

Title VI Proposed Policies

Human Services Technical Committee

March 14, 2013

Title VI

- Title VI of the Civil Rights Act of 1964 (as amended) is intended to ensure the fair delivery of public services.

“...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 otherwise subjected to discrimination under any program or activity receiving federal financial assistance.”

Title VI Proposed Policies

- Policies
 - Major Service Changes
 - Fare Changes
- Process
 - Engage the public in policy review
 - Solicit input, build consensus, gathering suggestions on proposed policies
 - Implement policies for service or fare changes occurring after April 1, 2013

Input Needed

- Determine appropriate thresholds for the policies
 - Major Service Change
 - 25% proposed threshold
 - Fare Equity
 - 3 to 5% proposed threshold, single value for final policy

Major Service Change Policy

3 step process



Major Service Change Policy

Step 1: Determine if analysis is required

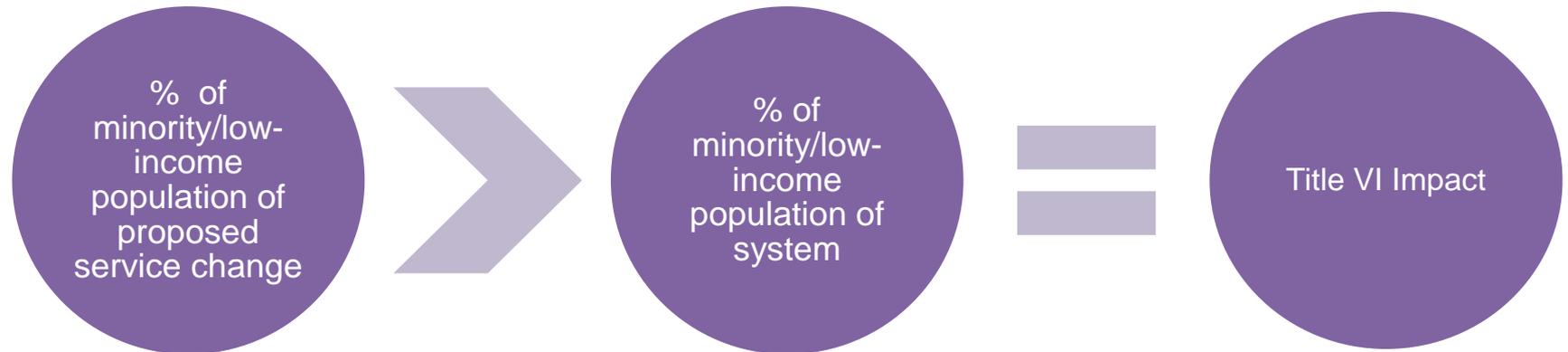
- Proposed threshold:

> 25% The route's existing service level

- 25% is consistent with local and national norms

Major Service Change Policy

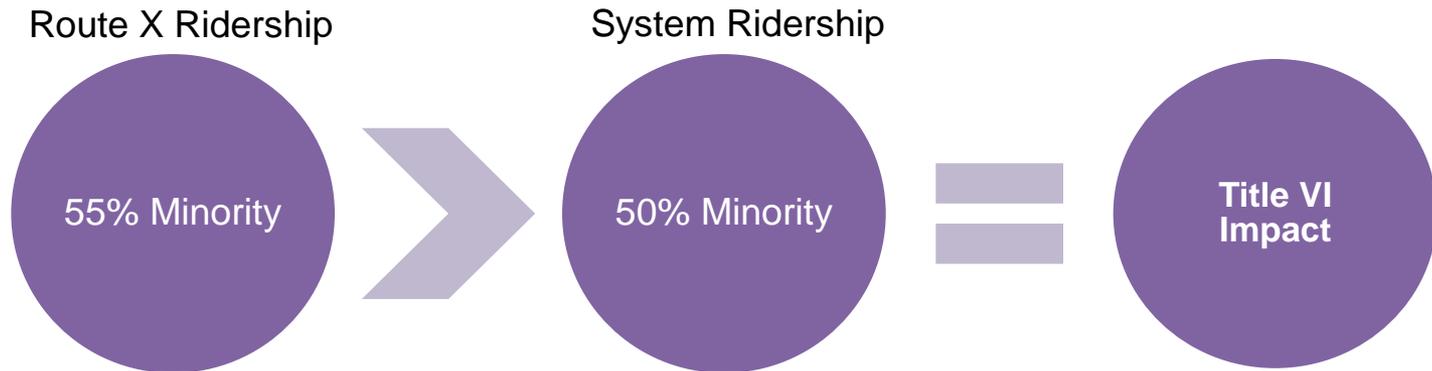
Step 2: Conduct low-income and minority impact analysis



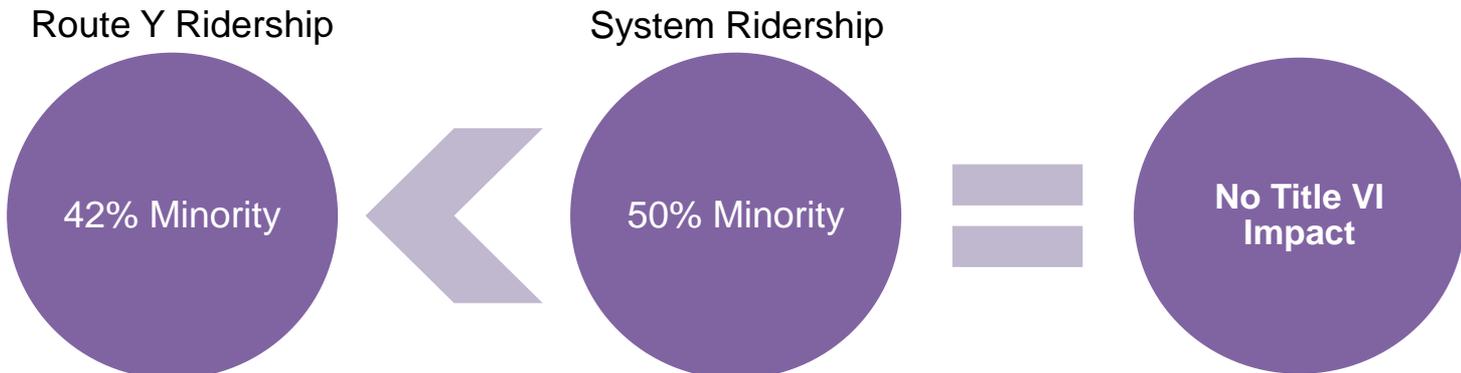
Major Service Change Policy

Step 3: Impact determination

Example 1: Proposed 30% Service Reduction on Route X

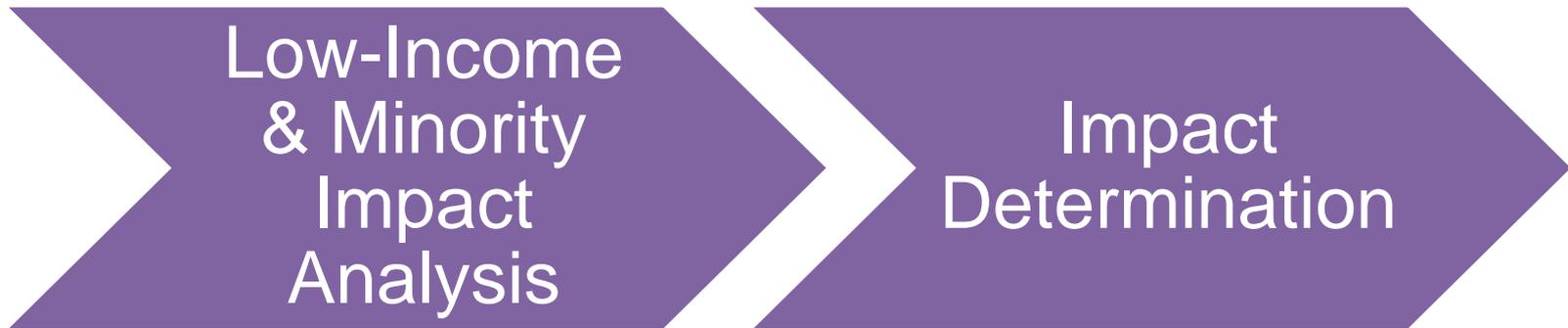


Example 2: Proposed 30% Service Reduction on Route Y



Fare Equity Policy

2 Step Process*



*All fare changes must undergo a Title VI analysis

Fare Equity Policy

Step 1: Analysis required

- Proposed threshold:

> 3 to 5%

- Compares the impact a proposed fare change has on riders
- Comparison ensures riders are being charged equitably based on the ridership demographics of the services they use

Fare Equity Policy

- Single value for final policy
- 3% threshold
 - Potentially require more frequent fare adjustments
- 5% threshold
 - Provides more flexibility in managing future fare adjustments
 - Greater range between fare types
 - Approx. 5% is consistent with FTA practice

Fare Equity Policy

Step 2: Impact determination

Example 1:

Proposed Local Fare **10%** Increase

Local Riders = 50% Minority

Proposed Express Fare **4%** Increase

Express Riders = 30% Minority

Increase on Predominately Minority Fares (**10%**) > Increase on
Predominately Non-Minority Fare (**4%**)



Fare Equity Policy

Step 2: Impact determination

Example 2:

Proposed Local Fare **5%** Increase

Local Riders = 50% Minority

Proposed Express Fare **20%** Increase

Express Riders = 30% Minority

Increase on Predominately Minority Fares (**5%**) < Increase on
Predominately Non-Minority Fare (**20%**)



Input Needed

- Major Service Change Policy
 - Do you agree with 25%?
 - Additional comments?
- Fare Equity Policy
 - Which value seems reasonable?
 - 3%
 - 4%
 - 5%
 - Additional comments?

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