on Time-1, Other-1, Pass Up-0, RD-1, RDW-0, Scheduling/On-Board Time-0, CC-	•
On-time Performance	81%	80%	85%		✓
Miles between road calls	7,075	8,090	7,500	YTD is 7% less than target.	✓
Operator Absences per weekday	17.00	18.00	9.00	YTD Operator Absences are 100% more than target. (Due in part to COVID-19)	✓
Passengers per Hour (PPH)	7.09	7.91	14.00	YTD PPH is 44% less than target and is due to COVID-19.	✓
Cost per Trip (CPT)	\$ 15.53	\$ 14.56	\$ 6.16	YTD CPT is 136% more than target and is due to reduced ridership related COVID-19.	✓
Lift Operation	Month	YTD	Target	Details	
Preventable accidents per 100,000 miles	4.44	3.42	1.20	There were 4.44 preventable accidents in Feb VS 3.42 in prior year. YTD accidents are 3.42 vs. 2.39 in prior year.	✓
Total Complaints per Per 10,000 boarding's	30.31	32.18	23.00	There were 24 total Lift complaints in Feb vs. 10 in prior year. The current month breakdown is as follows: DA-1, Discrimination-0, II-1, Maintenance-0, No Show-5, Not on Time-3, Other-2, Pass Up-0, RD-1, RDW-1, Scheduling/On-Board Time-3, CC-1	✓
Total Valid Complaints per 10,000 boarding's	0.00	0.00	12.00	Of the 24 total Lift complaints, 7 was classified as valid with the current month breakdown as follows: DA-0, Discrimination-0, II-0, Maintenance-0, No Show-1, Not on Time-3, Other-1, Pass Up-0, RD-0, RDW-0, Scheduling/On-Board Time-2, CC-1	•
On-time performance	96%	94%	0.95	YTD On-time Performance is consistent with target.	•
Miles Between Road Calls	16,899	20,492	22,500	YTD Miles Between Road Calls is 9% less than target,.	•
Passengers per hour (PPH)	1.90	2.03	2.00	YTD PPH is 3% more than target.	•
Cost per Trip (CPT)	\$ 68.40	\$ 53.08	\$ 50.91	YTD CPT is 4% less than target projected .	✓
* Includes Nightline and Sunday Service		DA = Driver Attitude		Reckless Driving = RD	
✓ Inconsistance or worse than target		II = Incorrect Information		Route Driven Wrong = RDW	
• Consistent with or better than target		CC = Call Center		No Show = NS	

Fixed Route Key Performance Indicators: For the Eight Months Ending Feb 28, 2022							
	Month			YTD Average			Target
	Current	Prior Year	% Change	Current	Prior Year	% Change	
1) Operate a Safe Transit System							
Preventable Vehicle Accidents per 100k Miles	1.01	5.61	-82.00%	1.35	1.91	-29.32%	1.8
OSHA Accidents per 200k Manhours	0	0	0.00%	0	0	0.00%	6
2) Meet and Exceed Customer Expectations							
Complaints per 10k Boardings	2.91	4.7	-38.09%	4.59	4.12	11.41%	4.35
On-time Performance	80.95%	74.14%	9.46%	79.63%	80.06%	0.00%	85.00%
Miles Between Road Calls	7,075	8,518	-16.94%	8,090	8,338	-2.98%	7,500
3) Maintain a Quality Workforce							
Operator Absences per Weekday	17	21	-16.18%	18	18	0.95%	9
Total Absences per Weekday	20	22	-12.53%	21	20	5.58%	12
Employee Turnover	38.71%	38.30%	2.63%	46.65%	38.49%	23.68%	35.00%
4) Operate an Effective System							
Ridership	89,303	74,422	20.00%	106,281	106,550	-0.25%	235,416
Passengers per Service Hour	7.09	5.97	18.76%	7.91	7.19	10.01%	14
Average Weekday Ridership	3,899	3,262	19.54%	4,385	4,662	-5.95%	10,000
Average Saturday Ridership	2,831	2,298	23.19%	2,821	2,398	17.60%	4,500
5) Operate an Efficient System							
Cost Per Service Hour	110.19	97.47	13.05%	115.15	89.39	28.82%	82.5
Cost Per Trip	15.53	16.34	-4.96%	14.56	12.43	17.14%	6.16
Fare Revenue per Trip	1.47	0.78	88.46%	0.95	0.82	15.85%	0.78

*Note: Includes Nightline

Lift Key Performance Indicators: For the Eight Months Ending Feb 28, 2022							
	Month			YTD Average			Target
	Current	Prior Year	% Change	Current	Prior Year	% Change	
1) Operate a Safe Transit System							
Preventable Van Accidents per 100k Miles	4.44	2.09	112.44%	3.42	2.39	43.10%	1.2
OSHA Accidents per 200k Manhours	26.83	0	0.00%	6.86	0	0.00%	10
2) Meet and Exceed Customer Expectations							
Complaints per 10k Boardings	30.31	25	21.24%	32.18	24.99	28.77%	23
On-time Performance	95.89%	94.52%	1.05%	94.26%	98.00%	-4.08%	95.00%
Miles Between Road Calls	16,899	11,943	41.50%	20,492	13,948	46.92%	22,500
Average Call Center Minutes on Hold Time	1.03	0.95	8.42%	1.03	0.49	110.20%	1
3) Maintain a Quality Workforce							
Employee Turnover	38.71%	19.35%	105.26%	46.58%	41.46%	14.63%	50.00%
4) Operate an Effective System							
Ridership	5,939	4,000	48.48%	7,071	5,402	30.89%	9,082
Van Passengers per Service Hour	1.9	1.69	12.43%	2.03	1.92	5.73%	2
Average Weekday Ridership	297	200	48.48%	329	256	28.61%	470
5) Operate an Efficient System							
Cost Per Service Hour	129.99	85.06	52.82%	107.6	131.89	-18.42%	72.25
Cost Per Trip	68.4	50.19	36.28%	53.08	68.8	-22.85%	50.91
Fare Revenue per Trip	1.96	1.74	12.64%	3.05	2.65	15.09%	2.79

MTTA Fixed Route and Nightline Ridership History

	FY16	FY17	FY18	FY19	FY20	FY21	FY22	FY22 Projection	Month PY Diff%	Month Proj Diff %	YTD PY Diff%	YTD Proj Diff%
Jul	257,721	220,171	214,937	216,788	212,515	125,211	106,645	118,165	-14.83%	-9.75%	-14.83%	-9.75%
Aug	258,098	253,038	252,561	245,858	216,104	121,119	112,994	127,798	-6.71%	-11.58%	-6.71%	-10.67%
Sep	260,554	249,130	234,852	217,214	201,697	117,755	109,442	122,573	-7.06%	-10.71%	-7.06%	-10.68%
Oct	268,644	247,638	242,265	254,630	200,505	114,865	112,255	128,128	-2.27%	-12.39%	-2.27%	-11.11%
Nov	222,594	242,690	230,162	218,731	171,745	101,516	111,004	112,541	9.35%	-1.37%	9.35%	-9.16%
Dec	244,645	215,699	208,189	197,135	201,209	101,976	111,695	112,220	9.53%	-0.47%	9.53%	-7.71%
Jan	224,215	224,716	219,230	209,048	163,707	95,464	96,613	109,929	1.20%	-12.11%	1.20%	-8.34%
Feb	240,783	225,744	203,274	200,767	181,626	74,422	89,303	108,807	20.00%	-17.93%	20.00%	-9.54%
Mar	245,657	243,908	234,842	210,497	155,244	115,321		114,060	0.00%	0.00%	0.00%	-8.48%
Apr	229,500	216,617	218,701	224,886	105,403	108,600		107,186	0.00%	0.00%	0.00%	-7.63%
May	221,301	236,228	236,600	209,452	122,303	97,598		108,136	0.00%	0.00%	0.00%	-6.94%
Jun	232,721	231,947	219,008	205,464	125,492	103,753		108,906	0.00%	0.00%	0.00%	-6.36%
Total	2,906,433	2,807,526	2,714,621	2,610,470	2,057,550	1,277,600	849,951	1,378,449	1.15%	-9.54%	1.15%	-106.36%

MTTA Lift Program Ridership History

	FY16	FY17	FY18	FY19	FY20	FY21	FY22	FY22 Projection	Month PY Diff%	Month Proj Diff %	YTD PY Diff%	YTD Proj Diff%
Jul	10,612	9,449	8,453	8,587	8,890	5,496	7,269	5,908	32.26%	23.04%	32.26%	23.04%
Aug	10,315	11,288	9,768	9,779	9,305	5,838	7,672	6,317	31.41%	21.45%	31.41%	22.24%
Sep	10,527	10,536	8,636	8,410	8,797	5,963	7,411	5,947	24.28%	24.62%	24.28%	23.03%
Oct	10,598	10,395	9,470	9,868	10,084	5,958	7,299	6,392	22.51%	14.19%	22.51%	20.82%
Nov	8,979	9,856	8,686	8,609	8,734	5,525	7,113	5,577	28.74%	27.54%	28.74%	22.17%
Dec	9,265	9,345	7,750	7,188	8,009	5,302	7,204	5,279	35.87%	36.47%	35.87%	24.55%
Jan	9,569	9,413	8,771	8,923	8,851	5,132	6,657	5,717	29.72%	16.44%	29.72%	23.39%
Feb	10,076	9,704	8,353	8,269	8,100	4,000	5,939	5,522	48.48%	7.55%	48.48%	21.41%
Mar	10,743	10,833	9,652	8,401	6,364	6,695		5,788	0.00%	0.00%	0.00%	19.03%
Apr	10,213	9,425	8,871	9,221	3,103	6,531		5,337	0.00%	0.00%	0.00%	17.13%
May	9,746	9,570	9,264	8,507	4,660	6,186		5,297	0.00%	0.00%	0.00%	15.57%
Jun	10,605	9,215	9,114	8,216	5,276	6,911		5,472	0.00%	0.00%	0.00%	14.27%
Total	121,248	119,029	106,788	103,978	90,173	69,537	56,564	68,553	31.66%	21.41%	48.48%	246.67%



FISCAL YEAR 2022 PERFORMANCE FOR EIGHT MONTH PERIOD ENDING FEB 28, 2022



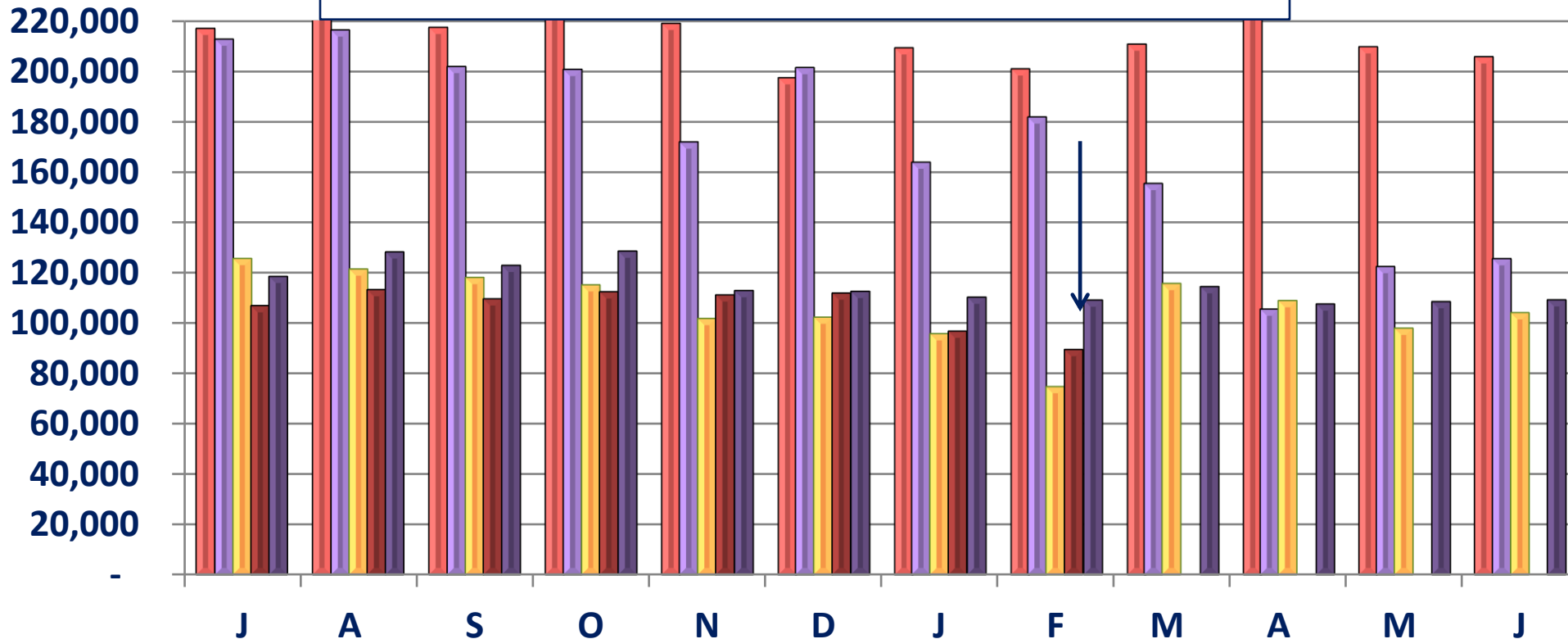
SUMMARY OF ACTIVITIES *(IN THOUSANDS)*

	FY 2022	FY 2022		
	Actual	Budget	Variance	Variance %
Operating Revenues	\$ 1,416	\$ 1,264	\$ 152	12%
Grant Revenues	14,405	17,449	(3,043)	-17%
Total Revenues	15,821	18,713	(2,891)	-15%
Total Expenses	(15,821)	(17,458)	1,636	-9%
Surplus (Deficit)	\$ -	\$ 956	\$ (956)	-100%

FIXED ROUTE RIDERSHIP

■ FY19
 ■ FY20
 ■ FY21
 ■ FY22
 ■ FY22 Projected

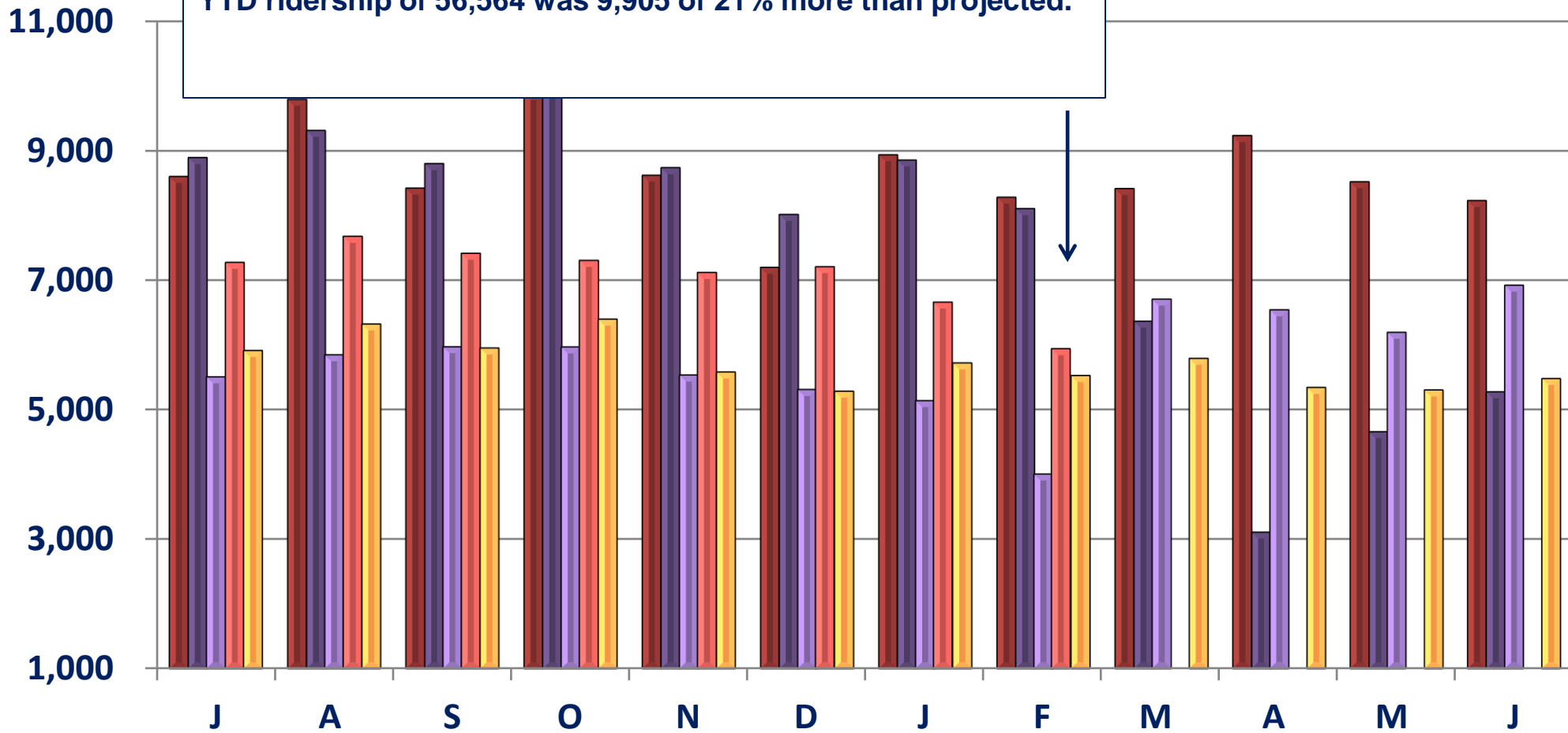
Feb 22 ridership of 89K was 13K or 18% less than target projection.
 YTD ridership of 850K is 70K or 9.4% less than projected. Feb 22
 ridership reflects a modified Saturday schedule.



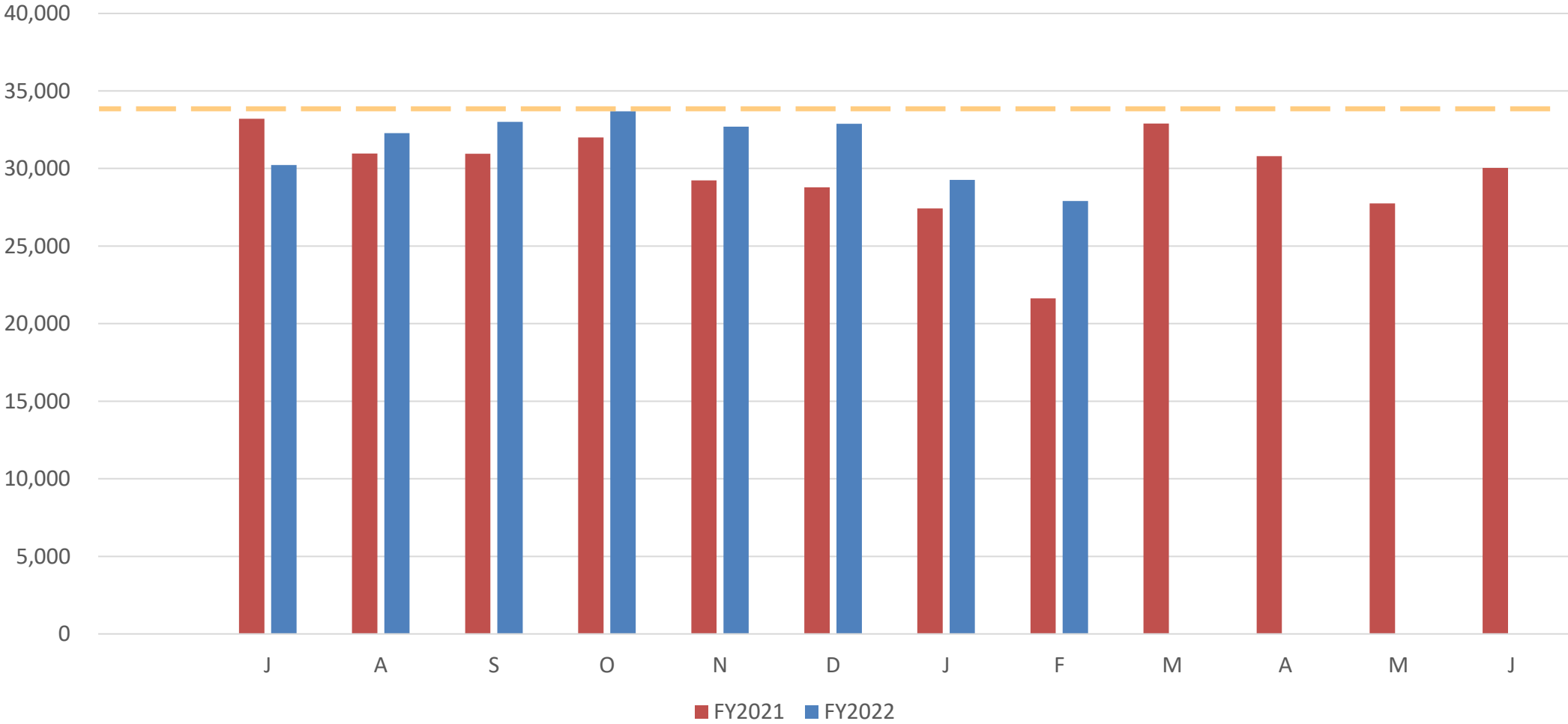
LIFT RIDERSHIP

■ FY19
 ■ FY20
 ■ FY21
 ■ FY22
 ■ FY22 Projected

Feb 22 ridership of 5,939 was 417 or 7.5% more than projected.
 YTD ridership of 56,564 was 9,905 of 21% more than projected.



BRT RIDERSHIP



*Average Route 105 Ridership was 34,000 per month.

GM Feb 2022 Expenses

There were not expenses to report for the month of February 2022

Upcoming Procurements

Est. Board Date	Good/Service	Type	Estimated Amt.	Status
April Board	Trapeze OPS	Sole Source	Over \$150,000 - \$960,000	Identifying Grant Funds
	To automate compiling of Operations timekeeping, bidding, dispatch, workforce & yard management			
April Board	On Call Consulting Firms	RFP	Over /\$100,000	Request we activate the Option Year for contract
	Implement option year			
April Board	MTTA Branding	RFP in Progress	Over \$50,000	In Progress
	Branding project for the agency. Waiting on scope			
2nd Qtr 2022	Bus Interior Cleaning	New RFP	Over \$50,000	Developing Scope
	Cleaning of the interior of the fixed route buses. Updating scope to include COVID cleaning.			
2nd Qtr 2022	Bus and Shelter Advertising	New RFP	Revenue	Developing Scope
	Contract for advertising from bus wraps and shelter advertising			
2nd Qtr 2022	Call Center/DAS Roof Replacement	RFP	Over \$100,000	Scope w/architects
	Recent hail storm requires replacement of roof at DAS and Call Center. Pending scope from On Call Architect			
2nd Qtr 2022	General Maintenance & Facility Repair	New RFP	Over \$50,000	Review & confirm scope w/Randy
	General contractor for Tulsa Transit on as needed basis. Review & confirm scope with Project Manager			
2nd Qtr 2022	On Call Printing Services	New RFP	Under \$50,000	Liann has scope details when she is ready.
	On Call contract for various printing needs of the agency - Waiting on confirmation of final scope & feedback from new GM.			
2nd Qtr 2022	APC	Sole Source	\$60,000	Identifying Grant Funds
	Purchase 10 sets (20 individual) need ≈30/Make determination as to which grant(s) to use.			
2nd Qtr 2022	Lift Vehicle Replacement	State Contract	Under \$100,000	Determining exact vehicle to purchase
	Replacement of Lift Vehicle totalled in accident.			
2nd Qtr 2022	Offsite Backup Solution	New RFP	Approx \$50,000	Planning
	FTA requires MTTA to have an offsite backup solution to prevent data loss			
3rd Qtr 2022	CNG Fueling Posts	New RFP	Over \$50,000	Waiting on bids from CNG Contractors
	CNG fueling posts for additional buses in the fleet - pending quotes from CNG Fuel Station Vendor and outside vendors.			
3rd Qtr 2022	CNG Compressors & Contract/-Trillium	Sole Source	Over \$150,000	Waiting on bids from CNG Contractors
	2existing pumps going out. Extend to 10 years if we get new equipment			
3rd Qtr 2022	Shop Truck	State Contract	\$90-\$140k	Future Grant
	Maintenance shop truck to replace old vehicle/Future grant to fund.			
3rd Qtr 2022	In Ground Lifts	IFB	Over \$300,000	Scope Needed
	Replacement of In-Ground Lifts for Maintenance Shop -Waiting on Scope			

MEMORANDUM OF UNDERSTANDING

**BETWEEN THE
THE METROPOLITAN TULSA TRANSIT AUTHORITY
AND
THE CITY OF TULSA**

THIS MEMORANDUM OF UNDERSTANDING is made this ____ day of _____, 2022, by and between the City of Tulsa, Oklahoma, a municipal corporation (“City”), and the Metropolitan Tulsa Transit Authority, an Oklahoma public trust of which the City is the beneficiary (“MTTA”).

WHEREAS, the City, as lead applicant, and MTTA, as supporting applicant, successfully applied for a USDOT Better Utilizing Infrastructure to Leverage Development (BUILD) Grant (the “BUILD Grant”) for implementing a project titled LINK Tulsa (Leveraging Intelligent Networks Key-Corridors: Peoria Avenue and Route 66) (the “Project”); and

WHEREAS, after the City and MTTA were notified that the BUILD Grant application was successful and would be awarded through the Federal Transit Administration (“FTA”), the City and MTTA requested that USDOT transfer the BUILD Grant award from the City to MTTA due to the MTTA’s long experience with managing FTA project funding; and

WHEREAS, the City and MTTA represented to USDOT that if the MTTA were awarded the BUILD Grant the City’s and MTTA’s respective roles in implementing the Project would be set forth in an interlocal Memorandum of Understanding between the City and MTTA; and

WHEREAS, USDOT granted the request of the City and MTTA and entered into that certain Grant Agreement with MTTA, a copy of which is attached hereto as Exhibit A; and

WHEREAS, the City and MTTA desire to set forth their roles and responsibilities in cooperating to implement the Project;

THEREFORE, in consideration of the mutual covenants herein contained, the parties hereto agree as follows:

ARTICLE I

MTTA and the City acknowledge this Memorandum of Understanding acts as an outline of the general duties of the parties, contingent upon any requirements of the BUILD Grant and any amendments thereto.

ARTICLE II

The City agrees to assume the following roles and responsibilities:

1. Provide, with the cooperation of MTTA, the necessary management of preconstruction and construction phase services to implement the Project at a total cost of approximately \$9,500,000, of which \$6,500,000 will be paid by the BUILD Grant funding to MTTA;
2. Provide supplemental funding for the planning, design and construction of the Project, subject to the approval through the City's formal appropriation and contracting requirements, in an amount not to exceed \$2,500,000;
3. Upon completion of the Project, provide maintenance of the fiber, signal upgrades and ADA improvements.

ARTICLE IV

MTTA agrees to assume the following roles and responsibilities:

1. Cooperate with the City to support the implementation of the Project;
2. Procurement of the real time arrival signs (RTAs);
3. Cooperate with the City in the design of the Project improvements, including the fiber and ADA improvements, transit signal priority (TSP) considerations, fiber connections to the BRT stations and coordination of the RTAs with the Route 66 BRT station construction;
4. Reimburse the City for cost share of any related Project costs from BUILD Grant award funds;
5. Reimburse the City for preconstruction phase services on a reimbursable invoice schedule from BUILD Grant award funds;
6. Upon completion of the Project, operate and maintain the RTAs and Route 66 BRT stations.

IN WITNESS WHEREOF, the parties have caused these presents to be executed effective as of the day and year first above written.

**Metropolitan Tulsa
Transit Authority**

Witnesses

Name: _____
Title: _____

**THE CITY OF TULSA, OKLAHOMA,
A Municipal Corporation**

By: _____
Mayor

Date: _____

ATTEST:

By: _____
City Clerk

APPROVED AS TO FORM:

By: _____
Assistant City Attorney

Recommendation

Authorize the General Manager to renew the Microsoft Office 365 licensing for \$28,200.45 for April 2022 through April 2023, and then renew annually for a further 4 years with an expected annual increase of 3%, not to exceed \$160,000 for the 5-year term.

Background

Microsoft Office 365 is a critical software suite for Tulsa Transit. This suite includes all office software, as well as our email system, and offsite Domain Controller for user access and resource control. This is a single source item as no other vendor can provide the Microsoft Office Suite (Outlook, Word, Excel, PowerPoint, Teams) along with email, and Active Directory in a single solution. Microsoft has moved from a perpetual licensing model to a SaaS (Software as a Service) licensing model, meaning that they must be renewed every year to continue using the software and business services suite.

We are asking for the multi-year authorization with an annual renewal because Microsoft's business model does not allow renewal, or even provide price quotes more than 30 days before the renewal date. By authorizing renewal multi-year, we eliminate the risk of a critical piece of the infrastructure ceasing to work waiting for Board approval.

Financial Impact

The year 1st year cost for renewing Microsoft Office 365 is \$28,200.45. With the expected 3% annual increase, the 5-year total should not exceed \$160,000. This is an annual operating expense. This is an Operational Expense and will utilize the 80/20 split for federal and local funding.

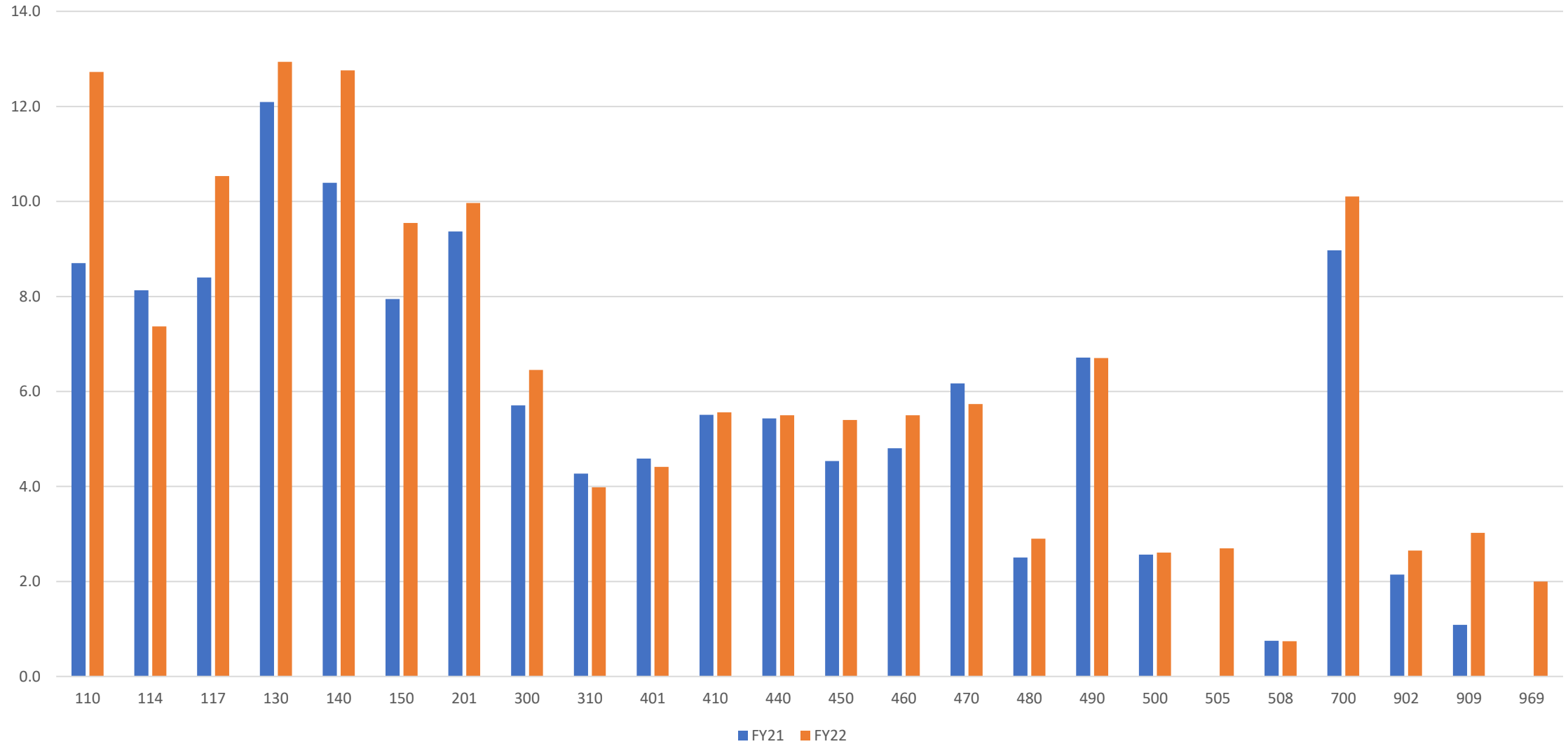
Performance Standards

Evaluating Route Performance

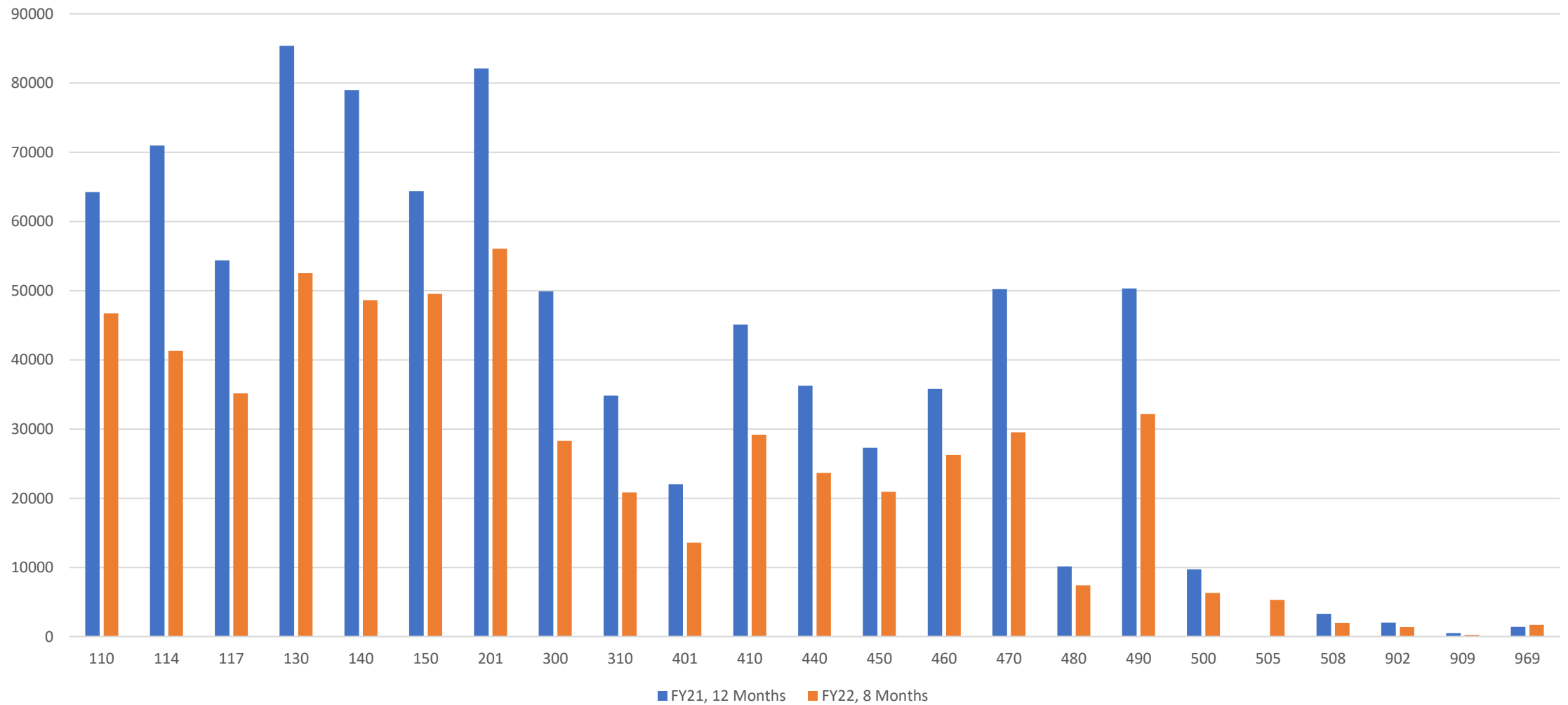
- Adopted in 2019, COA
- Primary: Passengers per Revenue Hour
- Passengers/Rev. Mile, Cost/Trip, Passengers/Trip, & Farebox Recovery
- Timeframe: New service vs. Existing Service
- Key Stops: APC Data Collection

	Weekday	Saturday	Weekday	Saturday	
	Daytime	Daytime	Night	Night	Sunday
Passengers per Revenue Hour	12.9	12.4	4.9	5.7	5.9

Passenger per Rev Hour



Ridership by Route



*Route 700: FY21: 357,612 (12 Months) FY22: 256,076 (8 Months)

Upcoming Changes

- Evaluating lower performing routes
- Public meetings
- Operations changes to improve reliability
- Increasing frequencies
- Changes will occur over April & December Signs. All changes will be approved through the board

TITLE VI PROGRAM FOR THE
METROPOLITAN TULSA TRANSIT AUTHORITY

Submitted April 2022



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Introduction

It is the intent of the *Civil Rights Act of 1964* that “No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” This intent, which is embodied in Section 601 of Title VI of the Civil Rights Act of 1964, has been translated into the Federal Transit Administration’s (FTA) Title VI Program that includes the following objectives:

- To ensure that FTA-assisted benefits and related services are made available and are equitably distributed without regard to race, color, or national origin.
- To ensure that the level and quality of FTA-assisted transit services are sufficient to provide equal access and mobility for any person without regard to race, color, or national origin.
- To ensure that opportunities to participate in the transit planning and decision-making processes are provided to persons without regard to race, color, or national origin.
- To ensure that decisions on the location of transit services and facilities are made without regard to race, color, or national origin.
- To ensure that corrective and remedial action is taken by all applicants of FTA assistance to prevent discriminatory treatment of any beneficiary based on race, color, or national origin.

It is the goal of Tulsa Transit to comply with the intent of the *Civil Rights Act of 1964* and FTA’s Title VI program objectives to ensure there is no discrimination in the provision of transportation planning and transit services within the Tulsa Transportation Management Area.

Definitions

- a. Adverse Effect means the totality of significant individual or cumulative human health or environmental effects, including interrelated social and economic effects, which may include, but are not limited to: bodily impairment, infirmity, illness, or death; air, noise, and water pollution and soil contamination; destruction or disruption of man-made or natural resources; destruction or diminution of aesthetic values; destruction or disruption of community cohesion or a community’s economic vitality; destruction or disruption of the availability of public and private facilities and services; vibration; adverse employment effects; displacement of persons, businesses, farms, or non-profit organizations; increased traffic congestion, isolation, exclusion or separation of individuals within a given community or from the broader community; and the denial of, reduction in, or significant delay in the receipt of benefits of Department of Transportation (DOT) programs, policies, or activities.
- b. Discrimination refers to any action or inaction, whether intentional or unintentional, in any

program or activity of a federal aid recipient, sub-recipient, or contractor that results in disparate treatment, disparate impact, or perpetuating the effects of prior discrimination based on race, color, or national origin.

- c. Disparate impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.
- d. Disproportionate burden refers to a neutral policy or practice that disproportionately affects low-income populations' more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.
- e. Disparate treatment refers to actions that result in circumstances where similarly situated persons are intentionally treated differently (i.e., less favorably) than others because of their race, color, or national origin.
- f. Limited English Proficient (LEP) persons refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.
- g. Low-income person means a person whose median household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines.
- h. Low-income population refers to any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed FTA program, policy or activity.
- i. Minority persons include the following:
 - (1) American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
 - (2) Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
 - (3) Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
 - (4) Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or

Central American, or other Spanish culture or origin, regardless of race.

- (5) Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
- j. Minority population means any readily identifiable group of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient populations (such as migrant workers or Native Americans) who will be similarly affected by a proposed DOT program, policy, or activity.
- k. National origin means the particular nation in which a person was born, or where the person's parents or ancestors were born.
- l. Predominantly minority area means a geographic area, such as a neighborhood, Census tract, block or block group, or traffic analysis zone, where the proportion of minority persons residing in that area exceeds the average proportion of minority persons in the recipient's service area.
- m. Service area refers either to the geographic area in which a transit agency is authorized by its charter to provide service to the public, or to the planning area of a State Department of Transportation or Metropolitan Planning Organization.
- n. Service standard/policy means an established service performance measure or policy used by a transit provider or other recipient as a means to plan or distribute services and benefits within its service area.
- o. Sub-recipient means an entity that receives Federal financial assistance from FTA through a primary recipient.
- p. Title VI Program refers to a document developed by an FTA recipient to demonstrate how the recipient is complying with Title VI requirements. Direct and primary recipients must submit their Title VI Programs to FTA every three years. The Title VI Program must be approved by the recipient's board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA. For State DOTs, the appropriate governing entity is the State's Secretary of Transportation or equivalent.

Profile of the Tulsa Metropolitan Area

The Tulsa Transportation Management Area is comprised of all of Tulsa County and portions of Creek, Osage, Rogers, and Wagoner Counties in northeastern Oklahoma. Currently Tulsa Transit's service area includes all of the City of Tulsa, with limited service to the cities of Jenks, Broken Arrow, and Sand Springs. In order to more closely describe Tulsa Transit's service area, demographic statistics for Tulsa County are provided.

Census Summary Statistics for Tulsa County

According to the 2013-2019 American Community Survey 1-Year Estimates, identified minorities comprised approximately 32.2% of the total population of Tulsa County. Table 1 identifies the largest minority groups identified. The largest absolute increase and the largest percentage increase occurred in the American Indian community (25.8% increase).

Table 1 Tulsa County Population

	2000		2010		2017		2019	
Total	563,299	100.0%	603,403	100.0%	643,346	100.0%	651,552	100.0%
Black	61,400	10.9%	64,564	10.7%	67,265	10.5%	64,765	9.9%
Hispanic/Latino	33,798	6.0%	66,374	11.0%	77,582	12.1%	86,586	13.3%
American Indian	29,292	5.2%	36,204	6.0%	28,207	4.4%	35,498	5.4%
Asian	9,013	1.6%	13,878	2.3%	19,006	3.0%	23,436	3.6%

Sources: U.S. Census 2000, 2010, 2020. 2013-2017 Estimate, 2019 American Community Survey 1-Year Estimate.

Table 2 Population Trends

	2000	2010	% Change	2017	% Change	2019	% Change
Total	563,299	603,403	7.1%	643,346	6.6%	651,552	1.3%
Black	61,400	64,564	5.2%	67,265	4.2%	64,765	-3.7%
Hispanic/Latino	33,798	66,374	96.4%	77,582	16.9%	86,586	11.6%
American Indian	29,292	36,204	23.6%	28,207	-22.1%	35,498	25.8%
Asian	9,013	13,878	54.0%	19,006	37.0%	23,436	23.3%

Sources: U.S. Census 2000, 2010, 2020. 2013-2017 Estimate, 2019 American Community Survey 1-Year Estimate.

Requirements

The following provides an update to the status of activities included under the FTA Requirements.

Title VI Notification

Tulsa Transit will display a Title VI notice to the public that indicates Tulsa Transit complies with Title VI, and informs members of the public of the protections against discrimination afforded to them by Title VI. Tulsa Transit will display the Title VI notification on its website at www.tulsatransit.org and in the Tulsa Transit route guidebook, known as the Tulsa Traveler. The notification has been placed in two different locations in the Traveler in English and in Spanish. (See Attachment 1.) Tulsa Transit will also display the notification in facility public areas.

Title VI Complaint Procedures

Tulsa Transit's Title VI Discrimination Complaint Processing Procedure is included as Attachment 2 and a sample of the Title VI complaint form is included as Attachment 2b. The procedures provide a framework for tracking and investigating complaints, follow up actions, supervisory review of actions taken, and post-investigation customer contact. Tulsa Transit has posted the complaint process, guidelines, and form on its website at <http://tulsatransit.org/about-mtta/civilrights/>.

Active Lawsuits and Complaints

All recipients shall prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming Tulsa Transit.

Currently Tulsa Transit does not have any active lawsuits against the organization for Title VI or Limited English Proficiency (LEP), but occasionally receives complaints alleging discrimination. These complaints are investigated by the Civil Rights Officer. (A list of complaints and outcomes is included as Attachment 3.)

Public Participation Plan

Tulsa Transit uses several methods to inform citizens of transit services available to them. The most common method is via the media, including paid advertising, news releases, and public outreach events. Tulsa Transit also uses online methods such as social media platforms and email, and virtual meetings. Tulsa Transit has made special efforts to communicate to the black community through the community newspaper and to the Hispanic community through media options through the

community. Tulsa Transit also provides information to any outlets that is located and is possible in the Asian community. Tulsa Transit staff also holds public forums to advise the public on services offered and how to use the bus system when possible.

For major service changes (any change that revises 20% or more of a route schedule or of a route's geography) or fare increases, Tulsa Transit has developed the following public participation plan.

a. Background

Public input is a requirement of the FTA for all fare increases and major service changes. Tulsa Transit must have a written process for how public comment is solicited and considered prior to raising fares or implementing major service changes.

b. Process

The public will have the opportunity to make verbal and/or written comments any time Tulsa Transit proposes a fare increase or major service change. Tulsa Transit will hold public meetings and/or forums in order to meet this requirement. Advance notice will be provided to the public through a variety of means as discussed in greater detail below. Tulsa Transit will also notify the public of additional ways to comment on changes such as mail, e-mail, or telephone. Public comments will be accepted for a minimum period of 15 days. Copies of public meeting/forum advertisements will be retained as part of the public input process documentation.

c. Notification

Public meetings/forums will be advertised in a way that reaches the greatest number of affected parties, within reason. The primary means of notification will be postings on transit vehicles and at transfer stations. Local newspaper advertisements will be published in local newspaper outlet, and news releases will be sent to additional local media outlets. Tulsa Transit will also post announcements on their social media platforms and will disburse email and text messages to individuals that have signed up for notifications. To ensure notification to minorities, low-income persons, and persons with limited English proficiency, a news release also will be distributed to media outlets and publications that target minority and limited English-speaking populations. In addition, notices may be posted at local churches, schools, public housing administrative offices, and public libraries when permission is granted.

d. Public Meetings/Forums

For public meetings/forums, the following procedures will be followed:

- Participants will be greeted upon arrival and asked to provide name and contact information for the record.
- When meetings are held, the purpose of the meeting will be stated at the beginning. In the event a forum is held, transit staff will greet customers and explain the purpose of the forum.
- Staff will supply background regarding why the fare or major service change is being considered.

- Staff will provide instructions on procedures for making a comment at the meeting/forum, as well as providing information on how comments will be shared across the organization, up to and including decision-makers.
 - An adequate period of time will be reserved to ensure all interested participants have a reasonable opportunity to make their comments heard.
 - Prior to the conclusion of each public meeting/forum, participants will be reminded of additional opportunities to comment such as mail, telephone, or email.
- e. Consideration
- Prior to the consideration of a proposed fare increase or major service change, Tulsa Transit Board of Trustees will receive a document summarizing public comments received, whether written or verbal. These comments will be considered in making a decision on the proposed fare increase or major service change. Additionally, Board members and City of Tulsa Councilors are encouraged to attend all public meetings/forums. Finally, staff recommendations for raising fares or implementing a major service change will thoroughly and meaningfully consider public comment received, and incorporate such feedback, to the extent possible, when conditions warrant or allow. Tulsa Transit has developed a Public Participation Plan and will provide this plan document to the FTA.
- f. Public Participation Since Last Title VI Program Summary
- Due to COVID-19 Tulsa Transit had to adjust level of service included you will find a service equity analysis. The public was notified of the change due to COVID.

Limited English Proficiency (LEP) Plan

Tulsa Transit has developed a Limited English Proficiency Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by the transit authority. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available. In order to prepare the plan, Tulsa Transit undertook the U.S. DOT four-factor LEP analysis which considers:

- The number or proportion of LEP persons in the service area who may be served or are likely to encounter a Tulsa Transit program, activity, or service.
- The frequency with which LEP persons come in contact with Tulsa Transit programs, activities, or services.
- The nature and importance of programs, activities, or services provided by Tulsa Transit to the LEP population.
- The resources available to Tulsa Transit and overall cost to provide LEP assistance.

Four-Factor Analysis Results

1. The number or proportion of LEP persons in the service area who may be served, or are likely to encounter a Tulsa Transit program, activity, or service.

The Census Bureau has designated four categories to classify how well people speak English. For planning purposes, Tulsa Transit is considering people that speak English less than “very well” as LEP persons. Table 1 shows the languages spoken at home for all persons five years old and older in the Tulsa City limits (2015 American Community Survey 5-Year Estimates).

Table 1: Language Spoken at Home for the Population 5 Years or Older

Limited English Proficiency for the Tulsa City Limits			
Language	Total Number that Speak that Language	Total Number that Speak English Less Than	Total Speaks English Less Than “Very Well” as a Percent of Total City Population
Spanish or Spanish Creole	55,071	21,899	5.86%
Frenchm Haitian, Creole	677	93	0.02%
German	1176	0	0.00%
Chinese	1,028	276	0.07%
Vietnamese	1,425	580	0.16%
Other Asian languages	4,910	2,544	0.68%
Other/Unspecified Languages	2069	303	0.08%
Other Indo-European languages	2113	213	0.06%
Arabic	1,160	441	0.12%
Russian, Polish, Slavic	528	186	0.05%
Korean	213	136	0.04%
Tagalog	618	441	0.12%

2. The frequency with which LEP persons come in contact with Tulsa Transit’s programs, activities or services.

Tulsa Transit has assessed the frequency of when staff and drivers have or could have, contact with LEP persons. The following “touch points” and frequencies have been identified:

Drivers	Frequently
Customer Service Representative – Phone	Often- Frequent
Traveler (Schedule book)	Often- Frequent
Dispatchers	Occasionally
Interior Cards	Frequently
On-street signage	Frequently
On-board surveys	Occasionally
Website	Occasionally
Receptionist (front office)	Not Often
Print media	Occasionally
Broadcast media	Occasionally
Public Participation (Public meetings)	Occasionally

In addition to information collected from Tulsa Transit staff, when attending meetings with other community stakeholder organizations, Tulsa Transit request information obtained from community partners about reports of language barriers when seeking information or using Tulsa Transit services. Local colleges, universities, human service agencies, and organizations serving minority and low-income individuals are among the community partners consulted.

3. The nature and importance of programs, activities, or services provided by Tulsa Transit to the LEP population.

The largest geographic concentrations of LEP individuals in Tulsa Transit’s service area are Spanish, and “Other Asian languages.” Services provided by Tulsa Transit that LEP persons are most likely to encounter are the fixed route system which serves the general public, the ADA paratransit system which serves persons with disabilities, telephone information through the Call Center, and in-person customer information at the Denver Avenue Station. In addition, LEP persons are likely to attend public meetings/forums held by Tulsa Transit for informational purposes.

Tulsa Transit has had outreach efforts with attending Hispanic events within the community. We have also surveyed our board member that represents the Hispanic community to gain information of what services that Tulsa Transit can provide to assist the Hispanic LEP population of Tulsa, as well as any other LEP communities.

Tulsa Transit found that the most valuable services to provide to the Hispanic LEP population would be translation of written documents and assistance with trip planning with verbal communication.

Tulsa Transit has discovered that the Other Asian languages populations also fall under the LEP guidelines. Tulsa Transit will continue to conduct outreach efforts to find what services would assist the other Asian LEP populations and will then update the Tulsa Transit LEP program as needed. Currently Tulsa Transit is still trying to find ways to reach this population such as partnerships with international student programs at local colleges and universities and work with human service agencies and local school districts. During COVID these opportunities were very limited.

Tulsa Transit has and will continue to perform many outreach efforts during the year at different agencies, businesses, and transfer stations to survey individuals on what language assistance is needed. We have found Spanish is the number one. However, we will continue to poll the agencies and businesses again in FY2022-2023.

4. The resources available to Tulsa Transit and overall cost to provide LEP assistance.

Tulsa Transit assessed its available resources that could be used to provide LEP assistance, including costs associated with professional interpreters and translation services on an as-needed basis, documents and phone assistance that would be most valuable if translated for LEP persons, and an inventory of available organizations that Tulsa Transit could partner with for outreach and translation efforts.

Because the American Community Survey does not breakdown the “other Asian languages” category, Tulsa Transit is unable to identify specific languages that would fall within this category for translations. It is administratively impractical and costly to identify and translate the additional languages. Tulsa Transit will translate vital documents into other languages upon request with the assistance of a language line. We can also use the system to use for calls we receive from LEP individuals.

Developing a Language Assistance Plan

After completing the Four Factor Analysis, Tulsa Transit used the results of the analyses to determine which language assistance services are appropriate for its service area. Additionally, Tulsa Transit has developed an assistance plan to address the identified needs of the LEP population(s) it serves. These plans are provided in the attachment 13.

Minority Participation in the Decision-Making Process

Currently Tulsa Transit does not have any board appointed advisory committees to report. However, if this status changes then Tulsa Transit will update the Title VI report to provide the racial breakdown of the membership of the committees and the explanation of the efforts made to encourage participation.

As of March 2022, pursuant to the requirements of Federal Transit Administration Circular 4702.1B, the racial minority representation of the Board of Trustees was analyzed in comparison with the current racial composition of the City of Tulsa as a whole, as shown below.

Body	Caucasian	Hispanic or Latino	African American	Asian	Native American
Population of the Service Area	70%	13%	10%	4%	5%
Board of Trustees	57%	14%	29%	0%	0%

Monitoring Sub-recipients and Sub-contractors

Tulsa Transit does not have any subrecipients at this time. Tulsa Transit subcontracts operations of paratransit service and some shuttle service to a third-party contractor, First Transit. Tulsa Transit is responsible for ensuring that First Transit is following the Title VI program of Tulsa Transit and complying with Title VI. As such, First Transit staff must participate in annual and new hire Civil Rights training. All First Transit drivers must also be familiar with options for providing information to individuals with LEP and/or low literacy. Tulsa Transit monitors its third-party contractor through random inspections. If First Transit staff receive a Title VI complaint, the complaint is reported immediately to Tulsa Transit and Tulsa Transit investigates the complaint. The complainant is referred to Tulsa Transit’s complaint procedures.

Determination of Site or Location of Facilities

Title 49 CFR Section 21.9(b)(3) states, “In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part.” Title 49 CFR part 21, Appendix C, Section (3)(iv) provides, “The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, nor does it include transit stations, power substations, etc., as those are evaluated during project development and the National Environmental Policy Act (NEPA) process. Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. In order to comply with the regulations:

- Tulsa Transit will 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. Tulsa Transit will engage in outreach to

persons potentially impacted by the siting of facilities. The Title VI equity analysis will compare the equity impacts of various siting alternatives, and the analysis will be completed before the selection of the preferred site.

- When evaluating locations of facilities, Tulsa Transit will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis will be done at the Census tract or block group level, where appropriate, to ensure that proper perspective is given to localized impacts.
- If Tulsa Transit determines the location of the project will result in a disparate impact on the basis of race, color, or national origin, the agency will only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. Tulsa Transit will show how both tests are met.
- Tulsa Transit will consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

Currently Tulsa Transit has purchased land for a parking lot and have attached the equity analysis. See attachment 9

System Wide Service Standards

a. Background

FTA requires all fixed route transit providers of public transportation to develop quantitative standards for the following indicators.

- Vehicle load for each mode: Generally expressed as the ratio passengers to the number of seats on a vehicle, relative to the vehicle's maximum load point. For example, on a 40-seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees. 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 distribution of routes within an agency's service area.

b. Vehicle Load Standards

The average of all loads during the peak operating period should not exceed the vehicle’s achievable capacities, as stated in the table on the following page.

Vehicle Type	Average Passenger Capacities			Maximum Load Factor
	Seated	Standing	Total	
23' Mini-Bus	13	6	19	1.5
30' Low floor	28	14	42	1.5
35' Low floor	38	14	52	1.4
40' Low floor	42	16	58	1.4

c. Vehicle Headway Standards

Vehicle headways are the amount of time between two vehicles traveling in the same direction on a given route. A shorter headway corresponds to more frequent service. Vehicle headways are measured in minutes (e.g., every 30 minutes). Service frequency is measured in vehicles per hour (e.g., 2 buses per hour). Headways and frequencies of service are general indications of the level of service along a route. Vehicle headway is one component of the amount of travel time expended by a passenger to reach his/her destination.

Scheduling involves the consideration of several factors including ridership productivity, transit/pedestrian friendly streets, density of transit-dependent population and activities, relationship to major transportation developments, land use connectivity, and transportation demand management.

Vehicle headway standards for Tulsa Transit are:

Weekday	Peak	Off-Peak	Night
Trunk	30	60	60
Suburban	60	60	--
Cross Town	20	30	--
Peak Express	30	--	--

Weekend	Peak	Off-Peak	Night
Trunk	60	60	60
Suburban	60	60	--
Cross Town	45	45	60
Peak Express	--	--	--

Tulsa Transit will improve vehicle headways first on routes that exceed the load factor standard or on routes that have the highest load factors.

d. On-time Performance

On-time performance is a measure of runs completed as scheduled. All schedules must be operated on-time when at all possible. Tulsa Transit defines on-time performance as zero (0) minutes early and up to six (6) minutes late in comparison to the established schedule. Tulsa Transit’s on-time performance objective is 85% or greater. Tulsa Transit continuously monitors on-time performance, and system results are issued upon request to Board of Trustees.

e. Service Availability

Service availability is a general measure of the distribution of routes within a transit provider’s service area. The measure used by Tulsa Transit to determine equal transit access is described below. Since ridership is positively correlated with population densities, routes are more closely spaced in higher density areas.

Population Density	Route Spacing	Maximum Walking Distance
Downtown Core Urban Area (2600 persons per square mile)	½ mile	¼ mile
Urban Area (3600 persons per square mile)	1 mile	½ mile
Suburban Area (2100- 3600 persons per square mile)	1 mile	½ mile

Tulsa Transit Service Policies

a. Vehicle Assignments

Bus assignments at Tulsa Transit 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 maybe assigned 20-30-foot buses rather than the larger 35-foot and 40-foot buses. Some routes that require tight turns on narrow streets are operated with 20-30-foot buses rather than larger vehicles. All of Tulsa Transit’s bus fleet is equipped with air conditioning, bike racks and are accessible to persons with disabilities.

b. Distribution of Transit Amenities Policy

Transit amenities refer to items of comfort, convenience, and safety available to the general riding public. To ensure equitable distribution of transit amenities across the system, installation of transit amenities along bus routes are based on the number of passengers boardings at stops and along those routes.

Tulsa Transit Amenities Policies

a. Placement of Shelters Policy

For our internal bus stop improvement program, the need for a shelter is prioritized based primarily upon ridership. 10 average weekday boardings is the minimum criteria to warrant a shelter. A bench and trashcan are typically installed as part of the shelter installation as well.

b. Placement of Stand-Alone Benches Policy

Tulsa Transit's standards require weekday boardings averaging five or more for bench placement. Exceptions will be reviewed on case by case basis. Benches may also be appropriate at locations where space or sight distance considerations make a shelter impractical, or where bus patrons are sitting on adjacent private property. Tulsa Transit does not typically maintain custom benches nor grant permission for their installation in the public right of way.

Collect and Report Demographic Data

a. Demographic and Service Profile Maps and Charts

Tulsa Transit will prepare demographic and service profile maps and charts after each decennial census and prior to proposed service reductions or eliminations. Tulsa Transit will use decennial census data or the American Community Survey to develop maps and charts until the next decennial census. These maps and charts will help Tulsa Transit determine whether, and to what extent, transit service is available to minority populations within the agency's service area. These maps will be prepared using Geographic Information System (GIS) technology. FTA requires transit providers to prepare maps and charts as shown below.

b. Base Map

Tulsa Transit will provide a base map of the service area that overlays Census tract, Census block or block group, traffic analysis zone (TAZ), or other locally available geographic data with transit facilities—including transit routes, transit stops and stations, depots,

maintenance and garage facilities, and administrative buildings—as well as major activity centers or transit trip generators, and major streets and highways. This map will overlay Census tract, block or block group data depicting minority populations with fixed transit facilities, such as bus shelters, transit stations. (See Attachment 4)

1) Demographic Map

A demographic map that plots the information listed above and also shades those Census tracts, blocks, block groups, TAZs, or other geographic zones where the percentage of the total minority population residing in these areas exceeds the average percentage of minority populations for the service area as a whole. (See Attachment 5)

2) Low Income Population

For purposes of addressing environmental justice, and in order to evaluate the impacts of major service changes on low-income populations, demographic maps that also depict those Census tracts, blocks, block groups, TAZs, or other geographic zones where the percentage of the total low-income population residing in these areas exceeds the average percentage of low-income populations for the service area as a whole. (See Attachment 6)

c. Demographic Ridership and Travel Patterns

Tulsa Transit will collect information on the race, color, national origin, English proficiency, language spoken at home, household income, and travel patterns of its riders using customer surveys. Tulsa Transit will use this data to develop a demographic profile comparing minority riders and non-minority riders, and trips taken by minority riders and non-minority riders. Tulsa Transit will also collect fare usage by fare type among minority users and low-income users, in order to assist with fare equity analyses. Tulsa Transit collects this data by performing a passenger survey every two years. Before performing the passenger survey in 2022, Tulsa Transit will take steps to translate customer surveys into languages other than English, or to provide translation services in the course of conducting customer surveys consistent with the Department of Transportation (DOT) LEP guidance and the agency’s language assistance plan. (See Attachment 7 for 2017 survey information.). Once 2022 data is ready the Title VI report will be updated to reflect new on-board survey data.

Monitor Transit Service

In order to ensure compliance with DOT’s Title VI regulations, FTA requires Tulsa Transit to monitor the performance of its transit system relative to their system-wide service standards and service policies (i.e., vehicle load, vehicle assignment, transit amenities, etc.) not less than every three years using the following method:

- Tulsa Transit will use the minority transit route definition to implement this monitoring program. Tulsa Transit will select a sample of minority and non-minority routes from all modes of service provided. The sample will include routes that provide service to predominantly minority and non-minority areas. As defined in Chapter I of Circular FTA C 4702.1B, a minority transit route is one in which at least one-third of the revenue miles are located in a Census block, Census block group, or traffic analysis zone where the percentage minority population exceeds the percentage minority population in the service area. Tulsa Transit may supplement this with ridership data and adjust route designations accordingly, when needed. If ridership data is used, Tulsa Transit will ensure it has adequate ridership data before making these determinations, and include that data in the analyses.
- Tulsa Transit will assess the performance of each minority and non-minority route in the sample for each of the Tulsa Transit's service standards and service policies.
- Tulsa Transit will compare the transit service observed in the assessment to Tulsa Transit's established service policies and standards.

Standards:

Vehicle load
 Vehicle
 Headway
 On-Time
 Performance
 Service Accessibility

Policies:

Vehicle Assignments
 Distribution of Transit
 Amenities

- For cases in which the observed service for any route exceeds or fails to meet the standard or policy, depending on the metric measured, Tulsa Transit will analyze why the discrepancies exist, and take steps to reduce the potential effects.
- Tulsa Transit will evaluate its transit amenities policy to ensure amenities are being distributed throughout the transit system in an equitable manner.

- Tulsa Transit has developed a policy or procedure to determine whether disparate impacts exist on the basis of race, color, or national origin, and will apply that policy or procedure to the results of the monitoring activities.
- Tulsa Transit will brief and obtain approval from Tulsa Transit's Board of Trustees regarding the results of the monitoring program.
- Tulsa Transit will submit results of the monitoring program as well as documentation (e.g., a resolution, copy of meeting minutes, or similar documentation) to verify the Tulsa Transit's Board of Trustees consideration, awareness, and approval of the monitoring results to FTA every three years as part of the Title VI Program. (See attachment 8)

Tulsa Transit will monitor its routes on a bi-annual basis after the redesign is implemented. This will allow Tulsa Transit to monitor the service standards and policies after the new service has commenced. Due to COVID-19 changes and effects, Tulsa Transit has not been able to conduct this bi-annual monitoring. However, starting in FY22 the Planning department will be looking at monitoring and proposing changes to routes to start in FY23 this will include a Title VI equity Analysis.

Evaluate Service and Fare Changes

a. Introduction

Tulsa Transit will evaluate, prior to implementation, any and all service changes that exceed its major service change threshold as well as all fare changes, to determine if those changes will have a discriminatory impact based on race, color, or national origin. One purpose of conducting service and fare analyses prior to implementing service or fare changes is to determine whether plan changes will have a disparate impact on the basis of race, color, or national origin.

The typical measure of disparate impact involves a comparison between the proportion of persons in the protected class who are adversely affected by the service or fare change and the proportion not in the protected class who are adversely affected. The comparison population for a statistical measure of disparate impact is all persons who are either affected by the service or fare changes or who could possibly be affected by the service or fare change (e.g. potential passengers).

Tulsa Transit will also evaluate proposed service and fare changes to determine whether low-income populations will have a disproportionate burden of the changes.

Upon completion of service or fare equity analyses, Tulsa Transit will brief its Board of

Trustees on the equity impacts of the service and or fare changes.

Please note that the Major Service Change Policy is 20%. There was proposed route changes planned for implementation fall above the 20% mark and a service equity analysis was conducted.

b. Service Equity Analysis

Tulsa Transit will evaluate proposed service and fare changes to determine whether minorities will be adversely affected by changes. a service equity analysis has been conducted for route changes implemented in 2019. As well as a service equity has been conducted for reduced service that was put in place due to COVID-19 in 2020. See Attachment 10 and 11.

c. Major Service Change Policy

Tulsa Transit constitutes a “major service change” as any change in which a single route’s geography or schedule is increased or reduced by 20% or more. A temporary addition of service (e.g., demonstration projects), including those that would otherwise qualify as a major service change, is exempt from Tulsa Transit’s definition of major service change. Should the temporary addition of service last longer than twelve months, Tulsa Transit will consider the added service as a major service change and conduct a service equity analysis.

Adverse Effects

Tulsa Transit will analyze adverse effects related to major changes in transit service. The adverse effect is measured by the change between the existing and proposed service levels that would be deemed significant. Changes in service that have an adverse effect and that may result in a disparate impact include a reduction of service (e.g., elimination of route, shortlining a route, rerouting an existing route, increase in headways). Additions to service may also result in disparate impacts, especially if they come at the expense of reduction in service on other routes. Tulsa Transit will consider the degree of adverse effects and analyze effects when planning its service changes.

d. Disparate Impact Policy

Before any major service change or fare change, Tulsa Transit will measure disparate impacts of the proposed change. Any time there is a difference in adverse impacts between minority and non-minority populations of plus or minus 10%, this is statically significant, and such differences in adverse impacts are disparate impacts. Minorities in Tulsa County make up 30% of the overall population. For example, if minorities would bear 45% impact of the proposed service or fare impacts, and the non-minority group

would bear 55%, there may be a disparate impact insofar as the minority group bears 15% more than its expected share, from 45% of the burden to 30% of the population; while the non-minority group bears 15% less than its expected share of 55% of burden compared to 70% of population – even though the absolute majority of the burden rests with the non-minority group. Applying the 10% disparate impact policy, Tulsa Transit will find a disparate impact and will consider modifying the proposed changes in order to avoid, minimize, or mitigate the disparate impact of the proposed changes. Please see service equity analysis for route changes from 2019.

e. Public Participation

Tulsa Transit engaged with the public in the decision-making process to develop and or revise major service changes and fare changes. This will be conducted by hosting public input meetings virtually and in person at locations that are available access from a Tulsa Transit route and will publicized in local paper, Tulsa Transit social channels and communication tools. Tulsa Transit will make sure all policy and official seats of the community are invited to meetings.

f. Data Analysis

Tulsa Transit will use Census blocks and/or ridership data in the service equity analysis. Census block data will be obtained from the U.S. Department of Commerce United States Census Bureau. Ridership data will be captured through the GFI Genfare farebox system utilized by Tulsa Transit. When relying on population data instead of ridership data, the choice of dataset should be the smallest geographic area that reasonably has access to the bus stop or station. For example, passengers will generally walk up to ¼ mile to a bus stop. The demographics of the neighborhoods within that distance will be the dataset used. Tulsa Transit may use the data from an entire Census block or block group when a portion of the area is within the ½ mile distance.

g. Assessing Service Impacts

Tulsa Transit will evaluate the impact of the proposed service changes using the framework outlined below. The measure of disparate impact involves a comparison between the proportion of persons in the protected class who are adversely affected by the service or fare change and the proportion of persons not in the protected class who are adversely affected. The population for a statistical measure of disparate impact is all persons that are either affected by the service or fare changes or that could possibly be affected by the service or fare change (e.g., potential passengers), thus the comparison population may vary depending on the type of change under evaluation. Tulsa Transit will include in the analysis the reason for the comparison population selected.

For example, when making headway changes, eliminating routes, or increasing service to an area currently served by Tulsa Transit, the appropriate comparison will likely be ridership,

and Tulsa Transit will compare the ridership of the affected route(s) with the ridership of the overall system.

On the other hand, when proposing to provide new service to a neighborhood or corridor not served by Tulsa Transit, the appropriate comparison will likely be the population of the service area, and Tulsa Transit will compare the population in Census block or block groups served by the proposed route(s) with the population in the service area.

Further, if Tulsa Transit is proposing a major service change that involves both headway changes and new service to a neighborhood or corridor not served by Tulsa Transit, the agency will use different comparisons for the different types of changes. Tulsa Transit will select either ridership or population of the service area and conduct an analysis using the same comparison.

In the event Tulsa Transit does not have adequate ridership data or is otherwise uncertain as to which population to use for comparison purposes, the FTA regional office will be contacted for technical assistance.

1) Ridership Data

When Tulsa Transit determines the correct population base is ridership, the agency will document the reasons for selecting the population base and analyze any available information generated from the ridership surveys to determine the minority and non-minority population ridership of the affected route(s) and the minority and non-minority of the entire system.

2) GIS or Alternative Maps

When Tulsa Transit determines the correct population base is Census blocks or block groups, the agency will document the reasons for selecting this population base and will prepare maps of the routes that would be reduced, increased, eliminated, added, or restructured. These maps will be overlaid on a demographic map of the service area in order to study the affected population. Tulsa Transit may also prepare these maps when doing an analysis based on ridership.

3) Determination of Disparate Impact

For each service change analysis, Tulsa Transit will compare existing service to the proposed change and calculate the absolute change as well as the percent change. Tulsa Transit will use the adverse effects definition and disparate impact threshold to determine whether the proposed major service change will result in adverse effects that are disproportionately borne by minority populations. This will be accomplished by comparing the proportion of minorities adversely affected to the proportion of non-minorities adversely affected. In addition, Tulsa Transit will consider the degree of the adverse effects when doing this analysis. Any service change analysis will be expressed as a percent change in tabular format.

4) Analysis of Modifications

If Tulsa Transit finds potential disparate impacts and then modifies the proposed changes in order to avoid, minimize, or mitigate potential disparate impacts, the agency will reanalyze the proposed changes in order to determine whether the modifications actually removed the potential disparate impacts of the changes.

5) Finding a Disparate Impact on the Basis of Race, Color, or National Origin

If Tulsa Transit chooses not to alter the proposed service changes despite the potential disparate impact on minority populations, or if Tulsa Transit finds, even after the revisions, that minority riders will continue to bear a disproportionate share of the proposed service change, the agency will implement the service change only if:

- Tulsa Transit has a substantial legitimate justification for the proposed service change, and;
- Tulsa Transit can show there are no alternatives that would have a less disparate impact on minority riders but would still accomplish the agencies legitimate program goals.

When making this determination, Tulsa Transit will consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

6) Examining Alternatives

If Tulsa Transit determines a proposed service change will have a disparate impact, the agency will analyze the alternatives to determine whether alternatives exist that would serve the same legitimate objectives but with less effect on the basis of race, color, or national origin. The existence of such an alternative method of accomplishing Tulsa Transit's substantial and legitimate interests demonstrates the disparate effects can be avoided by adoption of the alternative methods without harming such interests. In addition, if evidence undermines the legitimacy of Tulsa Transit's asserted justification—that is, that the justification is not supported by demonstrable evidence—the disparate effects will violate Title VI, the lack of factual support will indicate there is not a substantial legitimate justification for the disparate effects. At that point, Tulsa Transit will revisit the service change and make adjustments that will eliminate unnecessary disparate effects on populations defined by race, color, or national origin. Where disparate impacts are identified, Tulsa Transit will provide a meaningful opportunity for public comment on any proposed mitigation measures, including the less discriminatory alternatives that may be available.

Service Equity Analysis for Low-Income Populations

Tulsa Transit will evaluate proposed service and fare changes to determine whether low-income populations will bear a disproportionate burden of the changes.

a. Major Service Change Policy

As described under the Service Equity Analysis for Minority Populations, Tulsa Transit has identified what constitutes a “major service change”, as only “major service changes” are subject to service equity analysis. The agency’s major service change policy will apply to both analyses. Tulsa Transit’s Major Service Change Policy is 20%.

b. Adverse Effects

As described under the Service Equity Analysis for Minority Populations, Tulsa Transit will define and analyze adverse effects related to major changes in transit service. The agency’s adverse effects policy will apply to both analyses.

c. Disproportionate Burden Policy

Before implementing any major service change or fare increase, Tulsa Transit will measure disproportionate burdens on low-income populations. Any time there is a difference in adverse impacts between low-income and non-low-income populations of plus or minus 10%, this is statistically significant, and such differences in adverse impacts are disproportionate burdens. Low-income persons in Tulsa make up 20% of the overall population. For example, if low-income persons would bear 45% impact of the proposed service or fare impacts, and the non-low-income group would bear 55%, there may be disproportionate burdens insofar as the low-income group bears 25% more than its expected share, from 45% of the burden to 20% of the population; while the non-low-income group bears 25% less than its expected share of 55% of burden compared to 80% of population – even though the absolute majority of the burden rests with the non-low-income group. Applying the 10% disproportionate burden policy, Tulsa Transit will find a disproportionate burden and will consider modifying the proposed changes in order to avoid, minimize, or mitigate the disproportionate burden of the proposed changes.

d. Public Participation

Tulsa Transit engaged with the public in the decision-making process to develop and or revise major service changes and fare changes. This will be conducted by hosting public input meetings virtually and in person at locations that are available access from a Tulsa Transit route and will publicized in local paper, Tulsa Transit social channels and communication tools. Tulsa Transit will make sure all policy and official seats of the community are invited to meetings.

e. Selection of Comparison Population

Tulsa Transit will use ridership data or population of the service area for the comparison population. The agency will use the same dataset for the service equity analysis for both disparate impact and disproportionate burden analyses.

f. Data Analysis

Tulsa Transit will use Census blocks and or ridership data in the service equity analysis. When relying on population data instead of ridership data, the choice of dataset should be the smallest geographic area that reasonably has access to the bus stop or station. For example, passengers will generally walk up to ½ mile to a bus stop. The demographics of the neighborhoods within in that distance will be the dataset used. Tulsa Transit may use the data from an entire Census block or block group when a portion of the area is within the ½ mile distance.

g. Assessing Service Impacts

Tulsa Transit will evaluate the impacts of the proposed service changes on low-income populations using the method outlined on the following page.

1) Ridership Data

When Tulsa Transit determines the correct comparison population base is ridership, the agency will document the reasons for selecting this comparison population and analyze any available information generated from the ridership surveys to determine the low-income and non-low-income population ridership of the affected route(s) and the low-income and non-low-income of the entire system.

2) GIS or Alternative Maps

When Tulsa Transit determines the correct population base is Census blocks or block groups, the agency will document the reasons for selecting this population base and will prepare maps of the routes that would be reduced, increased, eliminated, added, or restructured. These maps will be overlaid on a demographic map of the service area in order to study the affected population. Tulsa Transit may also prepare these maps when doing an analysis based on ridership.

3) Determination of Disproportionate Burden

For each service change analysis, Tulsa Transit will compare existing service to the proposed change, and calculate the absolute change as well as the percent change. Tulsa Transit will use the adverse effects definition and disproportionate burden threshold to determine whether the proposed major service change will result in

adverse effects that are disproportionately borne by the low-income population, by comparing the proportion of low-income persons adversely affected to the proportion to the non-low-income persons adversely affected. In addition, Tulsa Transit will consider the degree of the adverse effects when doing this analysis. Any service change analysis will be expressed as a percent change in tabular format.

4) Avoid, Minimize, Mitigate

At the conclusion of the analysis, if Tulsa Transit finds that low-income populations will bear a disproportionate burden of the proposed major service change, Tulsa Transit will describe alternatives available to low-income passengers affected by the service changes.

Fare Equity Analysis

a. Fare Changes

The fare equity analysis requirement applies to all fare changes regardless of the amount of increase or decrease. As with the service equity analysis, FTA requires Tulsa Transit to evaluate the effects of fare changes on low-income populations in addition to Title VI-protected populations.

b. Exceptions

Fare equity analyses will not be conducted for promotional fare reductions with duration of six months or less. The “Free Fare Day” program, which offers reduced or free fares to all passengers, is an example of a promotional fare.

c. Data Analysis

For proposed changes that would increase or decrease fares on the entire system, or on certain transit modes, or by fare payment type or fare media, Tulsa Transit will analyze any available information generated from ridership surveys indicating whether minority and/or low-income riders are disproportionately more likely to use the payment type, or payment media that would be subject to the fare change. Notably, Census data will not be effective data for fare analyses, since it is impossible to know, based on Census data, what fare media people are using. Tulsa Transit will describe the dataset(s) to be used in the fare change analysis. The agency will:

- Determine the number and percent of users of each fare media being changed.

- Review fares before the change and after the change.
- Compare the differences for each particular fare media between minority users and overall users.
- Compare the differences for each particular fare media between low-income users and overall users.

d. Assessing Impacts

Tulsa Transit will evaluate the impacts of proposed fare changes (either increases or decreases) on minority and low-income populations separately, using the following framework.

e. Minority Disparate Impact Policy

Tulsa Transit has developed a policy for measuring disparate impact to determine whether minority riders are bearing a disproportionate impact of the change between the existing cost and the proposed cost. The impact may be defined as a statistical percentage. The disparate impact threshold will be applied uniformly, regardless of fare media, and will not be altered until the next Title VI Program submission.

f. Public Participation Process

Tulsa Transit will engage the public in the decision-making process to develop and/or revise the disparate impact threshold. Tulsa Transit may go to the transit stations and set up voting surveys for people to vote on the changes they want to see take place. Tulsa Transit will also ask for any comments. Tulsa Transit will hold a public hearing at a location that is accessible from a transit route. This process gives the public opportunity to ask questions, and voice their comments.

g. Modification of Proposal

If Tulsa Transit finds potential disparate impacts and then modifies the proposed changes in order to avoid, minimize, or mitigate those impacts, Tulsa Transit will reanalyze the proposed changes in order to determine whether the modifications actually removed the potential disparate impacts of the changes. Tulsa Transit did not find any disparate impact.

h. Finding a Disparate Impact on the Basis of Race, Color, or National Origin

If Tulsa Transit chooses not to alter the proposed fare changes despite the disparate impact on minority ridership, or if Tulsa Transit finds, even after the revisions, that minority riders will continue to bear a disproportionate share of the proposed fare change, the agency may implement the fare change only if:

- Tulsa Transit has a substantial legitimate justification for the proposed fare change, and
- Tulsa Transit can show there are no alternatives that would have a less disparate impact on minority riders but would still accomplish the agency's legitimate program goals.

i. Examining Alternatives

If Tulsa Transit determines a proposed fare change will have a disparate impact, the agency will analyze the alternatives (identified in the second bullet above) to determine whether alternatives exist that would serve the same legitimate objectives but with less of a disparate effect on the basis of race, color, or national origin. The existence of such an alternative method of accomplishing Tulsa Transit's substantial and legitimate interests demonstrates that the disparate effects can be avoided by adoption of the alternative methods without harming such interests. In addition, if evidence undermines the legitimacy of Tulsa Transit's asserted justification—that is, that the justification is not supported by demonstrable evidence—the disparate effects will violate Title VI, as the lack of factual support will indicate there is not a substantial legitimate justification for the disparate effects. At that point, Tulsa Transit will revisit the fare changes and make adjustments to eliminate unnecessary disparate effects on populations defined by race, color, or national origin. Where disparate impacts are identified, Tulsa Transit will provide a meaningful opportunity for public comment on any proposed mitigation measures, including any less discriminatory alternatives that may be available.

j. Low-Income Disproportionate Burden Policy

Tulsa Transit has developed a policy for measuring the burden of fare changes on low-income riders to determine when low-income riders are bearing a disproportionate burden of the change between the existing fare and the proposed fare. The impact may be defined as a statistical percentage. The disproportionate burden threshold must be applied uniformly, regardless of fare media, and cannot be altered until the next program submission.

Tulsa Transit will engage the public in the decision-making process to develop or revise the disproportionate burden threshold.

At the conclusion of the analysis, if Tulsa Transit finds that low-income populations will bear a disproportionate burden of the proposed fare change, Tulsa Transit will take steps to avoid, minimize, or mitigate impacts where practicable. Tulsa Transit will describe alternatives available to low-income populations affected by the fare changes.

Attachment 1
Title VI Public Notice

Tulsa Transit operates public transit service without regard to race, color or national origin. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Tulsa Transit.

For more information on Tulsa Transit's Civil Rights Program, and the procedures to file a complaint, contact (918) 582-2100 (TTD: 584-7209) email: info@tulsatransit.org or visit us at 319 S. Denver Avenue or 7952 E. 33rd St., Tulsa, OK.

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor – TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

If information is needed in another language, contact (918) 582-2100. Por favor llame al (918) 582-2100 (TTD: (918) 584-7290).

Nếu cần thông tin bằng ngôn ngữ khác, liên hệ (918) 582-2100.

如果需要其他語言的信息，請聯繫 (918) 582-2100。

Rúguǒ xūyào qítā yǔyán de xìnxī, qǐng liánxì (918)582-2100.

Attachment 2
Title VI
Complaint Policy & Procedures

Tulsa Transit's Call Center receives Title VI complaints from customers or their representatives regarding fixed-route, fixed-route flexible, and ADA complementary paratransit operations, policies, and procedures. The following policy outlines the process for recording, investigating, responding to, and maintaining Title VI complaints.

Objectives

The objectives of the complaint procedures are to:

- Provide an opportunity for customers to report any policies, procedures, or actions by Tulsa Transit they believe violate the persons Title VI rights.
- Document and investigate the allegations in a timely and thorough manner.
- Timely respond to customers and provide the outcome of the investigation.

Civil Rights Officer

Tulsa Transit's Civil Rights Officer investigates Title VI complaints. The Civil Rights Officer

Liann Alfaro
510 S. Rockford Ave
Tulsa, OK 74120
(918) 582-2100
info@tulsatransit.org

Complaints also may be filed directly with the Federal Transit Administration, regional office by contacting:

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

Complaint Receipt

1. Tulsa Transit Customer Service Representatives receive the complaint from customers or their representatives via the telephone (918-582-2100), e-mail (info@tulsatransit.org), mail (PO Box shown above), on the

Tulsa Transit website,(www.tulsatransit.org/about-mtta/civilrights/),or
in person at:

319 S. Denver Ave
Tulsa, OK 74120

2. Complaints are taken up to 180 days past the date of the incident. Beyond that time period, complaints will be classified as comments.
3. The complaint is input into a Call Log in the Quality Assurance software by a Customer Service Representative immediately upon receipt of the complaint. In order for a complaint to be investigated, customers or their representatives must provide an address, telephone number, or email address. Those complaints without contact information will be classified as comments.
4. Service Coordinators in the Call Center review the complaints for completeness and accuracy and call the customer if additional details are needed for the investigation. Service Coordinators have three (3) calendar days to complete the initial review.

Complaint Investigation and Customer Follow-up

1. Any complaint that alleges discrimination on the basis of race, color or national origin will be designated as a Title VI complaint. The Civil Rights Officer will be responsible for investigating the complaint and following up with the customer.
2. The Civil Rights Officer will be responsible for contacting the appropriate manager/ service contractor(s) to get information needed in order to complete the investigation of the complaint including, but not limited to, any video or audio recordings of the incident.
3. Once the investigation has been completed, the Civil Rights Officer will make a decision regarding the validity of the complaint and what, if any, remedial actions will be taken to address the complainant's concerns.
4. The Civil Rights Officer will notify the complainant in writing of Tulsa Transit's decision regarding the complaint typically within seven (7) calendar days after the investigation has been completed.
5. If complainants disagree with the determination by the Civil Rights Officer, they can appeal the decision in writing within thirty (30) days from the date of the determination letter. The appeal letter should state the reason(s) the complainant believes the decision was in error. The appeal letter should be mailed to:

General Manager
Tulsa Transit
510 S. Rockford Ave
Tulsa OK, 74120

Complaint Tracking and Record Retention

The Civil Rights Officer will be responsible for tracking all Title VI complaints for the purpose of establishing trends in allegations of discrimination.

The Civil Rights Officer will maintain a summary log of all Title VI complaints. In addition, all complaint documents and materials gathered during the investigation are maintained for no less than five (5) years.

**Attachment
2b
Online Form**

To view our online form please visit, <http://tulsatransit.org/title-vi-complaint-form/>

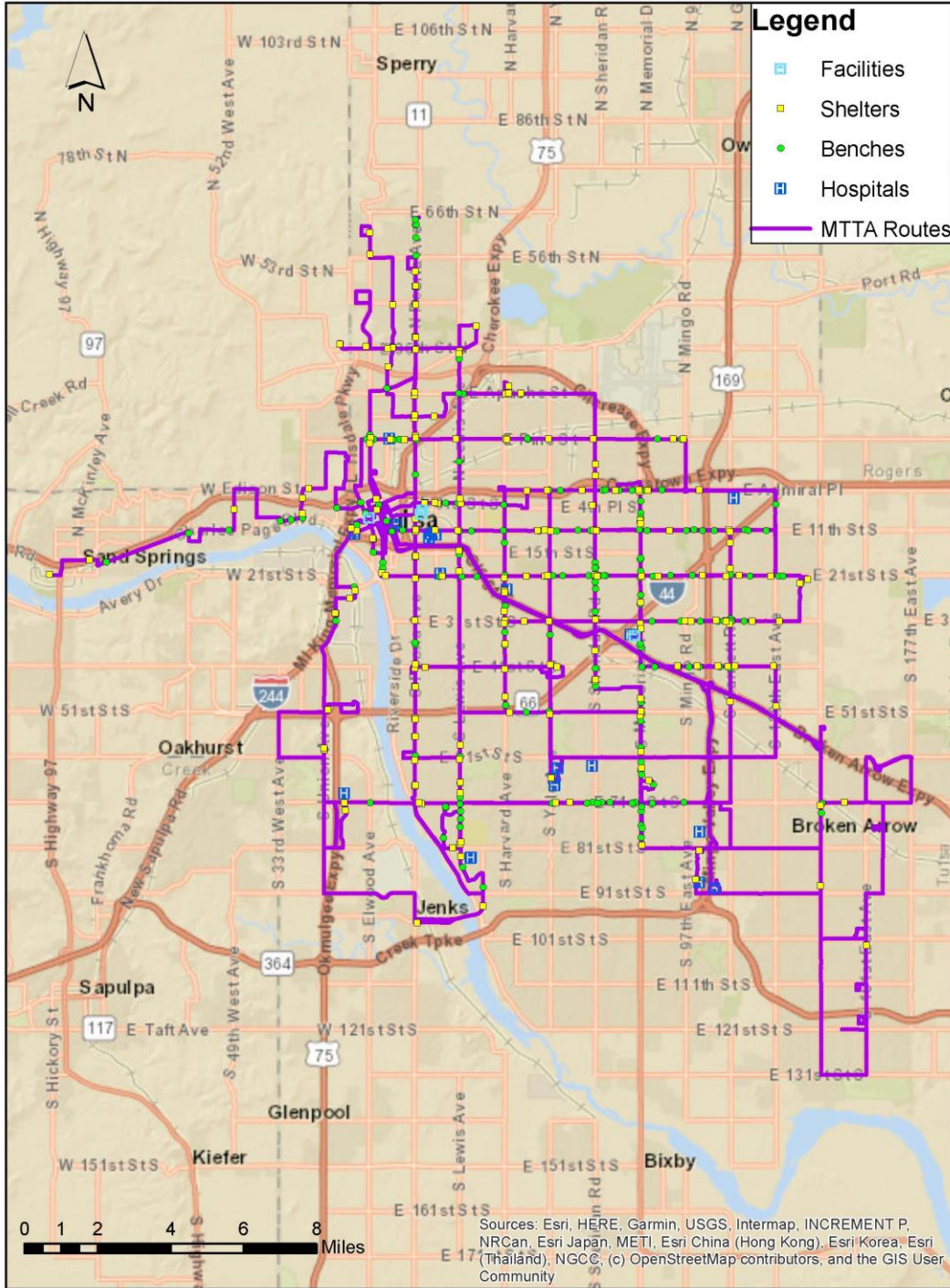
Attachment 3
Log of Title VI Complaints

These complaints have been filed with a Customer Service Representative over the phone. We have not received any complaints filled on the online form, email, or mail.

FY19-21			
Log of Title Vi Complaints			
Fixed Route			
Date Of Complaint	Summary	Status	Actions taken
FY19			
7/10/2018	Customer didn't understand why he was not allowed to ride when an African American woman was	Completed	We investigated to find out driver and then pulled video. We can not
FY20			
7/27/2018	customer claims the driver is discriminating against her due to race	Completed	Watched video and the customer was cussing out driver that is why watched video driver of the 112 did not hear the request
12/10/2018	Customer says the driver is discriminating against him because driver did not call the other bus to hold	Completed	not hear the request
9/12/2019	Driver discriminating against her because driver made her walk from the bus stop	Completed	viewed video
7/10/2018	Customer didn't understand why he was not allowed to ride when an African American woman was	Completed	We investigated to find out driver and then pulled video. We can not
12/20/2018	Customer claims discrimination due to not letting them deboard	Completed	Watched Video, driver was in wrong
FY21			
10/23/2020	Customer feels he is discriminated against due to color	Completed	Investigated by watching video. The customer was not a bus stop.

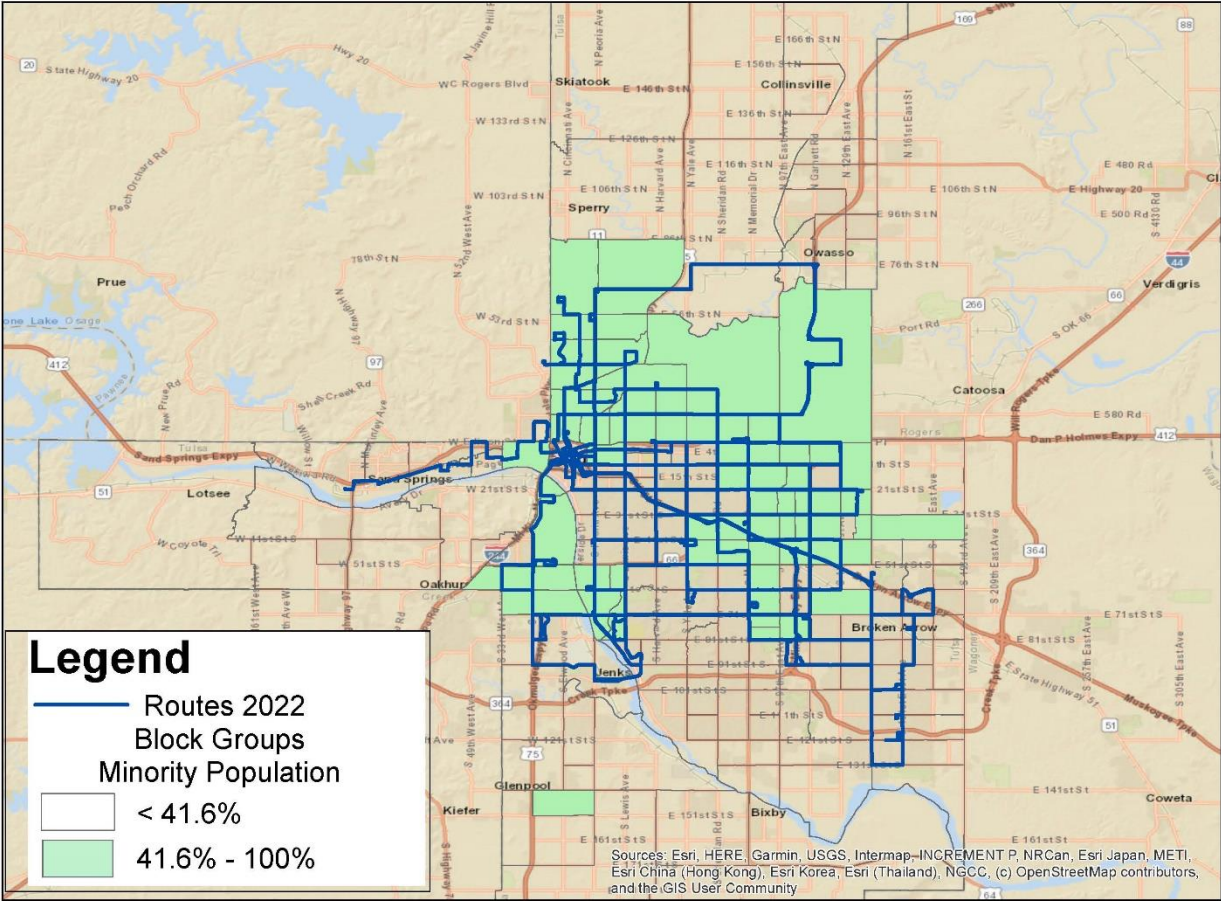
Attachment 4
Base Map with Amenities

MTTA Route Amenities



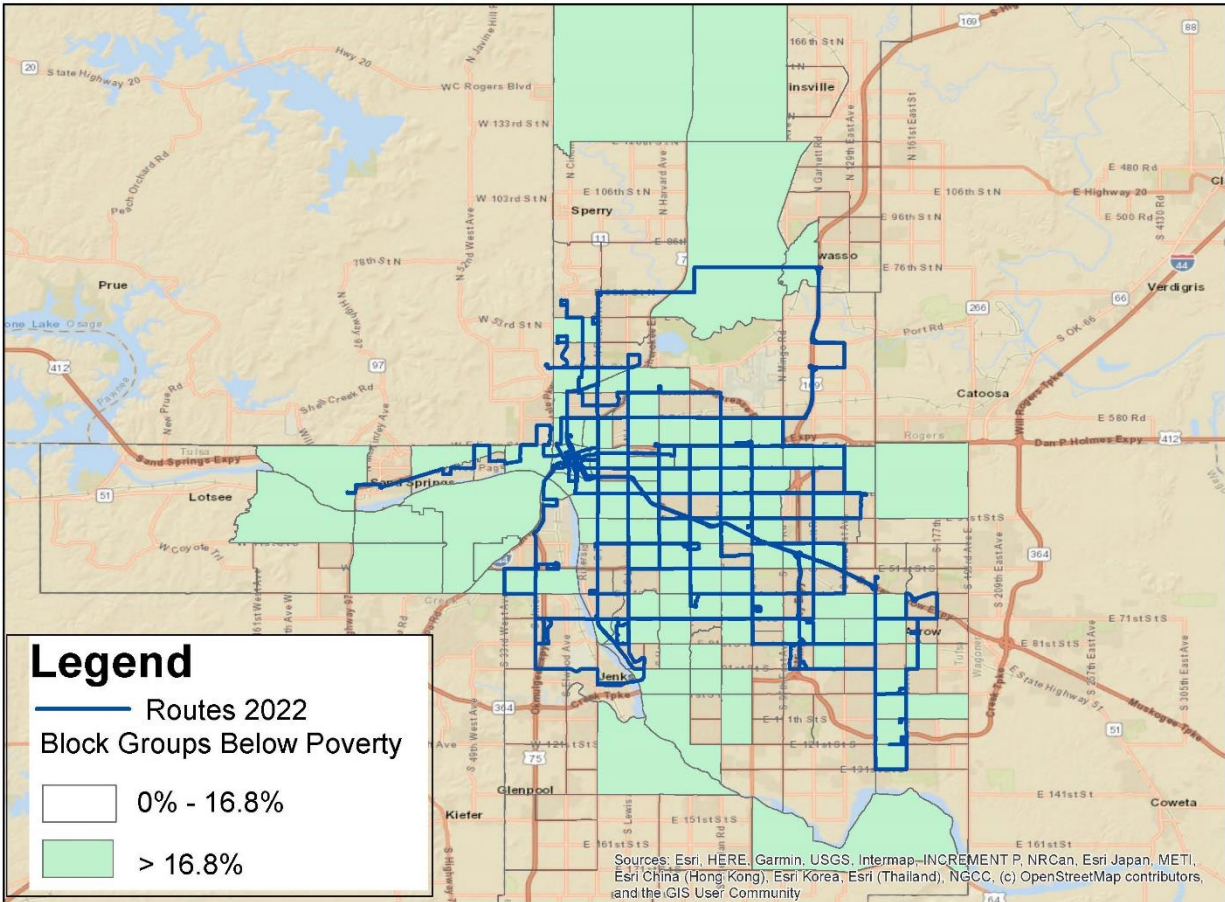
**Attachment 5
Minority Demographic Map**

Higher Than Average Minority Block Groups



Attachment 6
Low-Income Demographic Map

Higher Than Average Below Poverty Level Block Groups



**Attachment 7
Fixed Route Passenger Survey Data**

**Tulsa Transit will be conducting a
new survey in March 2022- Can
update this attachment when
analysis is complete**

November 2017 - Total 1,420

The following tables are calculated on the percentage of the total survey responses (1,420).

1. How long have you been riding Tulsa Transit?

Years Riding	Minority	Non-Minority
Less than 1 year	10%	8%
1 - 5 years	16%	13%
Over 5 years	29%	24%

2. How often do you ride the bus?

Days Riding	Minority	Non-Minority
5 or More Days Per	30%	20%
2-4 Days Per Week	20%	19%
Less Than 2 Days Per	5%	7%

3. What type of fare do you usually use to pay for your trip?

Fare Media	Minority	Non-Minority
Cash	30%	22%
1-Day Pass	3%	2%
7-Day Pass	3%	2%
10-Ride Pass	6%	7%
31-Day Pass	10%	8%
Lift Card	2%	2%
School ID	0%	0.4%

4. What is your most common trip purpose?

Trip Purpose	Minority	Non-Minority
Community to/from Work	26%	17%
School or College	4%	2%
Medical Appointment	11%	10%
Personal Business	10%	12%

Days Riding	Minority	Non-Minority
One bus	8%	12%
2 buses	34%	27%
3 or more buses	12%	7%

6. What is your most important reason for riding Tulsa Transit?

Most Important Reason for	Minority	Non-Minority
Don't have a car available	46%	36%
Don't like to drive	4%	3%
Reduce transportation costs	4%	4%
Reduce parking costs	0%	1%
Reduce air pollution	1%	1%

7. How many vehicles are owned by members of your household?

Vehicles Available	Minority	Non-Minority
2 or more	5%	5%
One	11%	9%
None	39%	32%

8. Is a vehicle usually available to you when you need to travel?

Vehicles Available	Minority	Non-Minority
Yes-driver	6%	5%
Yes-passenger	9%	5%
No	40%	35%

9. Which one transit improvement would you most like to see?

Improvements	Minority	Non-Minority
More frequent weekday	15%	13%
Better evening service	13%	12%
More frequent Saturday	12%	10%
Service to more locations	11%	7%

10. Where do you get your news or information about what is happening at Tulsa Transit?

Information	Minority	Non-Minority
Social Media	10%	6%
Website	5%	5%
Call the call center	13%	9%
Schedule book	9%	9%
Posters on buses and	17%	14%
Text alerts	2%	2%

Occupation	Minority	Non-Minority
Professional/administrativ	7%	6%
Craftsman/laborer	9%	6%
Sales/clerical/other	10%	7%
Student-full time	3%	1%
Student-employed	2%	1%
Homemaker	3%	3%
Retired	10%	10%
Unemployed	11%	11%

12. What is your gender

Gender	Total
Male	44%
Female	56%

13. What is your age?

Age	Total
Under 18	0.4%
18-24	7%
25-34	17%
35-44	17%
45-54	22%
55-64	25%
65-74	9%
75 or older	

14. How many children under 18 live in your household?

Children in Household	Minority	Non-Minority
None	36%	35%
One	7%	5%
Two	6%	4%
More than two	6%	3%

15. How many people age 65 or older live in your household?

Age 65+ in Household	Minority	Non-Minority
None	43%	37%
One	8%	7%
Two	2%	1%
More than two	1%	0%

16. How many people with a disability live in your household?

People with a Disability in	Minority	Non-Minority
None	30%	23%
One	18%	16%
Two	5%	5%
More than two	1%	1%

17. What current level of education best applies to you?

Education	Total
Some high school	15%
High school	36%
Some college	32%
College graduate	17%

18. What is your ethnicity?

Ethnicity	Total
African American	37%
Caucasian/White	45%
Hispanic/Latino	4%
Native American	12%
Oriental/Asian	1%

19. What is your annual household income?

Household Income	Total
Under \$15,000	64%
\$15,000 - \$24,999	19%
\$25,000-\$34,999	8%
\$35,000-\$49,999	4%
\$50,000-\$74,999	2%
\$75,000-\$99,999	1%
Over \$100,000	1%

20. How did you get to the bus today?

People with a Disability in	Minority	Non-Minority
None	49%	41%
One	2%	2%
Two	1%	1%
More than two	3%	1%

21. If you walked, did you have sidewalks to get to the bus stop area?

Did you have Sidewalks	Minority	Non-Minority
Yes	40%	31%
No	13%	13%

22. How will you get where you are going after you leave the bus?

How will you get where you are	Minority	Non-Minority
Walk	50%	41%
Bike	1%	2%
Drive	1%	1%
Get picked	1%	1%
Other	2%	1%

Attachment 8 Route Monitoring

March 2022- Route Monitoring

The FTA circular requires that recipients undertake periodic service-monitoring activities to compare the level and quality of service provided too predominantly minority and low-income areas with service provided to other areas. To comply with this requirement, Tulsa Transit has chosen Option A: Level of Service Methodology. This option requires that recipients 1) select a sample of bus routes that provide service to a demographic cross section of the population; 2) assess the performance of each route in the sample for each service standard and policy, 3) compare the transit service observed in the assessment to the established service policies and standards, and 4) if observed service does not meet the stated policy or standard, determine why the discrepancy exists and take corrective action to correct the discrepancy.

The bus routes selected as a sample that provide service to a demographic cross section of the population include:

110 MLK/Hartford/Nightline	401 North/Northeast/ Nightline	505 Turley Connector
114 Charles Page/Sand Springs	410 Lewis	508 BA Connections
117 Union/SWBLVD	440 Harvard/ Nightline	700 AERO Peoria
130 Admiral/ Nightline	450 Yale	902 Broken Arrow Express
140 11 th Street	460 Sheridan	909 Union Express
150 21 st Street	470 Garnett	804 Nightline
201 Pine/Memorial	480 61 st Street/41 st Street	805 Nightline
300 31 st Street	490 West Tulsa/Nightline	
310 South/Southeast	500 Jenks Connector	

Current Tulsa Transit Routes

Route	Total One-Way Distance (miles)	Distance (miles) within MinorityTAZ	Percentage of Route within MinorityTAZ
110	9.18	1.38	15%
114	13.71	2.42	18%
117	12.32	2.25	18%
130	9.1	1.56	17%
140	11.24	3.09	27%
150	11.12	3.02	27%
201	14.95	4.07	27%
300	11.89	2.56	22%
310	14.99	4.66	31%
401	9.56	1.39	15%
410	14.99	3.71	25%
440	11.9	2.53	21%
450	11.06	2.48	22%
460	12.55	3.03	24%
470	14.95	4.73	32%
480	6.24	0.70	11%
490	14.75	5.25	36%
500	9.18	1.89	21%
508	27.55	11.16	41%
700	17.63	5.76	33%
902	24.27	13.89	57%
909	19.74	11.70	59%
969	34.92	20.38	58%

Route	In Poverty	% In Poverty
110	3441	29%
114	2116	18%
117	3428	33%
130	10383	28%
140	9900	22%
150	6461	16%
201	15970	27%
300	4951	14%
310	4097	14%
401	4551	36%
410	9047	23%
440	9350	16%
450	8690	19%
460	9626	20%
470	10271	21%
480	2716	15%
490	5642	18%
500	2102	25%
508	3046	10%
700	7912	21%
902	6925	13%
909	6939	13%
969	13071	30%

Tulsa Transit has performed a comparison of a high minority route and low minority route in the current service structure. In the table below such items as, vehicle load, headways, bus number on route, shelters, benches and even trash cans have been compared between the two routes.

The two routes chosen for this test were route 110 with a minority percentage of 72.19 and route 500 with a minority percentage of 40.21.

The higher minority route has more buses and with same headway time. The minority route also has more benches than shelters along the route. The less minority route has less benches than shelters, however, operates less mileage and one of the shelters is shared with the local BRT route.

Tulsa Transit has decided there is not a disparity on the high minority route based upon the system’s Amenities Policy.

Comparison of high and low minority percentages							
Weekday-Saturday							
Route Number	Minority Percentages	Vehicle Load Standards	Headway Minutes	Number of Buses	Number of Shelters	Number of Benches	Number of Trash Cans
110	72.19	40ft	60	2	7	10	12
500	40.21	35ft	60	1	5	2	5

**Attachment 9
Tulsa Transit
Title VI Equity Analysis for Land Purchase**

Prepared for Tulsa Transit

December 15, 2021



Metropolitan Tulsa Transit Authority
Title VI Land Acquisition/Facility Equity Analysis

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METROPOLITAN TULSA TRANSIT FACILITY EQUITY ANALYSIS

1332-1348 EAST 5TH PLACE, TULSA, OK 74120

Background and Project Description

Metropolitan Tulsa Transit Authority (MTTA) is outgrowing its existing parking facilities for transit vehicles. Understanding that space and capacity constraints are hindering organizational growth and service expansion, MTTA conducted a needs assessment to determine the most appropriate size and location for additional parking. The needs assessment found that a site across the street from the existing facility would accommodate the parking needs for MTTA's plans to expand transit service over the next two to five years. The site located at 1332-1348 East 5th Place, Tulsa, OK 74120 has been identified as the location that would have the size and proximity to the primary transit facility and meet the needs identified in the assessment.

Per FTA C 4702.1B, Title VI of the Civil Rights Act, an equity analysis of facilities must occur in the planning stages of acquiring a facility. MTTA searched for other available properties that would meet the needs identified in its needs assessment and found that the parcels on East 5th Place are the only appropriate properties. The Transit Board of Directors was notified of the needs assessment and results of alternate locations and the public was invited to provide input and comments during two public meetings. There were no concerns with the location of the property or the purchase during the outreach process. The preferred site has been purchased.

Compliance with Title VI of the Civil Rights Act

MTTA is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI of the Civil Rights Act. The public can find MTTA's current Title VI Policy, including the process for filing a complaint on the MTTA website at: <http://tulsatransit.org/about-mtta/civilrights/>.

Title 49 CFR Section 21.9(b)3) states, "In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part." Facilities included in this provision include, but are not limited to, storage facilities. In order to comply with the regulations:

1. The recipient 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. Recipients shall engage in outreach to persons

potentially impacted by the siting of facilities. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.

2. When evaluating locations of facilities, recipients should give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result.
3. If the recipient determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, the recipient may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. The recipient must show that both tests are met; it is important to understand that in order to make this showing, the recipient must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

The following analysis is provided to ensure that MTTA is selecting the location without regard to race, color, or national origin.

Site Selection Process

The site selection process involved consideration of all available parcels that satisfy the MTTA facility needs assessment. There were a very limited number of parcels available. Ultimately, the selected parcels were the only locations within the necessary proximity of the primary MTTA vehicle facility. Proximity is important to the logistics of maintaining vehicles, security, and scheduling. Selection criteria included the following factors, at minimum:

- Size
- Location/Proximity to MTTA main facility
- Zoning
- Future growth potential
- Site access
- NEPA standards met
- Risk management
- Land cost

In addition to scoring high in the above noted categories, MTTA considered that their current facility is landlocked with few viable alternatives. An adjacent property on the same side of the street was not available. The selected property is adjacent but across the street. Exhibit 1 illustrates the location of the proposed parcel and its proximity to the existing MTTA facility.

Exhibit 1 Location of Proposed Parcels



Equity Analysis

Tulsa County and the portion of Osage County that is served by MTTA has an average poverty level of 15.6 percent. The average non-white population of the MTTA service area is 37.4 percent, and nearly 3.8 percent of the population has Limited English Proficiency (LEP). The proposed parking lot location is located within Census Block Groups that have populations lower than the average for each of the three categories noted above.

The preferred parcels are located in Census Tract 23.01, Block Group 1. The parcels are located in an industrial area, which limits the impact on the minority and non-minority populations. Furthermore, the location does not impact the schedules for MTTA bus routes and therefore will not impact service to any part of the MTTA fixed routes.

Table 1: Equity Analysis Summary

Category	MTTA Service Area Statistics	Census Block Group Statistics
Total Population	669,279	748
Percent White	77%	75%
Percent Non-White	23%	25%
Percent in Poverty	19.4%	36%
Median Household Income	\$55,517 (2019)	\$17,543 (2019)
LEP	3.8%	6.3%

Source: U.S. Census Bureau 2015-2019 American Community Survey 5-Year Estimates

Public Outreach

MTTA sought public input on the proposed parking location during two public meetings held on December 2nd at 5:30 PM at Central Center in Veterans Park, Tulsa OK, and on December 3rd at a virtual public meeting opportunity was offered. The public comment period was open for 15 days following the public meetings. During the December 2nd public meeting, MTTA presented the results of the needs assessment and the proposed facility location, and opened the opportunity for meeting participants to ask questions of the staff and make comments. No members of the public joined the December 3rd virtual public meeting. Notification of the public meetings was made using the following media:

- Social Media
 - Facebook
 - Twitter
- MTTA Website
 - Banner with link to the Facebook event page
- Email Invitations
 - Direct emails to MTTA's stakeholder mailing list
- Text Alert
 - Text with a link to the Facebook event page
- Flyer Distribution
 - Door-to-door distribution to local businesses
- Advertisement in Tulsa World
 - Alert about meetings

During the course of the public meetings, the following comments were made by attendees at the December 2nd meeting.

- Worried about personal property value in the area if the lot is turned into a parking lot.
- Would rather have a mixed facility building in place of the lot.
- The owner of the south end of the property wants to develop the land.
- There is a local desire to make 6th Street an anchor like Cherry Street and the parking lot does not support that desire.

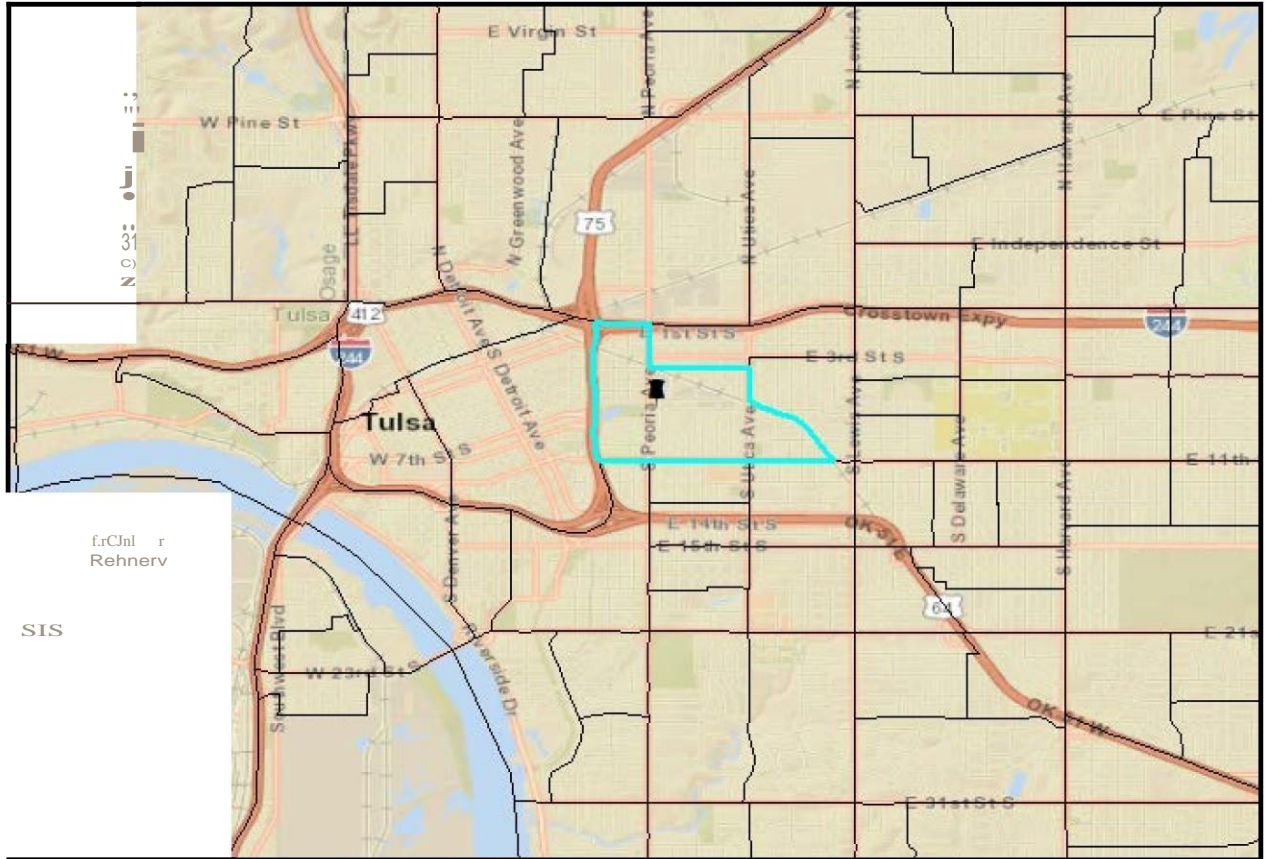
Conclusions

The location was selected without regard to race, color, or national origin. An evaluation of the non-white population rate, poverty rate, and population with limited English proficiency shows no disparate impact would occur should the site be selected as an expansion for vehicle storage. This conclusion is based on the fact that the poverty, non-white, and LEP populations are lower than the Census Block Group averages across the MTTA service area. Furthermore, no concerns about the location were raised through public input opportunities.

Finally, expanding the vehicle storage facility to a location with the closest proximity to the main MTTA facility brings logistical benefits to the operation of fixed route service and vehicle

maintenance programs and meets the needs identified in the MTIA needs assessment. The traffic impact from the expanded facility is minimal because MTIA is currently traveling to its primary facility less than one block away and on the same street (South Quincy Avenue).

APPENDIX: BLOCK GROUP LOCATION OF PROPOSED FACILITY



ATTACHMENT 10

TITLE VI SERVICE EQUITY ANALYSIS

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Federal Transit Administration (FTA) Circular 4702.1B requires any FTA recipient serving a population of 200,000 or greater to evaluate any major service change or fare change to determine whether those changes have a discriminatory impact. Tulsa Transit conducted its equity analysis and the findings are outlined in the following paragraphs.

HISTORY

The *Connecting Progress Plan* (August 2018) was undertaken by Tulsa Transit to support the successful launch of AERO BRT, while simultaneously reviewing and improving the rest of the local bus network. The overarching theme of the Connecting Progress Plan is to determine the best way to deploy and reorganize resources to best serve existing and future transit customers. Improvements to trip speed, frequency, connections, and access are all expected outcomes when the proposed network is implemented.

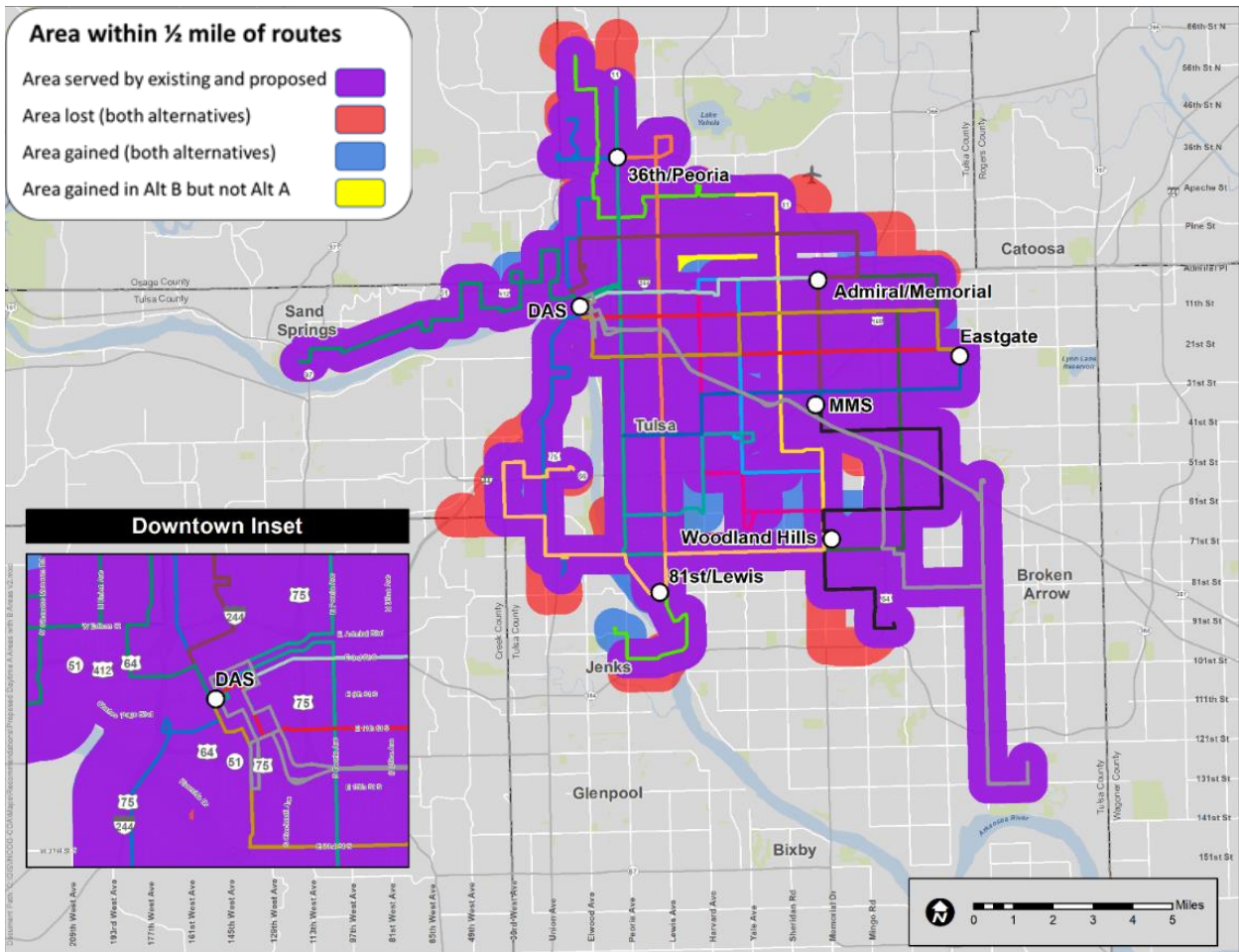
Five goals were identified for the Connecting Progress Plan, including:

- ◆ Goal 1: Help Tulsa Transit determine how to improve service frequencies and reduce rider travel time without additional operating costs.
- ◆ Goal 2: Build network off the AERO Peoria BRT in the short term and AERO Route 66 BRT in the intermediate term.
- ◆ Goal 3: Improve Tulsa Transit's presence in the community through a robust and meaningful public outreach process as well as aligning services with stakeholder goals.
- ◆ Goal 4: Make recommendations related to Tulsa Transit's "hub and spoke" design while also addressing schedule adherence issues.
- ◆ Goal 5: Recommend other non-traditional service delivery approaches like private providers, TNCs, and demand response zones, as appropriate.

These goals provided guidance throughout the study. They were also used to review the recommended plan to ensure the final recommendations fulfil the desired outcome of the Connecting Progress Plan.

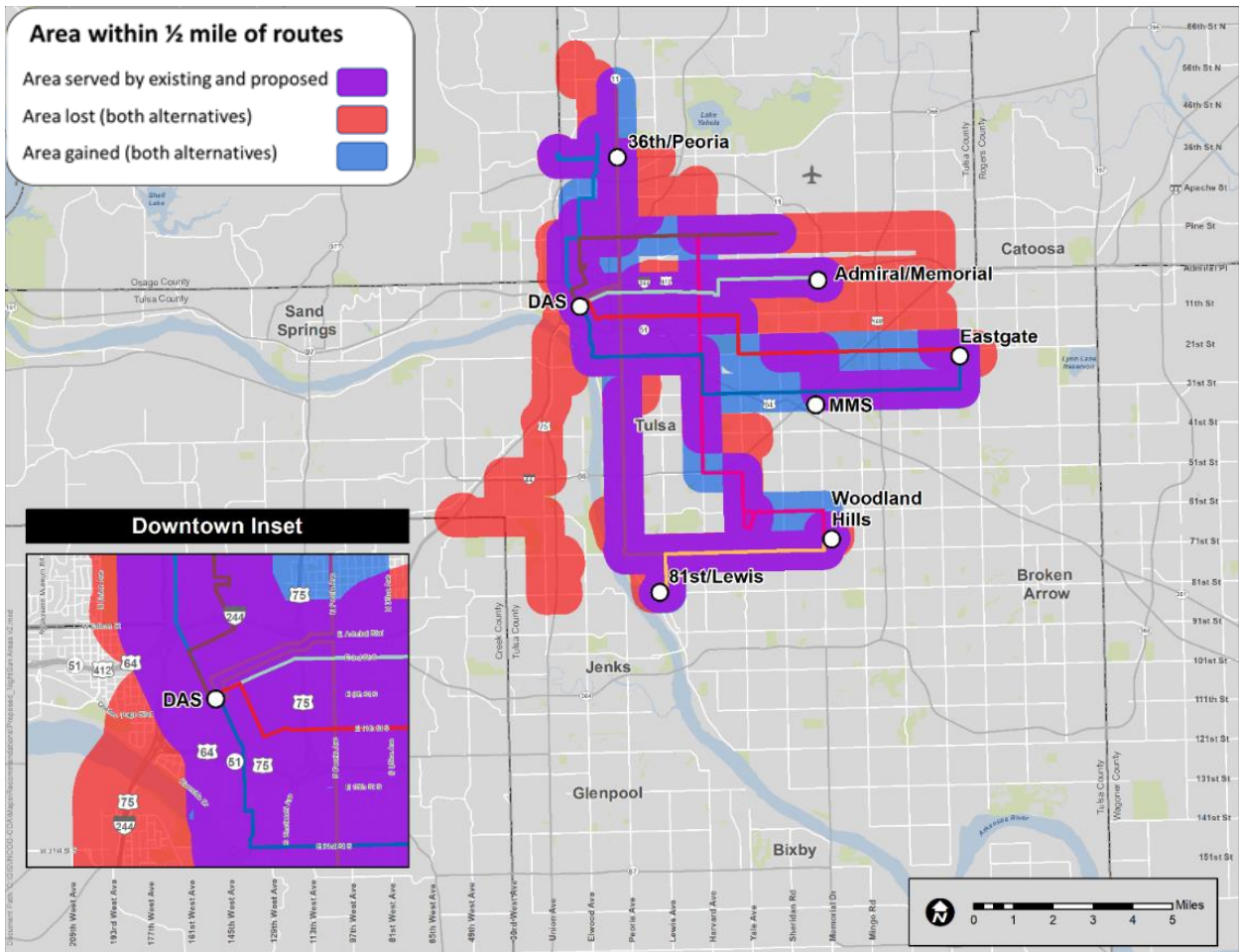
Figures 1 and 2 depict the route changes that will be implemented in 2019 as a result of the Connecting Progress Plan. The first map illustrates the service coverage change for weekday daytime service. The second map illustrates the service coverage change for night/Sunday service. As illustrated in the maps, the service changes involve combining and renaming existing routes throughout the service area. Therefore, the service equity analysis was conducted based upon an analysis of the fixed route system as a whole rather than a route-by-route analysis.

Figure 1: Service Coverage Change for Weekday Daytime



Source: Connecting Progress Plan, August 2018

Figure 2: Service Coverage Change for Night/Sunday



Source: Connecting Progress Plan, August 2018

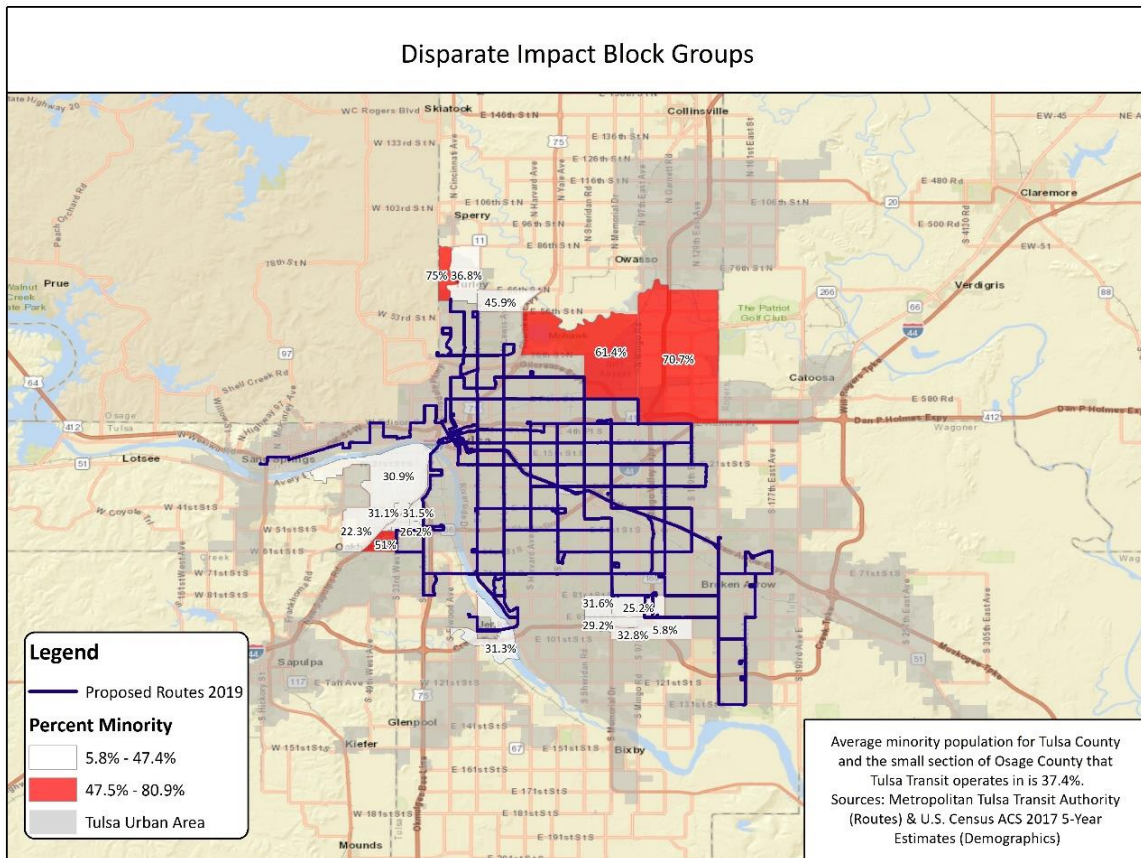
NEW SERVICE

In addition to the route redesigns, Tulsa Transit is also implementing new shuttle services where no service previously existed. A shuttle will operate on 10-minute headways around the Blue Dome, Deco, and Oil Capital Historic Districts on weekdays from 11:00 AM to 11:00 PM and weekends from 11:00 AM to 12:00 AM. The population within 1/4 mile of the shuttle service area is approximately 1,672 people. Job numbers indicate that there are 15,224 jobs in the area.

The Gathering Place Park & Ride will also now be served every 30 minutes and connect with the shuttle, 7 days a week between 10:00 AM and 10:00 PM. The Park & Ride service area has a population of 2,174 people and 13,241 jobs.

DISPARATE IMPACT

Before any major service change or fare change, Tulsa Transit will measure disparate impacts of the proposed change. Any time there is a difference in adverse impacts between minority and non-minority populations of plus or minus 10%, this is statically significant, and such differences in adverse impacts are disparate impacts. Minorities in Tulsa County and a small portion of Osage make up 37.4% of the overall population. The map below highlights the block groups that will be affected by the geography of the service changes.



Route 418, West Connector

The removal of the west end of Route 418, the West Connector, would disproportionately impact minorities living in block group 401430067012 in the Oakhurst area. That block group has a minority population of 51% which is more than 10% greater than the average minority population.

Mitigating Factors

- ◆ The area impacted by this route change was annexed by the City of Sapalupa. Tulsa Transit will notify the City of Sapalupa of the impact on minority residents in this area and continue to provide Sapalupa with information about how to access the nearest bus routes and other transportation services operated by private companies, non-profit organizations and

human service agencies. Tulsa Transit is open to discussions with Sapalupa about strategies to address any newly identified service needs that arise out of these discussions.

Route 101, Suburban Acres

The removal of the northern turnaround on Route 101, Suburban Acres, would disproportionately impact minorities living in block group 401430091011 in the Turley area. That block group has a minority population of 75% which more than 10% greater than the average minority population.

Mitigating Factors

- ◆ The area impacted by this route change is not within the City of Tulsa. Because Turley is not a funding partner for Tulsa Transit service, the system does not operate there. Tulsa Transit will notify the City of Turley about the impact on minority residents in this area and continue to provide information about how to access the nearest bus routes and other transportation services operated by private companies, non-profit organizations and human service agencies. Tulsa Transit is open to discussions with Turley about strategies to address any newly identified service needs that arise out of these discussions.

Route 203, Airport

The removal of the airport turnaround on Route 203, Airport, would disproportionately impact minorities living in block group 401430111001 near the airport. That block group has a minority population of 61.4% greater than 10% from the average minority population.

Mitigating Factors

- ◆ The decision to remove the turnaround and discontinue service to the Airport is based on existing ridership levels. Tulsa Transit is currently transporting approximately one person per day to the airport. Other communities impacted by the removal of the turnaround are served by new routes to be implemented with the service change. Only the stop at the Airport was removed from the route service. Tulsa Transit will continue to monitor demand and requests for service to and from the Airport. The Airport is currently served by other transportation providers including private operators.

Route 850, Northeast Nightline and Route 222, Pine/41st Street

The removal of the east end loop on Route 850, Northeast Nightline, and 222C, Pine/41st Street, would disproportionately impact minorities living in block group 401430059001 east of the airport almost to Catoosa. That block group has a minority population of 70.7% which is more than 10% greater than the average minority population.

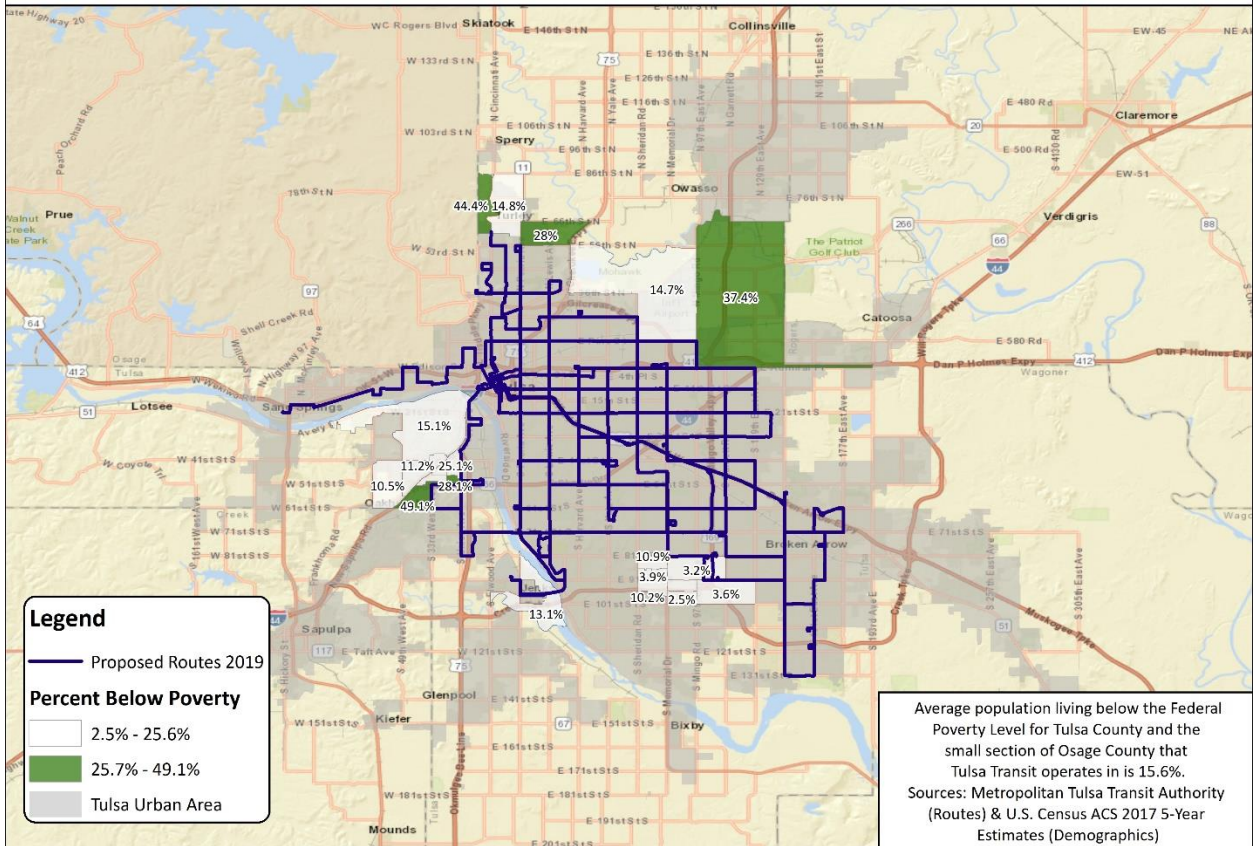
- ◆ The decision to remove the east end loop on Route 850 and the portion of Route 222 is based on existing ridership levels which are very low. Tulsa Transit explored the potential impact of removing the portion of service for these routes and discovered that while the block group has a high minority population, the area within ¼ mile of the route is industrial with very few households and the number of people impacted by the change is relatively small. The area included in this elimination is mainly industrial.
- ◆ The impacted area between Mingo and Garnett had an estimated population of 13 people living in five occupied households. Approximately 61% of the population in this small area are minority. Approximately 95% of the households have an available vehicle.
- ◆ Tulsa Transit will continue to monitor demand and requests from this area through passenger surveys and all public input opportunities. The system provides information about how to access Tulsa Transit's routes.
- ◆ Tulsa Transit will advertise training about how to use the new redesigned services in this area to provide opportunity for anyone impacted by the change to learn about how to access the new routes.



DISPROPORTIONATE BURDEN

Before implementing any major service change or fare change, Tulsa Transit also will measure disproportionate burdens on low-income populations. Any time there is a difference in adverse impacts between low-income and non-low-income populations of plus or minus 10%, this is statistically significant, and such differences in adverse impacts are disproportionate burdens. Low-income persons in Tulsa make up 15.6% of the overall population. The map below highlights the block groups that will be affected by the service changes geographically.

Disproportionate Burden Block Groups



Route 418, West Connector

The removal of the west end of route 418, the West Connector, would disproportionately impact individuals living below the poverty level in block groups 401430067012 and 401430048003 in the Oakhurst area. Those block groups have poverty levels of 49.1% and 28.1% respectively more than 10% greater than the average low-income population density.

Mitigating Factors

- ◆ The area impacted by this route change was annexed by the City of Sapalupa. Tulsa Transit will notify the City of Sapalupa of the impact on residents below the Federal Poverty Level in this area and continue to provide Sapalupa with information about how to access the nearest bus routes and other transportation services operated by private companies, non-profit organizations and human service agencies. Tulsa Transit is open to discussions with Sapalupa about strategies to address any newly identified service needs that arise out of these discussions.

Route 101, Suburban Acres

The removal of the northern turnaround on route 101, Suburban Acres, would disproportionately impact individuals living below the poverty level in block group 401430091011 in the Turley area. That block group has a poverty level of 44.4% which more than 10% greater than the average low-income population density.

Mitigating Factors

- ◆ The area impacted by this route change is not within the Tulsa Transit service area. Because Turley is not a funding partner for Tulsa Transit service, the system does not operate there. Tulsa Transit will notify the City of Turley about the impact on residents living below the Federal Poverty Level in this area and continue to provide information about how to access the nearest bus routes and other transportation services operated by private companies, non-profit organizations and human service agencies. Tulsa Transit is open to discussions with Turley about strategies to address any newly identified service needs that arise out of these discussions.

Route 105, Peoria

The removal of the northern turnaround on Route 105, Peoria, would disproportionately impact individuals living below the poverty level in block group 401430091042 in the Turley area. That block group has a poverty level of 28% more than 10% greater than the average low-income population density.

Mitigating Factors

- ◆ The area impacted by this route change is no longer within the Tulsa Transit service area. Because Turley is not a funding partner for Tulsa Transit service, the system does not operate there. Tulsa Transit will notify the City of Turley about the impact on residents living below the Federal Poverty Level in this area and continue to provide information about how to access the nearest bus routes and other transportation services operated by private companies, non-profit organizations and human service agencies. Tulsa Transit is open to discussions with Turley about strategies to address any newly identified service needs that arise out of these discussions.

Route 850, Northeast Nightline and Route 222C, Pine/41st Street

The removal of the east end loop on route 850, Northeast Nightline, and 222C, Pine/41st Street, would disproportionately impact individuals living below the poverty level in block group 401430059001 east of the airport almost to Catoosa. That block group has a poverty level of 37.4% which is more than 10% greater than the average low-income population density.

Mitigating Factors

- ◆ The decision to remove the east end loop on Route 850 and the portion of Route 222 is based on existing ridership levels which are very low. Tulsa Transit explored the potential impact of removing the portion of service for these routes and discovered that while the block group has a high minority population, the area within ¼ mile of the route is industrial with very few households and the number of people impacted by the change is relatively small. The area included in this elimination is mainly industrial.
- ◆ The impacted area between Mingo and Garnett had an estimated population of 13 people living in five occupied households. Approximately 61% of the population in this small area are minority. Approximately 95% of the households have an available vehicle.
- ◆ Tulsa Transit will continue to monitor demand and requests from this area through passenger surveys and all public input opportunities. The system provides information about how to access Tulsa Transit's routes.

- ◆ Tulsa Transit will advertise training about how to use the new redesigned services in this area to provide opportunity for anyone impacted by the change to learn about how to access the new routes.

Prior to implementation of any route changes, Tulsa Transit will present the service area and route frequency changes to the minority and low-income areas and provide an opportunity for public feedback about the challenges presented by these changes. If challenges are presented, Tulsa Transit will develop a plan to reduce or remove the disparate or disproportionate impact to the area. If it is not possible to remove the impact, Tulsa Transit will explore all opportunities to mitigate the impact and reduce the burden to the local community.

Attacment 11
Reduced Service Equity Analysis

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EXECUTIVE SUMMARY

PURPOSE

The Federal Transit Administration (FTA) guidance indicates that a Title VI equity analysis must be performed for service changes and cuts made during the COVID-19 Pandemic due to reduced staffing and ridership levels. The guidance indicates that if a transit agency makes any changes permanent, the agency must perform a service equity analysis to ensure that changes do not unfairly impact people of color or individuals with low incomes. The Metropolitan Tulsa Transportation Authority (MTTA/Tulsa Transit) implemented service reductions in response to a drastic decline in ridership and uncertainty about the recovery of service demand. Staffing levels at Tulsa Transit also declined during the Pandemic making it more difficult for the agency to spread its shrinking driver workforce across the existing hours of operation.

In addition to service hour (span) and some frequency of service reductions made due to the COVID-19 pandemic conditions, Tulsa Transit also implemented a route change in response to an unplanned construction project that has been ongoing for several months.

Finally, Tulsa Transit's Major Service Change policy indicates that any temporary change in service that lasts more than 12 months is considered a Major Service Change. An equity analysis is required for all Major Service Changes.

Major Service Changes are examined for potential adverse effects at the line and systemwide levels based on race/ethnicity and income.

FINDINGS

To provide a systemwide understanding of Tulsa Transit's service, the minority population by Census Block Group was analyzed for each route. The average minority population per Census Block Group in Tulsa's urbanized area is 30.41 percent. Figure 1 shows the areas throughout Tulsa where the percentage of the block group population that is a minority is higher than the average of the entire service area. The block groups shown in red are more than 30.41 percent minorities and are located primarily in northern Tulsa and partially on the western and eastern sides of the city.

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Figure 1: Percent Minority Population

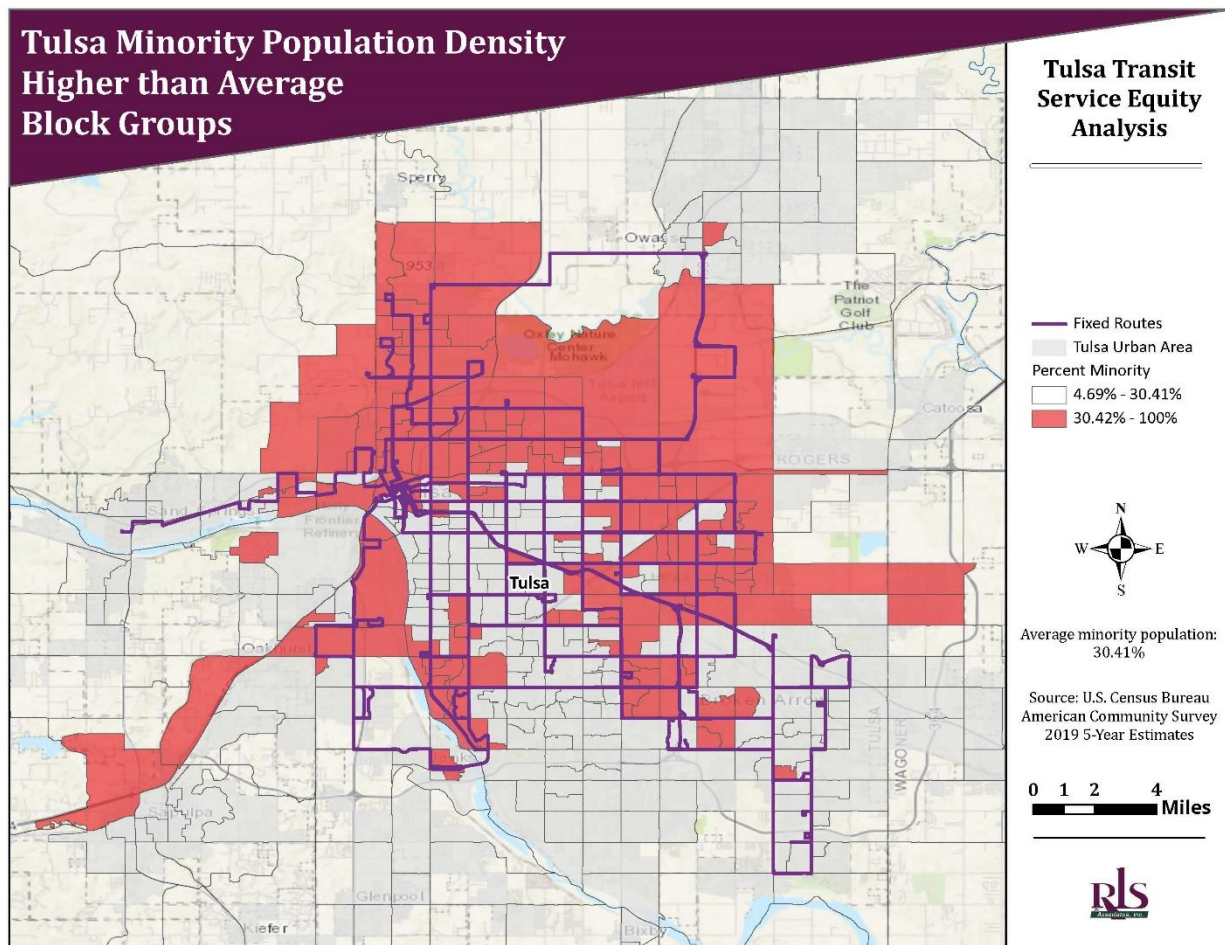


Table 1 shows the breakdown of minority and individuals in poverty within one-quarter of a mile from each route. When analyzing the minority population, Route 401 has the highest percentage of minority and population with low incomes within a one-quarter mile at 89 percent minority population and 41 percent, respectively.

Route 508 has the lowest percentages at 24 percent of the population within one-quarter mile, being a minority and eight percent having low incomes.

Table 1: Minority & Poverty Populations by Route

Route	Population	Percent Minority	Percent Poverty
110	13,601	73%	25%
114	12,351	50%	26%
117	10,704	39%	20%
130	10,640	45%	25%
140	15,862	40%	19%
150	13,492	39%	13%
201	15,360	60%	25%
300	16,944	41%	18%
310	12,502	50%	17%
401	6,622	89%	41%
410	18,416	48%	32%
440	14,432	28%	14%
450	15,738	37%	19%
460	10,271	57%	26%
470	17,198	65%	18%
480	6,029	46%	31%
490	12,622	50%	24%
500	11,543	47%	19%
508	15,133	24%	8%
700	31,597	55%	24%
902	26,897	35%	11%
909	25,099	37%	12%
969	15,126	76%	34%

ROUTE 117

Tulsa Transit implemented temporary changes to Route 117 due to construction. The changes have become long-term as construction continues. Before the changes were implemented, the route was 11.82 miles. The new route is 13.83 miles. The adjustments occurred to 16.96 percent of the total route mileage which is more than Tulsa Transit's threshold of 15 percent. Therefore, it is considered a major service change.

The changes were analyzed to determine if they resulted in a disparate impact to populations served by the route. Prior to implementing the changes, the population within one-quarter mile of Route 117 was 39 percent minority, and 20 percent were below poverty. After the changes, 35 percent of the service area population were a minority, and 19 percent were below poverty. The route changes resulted in service to 10 percent fewer people of color. The service change also resulted in service to five percent fewer people in poverty.

Table 2: Route 117 Percent Minority Change

Route	Population	Percent Minority	Percent Poverty
117 - Before Changes	10,704	39%	20%
117 - After Changes	10,817	35%	19%

Figures 2 and 3 illustrate Route 117 before and after the change.

Figure 2: Route 117 Prior to Changes

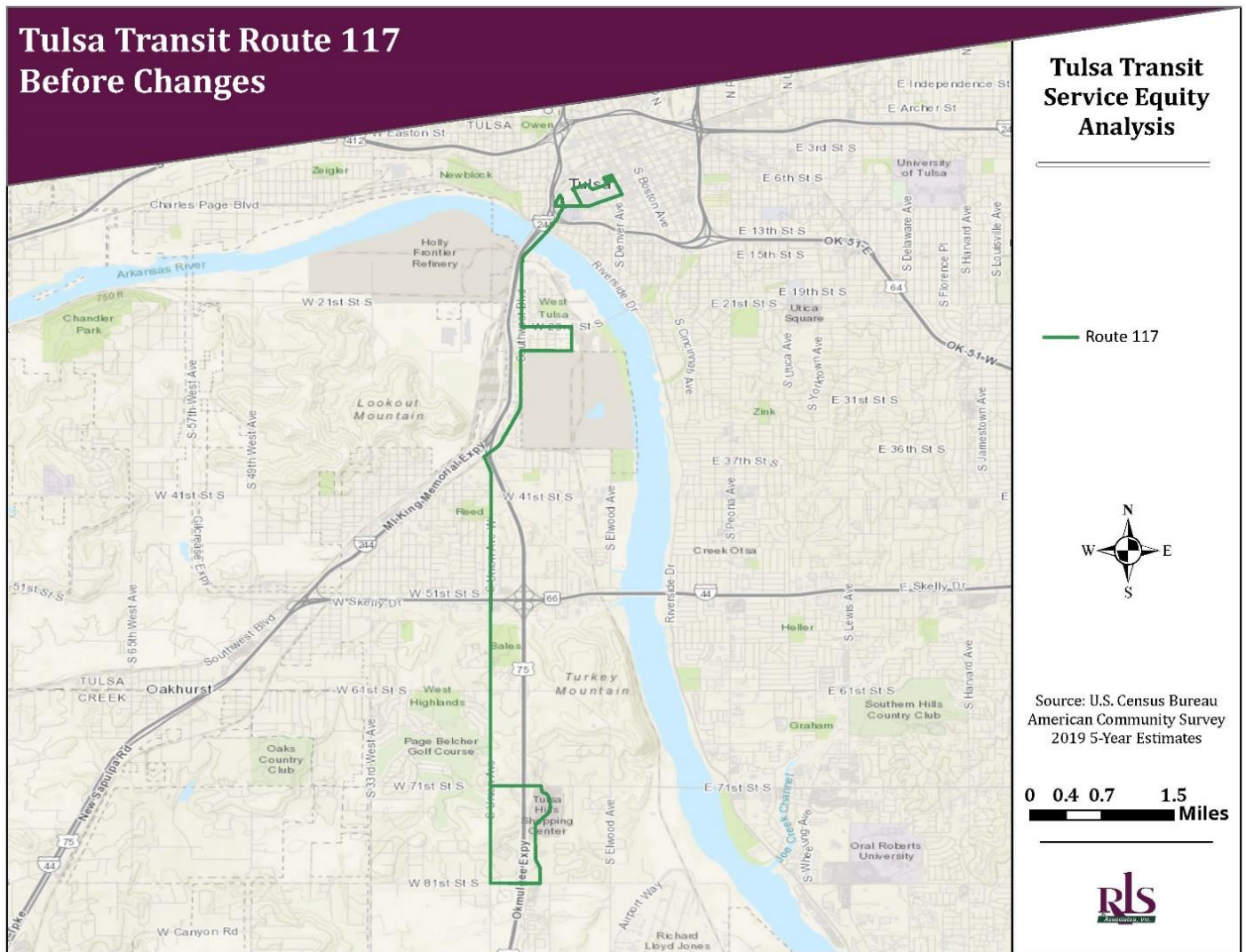
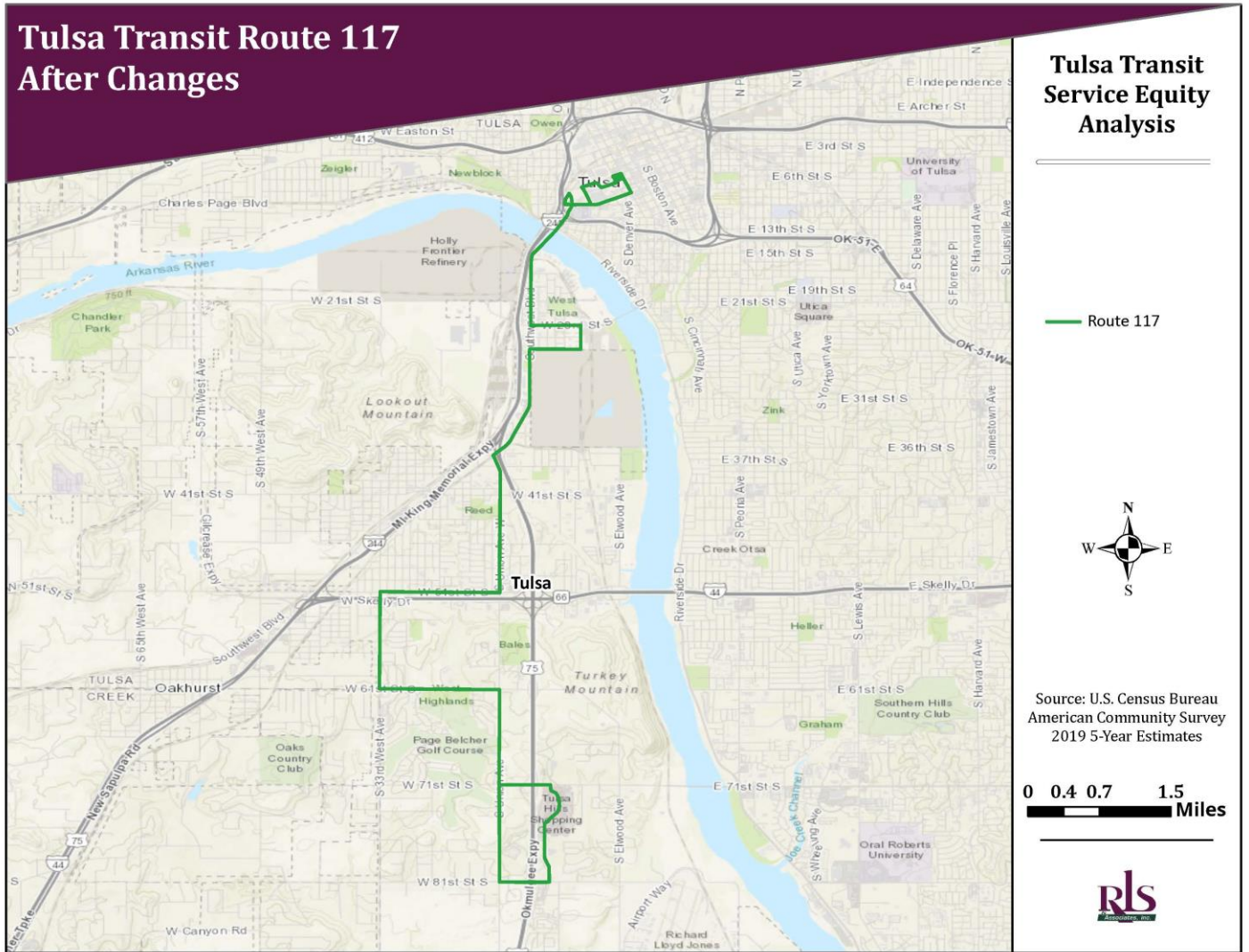


Figure 3: Route 117 After Changes



Analysis

SERVICE EQUITY ANALYSIS

OVERVIEW

Tulsa Transit temporarily reduced service systemwide to reflect declining ridership, demand, and staffing levels that resulted from the COVID-19 Pandemic. The agency implemented systemwide service frequency reductions so that it could continue serving the community to the highest possible level. The service frequency reductions were implemented as a strategy for preserving transportation options throughout the service area so that riders could continue having access to community resources and employment on a daily basis.

On April 7, 2020, the FTA published guidance indicating that if a transit agency chooses to make any changes permanent during an emergency, then the agency must perform a service equity analysis. The consistent decline in ridership and persistent staff shortages have made it necessary for Tulsa Transit to maintain the reduced service levels for more than one year. The Major Service Change policy of Tulsa Transit clarifies that temporary changes that last more than 12 months require analysis to ensure there has been no disparate impact on people of color or disproportionate burden on populations or riders with low incomes.

COVID-19 SERVICE CHANGES

Tulsa Transit increased frequency on five fixed routes from 30 minutes to 60 minutes. In addition, Route 700 AERO Peoria frequency increased from 15 minutes to 20 minutes. The changes listed in Table 2 were implemented in October 2020 due to reduced ridership and staffing shortages created by the COVID-19 Pandemic. All other fixed routes were unchanged and continue to operate with 60-minute frequency. In addition to the route-level changes, Tulsa Transit reduced the span of operating hours from 5:00 AM to 9:00 PM (16 hours per day) to 6:00 AM to 8:00 PM (14 hours per day).

Table 2: Frequency of Service Changes during COVID-19

Line	Service Change Description
700 AERO Peoria	Reduced frequency from 15 minutes to 20 minutes.
110 MLK/Hartford	Reduced frequency from 30 minutes to 60 minutes.
117 Southwest Blvd./Union	Reduced frequency from 30 minutes to 60 minutes.
130 Admiral	Reduced frequency from 30 minutes to 60 minutes.
140 11 th	Reduced frequency from 30 minutes to 60 minutes.
300 South/Southeast	Reduced frequency from 30 minutes to 60 minutes.
508 B.A. Connection	Reduced hours of service

To determine whether route-level changes meet the definition of a Major Service Change, current and proposed services are compared in terms of frequency and span (hours) of service. Changes of 15 percent or more qualify as a Major Service Change.

There were changes to span (hours) of service. The span of service changes were implemented systemwide. Daily hours of operation were reduced by two hours per day. The following tables outline the impact of span of service changes on minority and non-minority lines.

Table 3: Weekday Headways and Span of Service for Minority and Non-Minority Lines

Weekday	Lines Operating	Service Begins	Headway	Service Ends	Span (Hours)
Minority population > 30.41%	20	6:00 AM	60	8:00 PM	14
Minority population < 30.41%	1	6:00 AM	60	8:00 PM	14
Minority population > 30.41%	1	6:00 AM	30	8:00 PM	14
Minority population < 30.41%	0	6:00 AM	30	8:00 PM	14

On weekdays, five of the 20 regular fixed routes that serve areas with above average minority population reduced headways from 30 minutes to 60 minutes. The other 15 minority area routes and one non-minority area route were unchanged and continued to operate at 60-minute headways.

One route that serves an area with above average minority population reduced headways from 15 to 20 minutes and reduced the span of hours from 16 hours per day to 14 hours per day.

After the changes, all routes in minority and non-minority areas have equal span of hours. All regular fixed routes that serve areas with above average minority population and all routes that serve non-minority areas reduced service span from 16 to 14 hours per day.

The change in headway for regular fixed routes from 30 minutes to 60 minutes represents a 50 percent increase in the time between buses arriving at stops. The change from 15- to 20-minute headways on Express routes represents a 33.3 percent increase in the time between buses at a stop.

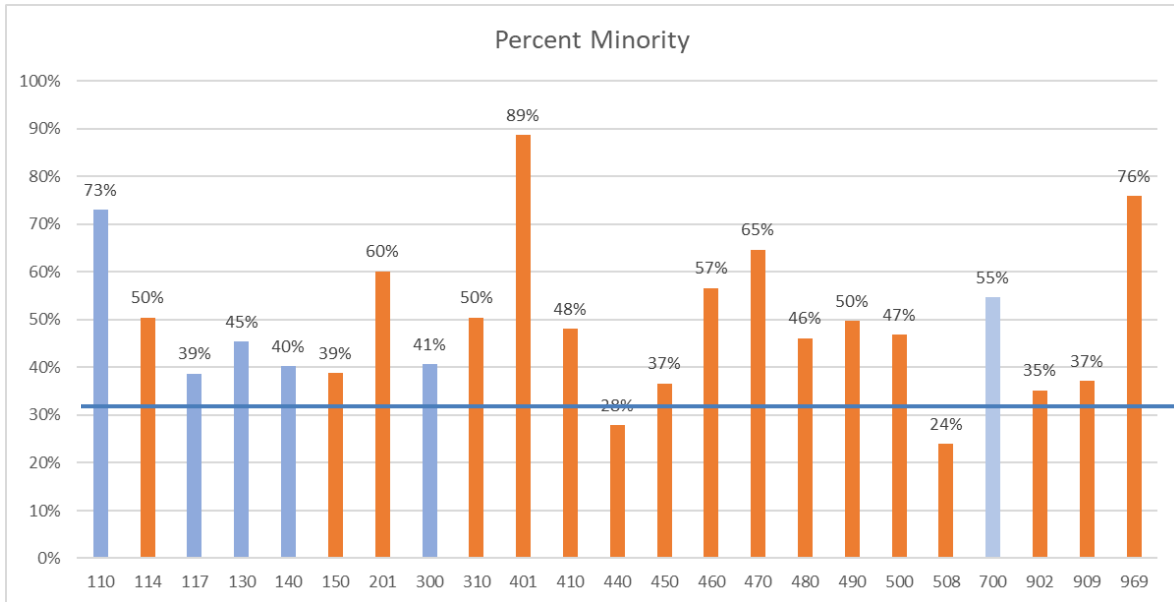
Line-Level Analysis

Having identified that the service changes for each line exceed the definition of a Major Service Change, the next step in the analysis is to look at each line to determine the potential Disparate Impacts on the minority populations and/or Disproportionate Burdens on the population with low incomes. The line-level analysis compares minority and low-income populations for the service area of each line and the minority and low-income populations of the Tulsa Urbanized Area as a whole.

Figure 4 illustrates the comparison of the disparate impact threshold (30.41%) with the percent of the minority population by route. The blue shaded columns experienced a change in frequency in addition to the change in span that applied to all routes. The orange shaded columns represent routes that experienced only a change in span of hours. All of the frequency changes impact routes

with a minority population of more than 30.41 percent. It is noted that all of Tulsa Transit’s routes serve areas with an average minority population above the service area average except Routes 440 and 508.

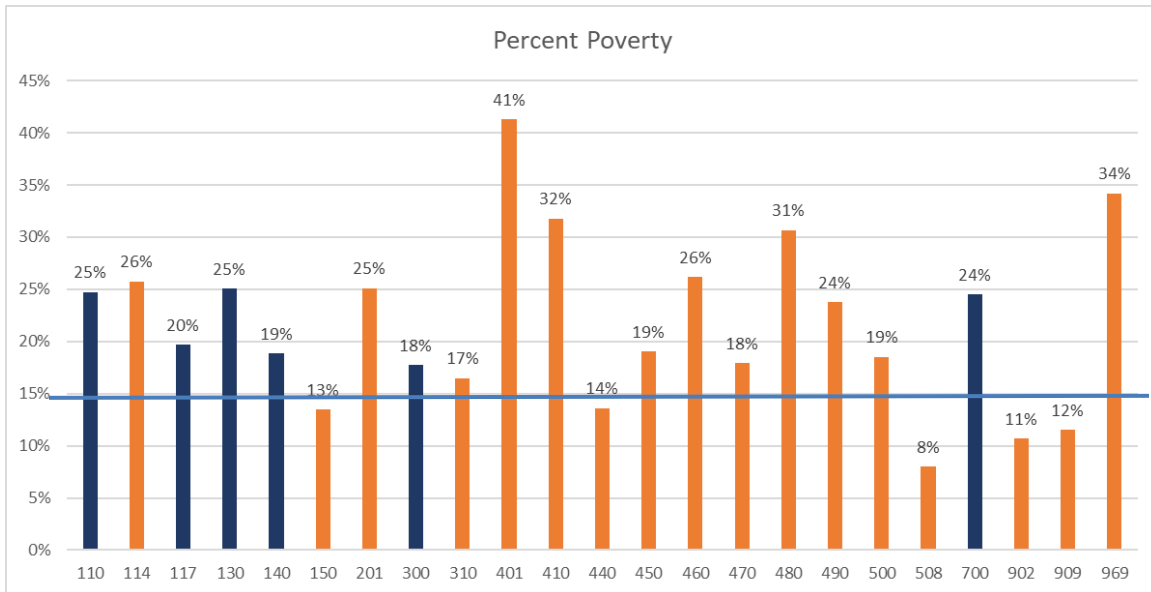
Figure 4: Disparate Impact with Disparate Impact Threshold by Route



Source: U.S. Census Bureau American Community Survey 2019 5-Year Estimates

Figure 5 illustrates the Disproportionate Burden of the weekday service frequency and span of hours changes on the population below poverty along each route. The frequency changes were implemented systemwide. Routes 401, 410, 969, and 480 serve areas with the highest percentages of people living below the Federal Poverty Level in Tulsa. Therefore, the impact of the frequency changes on populations with low incomes will be felt throughout Tulsa but are most significant on the service areas covered by those routes. The routes with increased frequency are illustrated in blue. Each route serves an area with population below poverty that is more than the 15 percent service area average. The population below poverty served by Routes 110, 117, 130, 140, 300, and 700 ranges from 13 percent to 26 percent.

Figure 5: Disproportionate Burden by Route



Source: U.S. Census Bureau American Community Survey 2019 5-Year Estimates

System-Level Disparate Impact Analysis

At the system level, the same analysis of disparate impact is determined by comparing the portion of the service area’s minority population that is potentially adversely impacted from service reductions with the non-minority population that could be potentially impacted. A disparate impact may exist if minority populations will have a substantially higher impact from the reductions.

Table 4 compares the impacted minority and non-minority populations. A greater percentage of the area’s non-minority population is potentially impacted by the major service changes to span of hours as compared to the minority population (52.61 percent compared to 47.39 percent, respectively). There is a disparate impact.

On a systemwide level, the reduced frequency as described above negatively impacts 29% of the service area population which is slightly below the threshold. Therefore, even though the negative

impact at the route level is significant on minority areas, at a system level the service changes to frequency do meet the definition of a Disparate Impact.

Table 4: System-Level Disparate Impact Analysis of Major Service Change

Service Changes	Percent Non-Minority Population Impacted	Minority Population Disparate Impact Threshold	Percent Minority Population Negatively Impacted	Potential Disparate Impact?
Reduced Frequency	26%	30.41%	29%	No
Span of Hours	52.61%	30.41%	47.39%	Yes

System-Level Disproportionate Burden Analysis

The Disproportionate Burden Analysis at the system level is prepared by comparing the proportion of Tulsa’s low-income population that is potentially adversely impacted with the population above the poverty level that is potentially impacted. A disproportionate burden exists if the impact on population below poverty is substantially more than the impact would have been on the percent of the population below poverty for the entire service area. According to the analysis, the changes in frequency on impacted 30 percent of the population below poverty and 27 percent of the population above poverty. The difference is three percent greater for individuals below poverty, and the impact on people below poverty along the routes is greater than the average population below poverty for the service area. Changes in span of hours impacted 20.41 percent of the population below poverty and 79.59 percent of those above poverty. Because the span of hours impacted 20.41 percent of the population on the route and that percent is higher than the average population below poverty for the Tulsa Urbanized Area, there is a disproportionate burden.

The summary of this report outlines mitigating actions and consideration.

Table 5: System-Level Disproportionate Burden Analysis of Major Service Change

Service Changes	Percent of Population Above Poverty Negatively Impacted	Population Below Poverty Level (2019 ACS, 5-Year Estimates)	Population Below Poverty Negatively Impacted	Potential Disproportionate Burden?
Reduced Frequency	27%	15%	30%	Yes
Span of Hours	79.59%	15%	20.41%	Yes

PUBLIC ENGAGEMENT

Tulsa Transit did not conduct public engagements prior to implementing service changes due to the COVID-19 safety precautions and restrictions on large gatherings that were in place when changes were implemented. The ability to conduct a robust and inclusive outreach effort was not possible at the time while dealing with changes in service demand and staffing shortages.

SUMMARY

The analysis concludes that the reduced frequency in weekday service for six minority area routes did not result in a disparate impact at the system level because the changes negatively impacted 29% of the minority population, which is one percent lower than the average minority population per Census Block Group in the Tulsa Urbanized Area.

The reduced span of hours, however, impacted 47.39 percent of the minority population which is 16.98 percent more than the average minority population per Census Block Group.

The analysis also concludes that the service changes to frequency and span of hours created a disproportionate burden for individuals with low incomes. Approximately 15 percent of the population is below the poverty level. At the system level, 20.41 percent of the population below poverty is impacted by the change in span of hours and 30 percent were impacted by the reduced frequency on six routes.

However, the reduced service frequencies for Routes 700, 110, 117, 130, 140, and 300 and the systemwide reduction in span of hours because was the only solution that would allow the system to continue providing the highest level of service to the community in the face of reduced staffing levels and reduced demand during the COVID-19 pandemic. Reducing frequencies on the selected routes to the level of all other routes was done in response to reduced ridership/demand and staffing shortages. While the minority areas served by Routes 700, 110, 117, 130, 140, and 300 were receiving more frequent service than all other route service areas prior to COVID-19, the reductions that were implemented reduced their service levels to being equal to other minority and non-minority area routes. Declining ridership was experienced systemwide. Therefore, the decision to reduce span of hours systemwide was a data-driven response to overall reduced demand.

The temporary change to Route 117 was implemented in response to construction. The adjusted route was the safest route to travel around the construction site while maintaining the most consistent level of service to the area.

Tulsa Transit will continue to monitor demand and ridership levels on all routes and respond accordingly if it can increase staffing levels.

Tulsa Transit will continue to monitor ridership levels and demand on the routes where service was reduced and respond accordingly to ridership demands.

Attachment 12
Title VI/Route Monitoring Board approval

Waiting on March 22 Board
Approval. (will be put in before
submitting to FTA)

Attachment 13
LEP Program



Limited English Proficiency (LEP) Plan

Improving Access to Services for Persons with
Limited English Proficiency



Metropolitan Tulsa Transit Authority
510 South Rockford Ave
Tulsa, OK 74120

(918) 582-2100 Fax (918) 582-5209
www.tulsatransit.org

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Limited English Proficiency (LEP) Plan

Metropolitan Tulsa Transit Authority April 2022

Introduction

This *Limited English Proficiency Plan* has been prepared to address Tulsa Transit's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et se, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin. Executive Order 13166, titled *Improving Access to Services for Persons with Limited English Proficiency*, indicates that differing treatment based upon a person's inability to speak, read, write or understands English is a type of national origin discrimination. It directs each federal agency to publish guidance for its' respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including the Metropolitan Tulsa Transit Authority (MTTA) which receives federal assistance through the U.S. Department of Transportation (U.S. DOT).

Plan Summary

Tulsa Transit has developed this *Limited English Proficiency Plan* to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided by Tulsa Transit. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available. In order to prepare this plan, Tulsa Transit undertook the U.S. DOT four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter Tulsa Transit's programs, activity or service.
2. The frequency with which LEP persons come in contact with Tulsa Transit's programs, activities or services.
3. The nature and importance of programs, activities or services provided by Tulsa Transit to the LEP population.
4. The resources available to Tulsa Transit and overall cost to provide LEP assistance.

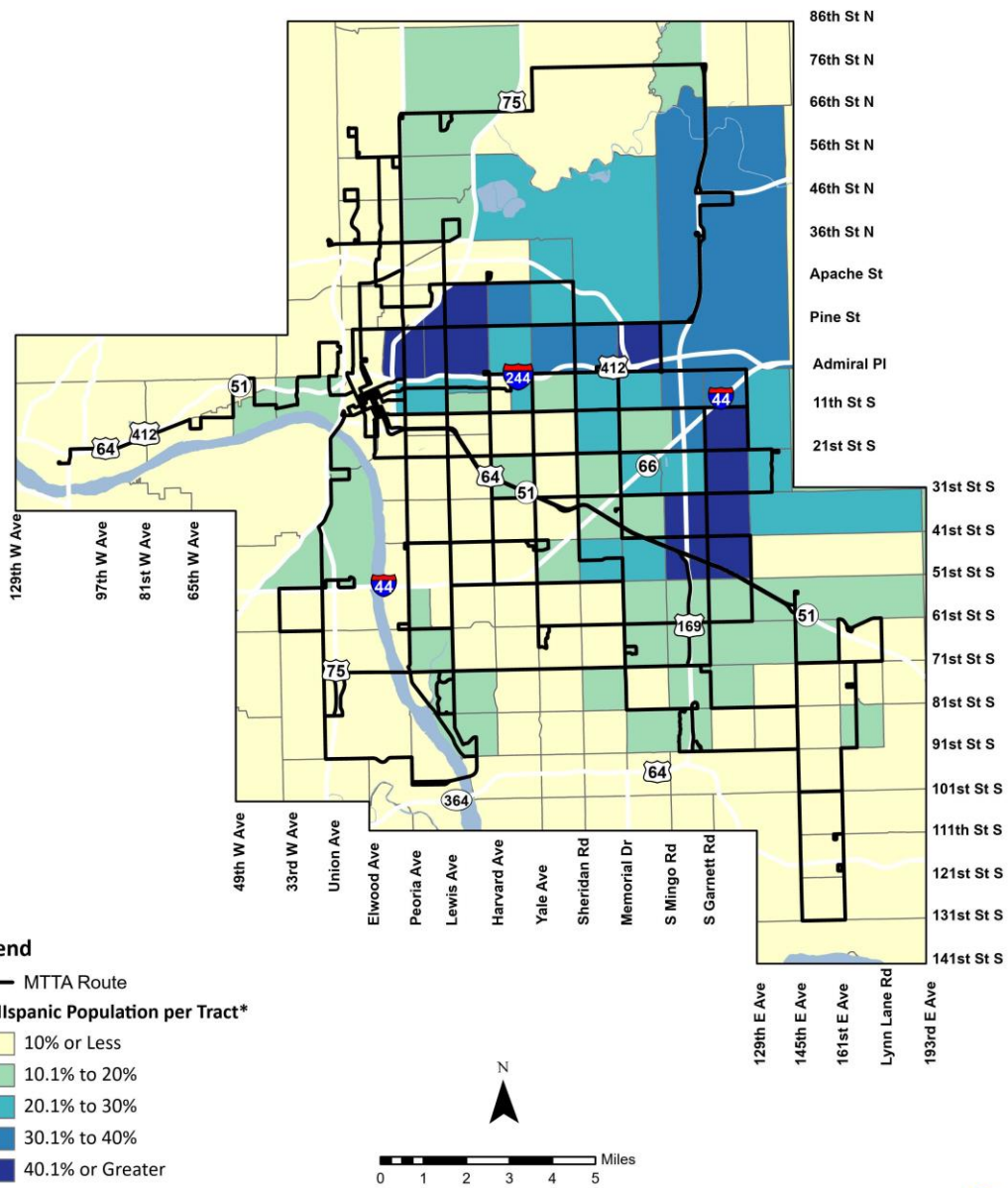
Four-Factor Analysis

1. *The number or proportion of LEP persons in the service area who may be served, or are likely to encounter a MTTA program, activity or service.*

The Census Bureau has a range of four classifications of how well people speak English. The classification is less than “very well”. For planning purposes, Tulsa Transit is considering people that speak English less than “very well” as Limited English Proficient persons. Table 1 shows the languages spoken at home for all persons five years old and older.

Table 1: Language Spoken at Home for the Population 5 Years or Older			
Limited English Proficiency for the Tulsa City Limits			
Language	Total Number that Speak that Language	Total Number that Speak English Less Than	Total Speaks English Less Than “Very Well” as a Percent of Total City Population
Spanish or Spanish Creole	55,071	21,899	5.86%
Frenchm Haitian, Creole	677	93	0.02%
German	1176	0	0.00%
Chinese	1,028	276	0.07%
Vietnamese	1,425	580	0.16%
Other Asian languages	4,910	2,544	0.68%
Other/Unspecified Languages	2069	303	0.08%
Other Indo-European languages	2113	213	0.06%
Arabic	1,160	441	0.12%
Russian, Polish, Slavic	528	186	0.05%
Korean	213	136	0.04%
Tagalog	618	441	0.12%

Concentration of Hispanics by Census Tract MTTA Service Area

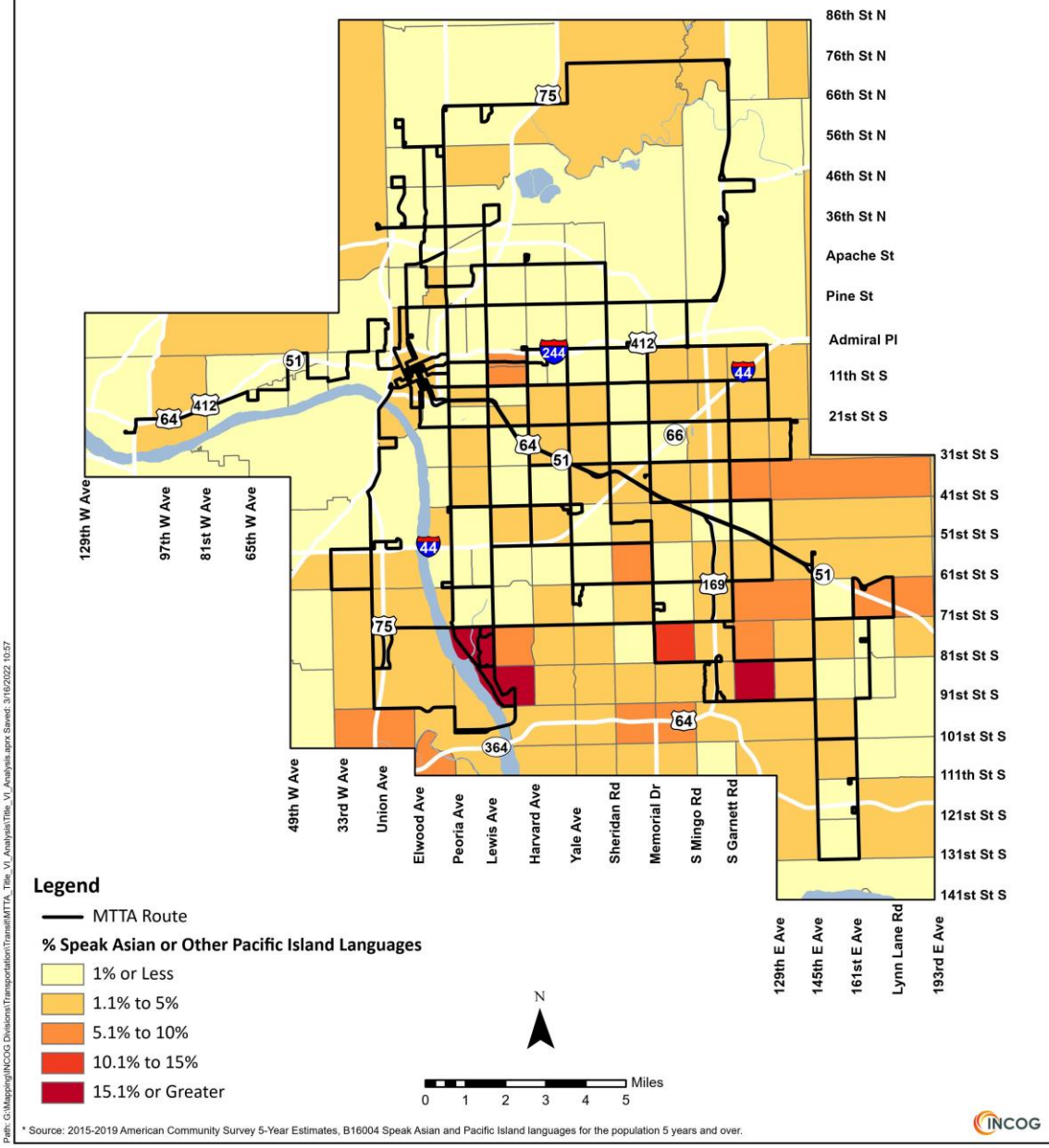


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* Source: 2015-2019 American Community Survey 5-Year Estimates, B03001 Hispanic or Latino Origin.



Concentration of Asian or Other Pacific Island Languages Spoken at Home by Census Tract MTTA Service Area



2. The frequency with which LEP persons come in contact with Tulsa Transit’s programs, activities or services.

Tulsa Transit has assessed the frequency of when staff have or could have, been in contact with LEP persons. The following “touch points” and frequencies have been identified:

Drivers	Frequently
Customer Service Representative – Phone	Often- Frequent
Traveler (Schedule book)	Often- Frequent
Dispatchers	Occasionally
Interior Cards	Frequently
On-street signage	Frequently
On-board surveys	Occasionally
Website	Occasionally
Receptionist (front office)	Not Often
Print media	Occasionally
Broadcast media	Occasionally
Public Participation (Public meetings)	Occasionally

3. The nature and importance of programs, activities, or services provided by Tulsa Transit to the LEP population.

The largest geographic concentrations of LEP individuals in Tulsa Transit’s service area are Spanish, and “Other Asian languages.” Services provided by Tulsa Transit that LEP persons are most likely to encounter are: the fixed route system which serves the general public, the ADA paratransit system which serves persons with disabilities, telephone information through the Call Center, and in-person customer information at the Denver Avenue Station. In addition, LEP persons are likely to attend public meetings/forums held by Tulsa Transit for informational purposes.

Tulsa Transit has had outreach efforts with attending Hispanic events within the community. We have also surveyed our board member that represents the Hispanic community to gain information of what services that Tulsa Transit can provide to assist the Hispanic LEP population of Tulsa, as well as any other LEP communities.

Tulsa Transit found that the most valuable services to provide to the Hispanic LEP population would be translation of written documents and assistance with trip planning with verbal communication.

Tulsa Transit has discovered that the Other Asian languages populations also fall under the LEP guidelines. Tulsa Transit will continue to conduct outreach efforts to

find what services would assist the other Asian LEP populations and will then update the Tulsa Transit LEP program as needed. At this time Tulsa Transit is still trying to find ways to reach this population such as partnerships with international student programs at local colleges and universities and work with human service agencies and local school districts. During COVID these opportunities were very limited.

Tulsa Transit has and will continue to perform many outreach efforts during the year at different agencies, businesses, and transfer stations to survey individuals on what language assistance is needed. We have found Spanish is the number one. However, we will continue to poll the agencies and businesses again in FY2022-2023.

4. The resources available to Tulsa Transit and overall cost to provide LEP assistance.

Tulsa Transit assessed its available resources that could be used to provide LEP assistance, including costs associated with professional interpreters and translation services on an as-needed basis, documents and phone translations that would be most valuable if translated for LEP persons, and an inventory of available organizations that Tulsa Transit could partner with for outreach and translation efforts.

Because the American Community Survey does not breakdown the “other Asian languages” category, Tulsa Transit is unable to identify specific languages that would fall within this category for translations. It is administratively impractical and costly to identify and translate the additional languages. Tulsa Transit will translate vital documents into other languages upon request.

Developing a Language Assistance Plan

After completing the Four Factor Analysis, Tulsa Transit used the results of the analyses to determine which language assistance services are appropriate for its service area. Additionally, Tulsa Transit has developed an assistance plan to address the identified needs of the LEP population(s) it serves.

Tulsa Transit Limited Proficiency Plan

Limited English Proficiency (LEP) Plan Outline

There are five areas that comprise Tulsa Transit’s LEP Plan:

1. Identifying LEP individuals who need language assistance

2. Language assistance measures
3. Training Staff
4. Providing Notice to LEP persons
5. Monitoring and updating the LEP Plan

1. Identifying LEP individuals who need language assistance

How Tulsa Transit may identify an LEP person who needs language assistance

- Work closely with our MPO- INCOG and Tulsa Transit GIS staff on maps, Census data and any language assistance they may have been requested during Tulsa Transit events;
- Examine customer service records and reports for language assistance request that have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events;
- When Tulsa Transit sponsors an event, have a staff person greet participants as they arrive. By informally engaging participants in conversation it is possible to informally gauge each attendee's ability to speak and understand English;
- Have Census Bureau Language Identification Flashcards available at Tulsa Transit events near the registration table. Individuals self-identifying as persons not proficient in English may not be able to be accommodated with translation assistance at the event, but it will assist in identifying language assistance needs for future events.

2. Language Assistance Measures

How Tulsa Transit will assist an LEP person who needs language assistance

- Provide a bilingual Hispanic translator when available at community events, public hearings, and public forums. Other languages will need to be requested
- Placement of statement in notices and publications that interpreter services are available for these meetings, with seven day advance notice;
- Survey drivers and other front-line staff, such as dispatchers, customer service representatives, annually on their experience concerning any contacts with LEP persons during the previous year;

- Provide language assistant materials at various properties of Tulsa Transit such as; stations and buses.
- Post the Tulsa Transit Title VI Policy and LEP Plan on the agency website, www.tulsatransit.org ;
- Tulsa Transit’s website has had Google Translation services posted on the front page to assist individuals to translate all information on the website in their native language; however, vital documents will automatically be translated in Spanish and placed on the website.
- When an interpreter is needed, for a language other than Spanish, in person or on the telephone, staff will access language assistance services from a professional translation service or qualified community volunteers.

3. Staff Training

How Tulsa Transit will train staff on its role and responsibilities in providing meaningful access to services for LEP persons

- Tulsa Transit has developed a training curriculum on the Title VI/ LEP requirements for providing meaningful access to services for LEP persons;
- Provide staff with a description of language assistance services offered by Tulsa Transit;
- Provide staff with specific procedures to be followed when encountering an LEP person, including how to handle a potential Title VI/LEP complaint;
- Instruct staff on the use of Tulsa Transit’s language assistant materials.

4. Providing Notice to LEP Persons

How Tulsa Transit will provide Notice to LEP Persons, both oral and written communications;

- Use an automated greeting in both Spanish and English, directing callers to select which language they prefer;
- Continue to use the services of a professional translation provider or by bilingual staff to ensure that vital documents are accurate (vital documents are defined as those documents without which a person would be unable to access services);
- The following are written communications printed in both English and Spanish.
- Introduction section of the Tulsa Transit Traveler Guide which contains

information on fares, accessibility, locations where discount tickets and passes are sold and general riding information.

- Onboard flyers containing information about route changes, fare increases and public hearings, meetings or forums.
- In various outlets Tulsa Transit may display safety or system policy information.
- In various outlets Tulsa Transit may display cash fare, cost of monthly discount passes and special promotions/campaigns.
- Onboard surveys.
- Provide information upon request in Spanish or other languages about Tulsa Transit's non-discrimination policies and information on the local/federal complaint process.
- Provide a tagline affirming that Tulsa Transit will make reasonable accommodations to translate any materials or to provide an interpreter at public hearings, meetings and forums.

5. Monitoring and updating the LEP plan

This plan is designed to be flexible and should be viewed as a work in progress. As such, it is important to consider whether new documents and services need to be made accessible for LEP persons, and also to monitor changes in demographics and types of services. Tulsa Transit will update the LEP as required by U.S. DOT. At a minimum, the plan will be reviewed and updated when data from the 2020 U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in the Tulsa Transit service area.

How Tulsa Transit will examine and update its' LEP Plan:

- Record and report the number of LEP persons were encountered annually through Tulsa Transit's in person training or events;
- Determine how the needs of LEP persons can be addressed;
- Determine the current LEP population in the service area and whether the need for translation services has changed;
- Determine whether transit system's financial resources are sufficient to fund language assistance resources needed;
- Determine whether Tulsa Transit and its contractor have fully complied with the goals of this LEP Plan;

- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals;
- Obtain input from customers and the general community via Tulsa Transit's focus groups and survey's.
- Survey frontline staff for frequency of contact with LEP individuals
- Survey frontline staff for any suggestions of what would help them to better communicate.

Dissemination of the Tulsa Transit LEP Plan

How Tulsa Transit's LEP Plan will be disseminated to customers and the community

A link to Tulsa Transit's LEP Plan and the Title VI Plan overview will be included on the Tulsa Transit website, www.tulsatransit.org. Any person or agency with internet access will be able to access and download the plan overview from the Tulsa Transit's website. Alternatively, any person or agency may request a copy of the complete plan via telephone, fax, mail, or in person, and shall be provided a copy of the complete plan at no cost. LEP individuals may request copies of the plan in translation which Tulsa Transit will provide, if feasible. Questions or comments regarding the LEP Plan may be submitted to the Tulsa Transit's Planning and Marketing Director as follows:

Tulsa Transit
 Planning/Title VI
 510 S Rockford Tulsa OK 74120
 Phone: (918) 582-2100 Fax: (918) 582-5209.

The Tulsa Transit CEO/General Manger has adopted the foregoing Limited English Proficiency Plan Policy.

 Scott Marr, CEO/General Manager

 Date