

Board of Directors Meeting Agenda

Meeting Date/Time: October 15, 2026 - 6:00pm – 8:30pm

Location: Riverside Arts Center, Ypsilanti (4th Floor) - Virtual via [Zoom](#) Passcode: 983308

Members: Kathleen Mozak (Chair), Mike Allemang (Treasurer), Praveena Ramaswami (Secretary), Simi Barr, Rich Chang, Travis, Gonyou, Julie Grand, Jesse Miller, Susan Pollay, Georgia Valentine

Agenda Item	Info Type	Start Time	Details	Page #
1. OPENING ITEMS				
1.1 Approve Agenda	D	6:00	Mozak	
1.2 Public Comment	O			
1.3 General Announcements	O			
2. CONSENT AGENDA				
2.1 Board Meeting Minutes: September 17, 2026	D	6:10		3
2.2 Committee Meeting Summaries	D			11
2.3 Construction (2.10)	M			17
3. OWNERSHIP LINKAGE				
3.1 OLTF	O	6:10	Chang	Verbal
4. POLICY MONITORING				
4.1 Sustainability Policy Proposal	D	6:15	Barr	39
4.2 Policy Language Discussion (if needed)	D	6:45	Mozak	Verbal
5. EMERGENT ITEMS				
5.1 Election Day Fare Payment by County	D	6:50	Carpenter	43
5.2 Title VI Introduction	D	7:20	Yang	48
6. OPERATIONAL UPDATES				
6.1 Legislative Updates	O	7:35	Pfeifer	Verbal
6.2 CEO Report	O		Carpenter	50
6.3 CEO's Draft Ends Interpretations (V1)	O	7:45	Carpenter	54
7. CLOSING ITEMS				
7.1 Action Item Recap	O	8:15	Holt	
7.2 Topics for Next Meeting Treatment of the Traveling Public (2.1) Compensation & Benefits (2.3) FY26 Q4 Financial Report Title VI Approval CEO Interpretations Education: Guest Lecture: Land Use (Prof. Levine) Millage Recommendation Future: Ridership Trends & Utilization, Draft Fare Scope, AI			November 19, 2026 6:00-8:30pm <i>Ann Arbor District Library (Ann Arbor)</i>	
7.3 Public Comment	O			
7.4 Adjournment		8:30		

* M = Monitoring, D = Decision Preparation, O = Other

If additional policy development is desired:

Discuss in Board Agenda Item 3.0 Policy Monitoring and Development. It may be appropriate to assign a committee or task force to develop policy language options for board to consider at a later date.

Emergent Topics

Policy 3.1.3 places an emphasis on distinguishing Board and Staff roles, with the Board focusing on “long term impacts outside the organization, not on the administrative or programmatic means of attaining those effects.” Policy 3.1.3.1 specifies that that Board use a structured conversation before addressing a topic, to ensure that the discussion is appropriately framed:

1. What is the nature of the issue? Is the issue within the scope of the agency?
2. What is the value [principle] that drives the concern?
3. Whose issue is this? Is it the Board’s [Policy, 3.0 and 4.0] or the CEO’s [running the organization, 1.0 and 2.0]?
4. Is there already a Board policy that adequately covers the issue? If so, what has the Board already said on this subject and how is this issue related? Does the Board wish to change what it has already said?

2026 Work Plan

Policy Topics or Decisions	Status
1. Sustainability: Exec Limit or Ends?	In progress
2. OLTF	
3. <i>(FYI: Millage decision likely in FY2027)</i>	

Topics of Board Education

Education Topics
~~1. Local Funding: How it Works~~
2. <i>Millage Decision Prep</i> ○ <i>CEO Context (Timeline, LRP, recommendation)</i> ○ <i>Post Pandemic Ridership Trends & Utilization of Services</i> ○ <i>Owner Preferences: Taxes & Additional Services</i>
3. Fare Study Scope Presentation
4. Artificial Intelligence
5. Transit Service & Land Use Plan
6. Library of General Education Topics on Website
7. <i>CEO’s new Ends Interpretations</i>

Board of Director's Meeting Minutes

Meeting Date/Time: September 17, 2026 - 6:00pm – 8:30pm

Location: Ann Arbor District Library (4th Floor) - Virtual via Zoom

Members Present: Kathleen Mozak (Chair), Mike Allemang (Treasurer), Jesse Miller (Secretary), Simi Barr, Rich Chang, Travis Gonyou, Julie Grand, Georgia Valentine

Members Absent: Susan Pollay (Excused), Praveena Ramaswami (Excused),

Chairwoman Mozak called the meeting to order at 6:00pm

1. OPENING ITEMS

1.1 Approve Agenda

No additions or changes noted to the agenda.

Mr. Barr motioned to approve the agenda, seconded by Mr. Allemang.

No discussion on the motion.

All in favor of approving the agenda:

Mr. Mike Allemang: Yes
Mr. Simi Barr: Yes
Mr. Rich Chang: Yes
Ms. Julie Grand: Yes
Mr. Jesse Miller: Yes
Ms. Georgia Valentine: Yes
Chairwoman Kathleen Mozak: Yes

The motion to approve the agenda passed unanimously.

1.2 Public Comment

Mr. Dirk Mayhew requested the agency consider offering free fare for Election Day in November. He has spoken with several organizations within the community to fundraise for passes to distribute and has asked the agency to join in the efforts.

*** Mr. Gonyou joined the meeting at 6:03pm*

1.3 General Announcements

Chairwoman Mozak placed a request for Audit Task Force members as the group will need to be assembled by mid-October. She also reminded the Board to provide any input on the policy manual mock-up to Mr. Carpenter. She and Ms. Valentine shared their recent attendance at the APTA Transit Board conference in Detroit.

2. CONSENT AGENDA

2.1 Board Meeting Minutes: August 20, 2026

2.2 Committee Meeting Summaries

Mr. Chang motioned to accept the Consent Agenda, seconded by Mr. Miller.

No discussion on the motion.

All in favor of accepting the Consent Agenda:

Mr. Mike Allemang: Yes
Mr. Simi Barr: Yes
Mr. Rich Chang: Yes
Mr. Travis Gonyou: Yes
Ms. Julie Grand: Yes
Mr. Jesse Miller: Yes
Ms. Georgia Valentine: Yes
Chairwoman Kathleen Mozak: Yes

The motion to accept the Consent Agenda passed unanimously.

3. OWNERSHIP LINKAGE

3.1 OLTF

Mr. Chang shared that he is working to coordinate meetings with newly elected local officials along with putting together an outreach strategy to share with the Board.

4. POLICY MONITORING

4.1 Budget Discussion & Approval

Mr. Carpenter noted that there is a two-step process for the annual budget approval – first the Board accepts the Financial Planning & Budgeting monitoring report, followed by a vote to adopt the annual budget.

4.1.1 Monitoring 2.4 (Budgeting)

Ms. Reed presented the monitoring report for Financial Planning & Budgeting (Policy 2.4) with a notation that all policies were compliant and there had been no additional comments from Board members on the monitoring report survey. The Finance Committee reviewed the monitoring report and recommends that the Board accept the report as (A) a reasonable interpretation.

Ms. Grand motioned to accept the Financial Planning & Budgeting (Policy 2.4) monitoring report as (A) a reasonable interpretation, seconded by Ms. Valentine.

There was no discussion on the motion.

All in favor of accepting the Financial Planning & Budgeting (Policy 2.4) monitoring report as (A) a reasonable interpretation:

Mr. Mike Allemang: Yes
Mr. Simi Barr: Yes
Mr. Rich Chang: Yes
Mr. Travis Gonyou: Yes
Ms. Julie Grand: Yes
Mr. Jesse Miller: Yes
Ms. Georgia Valentine: Yes
Chairwoman Kathleen Mozak: Yes

The motion to accept the Financial Planning & Budgeting (policy 2.4) monitoring report as (A), a reasonable interpretation, passed unanimously.

4.1.2 FY2027 Budget Presentation & Approval

Ms. Reed presented the final FY2027 Operating and Capital Budget recommendation ([Board packet, pg. 210](#)) with \$78.2M for operations and \$46.6 in capital investment. The budget is balanced with full services maintained, strong income growth, no fare changes, cost pressures managed, funding for the union contract, and funding for capital projects.

Mr. Allemang motioned to adopt the FY2027 Operating & Capital Budget Resolution as presented, seconded by Mr. Miller.

There was no discussion on the motion.

All in favor of adopting the FY2027 Operating & Capital Budget Resolution as presented:

Mr. Mike Allemang: Yes
Mr. Simi Barr: Yes
Mr. Rich Chang: Yes
Mr. Travis Gonyou: Yes
Ms. Julie Grand: Yes
Mr. Jesse Miller: Yes
Ms. Georgia Valentine: Yes
Chairwoman Kathleen Mozak: Yes

The motion to adopt the FY2027 Operating & Capital Budget Resolution as presented passed unanimously.

4.2 Labor Negotiations

4.2.1 Closed Session (Pursuant to 8(c) of OMA)

Chairwoman Mozak took a roll call vote to go into Closed Session pursuant to 8(c) of the Open Meetings Act, the closed session is for strategy connected with the negotiation of a collective bargaining agreement.

Vote to go into closed session (Yes/No response):

Mr. Mike Allemang: Yes
Mr. Simi Barr: Yes
Mr. Rich Chang: Yes
Mr. Travis Gonyou: Yes
Ms. Julie Grand: Yes
Mr. Jesse Miller: Yes

Ms. Georgia Valentine: Yes
Chairwoman Kathleen Mozak: Yes

The Board unanimously voted to go into closed session at 6:18pm.

Vote to move out of closed session (Yes/No response):

Mr. Mike Allemang: Yes
Mr. Simi Barr: Yes
Mr. Rich Chang: Yes
Mr. Travis Gonyou: Yes
Ms. Julie Grand: Yes
Mr. Jesse Miller: Yes
Ms. Georgia Valentine: Yes
Chairwoman Kathleen Mozak: Yes

The Board unanimously voted to move out of closed session at 6:30pm.

4.2.2 Monitoring 2.3.6 – 2.3.8 (Labor Negotiations)

Mr. Carpenter noted that there is a two-step process for approving a labor contract – first the Board accepts the Policy 2.3.6-2.3.8 (Labor Negotiations) monitoring report, followed by a vote to approve the Collective Bargaining Agreement.

The Finance Committee reviewed the monitoring report and recommends that the Board accept the report as (A) a reasonable interpretation.

Mr. Allemang motioned to accept Policy 2.3.6 – 2.3.8 (Labor Negotiations) monitoring report as (A) a reasonable interpretation, seconded by Mr. Barr.

There was no discussion on the motion.

All in favor of accepting accept Policy 2.3.6 – 2.3.8 (Labor Negotiations) monitoring report as (A) a reasonable interpretation:

Mr. Mike Allemang: Yes
Mr. Simi Barr: Yes
Mr. Rich Chang: Yes
Mr. Travis Gonyou: Yes
Ms. Julie Grand: Yes
Mr. Jesse Miller: Yes
Ms. Georgia Valentine: Yes
Chairwoman Kathleen Mozak: Yes

The motion to accept Policy 2.3.6 – 2.3.8 (Labor Negotiations) monitoring report as (A), a reasonable interpretation, passed unanimously.

4.2.3 Collective Bargaining Agreement Approval

Chairwoman Mozak asked for someone to move approve the Tentative Agreement Resolution signing of the contract between AAATA and TWU Local 171.

Mr. Gonyou motioned to approve the TA Resolution, seconded by Ms. Grand.

There was no discussion on the motion.

All in favor of approving the TA Resolution:

Mr. Mike Allemang: Yes
Mr. Simi Barr: Yes
Mr. Rich Chang: Yes
Mr. Travis Gonyou: Yes
Ms. Julie Grand: Yes
Mr. Jesse Miller: Yes
Ms. Georgia Valentine: Yes
Chairwoman Kathleen Mozak: Yes

The motion to approve the TA Resolution passed unanimously.

4.3 Policy Language Discussion

Board members briefly discussed modifying the monitoring schedule for policies 2.3.6 – 2.3.8 to align with the negotiation schedule and agreed the monitoring schedule should be updated.

Ms. Grand put forth a motion to update the monitoring schedule so policies 2.3.6 – 2.3.8 are monitored concurrent with labor negotiations, seconded by Ms. Valentine.

There was no discussion on the motion.

All in favor of updating the monitoring schedule so policies 2.3.6 – 2.3.8 are monitored concurrent with labor negotiations:

Mr. Mike Allemang: Yes
Mr. Simi Barr: Yes
Mr. Rich Chang: Yes
Mr. Travis Gonyou: Yes
Ms. Julie Grand: Yes
Mr. Jesse Miller: Yes
Ms. Georgia Valentine: Yes
Chairwoman Kathleen Mozak: Yes

The motion to update the monitoring schedule so policies 2.3.6 – 2.3.8 are monitored concurrent with labor negotiations was accepted unanimously.

5. OPERATIONAL UPDATES

5.1 FY26 Q3 Service Report

Mr. Brooks presented the FY26 Q3 Service Report to the Board. He reported strong performance for the quarter – fixed route services were down 4% over the year as service was impacted with 17 detours across 13 routes along with the temporary BTC relocation, on time performance remained at 80%. There was a 40% increase to FlexRide and 17% trip denials and MV maintained a 97% trip fulfillment rate. He also included comparable performance with other agencies. He fielded questions from Board members related to complaint trends, trip denials, ridership declines and requests for multi-year quarterly ridership recording.

*** Ms. Grand left the meeting at 6:51pm*

5.2 Legislative Updates

Mr. Pfeifer shared updates on federal surface transportation legislation which will provide funding and policy priorities over the next 5 years and the continuing budget resolution to keep funding at the same level through December 11th. At the state level, Infrastructure Projects Authority Fund award results will be released within the next few weeks.

5.3 CEO Report

There was no additional discussion on the monthly CEO report.

6. EMERGENT ITEMS

6.1 Officer Elections (FY27 – Starts October)

In accordance with Article II, Section 2 of the Bylaws:

Nominations for each Board Officer position shall be made from the floor. Offices will be filled one at a time by roll call vote. Officers shall be elected in September and take office October 1 for a one-year term.

Chairwoman Mozak opened the floor for nomination for Board Secretary for FY 2027

Mr. Chang nominated Ms. Ramaswami

(Ms. Ramaswami, while not in attendance, had indicated she would accept a nomination for Board Secretary for FY 2027)

All in favor of nominating Ms. Ramaswami for Board Secretary:

Roll call vote (Yes/No response):

Mr. Mike Allemang: Yes
Mr. Simi Barr: Yes
Mr. Rich Chang: Yes
Mr. Travis Gonyou: Yes
Mr. Jesse Miller: Yes
Ms. Georgia Valentine: Yes
Chairwoman Kathleen Mozak: Yes

All in favor, none opposed.

Chairwoman Mozak opened the floor for nomination for Board Treasurer for FY 2027

Mr. Miller nominated Mr. Allemang.

Mr. Allemang accepted the nomination for Board Treasurer for FY 2027

All in favor of nominating Mr. Allemang for Board Treasurer:

Roll call vote (Yes/No response):

Mr. Mike Allemang: Yes
Mr. Simi Barr: Yes

Mr. Rich Chang: Yes
Mr. Travis Gonyou: Yes
Mr. Jesse Miller: Yes
Ms. Georgia Valentine: Yes
Chairwoman Kathleen Mozak: Yes

All in favor, none opposed.

Chairwoman Mozak opened the floor for nomination for Board Chair for FY 2027

Mr. Allemang nominated Ms. Mozak.

Ms. Mozak accepted the nomination for Board Chair for FY 2027

All in favor of nominating Ms. Mozak for Board Chair:

Roll call vote (Yes/No response):

Mr. Mike Allemang: Yes
Mr. Simi Barr: Yes
Mr. Rich Chang: Yes
Mr. Travis Gonyou: Yes
Mr. Jesse Miller: Yes
Ms. Georgia Valentine: Yes
Chairwoman Kathleen Mozak: Yes

All in favor, none opposed.

7. CLOSING ITEMS

7.1 Action Item Recap

- Chairwoman Mozak will send an email seeking volunteers for the Audit Task Force before their first meeting in November
- Board members are reminded to send policy manual mock-up input to Mr. Carpenter
- FY27 Operating and Capital Budget was adopted
- Both monitoring reports were accepted as "A"
- TA was approved
- Board policy manual monitoring schedule will be updated for 2.3.6 – 2.3.8 to be monitored concurrent with union negotiations

7.2 Topics for Next Meeting

Compensation & Benefits (2.3)

Construction (2.10)

Millage Recommendation (November)

7.3 Public Comment

No public commenters.

7.4 Adjournment

Ms. Valentine motioned to adjourn the meeting, seconded by Mr. Gonyou.

There was no discussion on the motion.

All in favor of adjourning the meeting:

Mr. Mike Allemang: Yes
Mr. Simi Barr: Yes
Mr. Rich Chang: Yes
Mr. Travis Gonyou: Yes
Mr. Jesse Miller: Yes
Ms. Georgia Valentine: Yes
Chairwoman Kathleen Mozak: Yes

Chairwoman Mozak adjourned the meeting at 7:18 pm.

Respectfully Submitted by Deborah Holt

Governance Committee Meeting Notes

Meeting Date/Time: Thursday, September 24, 2026, 3:00pm – 5:00pm

Members Present: Kathleen Mozak (Chair), Rich Chang

Members Absent: Mike Allemang

Staff: Matt Carpenter, Dina Reed, Raymond Hess, Jeff Pfeifer, Deb Holt

Location: REMOTE – Via Zoom

Chairwoman Mozak called the meeting to order at 3:01 pm

1. OPENING ITEMS

1.1 Agenda (Additions, Approval)

No additions or changes noted to the agenda.

1.2 Communications

Mr. Carpenter provided a brief operational update to the committee relating to a recent bus accident. Ms. Reed shared that the Board will be receiving information on an upcoming Title VI report which will be presented to the Board next month.

Chairwoman Mozak shared an update on changes to the Service Committee chair position which will take place in November.

2. BOARD DEVELOPMENT

2.1 Recruitment / Training / Attendance

Chairwoman Mozak deferred attendance updates to the October Governance Committee meeting. PG Bootcamp will be hosted next spring in Ann Arbor.

2.2 OLTF & Linkage Opportunities

Mr. Chang provided an update on a recent meeting with several Board members related to a strategy for engaging with local officials and planning for an upcoming millage.

2.3 Officer Election Results

The committee discussed officer election results from the September Board meeting.

2.4 Board Retreat

The committee discussed planning a retreat and what educational topics and/or priorities would be beneficial for both seasoned and newer board members. The committee will discuss it at the next Governance Committee meeting.

2.5 Digital Board Library

The committee discussed staff creating a SharePoint page for board documents and presentations to be easily accessible. Staff will begin organizing the document files from the past few years and share with committees in the upcoming months.

3. POLICY MONITORING & DEVELOPMENT

No policy monitoring or development discussion.

4. STRATEGY & OPERATIONAL UPDATES: CEO

4.1 Legislative Updates

Mr. Pfeifer noted that there are no new legislative updates at the state or federal level since the Board meeting. He is continuing to monitor upcoming election impacts. He also shared that IPAF award results have not yet been released by the State of Michigan.

5. EMERGENT ITEMS

No emergent items.

6. CLOSING ITEMS

6.1 Committee Agendas

Service Committee – No changes noted

Finance Committee – Finance committee will be cancelled due to a light agenda.

Board Meeting – Compensation & Benefits will be deferred to the November agenda, Construction Policy will be added to the agenda, add Title VI introduction under Emergent Items (move to the top of the agenda) and then Title VI approval for the November agenda.

6.2 Action Item Recap

- Board attendance / Survey participation was deferred to October Governance Committee
- Staff will begin work on building files in SharePoint
- Finance Committee meeting will be cancelled – committee will be notified
- Changes to Board meeting agenda –Construction Policy and Title VI introduction will be added to October agenda, Compensation & Benefits deferred to November along with Title VI approval

6.3 Topics for Next Meeting

Board attendance / survey participation
Board retreat

Future:
Governance Training Options
Vice Chair Succession Planning (Summer)
POSA Update
OLTF: TF/Committee Language

6.4 Adjournment

Chairwoman Mozak thanked the committee and staff and adjourned the meeting at 4:16pm.

Respectfully Submitted by Deborah Holt

DRAFT

Service Committee Meeting Notes

Meeting Date/Time: Tuesday, September 29, 2026, 3:00pm – 5:00pm

Members Present: Simi Barr (Chair), Rich Chang, Jesse Miller, Susan Pollay

Members Absent: Praveena Ramaswami (Excused)

Staff: Matt Carpenter, Raymond Hess, George Brooks, Jeff Pfeifer, Rosa-Maria Kamau, Deb Holt

Location: REMOTE – Via Zoom

Mr. Barr called the meeting to order at 3:02 pm

1. OPENING ITEMS

1.1 Agenda (Additions, Approval)

No changes noted for the agenda.

1.2 Communications

Mr. Hess provided an update on the Title VI program renewal –more detailed updates will be shared at the October Board meeting.

2. POLICY MONITORING & DEVELOPMENT

2.1 Environmental Sustainability: EL/Ends

Mr. Barr provided an overview of proposed revisions to the Ends policies related to sustainability. The committee discussed and agreed to move forward with presenting to the Board for their input

2.2 Construction (2.10)

Mr. Barr provided an overview of the Construction monitoring report, and all policies were shown to be in compliance and the Board survey responses agreed with the CEO interpretations / evidence. The committee will recommend that the Board accept the monitoring report as (A) a reasonable interpretation and the monitoring report will be added to the Consent Agenda.

3. STRATEGY & OPERATIONAL UPDATES: CEO

3.1 Legislative Update

Mr. Pfeifer shared brief legislative updates noting mid-term elections are a month away. He shared that a continuing resolution (federal level) for transportation funding is expected To occur in December. The IPAF grant awarding responses are expected to be released soon.

He and committee members discussed potential election impacts for transit.

4. EMERGENT ITEMS

None.

5. CLOSING ITEMS

5.1 Action Item Recap

- Environmental Sustainability: EL/Ends policy revisions will be added to October Board agenda
- Construction monitoring report will be added to the Consent Agenda – Service Committee recommends that the report be accepted as (A).

5.2 Topics for the Next Meeting

Treatment of the Traveling Public (2.1)

Future:
POSA Updates
Draft Fare Scope

5.3 Adjournment

Mr. Barr thanked the committee and staff and adjourned the meeting at 3:40pm.

Respectfully Submitted by Deborah Holt

Finance Committee Meeting Notes

Meeting Date/Time: Tuesday, October 6, 2026, 3:00pm – 5:00pm

Members: Mike Allemang (Chair/Treasurer), Travis Gonyou, Julie Grand, Georgia Valentine

At the September 24, 2026 Governance Committee Meeting, it was determined with a brief agenda and no pressing items of discussion, the October 6, 2026 Finance Committee Meeting would be cancelled.

Monitoring Report: Construction (Policy 2.10)

Monitoring Period: FY26: 1st October 2025- 30th Sept 2026

Service Committee Meeting Review Date: September 29, 2026
Board of Directors Meeting Review Date: October 15, 2026

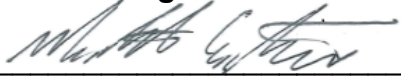
INFORMATION TYPE
Monitoring
RECOMMENDED ACTION(S)
The Service Committee reviewed at their September 29, 2026 meeting and recommends the Board consider accepting it as: (A) a reasonable interpretation for all policy items and that the evidence demonstrates compliance with the interpretations. (B) a reasonable interpretation for all policy items and that the evidence demonstrates compliance with the interpretations, except for the CEO's stated non-compliance with item(s) x.x, which the Board acknowledges and accepts the proposed dates for compliance. (C) 1. For policy items x.x.x – there is evidence of compliance with a reasonable interpretation 2. For policy items x.x.x – the interpretation is not reasonable 3. For policy items x.x.x – the interpretation is reasonable, but the evidence does not demonstrate compliance 4. For policy items x.x.x – the Board acknowledges and accepts the CEO's stated non-compliance and the proposed dates for compliance
PRIOR RELEVANT BOARD ACTIONS & POLICIES
Monitoring Reports are a key Policy Governance tool to assess organizational/CEO performance in achieving Ends (1.0) within Executive Limitations (2.0). A Policy-Governance-consistent Monitoring Process is: 1. CEO sends Monitoring Report to all board members 2. At Board meeting, board accepts Monitoring Report through majority vote (or if not acceptable, determines next steps)
ISSUE SUMMARY
TheRide's Board of Directors establishes policies that define what methods are unacceptable to use to achieve expected results, called Executive Limitations. This monitoring report provides the CEO's

interpretations of those policies, evidence of achievement, and an assertion on compliance with the Board's written goals. As with other monitoring reports, the Board decides whether the interpretations are reasonable, and the evidence is convincing.

Per Appendix A of the Board Policy Manual, this report was scheduled for monitoring in October and was submitted in October.

I certify that the information is true and complete, and I request that the Board accept this as indicating an acceptable level of compliance.

CEO's Signature



Date

September 21, 2026

ATTACHMENTS

1. Monitoring report for Construction (Policy 2.10)

Table of Contents

POLICY TITLE: CONSTRUCTION	Pg#	Compliance
2.10 The CEO shall not allow construction of a new building or facility or major renovation that is inconsistent with industry standards and grantor expectations, environmentally irresponsible, risks financial jeopardy, or is not aligned with achievement of the Board's Ends. Further, without limiting the scope of the above by the following list, the CEO shall not:	5	
2.10.1 Proceed with funding applications, detailed architecture or engineering, procurement of construction services, or real-estate transactions for a construction or major renovation project.	7	
2.10.1.1 Request authorization to proceed with a project prior to providing information that demonstrates that such construction is fiscally responsible and aligned with achievement of the board's Ends, and without providing data that supports an informed decision by the board – including but not limited to clearly articulated information about the following: A. Definition of the project's purpose and goals. B. Definition of the project's key elements and rationale for their inclusion. C. Definition of the project's strategic context, and contribution to advancing the board's Ends or other policies. D. Explanation of the project's priority relative to other capital needs. E. Estimates of the capital cost, ongoing operating and maintenance costs, and expected useful life associated with the project. F. Explanation of anticipated funding sources and financing mechanisms. G. Definition of risks associated with the project. H. Project timeline. I. Public involvement process.	8	
2.10.1.2 Request authorization to proceed with a project without incorporating it into an annual budget or a budget amendment.	10	
2.10.2 Expend funds on a construction project prior to having confirmed funding for that stage.	11	

2.10.3 Proceed with construction that does not minimize inconvenience to the travelling public and those businesses and residences directly impacted to the extent that is reasonably practicable.	12	
2.10.3.1 Proceed without providing timely and accurate information to the travelling public, residents and business owners.	13	
2.10.3.2 Proceed with construction project or changes to the project that could be foreseen to create significant resistance from the traveling public and external stakeholders because they had not had the opportunity for consultation.	14	
2.10.4 Allow the board to be unaware of political, residents' and businesses' issues related to the proposed construction.	15	
2.10.5 Allow the board to be without regular reports on the project's implementation, including but not limited to: A. Changes to the anticipated cost of the project. B. Changes to the elements/scope of the project. C. Changes to scheduled completion, delays or impacts to timelines. D. Timely notice of possible cost overruns and planned action to reduce impact.	16	



Fully Compliant



Partially Compliant



Non-Compliant

Preliminary CEO Interpretations and Evidence

POLICY 2.10

The CEO shall not allow construction of a new building or facility or major renovation that is inconsistent with industry standards and grantor expectations, environmentally irresponsible, risks financial jeopardy, or is not aligned with achievement of the Board's Ends. Further, without limiting the scope of the above by the following list, the CEO shall not:

Degree of Compliance

Compliant 

Interpretation

Operation definition:

I define key terms as follows:

1. A new “**building**” is an edifice or structure with walls and a roof which remains in one place and is intended to be permanent. This does not include structures such as bus shelters or temporary storage structures.
2. A new “**facility**” is a significant piece of infrastructure that remains in one place (e.g., a bus terminal platform, a park n ride lot, a storage yard, a rail line, road reconfigurations, significant utility work, etc.) and is intended to be permanent. A building can be a part of a larger facility. Due to their ubiquity and small scale, bus stops, pads, shelters and benches, and adjoining sidewalks are excluded.
3. A “**major renovation**” is a significant, permanent change to an existing building or facility that 1) changes the exterior dimensions, or 2) fundamentally changes the function of part or all of a building or facility. This does not include maintenance activities, repairs or routine upgrades, replacement of worn-out elements, or renovations of interior spaces, etc. (e.g., roof replacement, remodeling offices). Such projects are addressed through annual facility maintenance budgets and are not reported on under this policy. Any individual maintenance project costing more than \$250,000 will be identified individually in an annual budget proposal to increase transparency.
4. “**Construction**” means activities related to **implementation** of a physical project and does not include the **planning or exploratory work** needed for the development and design of such projects which are delegated to the CEO.
5. “**Industry standards**” means minimum construction requirements from regulatory or grantor agencies. “**Environmentally irresponsible**” means to violate law.
6. The concepts of fiscal jeopardy and aligning with Board's Ends are interpreted in policy 2.10.1.1.

The distinction between implementation activities and exploratory/planning work is reasonable because:

- This policy exists to ensure Board control over large financial or political **commitments**. Exploratory or planning work is not a commitment and the Board

still retains final authority. While such planning work may create public expectations, the CEO can take steps to manage such expectations, so they do not force the Board's hand.

- Facilities, and their construction, are a Means to achieve the Board's actual Ends. If planning and design work requires Board approval, the Board will be allowing itself to direct Means and projects will move much more slowly. This is supported by policies 3.1.4 and 4.3.3 in which the Board has delegated most Means to the CEO.
- This policy creates information and performance expectations for proposals from the CEO to the Board. The CEO could not meet those expectations unless they had the latitude to plan and develop projects to a sufficient degree. Exploratory work is often necessary for the CEO to decide whether a project is even viable and worth pursuing, and then to generate the information the Board is requesting. For example, exploratory studies may be necessary to develop preliminary cost estimates.
- Large studies will likely require Board authorization through the annual budget process, providing another means of Board oversight.

Measure/Standards & Achievement

Compliance with this policy will be demonstrated when

- A. Correspondence from the Federal Transit Administration (FTA) verifies that their expectations with respect to industry standards, environmental responsibility, construction, and grantor expectations have been met.
- B. Documentation of compliance with environmental requirements, local oversight and permitting agencies and procurement of appropriate permits and approvals (e.g. building codes, etc.).
- C. Lower-level policies are compliant, especially pertaining to finances and alignment with Ends.

Rationale

- A. Having compliance be determined by the FTA is reasonable because they provide most funding and set most rules, promulgate a great deal of information about standards that can be understood in advance and followed, and are an independent third party, who verifies whether expectations were met.
- B. Local or state regulatory bodies usually have oversight of construction activity – whether it be following the building code for new buildings or obtaining permits for construction activities in the public rights-of-way. Coordination and gaining appropriate approvals demonstrate TheRide is following proper protocols for construction activities.
- C. The Board has interpreted “financial risk” and “alignment with Ends achievement” in the lower-level policies below.

Evidence

Source of Data: Ypsi City Council Meeting Minutes and lower-level policy

Date of Data Review: 09/18/2026 as verified by Manager, Project Management and Delivery.

Data:

A. There was no qualifying construction-related activity that required FTA or state approval.

B. The Ypsilanti City Council approved the sale of two parcels for the new YTC.

No other approvals were required/granted.

C. All lower-level policies are compliant.

POLICY 2.10.1

Proceed with funding applications, detailed architecture or engineering, procurement of construction services, or real-estate transactions for a construction or major renovation project.

Degree of Compliance

Compliant 

Interpretation

Operational Definition

I interpret this policy to mean that Board approval must be secured before the CEO can proceed with the activities identified in this policy.

Measure/Standards & Achievement

Compliance with this policy will be demonstrated when Board meeting minutes indicate that formal Board approval was granted before the initiation of the following **construction implementation activities**:

- A. Applying for competitive grants or earmarks directly connected with implementation of a project,
- B. Hiring anyone to finalize plans/designs/engineering,
- C. Hiring anyone to provide demolition, earthwork, utility relocation, paving, or construction services, and
- D. The purchase, disposal or long-term encumbrance of land property.

Rationale

The use of meeting minutes is reasonable because board meeting minutes are the official documentation of board decisions, and the dates will document the sequence in which actions called out in this policy occurred.

Evidence

Source of Data: Board Meeting Minutes and Planning Documents

Date of Data Review: 09/18/2026 as verified by Manager, Project Management and Delivery and the Manager, Finance

Data:

A. As part of the FY 2026 budget approval, the Board authorized the procurement of a formal design contract for the BTC expansion project, subsequently retaining the Smith Group in April 2026 for design consultation. Additionally, the budget authorized construction activities for the YTC, leading to the June 2026 hiring of a construction manager to assist with pricing.

B. TheRide did not hire anyone to conduct demolition, earthwork, utility relocation, paving (bus stop paving is not considered construction and is addressed separately in policy 2.1)

C. The Board approved the purchase of land for the YTC project in June 18th, 2026. Initial payments were made on June 25th, 2026.

POLICY 2.10.1.1

Request authorization to proceed with a project prior to providing information that demonstrates that such construction is fiscally responsible and aligned with achievement of the board's Ends, and without providing data that supports an informed decision by the board – including but not limited to clearly articulated information about the following:

- A. Definition of the project's purpose and goals.
- B. Definition of the project's key elements and rationale for their inclusion.
- C. Definition of the project's strategic context, and contribution to advancing the board's Ends or other policies.
- D. Explanation of the project's priority relative to other capital needs.
- E. Estimates of the capital cost, ongoing operating and maintenance costs, and expected useful life associated with the project.
- F. Explanation of anticipated funding sources and financing mechanisms.
- G. Definition of risks associated with the project.
- H. Project timeline.
- I. Public involvement process.

Degree of Compliance

Compliant



Interpretation

Operational definition

I interpret this policy to mean that the CEO will provide the Board with the information identified in points A-I above before requesting authorization to proceed with the implementation activities of any construction project.

Measure/Standards & Achievement

Compliance with this policy will be demonstrated when the minutes of the Board meeting record that a CEO's request for Board approval of an element of implementation of a construction project comes in the form of a proposal that answers the questions identified for each of the elements interpreted below:

1. **Scope** – What is the nature of the project? What are the most important elements?
2. **Alignment with Ends & Rationale** – Description of how the project will advance specific goals identified by the Board.
3. **Public Involvement** – How has the public been engaged in the development of the proposal thus far? How will the public be engaged going forward?
4. **Priority** – Why is this project being prioritized and how does it compare with other projects? How would this project affect the 10-Year Capital Plan?
5. **Fiscal responsibility** –
 - a. What are the anticipated capital and operating costs during the life of the project?
 - b. How will the capital and operating costs of the project be paid during the lifespan of the project? What assumptions are made regarding outside grant funding, funding from the Capital Reserve, or local millage funds?
 - c. How would the approval of this project impact on the agency's ability to maintain existing services and infrastructure, or afford other projects?
6. **Timeline** – What are the expected dates of major milestones such as construction, opening/initiation, operating lifespan, decommissioning?

Rationale:

This interpretation is reasonable because minutes are the official record of the Board's meetings and identify when a request is made. The elements of the proposal address all of the items specified by the Board in its policy.

Evidence

Source of Data: Board meeting minutes

Date of Data Review: 09/05/2025 as verified by Manager, Project Management and Delivery, DCEO, Finance and Admin and the Corporate Strategy & Performance Officer

Data:

On June 18, 2026, the CEO requested authorization to proceed with YTC land acquisition. A review of Board meeting packet indicate that details A-I were captured in the authorization request. There were no other construction-related requests for authorization during the monitoring period.

POLICY 2.10.1.2

Request authorization to proceed with a project without incorporating it into an annual budget or a budget amendment.

Degree of Compliance

Compliant

**Interpretation**Operational Definition

I interpret this policy to mean that construction implementation activities should be part of a Board-approved budget.

Measure/Standards & Achievement

Compliance with this policy will be demonstrated when meeting minutes demonstrate that all requests to fund implementation activities were identified to the Board as part of the budget process, either the regular budget-approval or through a mid-year budget amendment.

Rationale

This interpretation is reasonable because minutes are the official record of the Board's meetings and identify if and when a request is made, and whether it was approved.

Evidence

Source of Data: Financial and planning documents, Board meeting minutes.

Date of Data Review: 09/18/2026 as verified by Manager, Finance

Data:

TheRide asked the Board to approve the YTC land procurement in June 18th, 2026. These expenses were built into the adopted FY 2026 budget (page 11).

POLICY 2.10.2

Expend funds on a construction project prior to having confirmed funding for that stage

Degree of Compliance

Compliant

**Interpretation**Operational Definition

I interpret this policy to mean that activities requiring compensation will not be initiated until the corresponding funding has been reasonably ensured, such as through commitment of funds already in possession or grant agreements with outside funders.

Measure/Standards & Achievement

Compliance will be demonstrated when dates for the initial written notice-to-proceed orders and first invoices occur after confirmation that funding is available, such as Board approval of a budget or written confirmation from an outside funder (e.g., notice of award or full funding grant agreement from the FTA).

Rationale

This is reasonable because it will prevent the organization from incurring unfunded liabilities if anticipated funding does not materialize. Further, each stage of a project can have an initiation point with an initial notice-to proceed order that is always in writing with a date, and dated invoices precede expenditures. Only the initial dates are warranted because there could be hundreds of subsequent invoices for various stages, but none could occur without the initial notice to proceed. Funding confirmations come from the Board vote, or state or federal government and should not be considered final until written notice is received

Evidence

Source of Data: AAATA Budget document

Date of Data Review: 09/18/2026 as verified by Manager, Finance

The adopted FY 2026 budget allocated funds for YTC land acquisition, design completion, and construction. An initial deposit was made later in June 25th, 2026.

No further payments occurred during the fiscal year, and no notice to proceed has been issued for construction.

POLICY 2.10.3

Proceed with construction that does not minimize inconvenience to the travelling public and those businesses and residences directly impacted to the extent that is reasonably practicable.

Degree of Compliance

Compliant 

InterpretationOperational Definition.

I interpret this policy to mean that the agency will identify situations in advance that may inconvenience the traveling public and the surrounding businesses and residences and do its best to mitigate such occurrences prior to construction.

Measure/Standards & Achievement

- A. Construction projects include a plan to minimize or mitigate public inconvenience that is deemed reasonable by the CEO and in the context of the project.
- B. Lower-level policies are compliant

Rationale

- A. Construction projects almost always cause some level of disruption, vary in scale and impact, and therefore need to be developed in context. The requirement for a plan allows for this context while ensuring the issue is addressed beforehand.
- B. Compliance with this policy is dependent on compliance of its sub policies.

Evidence

Source of Data: Board meeting minutes, AAATA Planning and Marketing records

Date of Data Review: 09/18/2026 as verified by Managers, Project Management and Delivery and Public Affairs and Community Engagement

Data:

A. The BTC construction project was expected to disrupt passenger routines starting in May 2026. The Board was briefed on this development during the December 18th, 2025 Board meeting. To mitigate public inconvenience, staff developed a mitigation plan that included relocating the terminal function and informed all concerned parties beginning in February 2026.

B. Lower-level policies are compliant

POLICY 2.10.3.1

Proceed without providing timely and accurate information to the travelling public, residents and business owners.

Degree of Compliance

Compliant

**Interpretation**Operational Definition

I interpret this policy to mean that the agency will notify the traveling public and any business or residence that will be or is likely to be impacted by the construction project prior to beginning activities that could cause disruption.

Measure/Standards & Achievement

Compliance with this policy will be demonstrated when review of public notices about foreseeable construction-related disruptions (e.g., closures, changes to services, etc.) confirms that notices were provided at least 7 days before activities begin, or blanket notices about uncertain timing are provided at least 14 days in advance. Public notice includes, at a minimum: media releases, website and social media notices, hardcopy notices where applicable, attempts to information nearby residents and property owners.

Rationale

These time periods are reasonable because they allow the public to make alternate arrangements, and construction timelines can sometimes need to change to keep a project progressing on schedule or on budget. Additionally, public notices are our standard means of informing the public and are recognized as official. Finally, non-construction information is addressed under policy 2.1.2.

Evidence

Source of Data: AAATA Planning and Marketing Records

Date of Data Review: 09/18/2026 as verified by Manager, Public Affairs and Community Engagement

Data:

The BTC terminal was scheduled to be closed as of May 2026. Internal records indicate that the following notices were sent at least three months in advance and as follows:

- February to April: "Coming soon!" messaging which built communications up as we got closer to relocating services from BTC
- May to date: "It's happening!" messaging was sent out
- August to early September: "Reminder!" messaging was sent out geared at addressing students returning to the community.

Communication was diversified to reach different audiences and included social media, paid media, flag pole banners, sidewalk decals, signage at shelters on 4th and at Pioneer, signage on windows/doors at BTC, bus cards, ride guide communications, letters to businesses near 5th and Washington, on the ground engagement with customers at temporary site, letters to A-Ride users, letters to GoldRide users and flyers/handouts.

POLICY 2.10.3.2

Proceed with construction project or changes to the project that could be foreseen to create significant resistance from the traveling public and external stakeholders because they had not had the opportunity for consultation.

Degree of Compliance

Compliant

**Interpretation**Operational Definition

I interpret this policy to apply to the logistics and impacts of direct construction activities (i.e., closures, site prep, demolition, earthworks, excavation, utility changes, paving, construction, etc.), not preceding decisions about project need, scope, cost, location, etc., covered under 2.7.5.5 (general public consultation requirement). The policy does not require construction to stop due to resistance, only that there were reasonable opportunities for input beforehand

Measure/Standards & Achievement

Compliance with this policy will be demonstrated when reasonable consultation opportunities were available prior to finalizing construction plans and are publicized beforehand. Consultation includes providing information on anticipated construction activities and plans, opportunities to provide feedback and identify concerns, efforts to mitigate impacts, and notice of final decision. Depending on the project context, this could include posted notices, website information, or public meetings.

Rationale

This interpretation is reasonable because it recognizes that construction is inherently disruptive and can cause resistance, requires consultation, attempts at mitigation before construction begins, and calls for communication with the public beforehand.

Evidence

Source of Data: Planning documents and Board meeting documents

Date of Data Review: 09/18/2026 as verified by Manager, Project Management and Delivery

Data:

Construction around the BTC were projects of the Ann Arbor DDA and Ann Arbor Housing Commission, not TheRide. Consequently, we did not proceed with any construction and our

own public involvement was not required. However, those organizations did conduct public involvement.

POLICY 2.10.4

Allow the board to be unaware of political, residents' and businesses' issues related to the proposed construction.

Degree of Compliance

Compliant 

InterpretationOperational Standard

I interpret this policy to be a request for additional incidental information regarding concerns or objections to construction activities. This includes, but is not limited to, concerns from elected leaders, and nearby residents or businesses that could be impacted by the activities. This includes the period before activities begin and until construction is complete. This is specific to construction activities as opposed to planning work.

Measure/Standards & Achievement

Compliance will be demonstrated when a review of board meeting materials and/or agency email communications finds that all significant known concerns with construction activities have been shared with the board.

Rationale

Sharing such information with the Board during meetings, or by email if time sensitive, is a reasonable way to meet the Board's expectations.

Evidence

Source of Data: Board meeting minutes, BTC Relocation Communications

Date of Data Review: 09/18/2026 as verified by Managers of Project Management and Delivery and Public Affairs and Community Engagement.

Data:

Construction at the BTC was expected to disrupt rider routines starting in May 2026. The Board was formally notified of this on December 18, 2025. Notices to those that would be impacted began going out in February 2026. The relocation proceeded as scheduled without major issues, and an update was delivered to the Board on May 21, 2026.

POLICY 2.10.5

Allow the board to be without regular reports on the project's implementation, including but not limited to:

- A. Changes to the anticipated cost of the project.
- B. Changes to the elements/scope of the project.
- C. Changes to scheduled completion, delays or impacts to timelines.
- D. Timely notice of possible cost overruns and planned action to reduce impact.

Degree of Compliance

Compliant

**Interpretation**Operational Definition

I Interpret this to mean significant changes to a qualifying construction project that will impact the overall cost, scope, or deadlines should be communicated to the Board in a timely manner.

Measure/Standards & Achievement

Compliance with this policy will be demonstrated when the Board receives at least monthly updates on construction projects which address the details outlined in items A-D above in comparison with assumptions and expectations created at the beginning of the project.

Rationale

This interpretation is reasonable because items A-D are self-explanatory, and monthly updates can be provided at board meetings.

Evidence

Source of Data: AAATA Planning documents and Board meeting minutes.

Date of Data Review: 09/18/2026 as verified by Manager, Project Management and Delivery

Data: Construction and related project updates were delivered to the Board monthly via the CEO report. As indicated in the reports, there were no material changes regarding cost, scope, or schedule.

Policy Trendlines

Policies	FY23	FY24	FY25	FY26
2.10				
2.10.1				
2.10.1.1				
2.10.1.2				
2.10.2				
2.10.3				
2.10.3.1				
2.10.3.2				
2.10.4				
2.10.5				

LEGEND	
	Policy is not compliant
	Policy is partially compliant *
	Policy is compliant
	Compliance cannot be determined*
*- TheRide no longer uses partially compliant or compliance cannot be determined. Policies are now presented as compliant or noncompliant.	

Guidance on Determining “Reasonableness” of CEO Interpretations

Are the interpretations reasonable?

An interpretation is reasonable if the following are provided,

1. a measure or standard,
2. a defensible rationale for the measure or standard,
3. a level of achievement necessary to achieve compliance and
4. a rationale for the level of achievement.

Is evidence verifiable?

Evidence is verifiable if there is

1. actual measurement/data,
2. the source of data and
3. the date when data was collected is provided.

CEO Notes: (If Applicable)**Board's Conclusion on Monitoring Report****Board's conclusion after monitoring the report.**

Following the Board's review and discussion with the CEO, the Board finds that the CEO:

- (A) a reasonable interpretation for **all** policy items and that the evidence demonstrates compliance with the interpretations.
- (B) a reasonable interpretation for all policy items and that the evidence demonstrates compliance with the interpretations, except for the CEO's stated non-compliance with item(s) x .x, which the Board acknowledges and accepts the proposed dates for compliance.
- (C)
 - 1. For policy items x.x.x – there is evidence of compliance with a reasonable interpretation
 - 2. For policy items x.x.x – the interpretation is not reasonable
 - 3. For policy items x.x.x – the interpretation is reasonable, but the evidence does not demonstrate compliance
 - 4. For policy items x.x.x – the Board acknowledges and accepts the CEO's stated non-compliance and the proposed dates for compliance

Board Notes: (If Applicable)

WORKSHEET RESULTS

Construction (Policy 2.10)

Participants: (7) Board Members

Mike Allemang, Simi Barr, Rich Chang, Jesse Miller, Kathleen Mozak,
Susan Pollay, Georgia Valentine

Performance on reasonable interpretation and verifiable evidence

Policy 2.10

The CEO shall not allow construction of a new building or facility or major renovation that is inconsistent with industry standards and grantor expectations, environmentally irresponsible, risks financial jeopardy, or is not aligned with achievement of the Board's Ends.

Further, without limiting the scope of the above by the following list, the CEO shall not:

Percent of Board members that find the interpretation reasonable	100%
Percent of Board members that find the evidence verifiable	100%

If you stated NO, kindly provide additional context: N/A

Policy 2.10.1

Proceed with funding applications, detailed architecture or engineering, procurement of construction services, or real-estate transactions for a construction or major renovation project.

Percent of Board members that find the interpretation reasonable	100%
Percent of Board members that find the evidence verifiable	100%

If you stated NO, kindly provide additional context: N/A

Policy 2.10.1.1

Request authorization to proceed with a project prior to providing information that demonstrates that such construction is fiscally responsible and aligned with achievement of the board's Ends, and without providing data that supports an informed decision by the board – including but not limited to clearly articulated information about the following:

- A. Definition of the project's purpose and goals.
- B. Definition of the project's key elements and rationale for their inclusion.
- C. Definition of the project's strategic context, and contribution to advancing the board's Ends or other policies.
- D. Explanation of the project's priority relative to other capital needs.

- E. Estimates of the capital cost, ongoing operating and maintenance costs, and expected useful life associated with the project.
- F. Explanation of anticipated funding sources and financing mechanisms.
- G. Definition of risks associated with the project.
- H. Project timeline. I. Public involvement process

Percent of Board members that find the interpretation reasonable	100%
Percent of Board members that find the evidence verifiable	100%

If you stated NO, kindly provide additional context: N/A

Policy 2.10.1.2

Request authorization to proceed with a project without incorporating it into an annual budget or a budget amendment.

Percent of Board members that find the interpretation reasonable	100%
Percent of Board members that find the evidence verifiable	100%

If you stated NO, kindly provide additional context: N/A

Policy 2.10.2

Expend funds on a construction project prior to having confirmed funding for that stage.

Percent of Board members that find the interpretation reasonable	100%
Percent of Board members that find the evidence verifiable	100%

If you stated NO, kindly provide additional context: N/A

Policy 2.10.3

Proceed with construction that does not minimize inconvenience to the travelling public and those businesses and residences directly impacted to the extent that is reasonably practicable.

Percent of Board members that find the interpretation reasonable	100%
Percent of Board members that find the evidence verifiable	100%

If you stated NO, kindly provide additional context: N/A

Policy 2.10.3.1

Proceed without providing timely and accurate information to the travelling public, residents and business owners

Percent of Board members that find the interpretation reasonable	100%
Percent of Board members that find the evidence verifiable	100%

If you stated NO, kindly provide additional context: N/A

Policy 2.10.3.2

Proceed with construction project or changes to the project that could be foreseen to create significant resistance from the traveling public and external stakeholders because they had not had the opportunity for consultation.

Percent of Board members that find the interpretation reasonable	100%
Percent of Board members that find the evidence verifiable	100%

If you stated NO, kindly provide additional context:

Yes response:

- Did we conduct engagement with the businesses/organizations on Washington prior to the temp BTC move? I could see that referenced as evidence for this policy.

Policy 2.10.4

Allow the board to be unaware of political, residents' and businesses' issues related to the proposed construction.

Percent of Board members that find the interpretation reasonable	100%
Percent of Board members that find the evidence verifiable	100%

If you stated NO, kindly provide additional context: N/A

Policy 2.10.5

Allow the board to be without regular reports on the project's implementation, including but not limited to:

- Changes to the anticipated cost of the project.
- Changes to the elements/scope of the project.
- Changes to scheduled completion, delays or impacts to timelines.
- Timely notice of possible cost overruns and planned action to reduce impact.

Percent of Board members that find the interpretation reasonable	100%
Percent of Board members that find the evidence verifiable	100%

If you stated NO, kindly provide additional context: N/A

Additional context questions

1. Is there any reason to doubt the integrity of the information presented?

NO – (7)

2. If the CEO has indicated **NON-COMPLIANCE** with any aspect of this policy, is there a commitment as to when the Board can expect to see compliance and is the proposed time-frame acceptable?

N/A – (7)

If you stated NO, kindly provide additional context: N/A

3. Having reviewed the monitoring report, does anything you have learned make you consider whether the **POLICY ITSELF** should be amended? (Policy amendment is not monitoring but should be addressed as a board decision.)

NO – (6)

YES – (1)

If you stated YES, kindly provide additional context:

- Should we add language to 2.10.1 like "... without prior approval of the board"?

4. Approximately how many minutes did it take you to fill out this form?

10, 25, 35, 15, 5, 10, 35

Changes to Environmental Sustainability Policies

Meeting: Board of Directors

Meeting Date: October 15, 2026

INFORMATION TYPE

Decision

RECOMMENDED ACTION(S)

That the Board amend the Board policy manual as per Attachment 2, on the recommendation of the Service Committee.

ISSUE SUMMARY

After adopting new Ends policies in January 2026, the full Board recognized redundancies between Ends policies and Executive Limitations policies regarding environmental sustainability (Attachment 1). It was noted that the repetition resulted in two virtually identical monitoring reports from the CEO and that the Board's expectations could be made even clearer. The Board charged the Service Committee with examining these challenges and recommending a path forward.

After several discussions, in September the Committee was able to recommend a single set of policies that they believe will clarify the agency's comprehensive commitment to sustainability while eliminating redundancies (Attachment 2).

BACKGROUND & RECOMMENDATION
--

Because environmental sustainability goals are both external and internal, the Service Committee recognized the contradiction of attempting to address both concerns in a single policy; Ends policies are focused on *external results* while Executive Limitations policies are intended to prevent unacceptable *internal activities* and circumstances (risk management).

The proposal below addresses these issues by dealing with internal and external concerns separately. It also clarifies the interest in indirect emissions and the goal of *eliminating* carbon emissions. There are three proposed changes to current policy:

1. **Policy Consolidation & Clarification:** Transfer the details from the Executive Limitation policy 2.11 into the Ends policy 1.4 while reformatting but without losing important expectations, eliminate references to 'activities', focus exclusively on beneficiaries and external results, and add clarifications regarding indirect emissions and elimination of carbon. It is expected that the resulting CEO interpretation and monitoring report would look similar to [the most recent version](#) in 2025. The CEO has offered that his interpretation of the new policy is that it will apply organization-wide not only to buses.
2. **Separate Discussions of Internal Activities from External Impacts:** Add a new requirement in policy 2.9 (Communication to the Board) for "incidental information" specifically about internal environmental *activities*. This allows the Board to ask operational questions freely outside of the policy monitoring process.

3. **Delete the Legacy Executive Limitation Policy:** Replaced by the new Ends policy.

These changes would clarify the overall status of environmental sustainability as an End, while allowing Board insight into operational activities (2.9). It would eliminate redundant monitoring reports on environmental results/impacts. No expectations are lost, specificity is increased, and new channels for discussion of activities are created.

PRIOR RELEVANT BOARD ACTIONS & POLICIES

Policy 1.2 regarding environmental impacts outside the organization

Policy 2.11 regarding environmental sustainability on agency operations

IMPACTS OF RECOMMENDED ACTION(S)

- Budgetary/Fiscal: N/A
- Social: N/A
- Environmental: N/A
- Governance: Clarification of Board expectations via written policy

ALTERNATIVE OPTION(S)

Take no action. Consider other policies options.

ATTACHMENTS

1. **Existing Environmental Policies - 1.4 and 2.11**
2. **Recommended Policy Changes**

Attachment 1: Existing Environmental Policies - 1.4 and 2.11

Recent Ends Policies (Created December 2025)

1.4 TheRide positively impacts the environment and carbon emission sare reduced.

Legacy Executive Limitation Policy (approved 2023)

2.11 ENVIRONMENTAL SUSTAINABILITY

The CEO will not cause or allow organizational practices or activities that are inconsistent with achieving environmental sustainability.

Further, without limiting the scope of the above statement by the following list, the CEO shall not:

- 2.11.1 Operate without measures to minimize, reduce, and eliminate emissions including greenhouse gasses and air pollutants.
- 2.11.2 Allow organizational operations that are inconsistent with the achievement of carbon neutrality.
- 2.11.3 Operate without processes that minimize material and energy consumption and provide for proper disposal of waste.
- 2.11.4 Allow operations which do not minimize harmful local ecological impact.

Attachment 2: Recommended Policy Changes

Proposed changes to existing policies are provided below. Deletions are struck through and additions are highlighted.

1.0 ENDS

~~1.4. The Ride positively impacts the environment and carbon emissions are reduced.~~ (Deleted)

1.4. Residents benefit from reductions of The Ride's direct and indirect environmental impacts including emissions, waste, and localized impacts.

1.4.1 Residents benefit from the absence of carbon and greenhouse gas emissions, and criteria air pollutants.

2.9 COMMUNICATION AND SUPPORT TO THE BOARD

2.9.1.5 Let the Board be unaware of ...any other incidental information requested by the Board. Incidental information includes...

J. An annual update on goals, activities, impacts and trends regarding environmental initiatives.

Legacy policy 2.11 is deleted

Suspension of Fares on Nov 3rd, 2026 (FY 2027 Budget Amendment)

Meeting: Board of Directors

Meeting Date: October 15, 2026

INFORMATION TYPE

Decision

RECOMMENDED ACTION(S)

That the Board authorize the CEO to suspend fare collection for a single day on November 3rd, 2026 (Election Day) *subject to* the CEO reaching an acceptable cost-sharing agreement with Washtenaw County that reimburses TheRide for fare revenue.

ISSUE SUMMARY

Washtenaw County has approached TheRide and offered to pay for all fares for a single day on November 3rd (Election Day). They want to run a pilot project to ascertain whether eliminating transit fares can increase civic engagement and voter turnout by making it easier to access polling stations. The pilot would suspend passenger fare payment for fixed-route, FlexRide and ARide services that day to any destination and for any purpose. In the County would pay the those fares via an invoice. This is a one-time pilot project with no future commitments.

The CEO is recommending that the Board consider accepting this offer because A) it seems to advance Board End policy 1.3 (No barriers) and B) provides a low-risk way to ascertain how ridership can be affected by the elimination of fares. The CEO requires Board approval to suspend fare collection. Time is a factor as this meeting (Oct 15th) is the last scheduled meeting before November 3rd, although a special meeting could be called if necessary.

Board policy 2.5.12 lays out the process for the CEO to seek Board approval before “adjusting” fares (Attachment 1). The CEO’s proposal is contained in Attachment 2 along with other considerations.

In addition, given the short timeline of the pilot, written agreements between the County and TheRide may not be ready before our meeting or election day. Therefore, the CEO is requesting the authority to suspend fare collection as long as a suitable final agreement can be reached with the County.

BACKGROUND

The County has verbally agreed to compensate TheRide based on tabulations of actual ridership on Election Day. This eliminates financial risk for TheRide by creating a revenue-neutral proposal that would accommodate any additional riders – we will be receiving the same amount of revenue either way, albeit through different channels. Final costs cannot be tabulated until after November 3rd. TheRide has estimated one-day fare revenue could range from \$25,000 to \$35,000.

Further, the eventual agreement with the County will constitute a revenue contract not anticipated in the recently approved annual budget. While entering into the contract is

already with the CEO's delegated authority (policy 2.5.6), he wants to make sure the Board is aware of the development.

PRIOR RELEVANT BOARD ACTIONS & POLICIES

Policy 2.5.12 – Requires the CEO to take certain steps to request Board approval for a fare change.

Policy 3.2.9 – Gives the Board the authority to make fare 'increases' although this has been interpreted to have meant any fare changes.

IMPACTS OF RECOMMENDED ACTION(S)

- Budgetary/Fiscal: It is the intent for this decision to be revenue neutral for TheRide's.
- Social: As a pilot project, the effort will help to determine how many additional people may have voted.
- Environmental: N/A
- Governance: Policy rules for fare changes.

ALTERNATIVE OPTION(S)

The Board can decline the County's offer or request additional information from the CEO. Time is a factor as this meeting (Oct 15th) is the last scheduled meeting before November 3rd, although a special meeting could be called if necessary.

ATTACHMENTS

1. Board Policy 2.5 and 2.5.12
2. CEO Proposal to Adjust Fares (Budget Amendment 01-FY2027)

Attachment 1: Board Policy 2.5.12 Regarding Fare Adjustments

2.5 FINANCIAL CONDITION AND ACTIVITIES

With respect to the actual, ongoing financial condition and activities, the CEO will not cause, allow or fail to address the development of fiscal jeopardy or deviation of actual expenditures from Board priorities established in Ends policies. This includes but is not limited to...

2.5.12 (the CEO will not) Adjust passenger fares.

2.5.12.1 Request authorization to adjust passenger fares without (a) incorporating the request into a budget or budget amendment for board consideration, (b) providing data that demonstrates the fare adjustment is fiscally responsible and aligned with achievement of the board's Ends, and (c) providing data that supports an informed decision by the board – including but not limited to clearly articulated information about the following:

- A. A clear listing of all proposed fare categories/types and prices, along with supporting information.*
- B. The fare discounts to be provided for low-income residents and other vulnerable populations and rationale for how residents qualify for fare discounts.*
- C. The impact of the proposed adjustment on equity among different fare categories.*
- D. The implication of the proposed fare adjustment on ridership.*
- E. The implications of the proposed adjustment on the authority's budget and the financial trade-offs required (e.g. tax rate increase/decrease, increased/decreased services, impact on reserve or deficit, etc.).*
- F. Opportunities that users, residents, Legal Owners, and stakeholders had to provide feedback on the proposed adjustment, the nature of their feedback, and how their feedback has been addressed.*

Attachment 2: CEO Proposal to Adjust Fares (Budget Amendment 01-FY2027)

Background

Washtenaw County has proposed to conduct a pilot project of eliminating transit fares for a single day on November 3rd. To this end, they have proposed compensating TheRide for the revenue we lose on that day by foregoing fare collection. We will monitor changes in ridership levels carefully.

Proposal

The CEO is seeking the Board's authorization to A) suspend fare collection on November 3rd, 2026, provided a revenue-neutral agreement is reached in time, and also to B) amend the FY2027 Budget (Approved September 2026) to accept unanticipated revenue from Washtenaw County in lieu of fare revenue.

If approved, staff will finalize an agreement to invoice the County for trips taken on fixed-route, FlexRide and ARide services on November 3rd. That day, fareboxes will be covered and fares will not be accepted. TheRide will make a special count of all trips, apply any appropriate factors, and bill the County accordingly. The goal is to hold TheRide harmless and replace the revenue and not to overcharge the County. The County has made a verbal agreement to compensate TheRide along these lines.

The suspension of fares and the special count do create some logistical changes for TheRide but the CEO believes these are a reasonable in-kind contribution as part of the partnership for this pilot project. While the financial risks has been addressed, there will be some residual risk-sharing with the County, outlined below.

Information Required Per Policy 2.5.12

Per policy 2.5.12.1, the CEO submits the following information for the Board's consideration:

- (a) This request is to amend the FY 2027 Budget regarding fare revenue.
- (b) The proposal is fiscally responsible as it is revenue neutral for TheRide. The agency will tabulate the number of riders on November 3rd, and invoice the County for the foregone revenue represented by those trips. The result is expected to be revenue neutral. Initial estimates place the cost between \$25,000-\$35,000.

The proposal is aligned with the Board's Ends policy 1.3 (reduce barriers) as it provides a low-risk opportunity determine how much the elimination of a barrier (travel costs) encourages ridership.

- (c) Clear information about:

A. Impacted fare categories: All fare categories will be suspended on November 3rd for fixed-route, FlexRide and ARide services. This does not include vanpool, or D2A2 or Michigan Flyer services. Vanpool does not collect fares per se, and the other services are controlled by other organizations.

B. Special Discounts: With fare collection suspended, there are no needs to qualify, and no additional discounts can be provided. All travelers will benefit from the absence of fares, although low-income riders may benefit disproportionately.

C. Equity Between Fares: All fare categories and riders receive the same benefit. There are no known inequities created by this suspension.

D. Ridership: To Be Determined. It is not known how much, if at all, ridership may change due the suspension of fares for a single day on November 3rd.

E. Budget Impacts: None. Fare revenue will be paid by Washtenaw County.

F. Public Input on Proposal: There has been no time to facilitate public input on this proposal. The offer from the County was received on October 7th, 2026. However, TheRide has received several requests to suspend fare collection on November 3rd in the last year.

In addition to the required information, the CEO offers the additional thoughts:

Regulatory compliance: The suspension of all fares eliminates legal concerns about illegal inequities between categories of riders or fares. It is legal under Title VI. It is necessary to suspend fares for paratransit (ARide) to avoid any perception of discrimination.

Reputational: While TheRide may receive some appreciation in 2026, we may also be opening ourselves up to some criticism; the pilot may create expectations of future fare suspensions, we may experience excessive riding for no purpose, we cannot adjust service to serve all polling stations directly, and some polling locations may not have sufficient service. TheRide has encouraged the County to consider extending the pilot to nearby transit operators outside our service area (WAVE, People's Express) but it appears that the pilot will be limited to TheRide. We do not know what sort of public feedback this may create.

Trip Purpose: TheRide will not attempt to limit travel only to polling locations. Travelers can travel for any reason and to any location. Travelers will not be asked the reason for their travel. TheRide has no capacity to collect such information, which could be seen as invasive or even discriminatory. This will make the results of the pilot less obvious.

Public Communication: The County will be leading public communications for the pilot. TheRide expects to amplify and clarify messages about public expectations for November 3rd. These plans are still in development.

Induced Demand: Eliminating the fee for travel may encourage people to travel more for any purpose. While this will not be a challenge or fixed-route, it may stress vehicle capacity of on-demand service like ARide and FlexRide. Additional steps are being taken in case of challenging levels of demand

Regardless of the outcome, this pilot should be seen as one indicator of interest in election day travel and the impact of suspending fare on ridership more generally. It is a isolated case that will not have a chance to be well known. Nevertheless, the ridership counts will be of interest for the forthcoming fare study.

Title VI Program Update Approval

Meeting: Board of Director's

Meeting Date: October 15, 2026

INFORMATION TYPE

Decision Preparation

RECOMMENDED ACTION(S)

Receive for information. Decision anticipated in November.

ISSUE SUMMARY

To maintain AAATA's eligibility for federal funding, AAATA must submit its routine Title VI program update report to the Federal Transit Administration (FTA) by November 30, 2026. Although a highly technical Means document prepared by staff, the FTA requires our Board to approve the document. Historically, the Board has approved this document via the Consent Agenda as a "Required Approval".

The key components of the Title VI Program include the Title VI Complaint Procedure, the Public Input Policy for Service and Fare Change, and the Equity Analysis Policy for Service and Fare Change. Other Areas of the Title VI Program including Language Assistance Plan, Demographic and Service Profile, Demographic Ridership and Travel Patterns, and Service Standards and Guidelines Monitoring have also been updated based on the most recent Census (2020) and American Community Survey (ACS) 5-Year Data, AAATA's 2024 Onboard Rider Survey, and AAATA's Recent Operational Data. The draft of the Title VI Program Update report is attached for Board review.

BACKGROUND

The Department of Transportation (DOT) requires recipients of DOT funds to demonstrate compliance with Title VI of the Civil Rights Act of 1964 through regular compliance reports. The FTA Circular 4702.1B, "Title VI Requirements and Guidelines for FTA Recipients" sets forth the information that should be included in the Title VI program updates and requires them to be submitted as Title VI programs every three years.

As required by Title VI of the Civil Rights Act of 1964, AAATA's Title VI program needs to demonstrate the Authority has the procedures and resources to ensure public transportation services are provided in a nondiscriminatory manner. AAATA must properly implement its program to ensure nondiscriminatory service, including full and fair public participation, and meaningful access to transit-related programs and activities by persons with limited English proficiency. Prior to implementing any major service changes or any fare change, AAATA must complete an "equity analysis", and submit it for board review and approval.

To ensure the timely completion of this update, staff have engaged an external consulting firm to review and update AAATA's 2023 Title VI program that was submitted to FTA on 11/30/2023.

PRIOR RELEVANT BOARD ACTIONS & POLICIES

The Board approved the current Title VI program in October 2023.

Several key Board policies are relevant to the Title VI program:

- 2.5.2 – Prohibits jeopardizing of federal funding (by not complying with regulations)
- 2.0 – Prohibits violation of federal law and regulations
- 2.1.2 – Prohibits discrimination against the public

IMPACTS OF RECOMMENDED ACTION(S)

- Budgetary/Fiscal: Board approval is necessary to ensure federal funding.
- Social: The report documents social impacts of transit services.
- Environmental: N/A
- Governance: “Mandatory Approval” is required of our Board

ATTACHMENTS

1. AAATA Title VI Program Update Report - Draft

CEO Report

Meeting: Board of Director's

Meeting Date: October 15, 2026

INFORMATION TYPE

Other

LONG-RANGE PLAN STATUS UPDATES

BLAKE TRANSIT CENTER RELOCATION & EXPANSION

The BTC is fully closed to the public and bus operations for the duration of nearby road construction, which is currently scheduled to end in December 2026. Fourth Ave construction is progressing on schedule thus far. Canopy installation has begun with the smallest going in first. Manufacturing timelines are still in flux for the largest canopy, but the construction team is working to deliver the project on schedule despite this uncertainty.

TheRide continues to work with the Ann Arbor Housing Commission (AAHC) and their codeveloper on the development of the site adjacent to the BTC (350 S. Fifth). Construction of the housing tower continues earnestly and is expected to last at least through 2028. Modifications to TheRide's existing BTC platform will be necessary to accommodate the housing development and new bus bays on the south side of the BTC building. The design, site planning, and environmental review for the platform expansion are underway. The transit elements of the development will not be under construction until FY2028 or later.

YPSILANTI TRANSIT CENTER PLANNING

Staff continue their efforts to finalize property acquisition on the two parking lot parcels adjacent to the existing YTC. Staff also continue to move forward on design, planning to reach 60% design by the end of October. The permitting process of the new YTC site and building will begin this month, as well. Staff continue to work with a construction manager (CM) to look at cost estimates for the latest design and construction phasing.

OPERATIONAL UPDATES

FARE STUDY

Staff work continues to develop the initial draft scope for the study of fares and fare collection technology. Once an initial draft is ready, it will be shared with the Board for feedback.

BUS OPERATOR COUNT/MCO CLASSES

AAATA's current operator count is 206, with the most recent class of 5 operators starting training on October 6th.

LOCAL ADVISORY COMMITTEE (LAC)

The LAC met on September 8th and discussed the board report and service updates.

ANN ARBOR CITY COUNCIL

CEO Matt Carpenter is scheduled to provide operational updates to Ann Arbor City Council on October 19th.

TRANSPORTATION COMMISSION (ANN ARBOR)

The Ann Arbor Transportation Commission met on September 16th and received a presentation on the proposed Division Street Bikeway Extension, including improvements connecting Catherine Street to the Broadway Bridge and Plymouth Road.

WATS POLICY COMMITTEE UPDATE

The September WATS Policy Committee meeting was cancelled.

EMPLOYEE & COMMUNITY ENGAGEMENT

BUS ROADEO

The Bus Rodeo took place on October 4th where AAATA MCOs competed against each other as well as U-M drivers. This year's winners were 1st place: Reginald Trussell, 2nd place: Kilo Coward, and 3rd place: Kelly Augustine. Reggie will go on to compete in the International Bus Rodeo competition next year.



MAIN STREET GREEN FAIR

TheRide participated in the A2Zero Green Fair on September 18th on Main Street. Staff were able to engage with community members who were current, as well as perspective riders.

CEO AT REGIONAL TRANSPORTATION SUMMIT

On Oct 1st the CEO joined leaders from SMART and DDOT to speak on a panel about challenges and opportunities facing transit in southeast Michigan. The panel was well received. One AAATA board member was in attendance.

U OF M EARTHFEST

TheRide joined the University of Michigan for their annual Earthfest on October 1st at their Central Campus Diag. AAATA staff spoke with students and staff about our services and the Mcard transit partnership.



ANN ARBOR FARMERS MARKET

On September 23rd, getDowntown had a community table at the Wednesday Ann Arbor Farmers Market. Staff were able to speak to community members about the go!pass program, the getDowntown Fall challenge, and provide reflectors to those who needed them.



THERIDE x RTA COLLABORATION

TheRide and RTA partnered on a social media collaboration video targeted at students back on campus. The video focused on the ease of transferring between the two services from their temporary boarding locations downtown Ann Arbor. You can view the video here: <https://www.instagram.com/p/Ddwg0QND7pB/>.

THERIDE'S TRANSIT TIPS

TheRide has been putting out a series of "Transit Tips" on its social platforms, as part of an ongoing series of sharing rider and safety tips. These videos can be viewed here: <https://youtube.com/playlist?list=PLdoJMqDWPEfI&si=uUO3rXcBxEnao1Es>.

RIDER SPOTLIGHT

One of our riders had a TheRide-themed birthday cake! Three-year-old Harrison's grandmother reached out and shared her grandson's love for the bus, and this homemade cake she created in honor of TheRide.



EXECUTION OF CONTRACTS OVER \$250K (Policy 2.9.1.5.D)

As approved in the FY2026 budget, on September 21, 2026, the CEO authorized a contract with W.W. Williams Company (authorized Allison distributor) for the purchase of transmissions for a base of one (1) year with four (4) additional one-year options. The contract has a not-to-exceed amount of \$895,000 through the base year of the contract.

Draft CEO Ends Interpretations for Feedback

Meeting: Board of Directors

Meeting Date: October 15, 2026

INFORMATION TYPE

Other – CEO Requesting feedback

RECOMMENDED ACTION(S)

Receive for information

ISSUE SUMMARY

The CEO is presenting a preliminary draft of his forthcoming interpretations of the Board's Ends policies (Attachment 2). He is seeking feedback on two points:

- A. At this early stage, does the full Board see anything 'unreasonable' in the CEO's interpretations? (see Attachment 1)
- B. In light of the interpretations, do board members want to discuss any edits to the policies?

Soliciting feedback on draft policy interpretations is an experiment. The Board cannot approve interpretations but can find them "unreasonable" or adjust policy to be more clear.

The CEO intends to introduce the draft interpretations in October for an initial orientation and return in November for a more fulsome discussion.

BACKGROUND

The Board approved new Ends policies in January 2026, setting a new direction for the organization. These policies identify the results and/or impacts the organization is to create by identifying *What* those impacts are to be, *For Whom* they are intended, and *At What Cost*. These policies create a single set of expectations for the CEO.

The next step in the Policy Governance process is for the CEO to develop written interpretations of those policies, where they provide a written response to the Board about what those policies mean and how progress will be measured. There is a formal structure for writing these interpretations that ensures completeness.

Usually, the Board would not see the interpretations until a monitoring report is submitted. However, given the radical changes to the policy and the interpretations, the CEO would like to take an early moment to check that all participants are on the same page.

The CEO is attempting to complete their written interpretations so that the first monitoring report can be produced later this year.

PRIOR RELEVANT BOARD ACTIONS & POLICIES
--

The Board approved new Ends policies in January 2026.

The Board discussed how to determine 'any reasonable interpretation' in 2025 and added Appendix B to the policy manual.

IMPACTS OF RECOMMENDED ACTION(S)

- Budgetary/Fiscal: N/A
- Social: N/A
- Environmental: N/A
- Governance: Policy direction and CEO interpretations are a central part of the Policy Governance model.

ATTACHMENTS

1. Policy Manual Appendix B: What is a reasonable interpretation of a Board policy?
2. DRAFT CEO Interpretations of Ends Policies v 4.1

Attachment 1: Policy Manual Appendix B: What is a reasonable interpretation of a Board policy?

What is a reasonable interpretation of a Board policy?

“Assurance of successful organizational performance on Ends and Executive Limitations” is in the Board’s job description (3.2.4 and 3.2.5). Just like in a CEO performance appraisal, the big question is: Do we have a competent CEO? Evaluating a monitoring report is a function of ongoing CEO evaluation. That question should extend to the assessment of a monitoring report.

Policy 4.4.4 states, “The standard for compliance shall be any reasonable CEO interpretation of the Board policy being monitored. The board is the final arbiter of reasonableness, but will always judge with a “reasonable person” test rather than with an interpretation favored by Board members or by the Board as a whole. “

Elements of An Interpretation

The following elements should be included in an interpretation for the Board to assess its reasonableness:

1. (An operational definition) How we have operationalized this policy inside the organization underscored by:
2. A measure or standard that would demonstrate aligned performance with a defensible rationale for that measure or standard.
3. A level of achievement (a target) necessary to demonstrate compliance or achievement **for this reporting period** with rationale for the level of achievement chosen.

The rationale provided is intended to persuade the board as to why it should find the interpretation as reasonable. The rationale provides context for the measure or standard chosen to demonstrate performance.

Basis for Reasonableness

When board members assess a monitoring report, their frame of mind matters. The assessment should not be approached from a “check list” perspective or a “gotcha” opportunity looking for faulty thinking or nit-picking on minor points, but rather, “Does this interpretation demonstrate

competent decision-making?” The reader of the report should approach it from a “generalist” lens rather than a “specialist” or activist lens. The reader should be assessing the degree of progress or compliance with the measurements identified. The reader should be assuming “good faith” in decision-making, but cognizant of confusing rationale or language that seems to obfuscate clear understanding. Overall, the reader should be considering, “Given the context of our organizational limitations, does the interpretation and the rationale make sense.”

The board has an obligation to listen to concerns presented, however, Policy 3.1.2 states, “The board will not allow dominant personalities or individual agendas to usurp the Board’s broader perspective, collective responsibilities or values.”

Questions to Discern Reasonableness

Is the interpretation complete? Were all values contained in the policy reasonably addressed?
Does the rationale for the choices presented make sense to me?
Does the measure or standard chosen demonstrate there is a system in place to create reliable/predictable results?
Are the projected results for the reporting period reasonable?
Does the evidence demonstrate compliance or achievement with the measure or standard identified for this reporting period?
Is the evidence or data provided verifiable? In other words, if I wanted to see the evidence that supports compliance, could I?

Explanation

The “any reasonable interpretation” standard exists to push the Board to clearly state their collective expectations proactively through written policy. If a CEO’s stated definition and target are aligned with the goal of the written policy and making acceptable progress (i.e. reasonable), then ANY method of achieving those results should be accepted. Otherwise, the Board risks prescribing Means, or allowing individual preferences to circumvent board holism or the CEO’s judgment. There is a natural temptation for board members to advocate for personal preferences. The ANY reasonable interpretation standard does NOT mean the Board’s intended interpretation, or “my interpretation”. The CEO may need to offer justification or rationale to provide context for the choices made. Objective, defensible rationale should assist in persuading the board of the reasonableness of the choices made.

Dissecting a CEO’s written interpretation of a board’s policy forces all parties to grapple with ambiguity, intent, group decisions, delegation, and accountability. For example, angst over a CEO’s interpretation may suggest that some board members may have a differing assumption about the intent of the policy or want the agency to go in a new direction. The correct action here is for fellow board members to update the policy in question. A narrower policy will force a tighter CEO interpretation, while still allowing any reasonable interpretation. Accepting ANY reasonable interpretation forces the board out of a management mindset and into their group leadership role.

Finally, this standard is not carte blanche to do whatever the CEO wants – accountability for delegated authority remains through the monitoring performance against Board policy. But it does help to ensure that the CEO’s professional judgment is respected while maintaining clear role delineation and accountability.

Ann Arbor Area Transportation
Authority

Title VI Program Update 2026

DRAFT

September 2026



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1. Title VI Program Introduction and Overview

This 2026 Title VI Program Update has been prepared to ensure that the Ann Arbor Area Transportation Authority (AAATA) is compliant with Title VI regulations of the Civil Rights Acts of 1964. As a recipient of federal funding under the programs of the Federal Transit Administration (FTA), AAATA has an obligation to ensure it does not discriminate or hinder the utilization of its services based on race, color, or national origin. Executive Order 13166, signed by President Clinton in 2000, further strengthened protections for users of federally funded services by requiring recipients ensure its users with limited English proficiency (LEP) can still meaningfully have access to and use its services.

“...no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance.”

- Title VI of the U.S Civil Rights Act of 1964, 42 U.S. Code § 2000d

“Recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons...Each Federal agency shall examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services consistent with, and without unduly burdening, the fundamental mission of the agency.”

- Executive Order 13166 (Aug. 11, 2000), 65 Fed. Reg. 50, 121 (Aug. 16, 2000)

To provide clarity on the law’s impact on transit agencies, the FTA published Circular 4702.1B, which was last revised in October 2012. Within it there are guidelines that specify several reporting, monitoring, and analysis requirements an agency must perform to ensure that:

- The benefits of its transit services are shared equitably throughout its service area.
- The level and quality of its services are sufficient to provide equal access to all riders in its service area.
- No one is precluded from participating in public meetings related to major changes to the service, including changes to the fare.
- Decisions regarding service changes or facility locations are made without regard to race, color or national origin.
- A mechanism is in place for the remediation of any discrimination which may occur, even if such discrimination is unintentional.

Within its available resources, and with full regard for the delivery of efficient and effective transit services, AAATA will continue complying with the regulations of the FTA and the Civil Rights Act of 1964.

AAATA acknowledges the publication in the Federal Register of 91 FR 35424, A Rule Rescinding Portions of Title VI Regulations to Conform more Closely with the Statutory Text and to Implement Executive Order 14281, as published by the U.S. Department of Transportation on June 11, 2026. Since the FTA has not updated the Title VI requirements and guidelines defined in FTA Circular 4702.1B or issued additional guidance at the time of this Program Update, AAATA continues to follow the requirements and guidelines as defined in Circular 4702.1B for this update.

2. Chapter III Requirements

Documentation of Board Approval of the Title VI Program Update

[To be added upon completion and approval of 2026 Title VI Program Update]

Title VI Notice to the Public

AAATA displays its Title VI notice to the public in the following locations:

- As a poster onboard every AAATA bus
- On the AAATA website at www.theride.org/title-vi
- In the printed AAATA RideGuide
- As a poster in the AAATA Headquarters lobby and Ypsilanti Transit Center, shown in Figure 2. The notice is also typically posted at the Blake Transit Center, which is currently closed to the public due to construction.

The content of AAATA's notice to the public is as follows:

Title VI Notification Procedure

Ann Arbor Area Transportation Authority (TheRide) provides programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. For information about TheRide's non-discrimination obligations, or to file a complaint if you believe you have been subject to unlawful discrimination, please contact TheRide.

By Mail:

*Ann Arbor Area Transportation Authority
Attn: Title VI
2700 S. Industrial Hwy.
Ann Arbor, MI 48104*

Online:

*TellUs@TheRide.org
TheRide.org*

Figure 1: Title VI Notice to the Public on AAATA Website

Title VI Notification Procedure

Ann Arbor Area Transportation Authority (TheRide) provides programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. For information about TheRide's non-discrimination obligations, or to file a complaint if you believe you have been subject to unlawful discrimination, please contact TheRide.

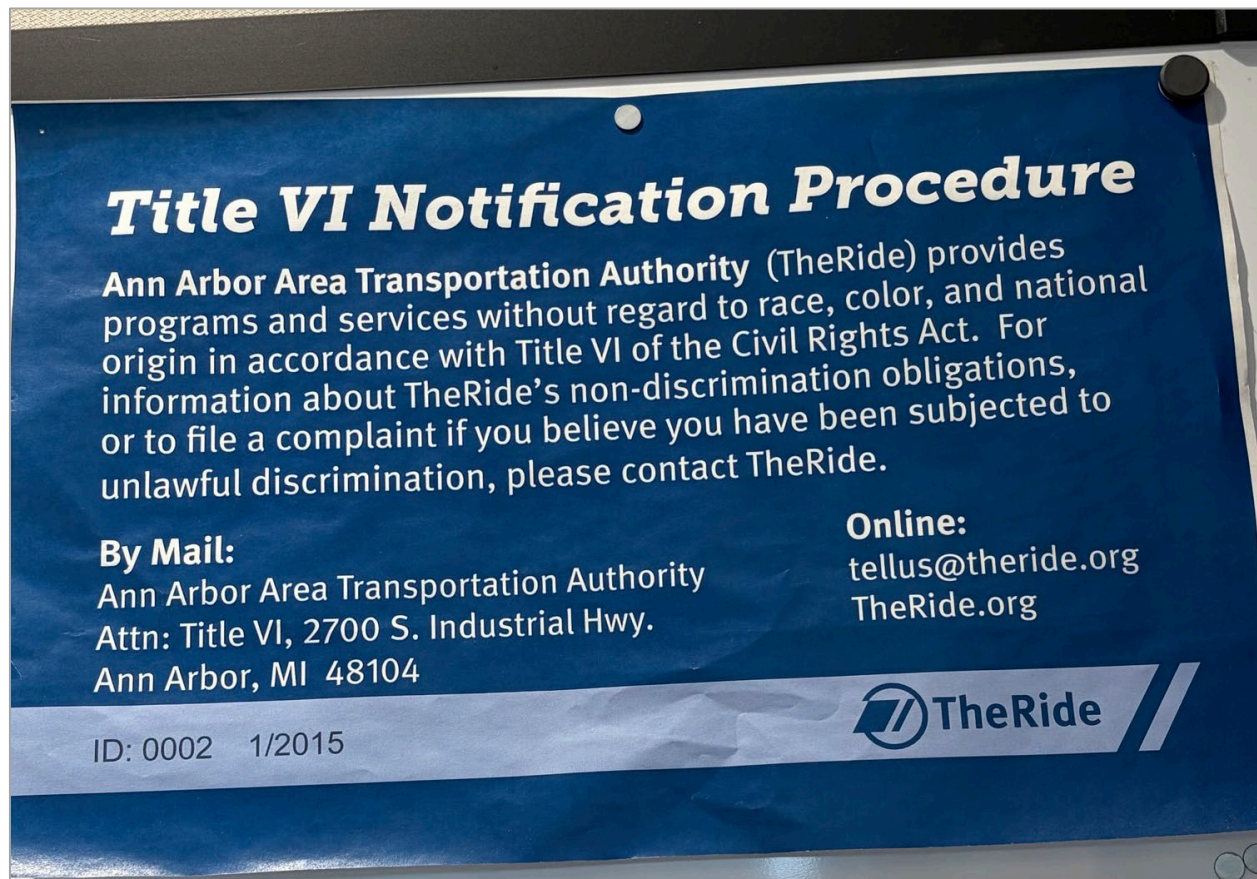
By Mail

Ann Arbor Area Transportation Authority
Attn: Title VI
2700 S. Industrial Hwy.
Ann Arbor, MI 48104

Online

TellUs@TheRide.org

Figure 2: Title VI Notice to the Public at AAATA Headquarters



Title VI Complaint Procedures

Ann Arbor Area Transportation Authority (AAATA/TheRide) is committed to ensuring that no person is excluded from participation in or denied the benefits of its programs and services based on race, color, and national origin in accordance with Title VI of the Civil Rights Act of 1964. For information about TheRide's non-discrimination

obligations, or to file a complaint if you believe you have been subjected to unlawful discrimination, please contact TheRide by mail, using the AAATA Title VI Complaint Form to Ann Arbor Area Transportation Authority - Attn: Title VI, 2700 S. Industrial Hwy., Ann Arbor, MI 48104, or by email at the “Contact Us” section of TheRide’s website, www.theride.org.

A copy of AAATA’s Title VI Complaint Form is available in print, in English, Spanish, Chinese, Korean, and Arabic, at AAATA’s main office, as well as posted online at www.theride.org/title-vi under the Title VI Notification Procedure section.

Each complaint received that alleges discrimination based on race, color, or national origin will be investigated using the procedure below, whether it specifically references Title VI or not. All complaints must be received within 180 days of the alleged discrimination incident/occurrence. The complainant will be notified within 7 days confirming receipt and advised it is being investigated. This notice may include a request for additional information necessary to investigate the complaint (e.g. specific time of an incident). A written response of the determination will be provided by mail to the complainant within 30 days of the date of complaint.

If the allegation concerns a specific incident involving an operator or customer service staff member, a preliminary investigation of the facts will be conducted by AAATA Transportation Department management staff. It should be noted that all AAATA’s buses and facilities are equipped with cameras. Cameras have proved to be extremely useful in resolving alleged complaints about specific incidents. Transportation Management Staff will make a preliminary determination about the facts, recommend any disciplinary measures, and transmit the complaint to the Chief Executive Officer (CEO), Deputy CEO, or their delegate.

For more general allegations, such as AAATA service design or fares, the CEO, Deputy CEO, or their delegate will determine the appropriate senior staff member to conduct the preliminary investigation and report the findings and recommendations for corrective action to the CEO, Deputy CEO, or their delegate.

The CEO, Deputy CEO, or their delegate will review all alleged discrimination complaints based on race, color, or national origin and the results of the preliminary investigation. The CEO, Deputy CEO, or their delegate will make a determination as to whether the alleged discrimination based on race, color, or national origin was valid, and any corrective action that will be taken. Note that even if the alleged discrimination is determined to be invalid, corrective action may still be warranted in some cases.

The CEO, Deputy CEO, or their delegate will provide her or his findings in writing (by mail) to the complainant within 30 days of the date of the complaint, including whether the alleged discrimination was found to be valid based on race, color, or national origin, and the corrective actions AAATA has taken or promises to take. The letter will inform the complainant of the opportunity to provide additional information that may lead AAATA to reconsider its decision and of the complainant’s right to file a complaint with the Federal Transit Administration (FTA). In addition to this policy, AAATA also follows up on informal complaints made by telephone, Internet, social media and email.

Title VI Complaint Form

The AAATA Title VI Complaint Form is shown in Figure 3. The form is also available in Spanish, Chinese, Korean, and Arabic, which are provided in Appendix D.

Figure C-1

1

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

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

Signature and date required below

Signature Date

Please submit this form in person at the address below, or mail this form to:

Ann Arbor Area Transportation Authority
Attention: Title VI Coordinator
2700 South Industrial Highway
Ann Arbor, MI 48103

List of Complaints, Investigations, and Lawsuits

From 2023 through 2026 to date, AAATA received 20 complaints alleging discrimination. All were submitted as informal complaints, and none of the complainants chose to complete the Title VI complaint form that they were offered. Nineteen of the complaints were found to be invalid following investigation, and one was found to be undetermined due to lack of video available. There were no other investigations or lawsuits during this period. A list of the complaints is provided in Appendix E.

Membership Demographics

The only transit-related, non-elected planning board, advisory council, or committee for which the Ann Arbor Area Transportation Authority (AAATA) selects the members is the Local Advisory Council (LAC) Executive Committee. The LAC advises the AAATA Board of Directors on issues of concern to people with disabilities and senior citizens. Monthly meetings are open to anyone who wishes to attend, and all who attend are encouraged to participate. LAC membership is conferred on anyone who attends more than one meeting. The AAATA Board appoints up to 10 people to the LAC executive committee for two-year terms. Any member can apply to serve on the executive committee.

There are currently five members of the Executive Committee, all of whom are Caucasian as indicated below in Figure 4. AAATA has attempted to encourage more minority participation and membership on the Executive Committee; through these efforts, there were three non-Caucasian members in 2023-2024, however, those members have since stopped attending. Based on the most recent Census, minority representation should include more Hispanic, African American, and Asian American members.

AAATA recruits members of its LAC through a series of actions:

- Reaching out to organizations devoted to minority population issues in the Ann Arbor MSA via emails, direct communications and notices on the website
- Reaching out to organizations devoted to low-income population issues in the Ann Arbor MSA via emails, direct communications and notices on the website
- Reaching out to other transit organizations within the MSA for potential candidates
- Contacting the Chamber of Commerce to find interested parties

Figure 4: Minority Representation on Non-Elected Committees and Councils Selected by AAATA

Committee or Council	Caucasian	Hispanic	African American	Asian American	Native American
Local Advisory Council (LAC)	100%	0%	0%	0%	0%

Description of Subrecipient Monitoring

AAATA monitored adherence to Title VI planning requirements for six subrecipients for the period 2023-2025. AAATA's subrecipients included:

- Western Washtenaw Area Value Express
- People's Express
- Avalon Housing
- Jewish Family Services
- Programs to Educate All Cyclists
- Milan Seniors for Healthy Living (MSHL)

There have been no Title VI complaints, investigations, or lawsuits for AAATA subrecipients over the past three years. AAATA uses the questionnaire below (Figure 5) as part of the monitoring program. Section 7 of the questionnaire covers the following areas:

1. Title VI program in place
2. Public Notices
3. Implemented LAP, complaints procedures and/or public participation procedures
4. List of Language Assistance Training for staff
5. List of Title VI investigations, complaints, lawsuits
6. Examples of public participation activities
7. List of transit facilities sited and equity analysis
8. List of transit facilities to be constructed/leased with equity analyses
9. List of fare increase or major service changes since 2018 with brief descriptions
10. List of fare change or service equity analyses completed since 2018

Receipt of questionnaires is tracked and AAATA staff review the answers and make appropriate comments to the documents. Title VI programs are requested of and provided by subrecipients, and AAATA tracks receipt and whether the plans have been updated in a timely manner. Responses from subrecipients are tracked for questionnaire receipt, Title VI program, receipt of Title VI complaints, and compliance determination. AAATA reviews the Title VI programs from subrecipients and provides feedback and requested corrective actions when required areas are determined to be missing or inadequate.

Figure 5: AAATA Subrecipient Questionnaire



AAATA Subrecipient Programs
Form: 2026 Subrecipient Desk Review Questionnaire
Reporting Period: FY25 (10/1/2024 - 9/30/2026)
Contact: Riley Kloepfer, rskloepfer@theride.org

Subrecipients of Federal funds are required to complete an annual desk review questionnaire as part of AAATA's risk-based subrecipient monitoring procedure. You may find several topics are not applicable to your agency for this year; please enter n/a. Please enter your responses into the *light blue* highlighted cells and return to khull@theride.org along with copies of any agency plans and policies that have changed. AAATA will review your responses and may request additional documentation or schedule a meeting/site visit as needed.

SECTION 1
Agency Information

Q: Please provide your organization's name and a staff contact for federally funded projects.
A:

SECTION 2
Legal/Lobbying

Federal Requirement: Subrecipients are prohibited from using appropriated Federal funds to lobby for Federal funds. If the subrecipient uses local funds to lobby for transit purposes, subrecipients must file OMB Standard Form LLL quarterly.

Q: Did your organization pay for lobbying activities in during the reporting period?
A:

Q: If yes, what type of funds were used?
A:

Q: If yes, was OMB Standard Form LLL filed quarterly with TheRide?
A:

SECTION 3
Financial Management and Capacity

Federal Requirement: Subrecipients must have financial management systems that meet standards for financial reporting, accounting records, internal control, budget control, allowable cost, source documentation, and cash management. Requirements for use of indirect cost when reimbursement is sought from a Federal award program must be met.

Q: Describe your organization's financial management systems, especially the method of accounting, how financial reports are prepared, and systems for internal control and cash management.
A:

Q: Does your organization use Federal funds to pay for indirect operating costs? (If yes, AAATA will contact you to review the calculation method.)
A:

SECTION 4
Satisfactory Continuing Control

Federal Requirement: Subrecipients must use FTA-funded property for project purposes.

Q: What vehicles, equipment, and property has your agency acquired with the assistance of FTA funds (e.g., Section 5310/5311), and how are these items being used in accordance with their intended project purpose?
A:

Q: Has your agency used any FTA-funded property for purposes other than purposes identified in a grant contract or subrecipient agreement?
A:

SECTION 5
Maintenance

Federal Requirement: Subrecipients that use FTA assistance to purchase assets must have maintenance programs for those assets. Such assets must be maintained in good condition and good operating order.

Q: Does your organization have a maintenance program for FTA-funded assets? (If yes, please ensure a copy has been provided to TheRide.)
A:

Q: Does the program address maintenance of wheelchair lifts and other accessibility features?
A:

Q: Is your organization following your program for preventive maintenance inspections? (Please attach any relevant documentation.)
A:

Q: Are your organization's FTA-funded assets under warranty, and are warranty claims pursued?
A:

SECTION 6
Title VI (Civil Rights Act of 1964)

Federal Requirement: Subrecipients must ensure that no person, on the basis of race, color, or national origin, be excluded from participating in, be denied the benefits of, or be subject to discrimination under any program or activity receiving Federal funds. All transit services and related benefits must be distributed in an equitable manner.

Q: Does your organization have a Title VI program in place? (If yes, please ensure your current Title VI Plan has been provided to TheRide.)

A:

Q: If yes, have the Language Assistance Plan, complaint procedures, and/or public participation procedures been implemented as described?

A:

Q: How does your organization notify the public of its rights under Title VI?

A:

Q: Has your organization received any discrimination complaints in the past three years, FY2018-2020? (If yes, please describe the nature of the complaint and the outcome, and attach any relevant documentation.)

A:

SECTION 7

Americans with Disabilities Act (ADA)

Federal Requirement: Subrecipients must comply with ADA. No entity shall discriminate against an individual with a disability in connection with the provision of public transportation service. Subrecipients must track, resolve, and respond to ADA-related complaints. All new bus vehicles purchased or leased for use in fixed-route service by public entities must be accessible. Used bus vehicles must be made accessible for use to the maximum extent feasible. Vehicles used in contracted fixed-route service must be accessible. Vehicles used in demand-responsive service must be accessible unless equivalent service is provided. Newly constructed and altered facilities must meet US DOT accessibility requirements. Service must comply with the US DOT ADA regulations and be accessible to and usable by persons with disabilities.

Q: How does your agency track, resolve, respond to, and retain records of ADA-related complaints?

A:

Q: Has your organization received any ADA-related complaints in the past three years, FY2018-2020? (If yes, please describe the nature of the complaint and the outcome, and attach any relevant documentation.)

A:

Q: Are public transportation facilities constructed or altered during the reporting period accessible to and usable by individuals with disabilities?

A:

Q: Describe how your organization follows ADA provision of service requirements (e.g., lift/ramp availability, priority seating, stop identification, employee training, accessible information formats, reasonable modification requests).

A:

SECTION 8

Equal Employment Opportunity (EEO)

Federal Requirement: A full EEO program must be submitted to TheRide if your organization employs 100 or more transit-related employees and requests or receives capital or operating assistance > \$1 million in a fiscal year, or requests or receives planning assistance > \$250,000 in a fiscal year. An abbreviated program must be submitted to TheRide if your organization employs 50-99 transit-related employees and requests or receives capital or operating assistance in excess of \$1 million in a fiscal year, or requests or receives planning assistance in excess of \$250,000 in a fiscal year.

Q: Is your organization required to submit an EEO program based on the thresholds above? (If yes, please ensure it has been submitted to TheRide.)

A:

SECTION 9

Drug and Alcohol Program

Federal Requirement: Subrecipients must have a board-adopted anti-drug and alcohol misuse policy. Subrecipients are required to provide at least 60 minutes of drug and alcohol training for covered employees and at least 120 minutes of training for supervisors and other officers authorized by the employer to make reasonable suspicion determinations. Subrecipients must obtain previous drug and alcohol testing program records from prior employers for employees performing safety-sensitive functions and must retain drug and alcohol testing program records for all covered employees in a secure location with controlled access. Medical Review Officers, substance abuse professionals, breath alcohol technicians, and collectors in the drug and alcohol program must have required certifications.

Q: Does your agency have a board-adopted drug and alcohol misuse policy? (If yes, please ensure it has been submitted to TheRide.)

A:

Q: Does the policy include the following elements: proof of policy adoption by governing body, identification of D&A program contact, employee categories subject to testing, prohibited behavior, testing circumstances, consequences for refusing tests/positive tests with alcohol concentrations of 0.04 or greater, consequences for positive tests with alcohol concentrations of 0.02 or higher but lower than 0.04?

A:

Q: Does your organization provide the minimum required trainings and reasonable suspicion testing?

A:

Does your organization obtain drug and alcohol testing records from prior employers, and are records stored in a secure location with controlled access?

A:

Q: Do all medical review officers, substance abuse professionals, breath alcohol technicians, and collectors in the drug and alcohol testing program have the required qualifications, and are the qualifications records kept on file by your agency?

A:

SECTION 10

Additional Requirements

Please indicate below if the following service types are applicable to your agency, and AAATA will reach out to you for additional information.

Q: Does your organization operate School Bus or School Tripper service?

A:

Q: Does your organization operate Charter Bus service?

A:

Equity Analysis for Siting Facilities

Agencies are required to conduct a Title VI equity analysis during the planning stage of any effort to site transit facilities. Transit facilities include maintenance facilities, garages/yards, operations centers but exclude transit amenities (e.g., shelters) and transit stations. The analysis must compare the impacts of alternative locations and must occur before the selection of the preferred site. As AAATA is not in the planning phase of siting facilities, a Title VI equity analysis is not required or available to report on at this time.

Public Participation Plan

It is the intention of the AAATA to listen to and act on public input before making decisions that may have public impact. The AAATA focuses on the following goals regarding public participation:

- To inform the public of proposed new implementations or changes that may affect them.
- To provide the public with opportunities to ask questions and understand the reasons behind the proposed new implementations or changes.
- To encourage the public to state objections to proposed new implementations or changes and make suggestions for revisions.
- To provide the AAATA an opportunity to revise proposed new implementations or changes based on public input to reduce negative effects.

Notifications to the Public

The AAATA uses a variety of means and methods to communicate regularly with the public to inform and encourage input and participation. In addition to these ongoing efforts, the AAATA undertakes more focused and concerted efforts for certain issues.

People must first know about proposed new implementations or changes to have the opportunity to participate and provide input. The public is provided at minimum 30 days in which to participate, review, ask questions, and provide input. The AAATA uses the following notification methods to provide notice to the public:

- **AAATA Website:** The AAATA website provides multiple opportunities to provide notification. Notice of proposed new implementations or changes appears on the front page, typically in the “What’s Happening” section and in a section on the website that provides further details on the proposed new implementations or changes. Typical details include a presentation or document of information and information on how to provide feedback via website, phone, email, or letter. In addition, for any public meetings to be held, these also appear on the “Events” page on the website.
- **Social Media:** The AAATA regularly uses social media to promote public engagement opportunities. Facebook, Twitter, and LinkedIn are used for these initiatives.
- **Press Releases:** The AAATA issues a press release for all proposed new implementations or changes which describe the proposed implementation or change and how to provide input. Press releases are distributed to all media outlets, posted on the AAATA’s website, and are shared on social media.
- **E-Newsletter:** The AAATA includes information on public engagement opportunities in monthly e-newsletters. E-newsletters are sent to community leaders and individuals who have elected to sign up to receive monthly emails from TheRide on current projects.
- **Onboard Bus Communications:** The AAATA utilizes on-board bus communications such as bus cards and bus seat stickers to communicate information on public engagement opportunities.

- **Presentations:** The AAATA develops presentations as needed, dependent on the level of impact of the proposed new implementation or change and shares the presentations at public meetings and online at the AAATA website.
- **Paid Media:** Dependent on the level of impact of a proposed new implementation or change, paid media is utilized to announce to the public the engagement opportunities. This includes but is not limited to: Public Notice in MLive, other print ads, radio ads, paid social media, and digital ads.
- **Stakeholder and Community Leaders Notification:** As Needed, the AAATA reaches out directly to key stakeholders that could be affected by proposed new implementations or changes and provides a notification of them to these stakeholders.
- **Public Meetings:** The AAATA hosts meetings in strategic locations with epicenters of general, minority, LEP, and low-income populations, and typically includes virtual public meetings in addition to these engagements.
- **Translations:** The AAATA notifies the public that translations of the public engagement information materials are available upon request in Spanish, Korean, Chinese, and Arabic.

The methods used to engage the public are tailored to the scale of the proposed new implementation or change.

Opportunities for Public Input

It is the AAATA's intention to make it possible for people to choose how they wish to provide input and whether they want to only provide comment, whether they desire a response regarding their input, or whether they wish to engage in a conversation regarding the matter. As part of the notification methods above, people are provided with several possibilities for making comments and asking questions including:

- **E-Mail:** E-Mail goes to a mailbox set up specifically to receive input.
- **Telephone:** A hotline is set up to receive comments with a callback by AAATA staff upon request.
- **Written:** Written letters provide a means for more formal communication.
- **Form on Website:** A form is directly available on AAATA's website that individuals may complete to submit their feedback.
- **Face-to-Face:** At meetings and by appointment, opportunity for face-to-face communication is made available to the public. For proposed new implementations or changes of a larger scale or major impact, meetings are provided at multiple times and locations, with an emphasis on meeting locations in the area(s) affected by the proposed new implementation or change. Meetings are typically scheduled as drop-in sessions for a 2-5-hour period to permit people to attend at their convenience and to encourage dialogue. Virtual meetings are also often provided as an option in addition to the in-person meetings.
- **AAATA Board Meetings:** The public is provided time at all meetings of the AAATA Board of Directors. While an opportunity for dialogue is not always available at these meetings, the AAATA's staff conducts follow-up with each of the individuals who comment about proposed new implementations or changes following the meetings for clarity and applicability.

The AAATA's public input process emphasizes two-way communication. The intention is not just to receive comments, but to discuss the effect of the proposed new implementation or change. Whatever method is used by a member of the public to communicate their comment, the AAATA's staff provides a response if requested or needed. In many cases, public input and AAATA response is a dialogue, rather than a single communication. The AAATA's staff summarize all comments received for consideration. This public input summary is then provided to those responsible for decision making along with any proposed revisions based upon the public input received.

List of Public Participation Activities

A list of public participation activities over the last three years along with the opportunities provided for public input is shown in Figure 6.

Figure 6: List of Public Participation Activities, 2023-2026

Year	Time Period	Purpose, Project, or Activity	Opportunities for Public Input
2023	January – December (April 2023 cancelled)	Board Meetings	In-person and virtual option
2023	January – December (December 2023 cancelled)	Local Advisory Committee (LAC) Meetings	In-person and virtual option
2023	July 20 – August 20	Title VI Program Policy Plan Updates Community Input	Virtual meetings; In-person meetings (BTC, YTC); email, call, and write-in options
2023	August - September	FY 24 Budget Public Comment	In-person and virtual options for Board Meetings; online, email, call, and write-in options
2023	October – November	Disadvantaged Business Enterprise Goals Public Comment	Email and Write-in options
2023	October 23 – November 23	Service Improvements Approved in 2022 Millage (Long-Range Plan) Public Input	Virtual meetings; in-person meetings (BTC, YTC, Ypsilanti Library); dedicated website; email, mail, and call-in options
2024	January – December (August and October 2024 cancelled)	Board Meetings	In-person and virtual options
2024	January – December (May and June 2024 cancelled)	Local Advisory Committee (LAC) Meetings	In-person and virtual options
2024	April 22 – May 22	Ypsilanti Transit Center Proposed Project – Public Input	Virtual meeting; In-person meeting (YTC); Board Meeting; dedicated website; call, email, write-in options
2024	August – September	FY 25 Budget Public Comment	In-person and virtual options for Board Meetings; online, call, email, and write-in options
2024	March 14 – April 14	ArborBike Public Comment	Virtual meetings; online form; email, call, and write-in options

Year	Time Period	Purpose, Project, or Activity	Opportunities for Public Input
2025	January – December	Board Meetings	In-person and virtual options
2025	January – December (January, July, and August 2025 cancelled)	Local Advisory Committee (LAC) Meetings	In-person and virtual options
2025	April 15 – May 23	Service Standards Public Feedback	Virtual meeting; Board Meeting; email, call, and write-in options
2025	August – September	FY 26 Budget Public Comment	In-person and virtual options for Board Meetings; online, email, call, and write-in options
2026	January – December	Board Meetings	In-person and virtual options
2026	January – December (February 2026 cancelled)	Local Advisory Committee (LAC) Meetings	In-person and virtual options
2026	March 2 – March 30	Updated Service Standards Public Input	Virtual meeting; Board Meeting; email, call, and write-in options
2026	April 1 – April 24	Security and Safety Public Feedback	Online survey

2026 Title VI Program Update Public Outreach Materials

[To be added following 2026 Title VI Program Update public outreach]

Language Assistance Plan

Background and Intent of the Language Assistance Plan

Title VI of the Civil Rights Act of 1964 - National Origin Discrimination Against Persons with limited English proficiency, and Presidential Executive Order 13166 require entities that receive federal funds to provide guidance on how they will address the needs of limited English proficient (LEP) individuals. USDOT has developed a guidance document entitled “A Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Persons”. This guidance was issued to ensure that persons in the United States are not excluded from participation in DOT-assisted programs and activities simply because they face challenges communicating in English.

The intent of this language assistance plan (LAP) is to ensure that residents of the region who have difficulty understanding English have access to the planning process and published information, and that public notification is provided to these individuals. In this analysis, a person is considered limited English proficient if they do not speak English as their primary language and have a limited ability to read, speak, write or understand English. To assist them, the production of multilingual publications and documents and/or interpretation at meetings/events will be provided upon request to the degree that funding permits, based on current laws and regulations.

Safe Harbor Provisions

Federal law through the Department of Justice establishes a Safe Harbor Provision so that a recipient of federal funds, like AAATA, can ensure with greater certainty that it is in compliance with its Title VI obligation to provide written translations of its documents to LEP persons. “Safe Harbor” is met if the recipient provides written translations in certain circumstances, then such action will be deemed as strong evidence of compliance with the recipient’s written-translation obligations under Title VI.

The failure to provide written translations, however, does not necessarily mean that there is non-compliance. Even if “Safe Harbor” is not used and if, for example, the written translation of certain documents would be so burdensome as to defeat the legitimate objectives of the program, then written translation will not be required. In such cases, other ways of providing meaningful access, such as effective oral interpretation of certain vital documents, may suffice to meet the requirements of Title VI.

Strong evidence of compliance with Title VI under the “Safe Harbor” provision involves providing written translations of vital documents for each language group of LEP persons that constitutes 5% of the population or 1,000 persons, whichever is less, eligible to be served or likely to be affected or encountered by the recipient. If that 5% is comprised of less than 50 persons, then translation of vital documents can be provided orally. Also, under the “Safe Harbor” provision, oral translation of non-vital documents is deemed sufficient to meet the requirements of Title VI.

AAATA is mindful of the fact that the “Safe Harbor” provision applies only to the translation of written documents. It does not affect the requirement to provide meaningful access to LEP persons through competent oral interpreters where oral language services are needed and reasonable to provide on an advance request basis.

Four Factor Analysis

To ensure and provide meaningful access to AAATA services for LEP persons, the agency regularly conducts and updates the Four Factor analysis as detailed in the Circular. The analysis consists of a four-step process that determines the following:

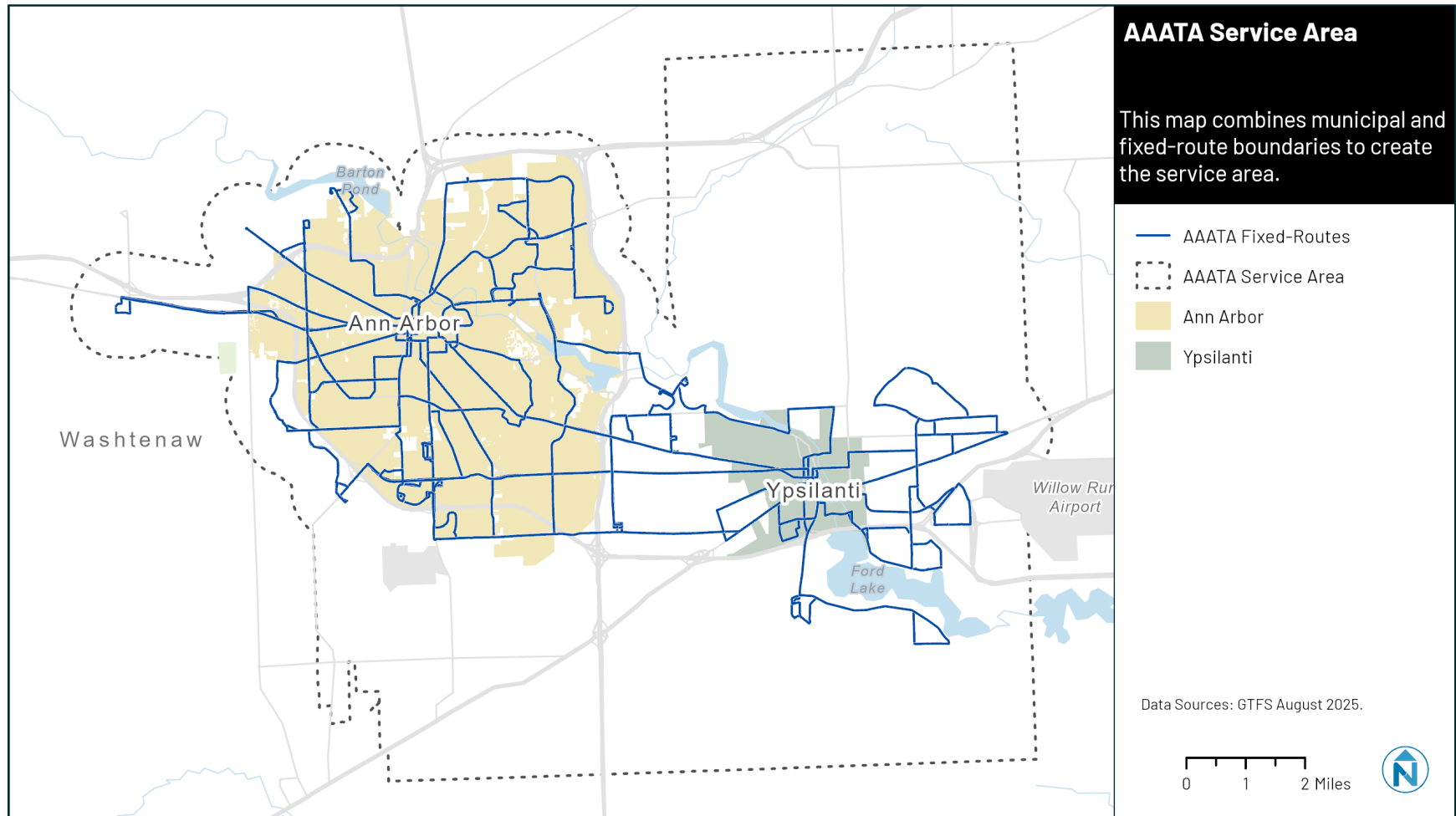
1. The number or proportion of LEP persons likely to be served by AAATA
2. The frequency with which LEP persons use AAATA services
3. An assessment of the importance of the AAATA to LEP persons
4. The resources available to assist the LEP population

Through the completion of these steps, the agency is able to gauge the extent, location, and characteristics of their LEP populations, which will help the agency determine the best approach to ensuring access to The Ride’s services within the resources available to the agency.

Methodology

This analysis primarily uses the most recently available U.S. Census data and the agency on board survey conducted in October 2024. The LEP population utilized Census Table B16001: Language Spoken at Home for the Population 5 Years and Over, using 5-year estimates from 2024. This table is available at the census-tract level, which allows a certain geographic specificity in the analysis as census tracts are typically sized to include a population ranging from 1,200 to 8,000 people. This census table includes one dozen languages (e.g., Spanish) or language groupings (e.g., Russian, Polish, or other Slavic languages are all one category). Within each of the twelve languages, the speaker is determined to have the ability to speak English either “very well” or “less than ‘very well’”. Persons that selected “less than ‘very well’” were assumed to be an LEP person.

Figure 7: AAATA Service Area for Four Factor Analysis



Factor 1: The number or proportion of LEP persons likely to be served by AAATA

In most cases, the LEP population that uses AAATA services will already reside in and around the service area. As a result, this analysis uses census data to estimate the number of LEP persons within the service area boundary defined in the methodology section. The results of the analysis, shown in Figure 8, shows that there are nearly 15,000 persons who are limited English proficient that reside within the service area, or roughly 5.8% of the total population. There are also three LEP populations (bolded) that either exceed 1,000 persons, or five percent of the total service area population (whichever is greater). These thresholds are used to determine if an agency is required to provide written translations for documents deemed vital by the agency. The languages that satisfy these requirements are Spanish, Chinese, and Korean. Arabic, which had met this requirement in the prior program update, no longer exceeds either of the two thresholds.

The table also shows that only other category to exceed the thresholds was “Other Indo-European”. However, due to the aggregated nature of the language category, it is not possible to discern which specific language they represent and were therefore not included in the list of languages that required vital document translations. However, due to the expansive list of languages included in this grouping, and based on local knowledge from the agency and recent translation requests called into the agency, it is extremely unlikely that a single language from this grouping would exceed the 1,000 person threshold on its own.

Figure 8: LEP Service Area Analysis, Source: Census Table C16001, 2024, 5-Year Estimates

Language ¹	Language Population	LEP Population	LEP Rate
All	248,852	14,537	5.8%
Spanish	10,101	3,302	1.3%
Chinese	9,338	3,599	1.4%
Korean	3,045	1,083	0.4%
Arabic	4,458	905	0.4%
French*	1,424	350	0.1%
German*	1,576	175	0.1%
Russian*	2,229	616	0.2%
Other Indo-European*	8,017	2,047	0.8%
Vietnamese	915	462	0.2%
Tagalog	828	314	0.1%
Other Asian*	4,180	929	0.4%

¹ Languages with an asterisk represent language groupings which may consist of a few, to several dozen languages.

Language ¹	Language Population	LEP Population	LEP Rate
Other*	2,076	756	0.3%

The map in Figure 9 shows the geographic distribution of the LEP population, inclusive of all languages. The map reveals several concentrations of census tracts that contain populations where 10% or more of the population is LEP. It is also evident that existing AAATA fixed-route services are serving all census tracts that exceed 15% LEP populations. Additional maps detailing the geographic distribution of LEP speakers of the three languages that exceeded the safe harbor threshold are shown in Figure 10 through Figure 12. The maps show the differences in the distribution of these populations. The highest concentration of Spanish LEP speakers is located in Ypsilanti, while Chinese and Korean LEP speakers are primarily located in southern Ann Arbor and north of the Huron River.

Figure 9: LEP Population Rate by Census Tract

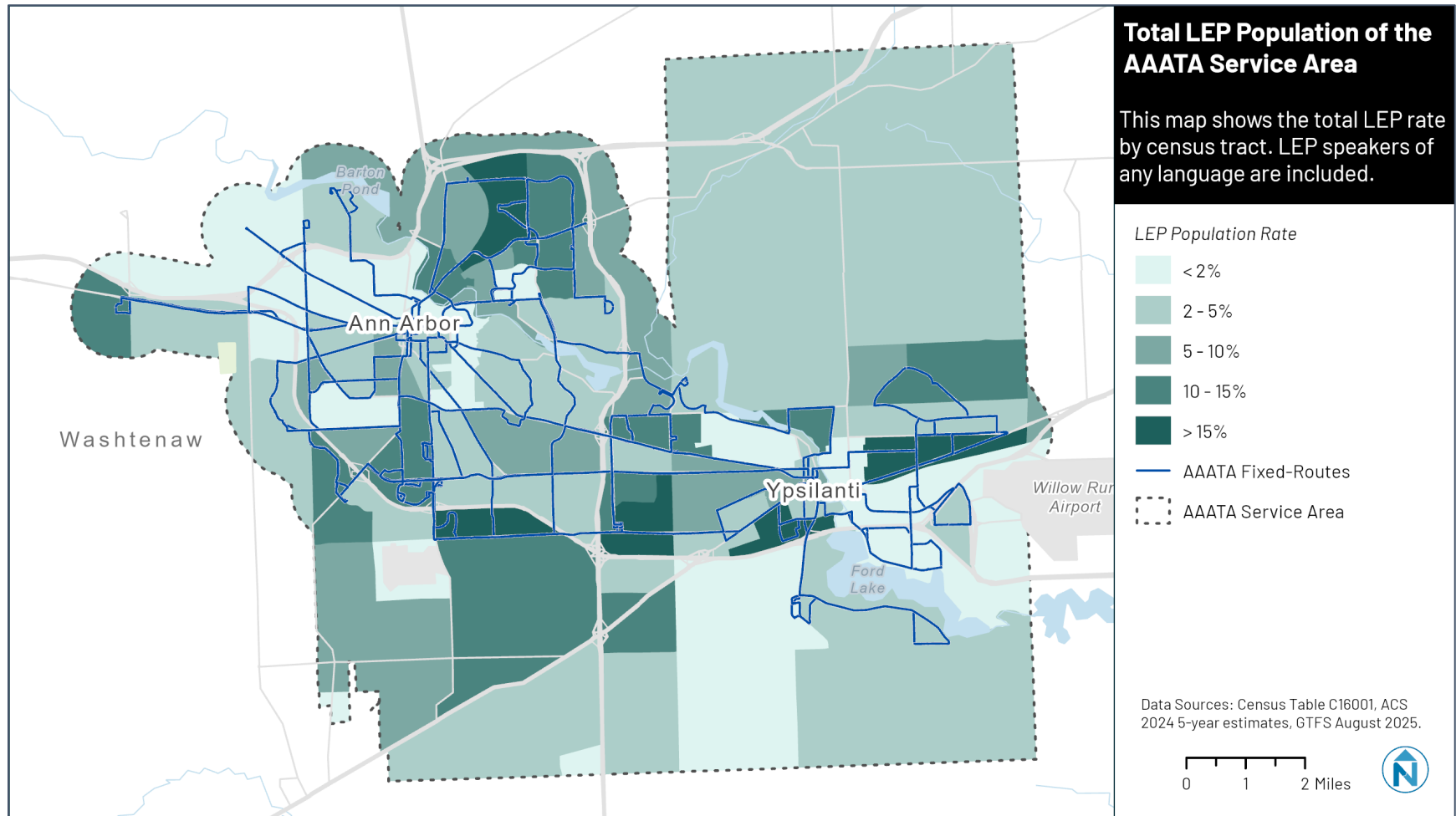


Figure 10: Spanish LEP Population Rate by Census Tract

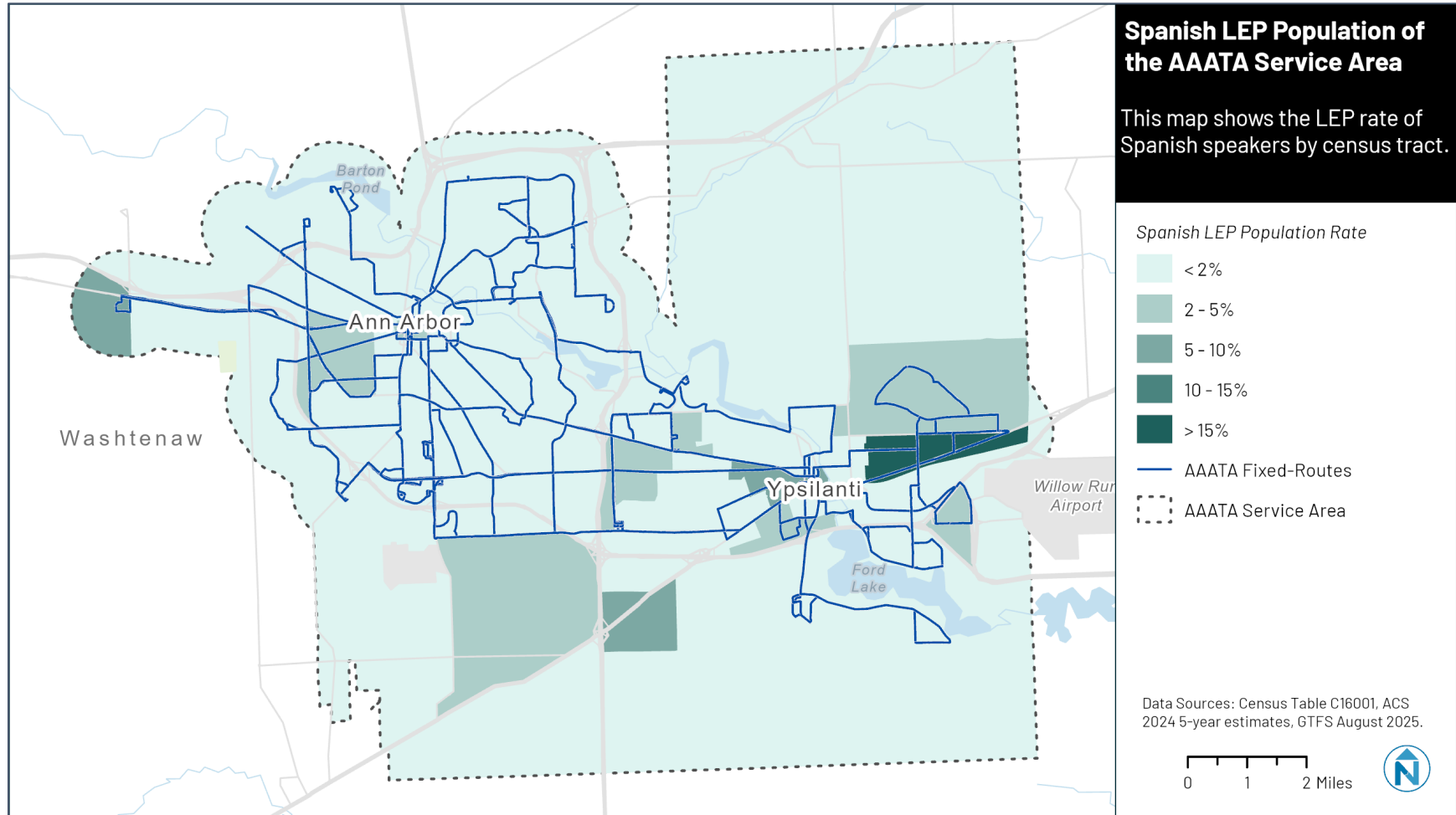


Figure 11: Chinese LEP Population Rate by Census Tract

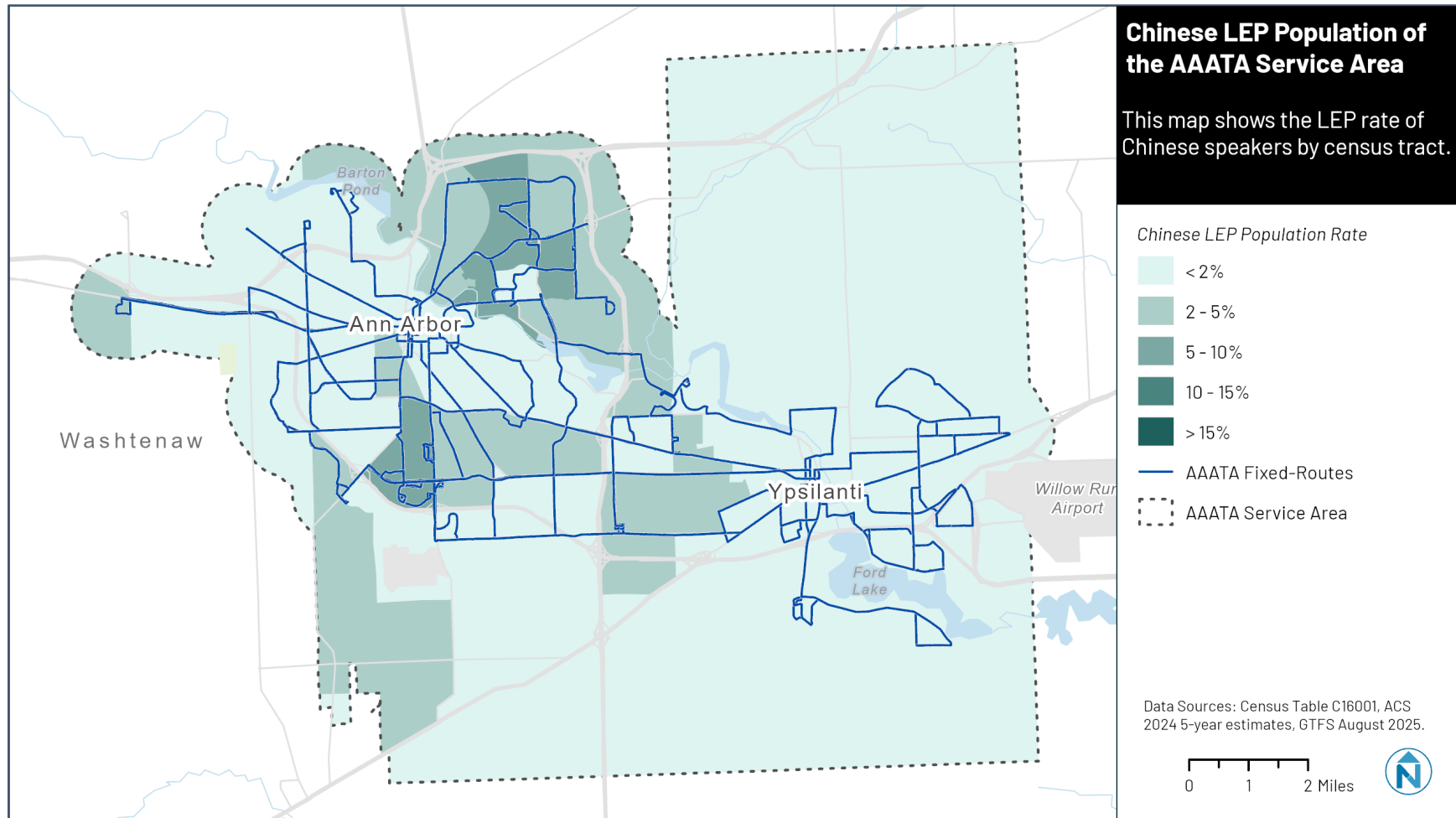
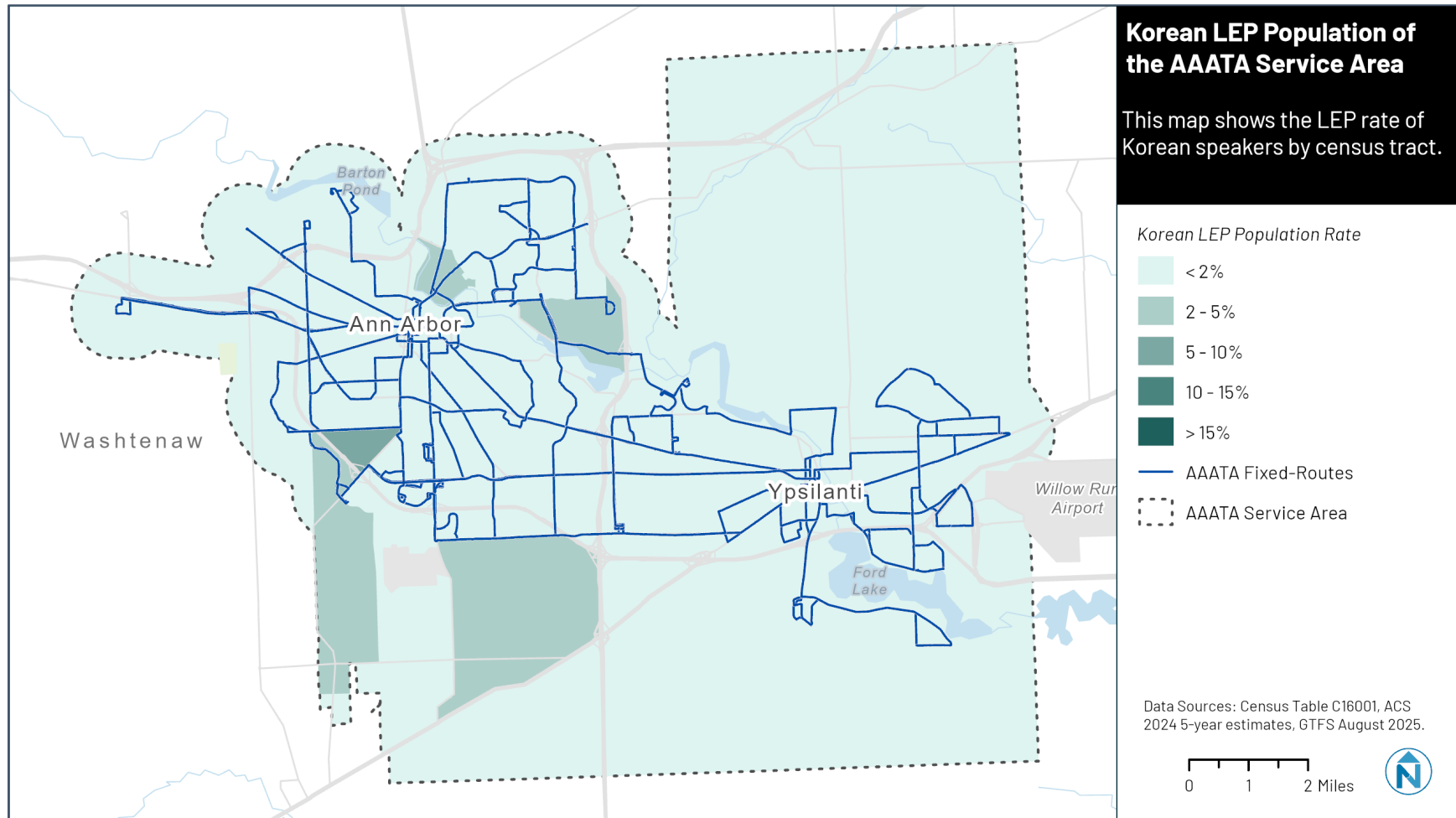


Figure 12: Korean LEP Population by Census Tract



Literacy

Another potential barrier to utilizing AAATA services is an inability for LEP persons to read and write in their own language. Below, in Figure 13, is information on literacy rates in countries where the three languages that exceed the vital document thresholds are used as an official language or predominately spoken. This information is paired with census table B05006: Place of Birth for the Foreign-Born Population of the United States for residents of Washtenaw County. This table does not measure the populations' ability to speak English, only where surveyed persons were born. However, it does serve as an imperfect methodology to gauge the need for alternative translation services (e.g., oral interpretation) if the county does exhibit a significant number of persons from a country with relatively low literacy rates. However, as the table shows, there are no countries from the three target languages where literacy is below 80%, indicating a low likelihood for AAATA staff to encounter illiterate LEP persons. However, this information serves as a reminder that publications in any language may be insufficient and that the availability of oral translation services or better visual signage that can communicate wayfinding, danger, or need for attention through symbols or other means, remains important.

Figure 13: Literacy Rates and Foreign-Born Populations

Country	Rate	Language	Year	Washtenaw County Origin Population
Argentina	99%	Spanish	2018	125
Bolivia	93%	Spanish	2015	26
Chile	97%	Spanish	2021	41
China	97%	Chinese	2018	8,901
Colombia	96%	Spanish	2020	597
Costa Rica	98%	Spanish	2021	250
Cuba	100%	Spanish	2021	110
Dominican Republic	96%	Spanish	2022	77
Ecuador	94%	Spanish	2022	78
El Salvador	89%	Spanish	2019	246
Guatemala	83%	Spanish	2021	1,124
Honduras	89%	Spanish	2019	349
Korea, South	99%	Korean	NA	3,085
Mexico	95%	Spanish	2020	2,540
Nicaragua	82%	Spanish	2015	9

Country	Rate	Language	Year	Washtenaw County Origin Population
Panama	96%	Spanish	2019	0
Paraguay	95%	Spanish	2020	-
Peru	95%	Spanish	2020	61
Puerto Rico	92%	Spanish	2021	-
Spain	99%	Spanish	2021	291
Uruguay	99%	Spanish	2019	53
Venezuela	98%	Spanish	2021	143

Source: CIA World Factbook and Census Table B05006, 2024, 5-Year Estimates

Factor 2: The frequency with which LEP persons use AAATA services

After estimating the LEP population in the AAATA service area, the second step in the analysis estimates the frequency with which these persons may utilize AAATA services. The most recent onboard survey from October 2024 made contacts with 4,439 riders. Of these, 252 (6%) were unable to participate in the survey due to language barriers. This rate is comparable to the LEP population in the service area. However, the rate of LEP riders is assuredly higher than the service area average (and the 252 riders identified) as Spanish versions of the survey were available to riders.² As a result of these findings, it is reasonable to assume that AAATA staff, particularly operators who serve hundreds of riders per day, may come into contact with and assist LEP riders.

AAATA has received no requests for translated materials and no requests for interpreters to date. The primary locations where the public comes into contact with AAATA are as follows:

- Main Office and Telephone Line (fare media sales, ID cards, general information)
- Downtown Information Center (fare media sales, route and schedule information)
- Paratransit Coordinator (ADA eligibility and paratransit information)
- Paratransit Telephone (paratransit reservations)
- Onboard fixed-route buses (specific trip information)
- AAATA website (TheRide.org)

AAATA works with a variety of governmental and human service agencies to assist in meeting the needs of their clients. Of particular importance in this context are the University of Michigan Office of International Programs (UMOIP) and Jewish Family Services (JFS). UMOIP provides services for foreign students, including families of married students. Jewish Family Services is the agency designated to provide services for refugees, migrants, and new arrivals in Washtenaw County.

RideGuides are produced in Chinese, Spanish, Korean, and Arabic, and are delivered to designated potential LEP population locations throughout the AAATA service area. No written correspondence regarding limited English

² The survey results did not indicate which were completed in English or Spanish.

proficiency has been received. The internet has become the dominant medium for people seeking general information about AAATA as well as specific information on routes and schedules. In addition, TheRide.org website includes language translation options. No internet inquiries or social media inquiries have been received.

Factor 3: Assessing the importance of AAATA to LEP persons

After determining the frequency with which LEP riders use the agency's services, the next step in the analysis estimates the importance of those services to LEP riders. AAATA operates scheduled fixed-route bus service and provides demand-response service for people with disabilities and senior citizens. Approximately 97% of AAATA riders are on fixed-route service and 3% use demand responsive service. Trip planning and in-trip information are the two most important areas that involve language skills in using fixed-route service. Essentially, to use fixed-route service, an individual first needs to determine bus stops, time, and bus routes to accomplish a particular trip, and then needs to wait at the correct bus stop, board the correct bus, and get off at the correct bus stop. A person who does not speak English very well may require assistance in trip planning, but this can occur before the time of the trip. During the trip, speaking and understanding English is not typically necessary, but may be required to deal with unusual situations.

Demand-responsive service has different requirements. To qualify, an individual must submit an application and, if approved, receive a picture identification card. English language skills are necessary for this process, and several social service agencies provide aid in this process. In addition, family members provide assistance in this process for many applicants. Once approved, an individual must make a telephone reservation for each trip. Language skills are required for this process, but another person can make the reservation on their behalf. Once again, agencies and family members may make reservations for clients. No additional language skills are necessary during the trip. The service is designed to provide service for people with a wide variety of disabilities, including persons with severe cognitive disabilities who do not speak or understand any language. The rider must have their identification card to ride, and their pick-up and drop-off locations are provided to the driver.

A final important area is participation in AAATA's public input process. Whenever an increase in fares or significant changes in service are considered, the AAATA actively seeks input from riders and other members of the public. Language skills are necessary for participation. However, the AAATA procedure provides a range of ways to make comments, ask questions, or make a suggestion. The most frequent method is via email.

Factor 4: Assessing the Resources Available and Associated Costs

The final factor details the resources available from AAATA to assist the LEP population and the costs associated with those efforts. These resources are available for both written and oral translation needs of the LEP population.

Currently, AAATA translates all vital documents, including the Title VI Notice, Complaint Form, and the Complaint Procedures into Spanish, Chinese, Korean, and Arabic.³ AAATA also translates The RideGuide into each of these languages and publishes them each time The RideGuide is updated. Additional resources allocated to assist the LEP population include funds for 24/7 oral interpretation services (via telephone); this information is located on multiple landing pages of the agency's website, as seen in Figure 14. This includes both the "Contact Us" webpage and the "Title VI" webpage. A log of the telephone calls by language is included in Figure 15.

³ Arabic is no longer a language that exceeds the safe harbor threshold as a result of this program update. Therefore, future vital documents or updates to existing vital documents would not need to be translated into Arabic. However, the agency will continue to maintain and update the existing Arabic translations of vital documents through the three-year horizon of this program update, whereupon the policy of providing Arabic translations will be reevaluated.

The agency website also provides contact information for two non-agency entities that may assist with translation services: Jewish Family Services and the University of Michigan Office of International Programs (UMOIP), the latter of which is for foreign students. The Jewish Family Services of Washtenaw County is a charitable organization that, among other activities, works extensively with immigrants and assists them in adapting to their new community, including translation services and configuring transportation options.

Figure 14: Agency website conveying translation assistance services

Translations Assistance

Limited English Assistance

If you need translation assistance, please call: 734-973-6500

Si necesita asistencia con una traducción, llame al 734-973-6500

如果您需要翻译协助，请致电：734-973-6500

번역 지원이 필요하면 734-973-6500번으로 연락하십시오

إذا كنت تحتاج إلى خدمات مساعدة فيما يتعلق بالترجمة، فيرجى الاتصال على رقم: 734-973-6500

 **TheRide**

Ann Arbor Area Transportation Authority call taker will reach out to interpreter service and connect riders with appropriate interpreters.

For translation assistance, please call: 734-973-6500.

Figure 15: Log of telephone calls requesting translation assistance by language

Month/Year	Language	Requestor
January 2025	Spanish	AAATA Information Operator
February 2025	Spanish	AAATA Information Operator
May 2025	Spanish	AAATA Information Operator
August 2025	Spanish	AAATA Information Operator
August 2025	Arabic	AAATA Information Operator
January 2026	Spanish	AAATA Information Operator

Language Assistance Plan

Results of the Four Factor Analysis

The results of the Four Factor Analysis revealed a changing LEP population compared to the previous analysis from the 2023 program update. There continues to be a significant presence of LEP persons in the agency's service area of nearly 6%. These populations continue to be predominantly Spanish and Chinese, whereas LEP Koreans are fewer in number but continue to exceed the thresholds that would require the translation of vital documents. The analysis also revealed that the Arabic LEP population would no longer exceed the safe harbor threshold. However, the agency will continue to maintain and update the existing Arabic translations of vital documents through the three-year horizon of this program update, whereupon the policy of providing Arabic translations will be reevaluated.

The analysis of the onboard survey also revealed a LEP population that uses AAATA services as frequently as any non-LEP rider. The analysis also elucidated the importance of AAATA services to the lives of LEP riders as a majority do not have available vehicles, are in poverty, and are typically unable to work from home.

Provisioning and notice of language services

The agency assists LEP riders first and foremost by providing telephone translation services at any time, free of charge to the caller. This service includes languages beyond the three that are currently required to have written translations of vital documents. This information is displayed on multiple landing pages of the agency's website, at www.theride.org. Moreover, vital documents, including the Title VI notice, Complaint Form, and Complaint Procedures Form, are all available in English, Spanish, Chinese, Korean, and Arabic. Through the agency website, there are also two external organizations that the agency directs riders to for translation services and assistance in navigating transportation options. These are:

- Jewish Family Services of Washtenaw County (www.jfsann Arbor.org)
- University of Michigan Office of International Programs (<https://internationalcenter.umich.edu>)

Monitoring and evaluation of the Language Assistance Plan

The plan is monitored based on the feedback received from AAATA staff that records each request for translation assistance, which informs the agency if additional resources may be needed or reallocated to ensure service accessibility for LEP persons. This information will be used to assess if there are changes either in the frequency of the language encountered, or if there are new languages that are being requested that were not revealed in the updated four factor analysis. For example, although the updated four factor analysis revealed that Arabic no longer has an LEP population that requires the agency to translate vital documents into the language, repeated contacts between operators and Arabic LEP persons may inform and influence the agency to maintain and update Arabic as a safe harbor language, regardless of the safe harbor threshold.

If there are noticeable changes, AAATA will perform an evaluation and determine if the plan needs to be updated. Absent any noticeable change, AAATA will perform an evaluation and revise the plan with the next required Title VI program update.

LEP training for employees

Agency operators participate in annual retraining that includes a summary of the latest Language Assistance Plan, including aspects of the four factor analysis that details the languages and LEP populations that an operator can anticipate coming into contact with. Operators are also briefed on the resources available to them and the riders in case of language difficulties. Lastly, all employees are asked to record any language assistance requests. This data is then collated at least once every three years by the agency.

3. Chapter IV Requirements

AAATA is a public transit provider that operates more than 50 fixed-route vehicles in peak services and operates in an urbanized area with a population of 200,000 or more. Chapter IV requires that all transit agencies set systemwide service standards and policies, but has additional requirements for larger agencies: those with 50 or more vehicles operated in maximum service (VOMS) and located in an urbanized area of 200,000 or more in population. Therefore, AAATA must satisfy additional requirements for larger transit agencies by including the following:

- Present a demographic profile of the service area, as well as a demographic profile of ridership based on rider survey data *(required of larger agencies)*
- Set systemwide service standards and policies *(required of all agencies)*
- Analyze and monitor performance of service standards and policies based on the demographic profile of the service area *(required of larger agencies)*.
- Articulate policies for disparate impact and disproportionate burden analysis related to any major service changes or fare changes *(required of larger agencies)*
- Present major service changes and fare changes and an assessment of equity impacts *(required of larger agencies)*

Demographic Profile

Demographics of Service Area

The maps shown in Figure 16 and Figure 17 detail AAATA facilities and amenities (e.g., park & rides, shelters, transit centers), route alignments, and major destinations. This information is overlaid with census data that highlights block groups with minority or low-income rates that are above the service area average of 40% and 30%, respectively. As both maps show, the existing route network connects major destinations, such as shopping centers, civic centers, and hospitals, with areas exhibiting higher rates of minority or low-income populations.

Minority Map Analysis

Out of 261 block groups in the AAATA service area, 102 exhibit minority rates above the service area's average. Of these, 88 block groups (86%) intersect with fixed-route service. The block groups that are not located near fixed-route service are primarily located in the northern and southern parts of Ann Arbor northwest of Michigan Avenue and State Street.

Low-Income Map Analysis

Of the 261 block groups in the AAATA service area, 92 block groups exhibit low-income rates that exceed the service area's average. Of these, 84 block groups (91%) intersect with existing fixed-route service. The 8 block groups that do not intersect with fixed-route service are primarily located east of Ford Lake in Ypsilanti Township, on the southeastern edge of the service area.

Figure 16: Block groups with minority populations above the AAATA service area average

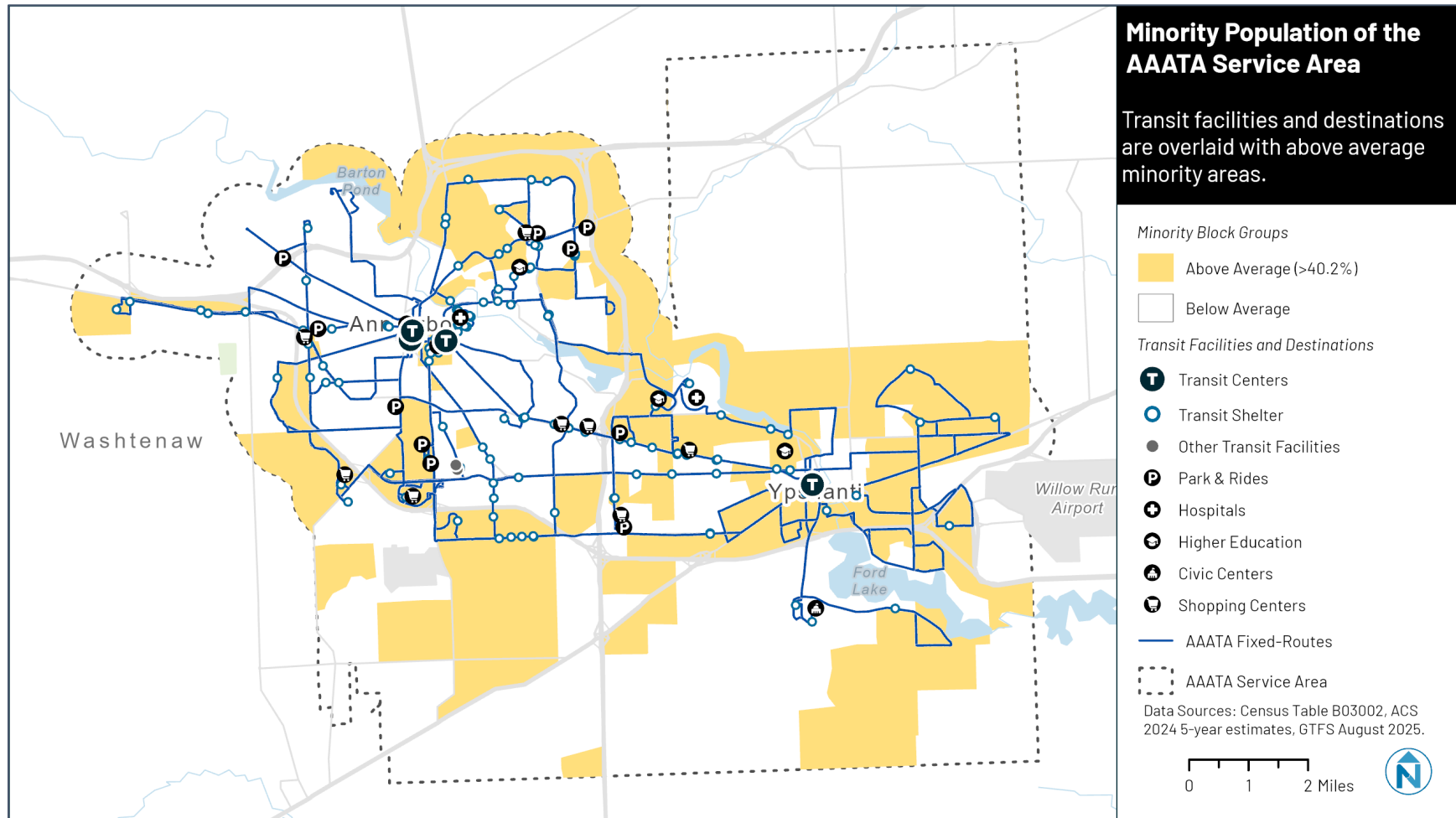
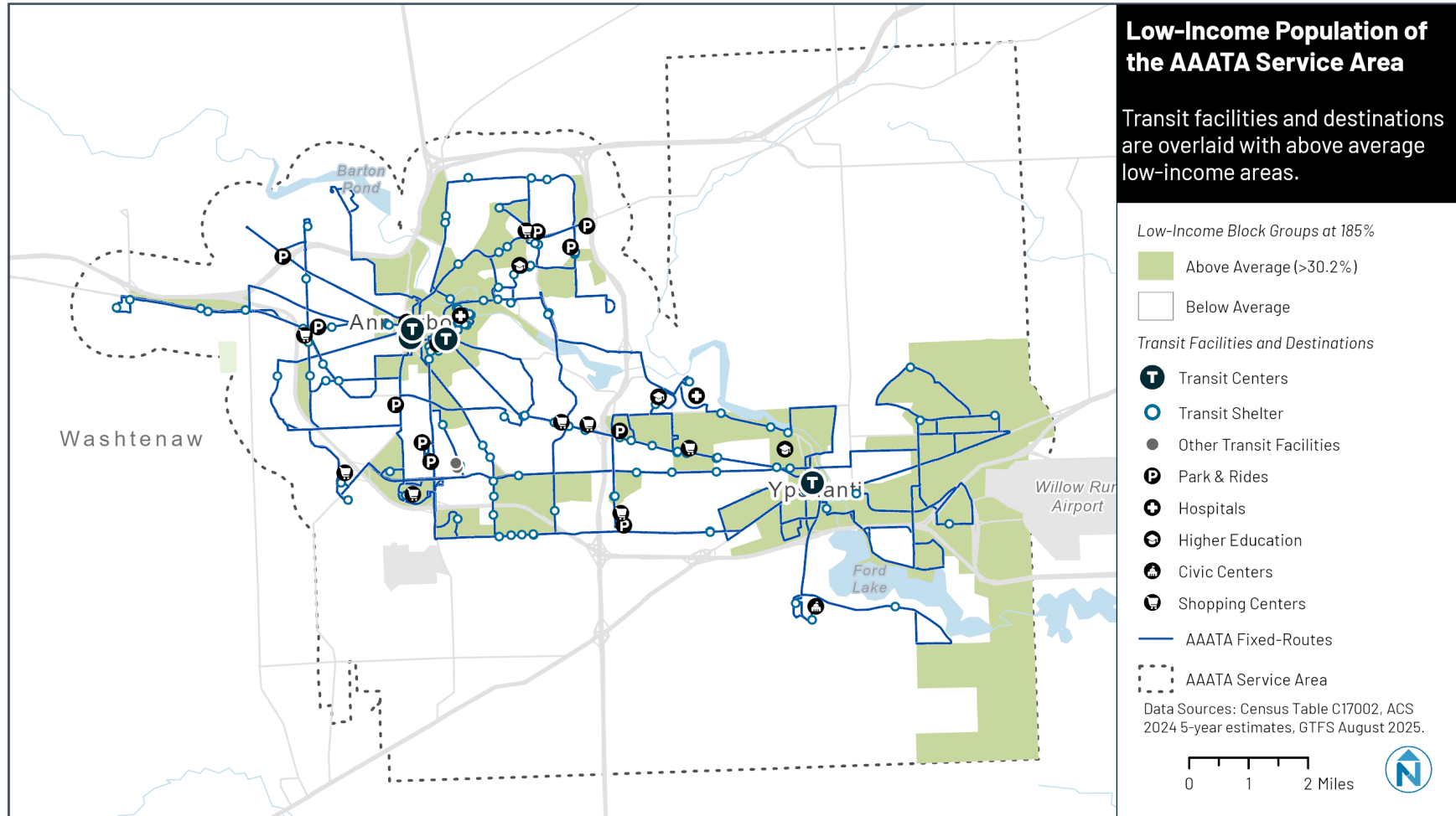


Figure 17: Block groups with low-income populations above the AAATA service area average



Demographic Ridership Analysis

Agencies of AAATA's size are required to collect and report on the demographic makeup of their ridership in order to perform an analysis that compares minority and low-income riders to non-minority and non-low-income riders. This comparative analysis of AAATA's ridership is gleaned from the October 2024 ridership survey. This survey, as shown in **Figure 18**, included 35 questions that elicited information ranging from how riders use the service and their impressions of service quality, to personal and demographic details. The results of the survey are below.

Survey Methodology

The 2024 passenger survey occurred in mid and late October at a time when the University of Michigan would be in session.⁴ The survey period also avoided times when the University of Michigan would host a football game to avoid distortions in the ridership that can result from the traffic disruptions that occur. Survey personnel rode an entire "run" of a bus and were directed to engage all riders who appeared 16 years of age or older. The survey was self-administered and assigned serial numbers to identify the route and day of week for the survey. The surveys were also available in both English and Spanish. A representative sample of runs was selected and modified to ensure a proportional response for all routes. This yielded a sample size of 1,707 surveys with varying degrees of completion and formed the basis for this analysis.

⁴ The previous survey collected data in April 2022, but the percentage of students surveyed were nearly identical, indicating that both survey periods are appropriate.

PASSENGER SURVEY — Please let TheRide know how to serve you better!



TheRide

1. Where were you before you went to the bus stop for this trip?

☐ Home	☐ Work	☐ Shopping	☐ School / college
☐ Social visit or recreation	☐ Doctor / medical	☐ Church	
☐ Other _____			

2. Will you transfer to another TheRide bus during this trip? ☐ Yes ☐ No

3. What are the cross streets at the place you are coming from now?

Street: _____

Cross street: _____

4. What city/Twp? (Circle one): ☐ Ann Arbor City ☐ Ypsilanti City ☐ Pittsfield Twp
☐ Scio Twp ☐ Superior Twp ☐ Ypsilanti Twp ☐ Other: _____

5. How did you get to the first bus stop you used on this trip?

☐ Walked ☐ Wheelchair/scooter ☐ Bike ☐ Drove ☐ Got a ride

6. How many minutes did it take to get to the first bus stop you used on this trip?
 _____ Minutes

7. What is your FINAL destination for this trip?

☐ Home	☐ Work	☐ Shopping	☐ School / college
☐ Social visit or recreation	☐ Doctor / medical	☐ Church	
☐ Other _____			

8. What are the cross streets at your final destination?

Street: _____

Cross street: _____

9. What city/Twp? (Circle one): ☐ Ann Arbor City ☐ Ypsilanti City ☐ Pittsfield Twp
☐ Scio Twp ☐ Superior Twp ☐ Ypsilanti Twp ☐ Other: _____

10. About how many minutes will this total trip take? _____

11. How many separate one-way bus trips will you make today? (For example, even if you transfer, going to work is only one trip; going home from work is a second trip)

☐ 1 trip ☐ 2 trips ☐ 3 trips ☐ 4 trips Other _____ (how many?)

12. How did you pay for this trip?

☐ Cash	☐ EZFare	☐ MCard	☐ Transfer	☐ 30-Day pass
☐ goPASS	☐ Token	☐ EMU Pass	☐ Other _____	

13. Do you have one of the following:

☐ An ADA (green) card ☐ GoldRide card (senior card) ☐ Fare Deal card (for disability)
☐ Fare Deal card (for low income) ☐ Fare Deal Card (age 60-64)

14. Which routes do you use regularly on TheRide? (choose up to 4)

Routes: 3 4 5 6 22 23 25 26 27 28 29 30 31 32 33 34
 42 43 44 45 46 47 61 62 63 64 65 66 67 68 104

15. Including today, on which of the past seven days have you ridden on TheRide?
 (All that apply)

☐ Mon ☐ Tue ☐ Wed ☐ Thurs ☐ Fri ☐ Sat ☐ Sun ☐ All 7 days

16. How satisfied or dissatisfied are you with TheRide service in each of the following areas?

	Don't know	Dissatisfied						Neutral						Satisfied
		☹️						😊						😊
a. Drivers' courtesy with passengers	☐	1	2	3	4	5	6	7						
b. Overall quality of customer information	☐	1	2	3	4	5	6	7						
c. Cleanliness of bus interiors	☐	1	2	3	4	5	6	7						
d. Safety from accidents	☐	1	2	3	4	5	6	7						
e. Personal security while using TheRide	☐	1	2	3	4	5	6	7						
f. Shelter at stops you use	☐	1	2	3	4	5	6	7						
g. Distance to bus stop you use most often	☐	1	2	3	4	5	6	7						
h. Sufficient service to areas you want to go to	☐	1	2	3	4	5	6	7						
i. Dependability of making transfers	☐	1	2	3	4	5	6	7						
j. Directness of routes	☐	1	2	3	4	5	6	7						
k. Total duration of your trip	☐	1	2	3	4	5	6	7						
l. Predictability of bus arrivals	☐	1	2	3	4	5	6	7						
m. TheRide Service overall	☐	1	2	3	4	5	6	7						

17. How likely are you to recommend TheRide to a friend or colleague?

Not at all likely Extremely likely

0 1 2 3 4 5 6 7 8 9 10

Please turn the survey over and complete the questions on the back

PASSENGER SURVEY — Please let TheRide know how to serve you better!					
TheRide					
18. Was a car (or truck or motorcycle) available to you to make this trip? ☐ Yes ☐ No					
19. When using TheRide, how secure do you feel in each of these places?					
	Very insecure	Insecure	I don't think about it	Secure	Very secure
a. On the buses	1	2	3	4	5
b. Blake Transit Center	1	2	3	4	5
c. Ypsilanti Transit Center	1	2	3	4	5
d. Bus stops	1	2	3	4	5
20. Why do you feel that way? 					
21. For how long have you been using TheRide? ☐ Less than a year ☐ 1-2 years ☐ 3-5 years ☐ 6-10 years ☐ 11-15 years ☐ more than 15 years					
22. How important is each of these reasons for which you use TheRide?					
	Not important at all	Not very important	Somewhat important	Extremely important	
a. I don't have a car	1	2	3	4	
b. TheRide more convenient than having a car	1	2	3	4	
c. Using TheRide cheaper than a car	1	2	3	4	
d. Protect the climate	1	2	3	4	
e. TheRide less stressful than driving	1	2	3	4	
Which is the ONE MOST important reason? a b c d e					
23. Which one of the following best describes you? Are you (circle only one): ☐ Employed for pay outside your home ☐ Employed for pay in your home ☐ Student ☐ Homemaker ☐ Unemployed ☐ Retired					
A. If you are employed, in a typical week, do you usually?					
a. Work after 9:00 PM on any day?	☐ Yes ☐ No				
b. Work Saturday and/or Sunday	☐ Yes ☐ No				
c. Start work before 7:00 am on any day?	☐ Yes ☐ No				
d. If you are employed, can your type of work be done from home?	☐ Yes ☐ No				
24. Are you a student? ☐ Yes ☐ No ☐ High school student ☐ College student ☐ Not a student					
25. If you are a college student, which college? ☐ U of M ☐ EMU ☐ WCC ☐ Concordia ☐ Cleary ☐ Cooley ☐ Other: _____					
26. Do you identify as... ☐ Male ☐ Female ☐ Non-binary ☐ Prefer not to answer					
27. How old are you? _____ Years old					
28. What is your total combined annual household income? ☐ Less than \$10,000 ☐ \$10,000 to \$14,999 ☐ \$15,000 to \$19,999 ☐ \$20,000 to \$24,999 ☐ \$25,000 to \$34,999 ☐ \$35,000 to \$49,999 ☐ \$50,000 to \$74,999 ☐ \$75,000 to \$100,000 ☐ More than \$100,000					
29. Do you identify as... (Circle all that apply): ☐ African-American/Black ☐ Asian ☐ Caucasian/white ☐ Native-American Indian ☐ Pacific Islander/Hawaiian ☐ Other _____					
30. Do you (also) identify as Hispanic/Latino(a)? ☐ Yes ☐ No					
31. What language do you most often speak at home? ☐ English ☐ Spanish ☐ Other: _____					
32. Do you rent or own the home where you live? ☐ Rent ☐ Own					
33. How many people live in your household? 1 2 3 4 5 or more					
34. Where do you often get route and schedule information?					
a. TheRide website on a desktop/laptop	☐ Yes ☐ No				
b. TheRide website on a smartphone	☐ Yes ☐ No				
c. The printed Ride Guide	☐ Yes ☐ No				
d. 734-996-0400 information number	☐ Yes ☐ No				
e. A smartphone app	☐ Yes ☐ No				
f. Text messages on a cell phone	☐ Yes ☐ No				
g. Facebook, X/Twitter, Instagram, TikTok, Pinterest, Nixle, or other social media	☐ Yes ☐ No				
35. Have you any comments or suggestions for TheRide? 					

Minority and Non-Minority Riders

Of the 1,707 usable surveys, 1,115 riders provided information about their race or ethnicity. Of these, 725 riders identified as a minority and 430 riders identified as non-Hispanic White, resulting in a minority ridership of 63%, which is significantly higher than the service area average of 40% minority. Figure 19 below compares these two respondent populations to glean any differences in how these two populations use the service. The results reveal that minority riders tend to experience the same trip duration and routes used. However, minority riders use AAATA more frequently, at an average of five days per week versus four days per week for non-minority riders. Moreover, although the majority of both minority and non-minority riders have low incomes and lack vehicle access, minority riders experience both of these issues at higher rates.

Figure 19: Minority and Non-Minority Characteristics Comparison

Metric	Minority	# of Surveys	Non-Minority	# of Surveys
Average Trip Duration (minutes)	30	621	29	381
Average One-way Trips	2.0	661	2.2	397
Average Routes Used	2.6	670	2.5	400
How many Days a Week	5	641	4	386
Car Available	19%	664	27%	403
Poverty Status	77%	566	62%	358

The survey also asked riders to rank or select multiple answers on fare usage, information accessibility, and perceptions of the service. The comparison results are shown in Figure 20 through Figure 22. The fare usage chart refers to the specific trip the surveyed rider took, while acknowledging that riders may use more than one fare type over the course of their patronage. As a result, the sum of the shares of each fare type total to 100% for minority and non-minority riders. Fare usage for minority riders is similar to non-minority riders; the greatest difference is with Cash fares, which minority riders use at a rate 8% higher than non-minority riders. The most common fare type is Mcards (University of Michigan fare pass), which are used by 49% of minority riders and 47% of non-minority riders.⁵ Non-minority riders also tend to use “Other” fare media at higher rates. “Other” fare primarily consists of Gold Ride passes, which are for riders aged 65 years and older.

Riders were also asked about how they obtain information about AAATA services and were able to select multiple answers. The survey revealed that minority and non-minority riders obtain AAATA information similarly, with a majority in both groups relying predominantly on smartphones to obtain information either through an app or from the website. The starkest difference between minority and non-minority riders is in the use of customer service. Nearly one-third (29%) of minority riders reported using customer service as opposed to one-fifth (18%) of non-minority riders. Minority riders are also more likely to use social media (14%) than non-minority riders (5%) to obtain information, although the shares for both remain small.

Both minority and non-minority riders reported average satisfaction scores between 2 and 3 in nearly all categories (Figure 22), which translates to a slightly below neutral impression of the service. The lowest scoring category, “Shelters”, revealed the largest difference between minority and non-minority riders, with a score of 2.5 and 2.3, respectively.

⁵ Both University of Michigan students and workers are permitted to use MCards.

Figure 20: Minority and Non-Minority Fare Usage Comparison

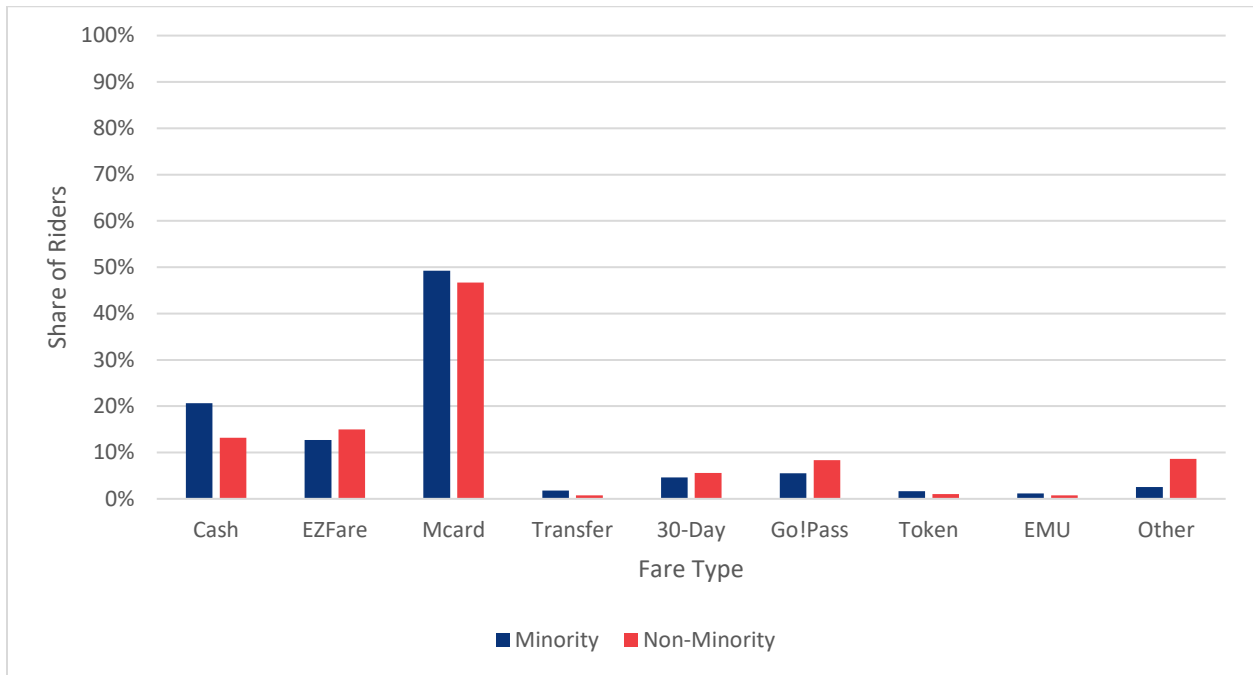


Figure 21: Minority and Non-Minority Information Source Comparison

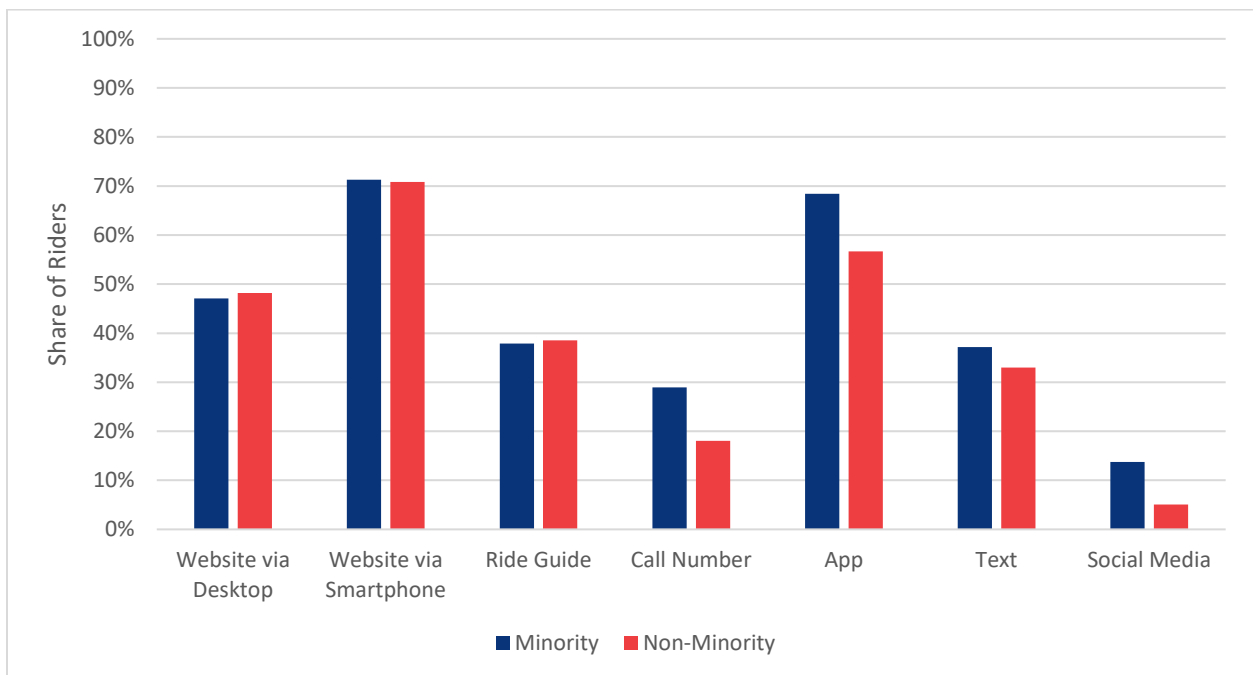
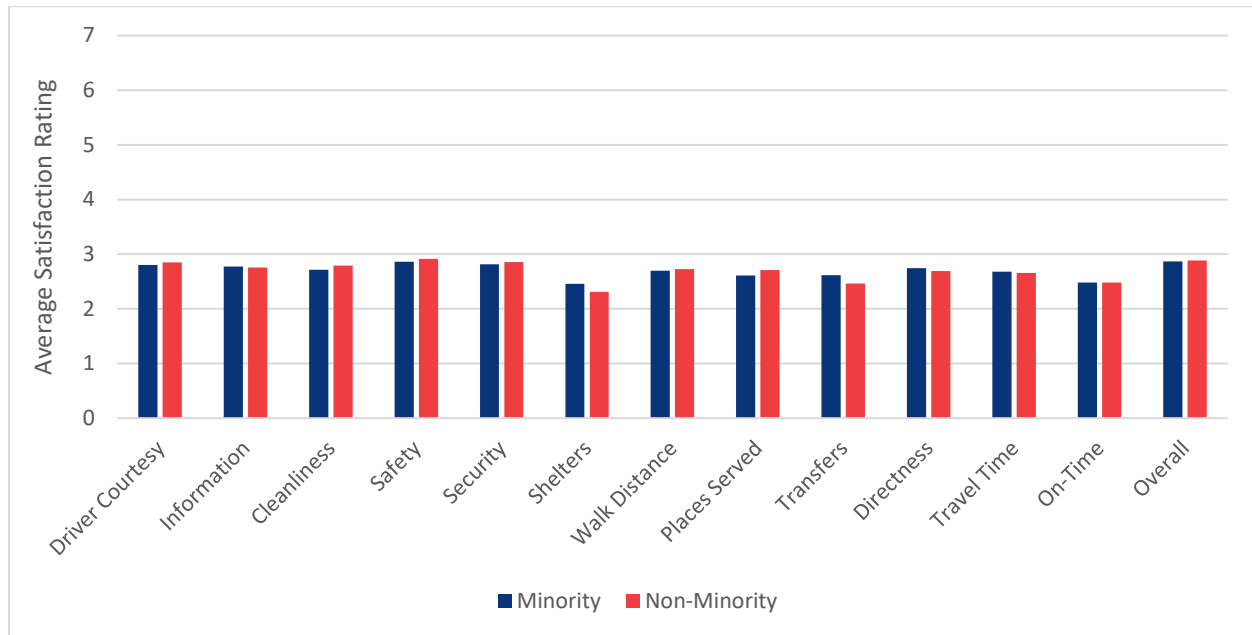


Figure 22: Minority and Non-Minority Rider Satisfaction Comparison



Low-Income and Non-Low-Income Riders

Of the 1,707 usable surveys, 959 riders provided information about income and household size, which is necessary to estimate the poverty status of the rider. Based on the reported household size and income, 685 riders were considered to be in poverty and 274 were considered to be above the poverty threshold, resulting in a low-income ridership of 71%, which is more than double the service area average of 30% low-income. The results in Figure 23 reveal that low-income riders, on average, have slightly longer trips and use more routes than non-low-income riders. The majority of low-income and non-low-income riders lack access to a vehicle but this issue is particularly high for low-income riders, where only 16% of low-income riders could have used a vehicle for their trip. Roughly two-thirds of low-income riders are also minority riders, compared to half of non-low-income riders.

Figure 23: Low-Income and Non-Low-Income Characteristics Comparison

Metric	Low-Income	Surveys	Non-Low-Income	Surveys
Average Trip Duration	31	596	28	252
Average One-way Trips	2.1	638	2.1	256
Average Routes Used	2.7	644	2.4	253
How many Days a Week	5	625	5	242

Metric	Low-Income	Surveys	Non-Low-Income	Surveys
Car available	16%	633	37%	265
Minority Status	66%	657	49%	267

The comparison results between low-income and non-low-income riders are shown in Figure 24 through Figure 26. Regarding fare media usage, the differences are far greater between the two income groups than between minority and non-minority riders. Low-income riders use cash fares at four times the rate of non-low-income riders. Moreover, although the use of the Mcard forms a plurality (37%) for low-income riders, it is a clear majority (72%) for non-low-income riders. Of the low-income riders using Mcard, 85% identified as being a student, whereas only 55% of non-low-income Mcard users identified as such. Another salient finding, EZfare usage, which is an electronic fare media that uses a mobile ticketing app, is roughly twice as high among low-income users. Although Mcard users might otherwise use EZfare mobile ticketing and erode the disparity between the two groups, when restricting EZfare usage to non-students, low-income users continue to utilize mobile ticketing at twice the rate of non-low-income users. Low-income users also purchase 30-day passes at higher rates than non-low-income users, although again, this disparity may be due to the predominance of Mcard usage among non-low-income users.

The results from Figure 25, which detail the sources of rider information, reveal that low-income riders tend to use traditional information sources (e.g., printed rider guide, customer service, and text messaging) at higher rates than non-low-income riders, indicating a continued need for these materials and points of access. Non-low-income users obtain their information primarily from their smartphone, with only 30% referencing printed materials and only 10% reported calling customer service.

Similar to the minority and non-minority comparison, the low-income status of a rider does not appear to have any impact on their perception of the service with both groups rating each of the 13 categories nearly identically, ranging between 2 and 3 (slightly below neutral).

Figure 24: Low-Income and Non-Low-Income Fare Usage Comparison

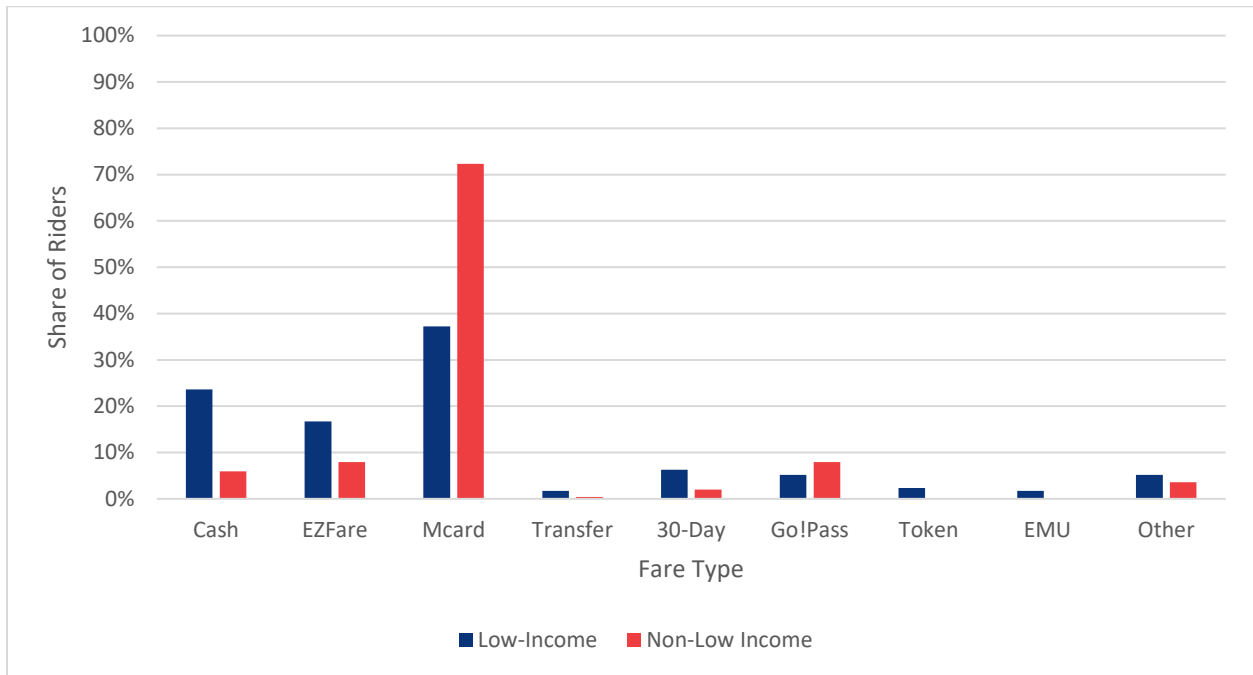
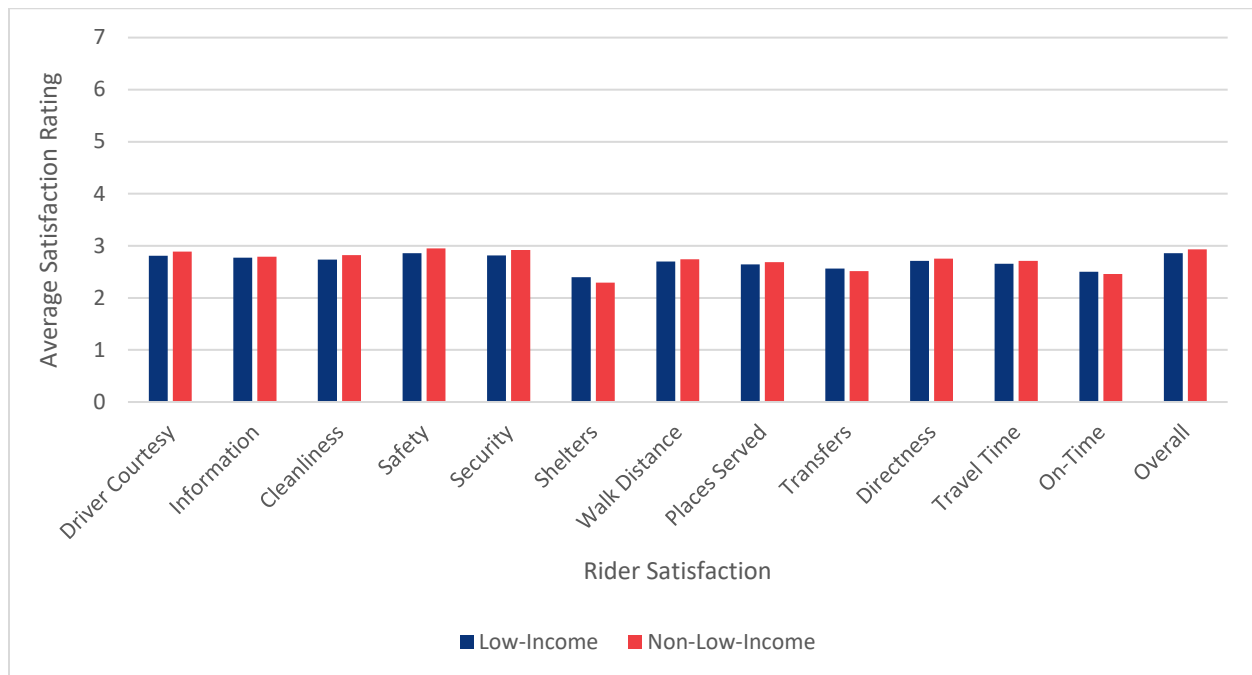


Figure 25: Low-Income and Non-Low-Income Information Source Comparison



Figure 26: Low-Income and Non-Low-Income Rider Satisfaction Comparison



Service Standards and Guidelines

AAATA has developed service standards and guidelines to promote service reliability, accessibility, and the equitable distribution of service.

Service Standards

The following service standards fulfill the requirement to establish specific quantitative and qualitative metrics as measurable rules that set minimum benchmarks for all fixed-route services. This allows both AAATA and the public to ensure that service is being delivered equitably and in a manner that is consistent with expectations.

Vehicle Load by Mode

Passenger loading in transit refers to the number of passengers on the bus at any given time. Managing passenger loads is an important aspect of maintaining efficient, comfortable, and safe public transportation. Crowding is the first condition riders notice once they are on board. A service that routinely forces riders to stand—especially for long distances—feels unreliable even if it is on time. High passenger loads can affect service quality, while low loads may indicate inefficiency in resource use. Low loads are addressed in this document under Ridership Productivity & Thresholds.

Passenger loads can be expressed as ratios to reflect the number of people on the vehicle in proportion to the number of seats. A standard of 1.0, for example, sets a goal of ensuring every passenger has a seat. A standard of 1.2 allows for some standing passengers. If a bus route consistently exceeds the vehicle loading standards, additional capacity (more or larger buses) should be added to the route.

Transit providers can adjust services to keep the number of passengers on their vehicles at a comfortable level, always within the limits of safety. Transit operators maintain passenger loads within acceptable levels by matching

capacity to demand. They can accomplish this by matching vehicle types with ridership levels (i.e., assigning larger vehicles to higher ridership routes) by increasing (or decreasing) the frequency of service.

AAATA's standards for maximum passenger loads are as follows:

- Trips will be flagged when load factors exceed 1.2 times seated capacity.
- Additional vehicles will be dispatched if loads pass 1.5 times seated capacity.

Vehicle Headway by Mode

The frequency of transit refers to how often the bus arrives, how often a bus passes a stop, or departs from a bus bay. High frequency services are expensive, so transit agencies must balance costs and the underlying demand for service. Ideally, service levels align with ridership.

Service frequency is critical to establish transit service as an attractive and viable travel mode and significantly influences transit ridership. Like span of service, frequency has a significant impact on operating costs. For example, improving a route from a 60-minute frequency to a 30 minute-frequency doubles the route's operating costs. Because operating high-frequency service is so expensive, frequency can vary throughout the day (i.e. peak and off-peak periods) to reflect existing or potential demand. Service frequencies are also set to ensure there are enough vehicles on the route to accommodate passenger volumes while not exceeding recommended loading standards (i.e. crowding).

Service frequency standards set the minimum expectation for the frequency of bus service to ensure network compatibility. Consistent with the span of service expectations, transit operators are permitted to provide higher service frequencies. However, these additional trips are expected to meet the minimum productivity expectations for the category of service.

The minimum standards for frequency are shown in Figure 27. Routes may exceed these standards, but they are designed to be the minimum standards that the routes should meet. Note that not all routes operate on all days. Frequency standards should apply to days when routes operate and will not imply that service should be added on days when routes are not scheduled to operate. The minimum frequency standards do not apply to Limited-Service Routes.

Figure 27: AAATA Minimum Frequency Standards (minutes)

Route Category	Weekday Peak 6-9am, 3-6pm	Weekday Midday 9am-3pm	Weekday Evening 6pm & later	Sat/Sun Day 6am-6pm	Sat/Sun Evening 6pm & later
Frequent	15	30	60	30	60
Local	30	30	60	30	60

On-Time Performance

Maintaining a high OTP is important to maintain reliability and trust of riders, efficiency within the transit network, positive rider experience, and operational cost savings.

Travel time plays a critical role in determining service quality. A rider's trip begins before boarding the vehicle and includes walking to the stop, waiting, and often transferring between routes. Delays at any point can extend the total trip time and create frustration. If a bus departs early, riders who arrive on time need to wait for the following trip and may miss their connections to other services, creating lengthy delays if the gaps between trips or

services is significant. If the bus departs late, the trip becomes longer and less reliable. Over time, inconsistent service discourages regular use of transit.

AAATA defines its on-time performance goal for fixed-route service as departures from timepoints within 0 minutes early and up to 5 minutes after the scheduled time, averaged over the entire network yearly. The on-time performance standard that AAATA aims to achieve is 85%.

Service Availability

Transit service availability refers to the extent to which public transportation services are accessible to people, in terms of the physical proximity to transit stops.

AAATA's service standard is that a minimum of 90% of the population of the fixed-route service area in the member jurisdictions (Ann Arbor, Ypsilanti, and Ypsilanti Township) will have service within 0.5 mile.

Vehicle Assignment

Vehicle assignment refers to the process that is used to determine which buses are used on which routes. While this may seem operational in nature, vehicle assignment has a significant impact on the rider experience. Newer vehicles tend to offer better reliability, accessibility, and amenities (such as USB ports or real-time information displays), and some agencies assign them strategically to higher-ridership or longer-distance routes to maximize rider benefit. Other agencies ensure consistency across routes through random or uniform fleet rotation. Assignment can also affect branding and fleet maintenance cycles, especially for services like BRT that use specialized vehicles.

AAATA assigns vehicles randomly from its single operating garage. Vehicle deployment does not vary by route or ridership level, and all vehicles are maintained under a uniform age policy.

Service Guidelines

Transit service guidelines are recommended practices that help shape decisions but allow for flexibility. Guidelines provide direction for all fixed-route services, but can be adapted to fit local needs or unique situations.

Transit Amenities

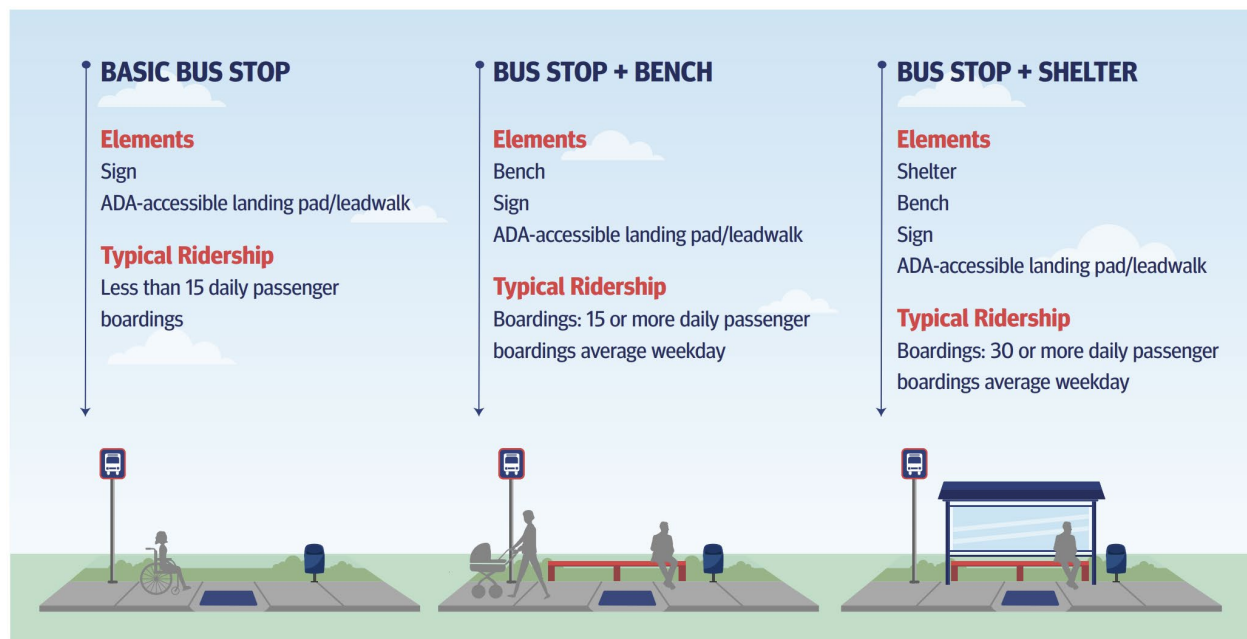
Bus stop amenities are the features and facilities provided at bus stops to improve the comfort, convenience, and safety of passengers. These amenities are designed to enhance the overall rider experience, making it easier for people to wait for and use public transportation. The right combination of amenities can encourage more people to rely on public transit and make the experience more enjoyable. Although popular, amenities are expensive and create ongoing operating costs, so they are used primarily at stops with larger numbers of boardings. AAATA cannot afford to provide amenities at low-use bus stops. The agency tries to avoid creating resentment by placing amenities at some under-used stops but not others.

The installation of transit amenities in the AAATA system is based on the number of passengers boarding at that stop, permitting requirements, right-of-way feasibility or private property owner approval, existing pedestrian infrastructure, and budgetary constraints. Bus stop amenities and thresholds for inclusion are shown below in Figure 28 and Figure 29, and documented in AAATA's 2025 Design Guidelines and Service Standards.

Figure 28: AAATA Bus Stop Amenities Thresholds by Stop Type

	Basic Bus Stop	Bus Stop + Bench	Bus Stop + Shelter
Typical Ridership (average weekday)	Less than 15 daily passenger boardings	15 or more daily passenger boardings	30 or more daily passenger boardings
Elements at Stop	- Sign - ADA-accessible landing pad/leadwalk	- Bench - Sign - ADA-accessible landing pad/leadwalk	- Shelter - Bench - Sign - ADA-accessible landing pad/leadwalk

Figure 29: AAATA Bus Stop Amenities Thresholds



Service Monitoring

Route Classification

AAATA utilizes passenger survey demographic data to assign minority classifications to their fixed-route services as opposed to relying on census data. This is done to more accurately reflect the existing users of the system, rather than relying on the surrounding demographics, who may or may not use the service. The racial composition of the surveyed route's ridership is compared to the service area average of 40% minority population. Routes with minority percentages that exceed the service area average are classified as minority routes, as shown in Figure 30. As a result, 10 out of the 31 fixed routes exceed the service area average and were classified as a minority route. This classification will be used to compare the performance of minority and non-minority routes to assess if there are excessive differences in meeting AAATA service standards and policies.

Figure 30: Minority Route Classification

Route	Route Name	Minority Rate	Minority Route Status
3	Huron River	40%	No
4	Washtenaw	38%	No
5	Packard	36%	No
6	Ellsworth – State	39%	No
22	Pontiac – Dhu Varren	43%	Yes
23	Plymouth	40%	Yes
25	Ann Arbor – Saline Road	35%	No
26	Scio Church	32%	No
27	West Stadium – Oak Valley	36%	No
28	Pauline	36%	No
29	Liberty	29%	No
30	Jackson Road	35%	No
31	Dexter Avenue	37%	No
32	Miller – Maple	37%	No
33	Newport	36%	No
34	Maple – Dexter	31%	No
42	Forest – MacArthur	41%	Yes
43	East Michigan Avenue	34%	No
44	Ecorse – Tyler	44%	Yes
45	Grove	41%	Yes
46	Paint Creek	41%	Yes
47	Harriet – West Michigan	42%	Yes

Route	Route Name	Minority Rate	Minority Route Status
61	U-M Miller	37%	No
62	U-M State	38%	No
63	U-M Pontiac	47%	Yes
64	Geddes – East Stadium	26%	No
65	U-M Plymouth – Greenhills	43%	Yes
66	Carpenter – Huron Parkway	45%	Yes
67	Eisenhower – Golfside	37%	No
68	Harris – Ford	33%	No
104	Washtenaw Express	35%	No

Analysis of Service Standards and Policies

This section compares minority routes and non-minority route performance with regards to the agency's service standards and policies to determine if there are disparate impact findings. AAATA currently identifies their disparate impact threshold as a 10% difference between minority and non-minority routes. Moreover, routes that fail to meet the standard are identified and excessive differences from the standard are analyzed for potential causes.

Vehicle Load

Passenger loading performance from Fall 2025 is detailed in Figure 31. The maximum load for each trip that occurred during the fall period was analyzed to determine if it exceeded the 1.2 and 1.5 load factors. Route 23, which is a minority route, had the highest number of trips that exceeded both load factors in terms of volume and percentage of trips observed. However, no routes exceeded the 1.2 load factor standard on more than 6% of all trips or the 1.5 load factor standard on more than 2.2% of the trips. In general, rider capacity on AAATA routes is not a widespread issue, but is rather localized to a few routes at low rates. Moreover, 11 of the 31 routes never exceeded the 1.2 load factor standard and 21 of the 31 routes never exceeded the 1.5 load factor standard. Of the three routes that exceed 2% of trips breaking the 1.2 load factor standard, Routes 4 and 23 are both frequent routes with 15-minute peak frequencies and Route 5 is a Local route that offers 15-minute peak frequencies on the trunk alignment.

When comparing the load performance of minority and non-minority routes, as shown in Figure 32, nearly 2% of trips on minority routes exceed the 1.2 load factor standard and 0.6% of trips exceed the 1.5 load factor standard. This compares to 0.8% and 0.2% for non-minority routes. This results in a difference that is below the threshold of a 10% difference between the performance of minority and non-minority routes. Nevertheless, the instances of routes regularly exceeding the 1.5 load factor standard, namely Route 23, should be further monitored for frequency increases to address the high load factor on the route.

Figure 31: Vehicle Load Performance, Fall 2025

Route	Trips Observed	Trips with Loads Exceeding 1.2	1.2 Load Rate	Trips with Loads Exceeding 1.5	1.5 Load Rate	Minority Status
3	1,773	19	1.1%	2	0.1%	No
4	7,429	276	3.7%	51	0.7%	No
5	5,436	114	2.1%	29	0.5%	No
6	1,751	1	0.1%	0	0.0%	No
22	2,531	64	2.5%	18	0.7%	Yes
23	5,642	340	6.0%	124	2.2%	Yes
25	3,028	1	0.0%	0	0.0%	No
26	2,239	0	0.0%	0	0.0%	No
27	3,160	0	0.0%	0	0.0%	No
28	2,626	1	0.0%	0	0.0%	No
29	1,787	3	0.2%	0	0.0%	No
30	2,191	0	0.0%	0	0.0%	No
31	2,796	0	0.0%	0	0.0%	No
32	666	0	0.0%	0	0.0%	No
33	2,992	3	0.1%	3	0.1%	No
34	619	0	0.0%	0	0.0%	No
42	2,905	1	0.0%	0	0.0%	Yes
43	3,056	0	0.0%	0	0.0%	No
44	2,022	0	0.0%	0	0.0%	Yes
45	2,829	1	0.0%	0	0.0%	Yes
46	1,724	7	0.4%	0	0.0%	Yes

Route	Trips Observed	Trips with Loads Exceeding 1.2	1.2 Load Rate	Trips with Loads Exceeding 1.5	1.5 Load Rate	Minority Status
47	1,931	0	0.0%	0	0.0%	Yes
61	193	0	0.0%	0	0.0%	No
62	767	4	0.5%	0	0.0%	No
63	772	1	0.1%	0	0.0%	Yes
64	1046	7	0.7%	2	0.2%	No
65	2,472	12	0.5%	0	0.0%	Yes
66	2,883	24	0.8%	4	0.1%	Yes
67	2,993	2	0.1%	1	0.0%	No
68	2,282	0	0.0%	0	0.0%	No
104	2,352	2	0.1%	1	0.0%	No

Figure 32: Vehicle Load Minority and Non-Minority Route Performance Comparison, Fall 2025

Route Classification	Trips Observed	Trips with Loads Exceeding 1.2	1.2 Load Rate	Trips with Loads Exceeding 1.5	1.5 Load Rate
Minority	25,711	450	1.8%	146	0.6%
Non-Minority	51,182	433	0.8%	89	0.2%
Total	76,893	883	1.1%	235	0.3%

Vehicle Headway

The published general transit feed specification (GTFS) representing the August 2025 schedule was utilized to determine the frequencies of the route during the weekday peak, midday, and weekend service. Referencing the standards identified earlier in Figure 27, the frequencies for all frequent and local routes meet or exceed the standards. Scheduled headways for all Frequent routes meet or exceed the 15-minute frequencies during the weekday peak, 30-minutes during the weekday midday service, and hourly or better after the p.m. peak period. All local routes also meet the 30-minute frequencies during the weekday peak and weekday midday service period and hourly or better after the p.m. peak period. Routes 5 & 6 are categorized as local service but provide frequent-level frequencies due to the overlapping branches of the 5A/5B and 6A/6B on the shared alignment in much of Ann

Arbor. All Frequent and Local routes also met the standard for weekend service, which are identical across both route categories. As a result of these findings, there is no disparate impact between minority and non-minority routes with regards to the scheduled frequencies and the route classification standards.⁶

Figure 33: Vehicle Frequencies, August 2025

Route Number ⁷	Route Category	Weekday Peak 6-9am, 3-6pm	Weekday Midday 9am-3pm	Weekday Evening 6pm & later	Sat/Sun Day ⁸ 6am-6pm	Sat/Sun Evening 6pm & later	Minority Status
3	Local	30	30	60	30	60	No
4	Frequent	8	15	30	30	30	No
5*	Local	15	15	30	30	60	No
6*	Local	15	15	30	30	60	No
22	Local	30	30	60	30	60	Yes
23	Frequent	15	15	30	30	30	Yes
25	Local	30	30	60	30	60	No
26	Local	30	30	60	30	60	No
27	Local	30	30	60	30	60	No
28	Local	30	30	60	30	60	No
29	Limited	30	30	60	30	-	No
30	Local	30	30	60	30	60	No
31	Local	30	30	60	30	60	No
32	Local	30	30	60	30	60	No
33	Local	30	30	60	30	60	No
34	Limited	30	-	-	-	-	No
42	Local	30	30	60	30	60	Yes

⁶ Limited-service routes do not have a frequency standard.

⁷ The routes with asterisks represent the headways associated with the trunk service, not the branches. Branch headways are roughly half of the trunk headways.

⁸ Bolded figures represent Saturday-only service.

Route Number ⁷	Route Category	Weekday Peak 6-9am, 3-6pm	Weekday Midday 9am-3pm	Weekday Evening 6pm & later	Sat/Sun Day ⁸ 6am-6pm	Sat/Sun Evening 6pm & later	Minority Status
43	Local	30	30	60	30	60	No
44	Local	30	30	60	30	60	Yes
45	Local	30	30	60	30	60	Yes
46	Local	30	30	60	30	60	Yes
47	Local	30	30	60	30	60	Yes
61	Local	30	30	-	-	-	No
62	Frequent	9-13	14	30	-	-	No
63	Limited	30	-	-	-	-	Yes
64	Limited	30	-	-	-	-	No
65	Local	30	30	30	-	-	Yes
66	Local	30	30	60	30	60	Yes
67	Local	30	30	60	30	60	No
68	Local	30	30	60	-	-	No
104	Limited	30	30	-	-	-	No

On-Time Performance

The on-time performance of AAATA fixed-route service in the August 2025 period are detailed in Figure 34. Percentages that did not meet or exceed the service standard of 85% are bolded. A comparison of the on-time performance of minority and non-minority routes are detailed in Figure 35. As demonstrated in the table, although most routes did not meet the standard for weekday service, minority and non-minority routes performed comparably in providing punctual service, with the difference between minority and non-minority routes not exceeding 10%. Minority routes also performed better than non-minority routes across both Saturday and Sunday, with at least 50% of minority routes meeting the standard. As a result of these findings, there is no disparate impact with regards to the on-time performance of minority and non-minority routes.

Figure 34: On-Time Performance

Route	Route Name	Weekday	Saturday	Sunday	Minority Status
3	Huron River	86%	93%	90%	No
4	Washtenaw	80%	70%	83%	No
5	Packard	69%	64%	87%	No
6	Ellsworth – State	76%	72%	76%	No
22	Pontiac – Dhu Varren	84%	63%	73%	Yes
23	Plymouth	80%	79%	83%	Yes
25	Ann Arbor – Saline Road	75%	81%	84%	No
26	Scio Church	71%	87%	88%	No
27	West Stadium – Oak Valley	88%	87%	93%	No
28	Pauline	91%	93%	91%	No
29	Liberty	81%	90%	-	No
30	Jackson Road	86%	78%	79%	No
31	Dexter Avenue	56%	64%	63%	No
32	Miller – Maple	70%	69%	74%	No
33	Newport	87%	-	-	No
34	Maple – Dexter	77%	-	-	No
42	Forest – MacArthur	85%	92%	86%	Yes
43	East Michigan Avenue	93%	98%	94%	No
44	Ecorse – Tyler	80%	84%	82%	Yes
45	Grove	94%	93%	94%	Yes
46	Paint Creek	84%	91%	87%	Yes
47	Harriet – West Michigan	94%	97%	93%	Yes

Route	Route Name	Weekday	Saturday	Sunday	Minority Status
61	U-M Miller	79%	-	-	No
62	U-M State	45%	-	-	No
63	U-M Pontiac	78%	-	-	Yes
64	Geddes – East Stadium	73%	-	-	No
65	U-M Plymouth – Greenhills	71%	-	-	Yes
66	Carpenter – Huron Parkway	74%	84%	-	Yes
67	Eisenhower – Golfside	70%	78%	82%	No
68	Harris – Ford	89%	-	-	No
104	Washtenaw Express	82%	-	-	No

Figure 35: On-Time Performance Minority and Non-Minority Route Comparison

Route Status	Total Routes	Weekday	Saturday	Sunday
Minority	10	30%	50%	57%
Non-Minority	21	33%	43%	46%

Service Availability

This analysis assesses the populations that are accessible within 0.5 mile of fixed route service in three member jurisdictions of Ann Arbor, Ypsilanti, and Ypsilanti Township.⁹ Buffers of one-half mile were applied to fixed-route bus stops to estimate the population access, using the same dataset described in the demographic profile chapter. The result of the analysis is shown in Figure 36. Using the half-mile buffer around the existing fixed-route transit stops, the entire population of both Ann Arbor and Ypsilanti are considered to have access to AAATA fixed-route service. Ypsilanti Township has a lower percentage of 60%, however, the minority population has increased access with roughly two-thirds of minority residents having access to AAATA fixed-route service. As a result, there does not appear to be a disparate impact finding with regards to service availability.

⁹ Pittsfield and Superior Townships primarily receive paratransit service and are not part of this analysis.

Figure 36: Service Availability Performance, Fall 2025

Route Status	Population	Population Access	Minority Population	Minority Access
Ann Arbor	116,835	100%	38,576	100%
Ypsilanti	19,380	100%	8,692	100%
Ypsilanti Township	64,333	60%	29,725	68%

Transit Amenities

Amenities such as signage and landing pads are required at all bus stops. The provisioning of amenities such as benches and shelters is primarily based on the average weekday boardings that occur at a stop. The agency also partners with non-agency partners (e.g., University of Michigan) to provide and maintain their own shelters.

Vehicle Assignment

As of March 2026, the agency maintains an active fleet of 100 vehicles with an average age of approximately seven years and eight months. The majority of the fleet are 40-foot buses with a seating capacity ranging from 36 to 38 riders and an additional eight 35-foot vehicles with a seating capacity for 32 riders. As AAATA assigns vehicles randomly, there is no disparate impact finding with regards to vehicle assignment. A profile of the active fleet, including information about the model & manufacturer, seating capacity, and vehicle age, is located in Appendix G.

Major Service Change, Disparate Impact, and Disproportionate Burden Process

The *Public Input Policy for Service and Fare Changes* as well as the *Equity Analysis Policy* have recently been updated and adopted by the AAATA Board of Directors in September 2023 and were included in the 2023 program update. These policies were last updated in 2011 and 2014, respectively. The text from both policy documents is below.

Public Input Policy for Service and Fare Changes

This policy supersedes the previous policy which was most recently revised in November 2011.

The intention of this policy is to listen to and act on public input before the AAATA makes a decision to change service or make fare changes with the following goals:

- To inform riders and others affected by a proposed change;
- To provide affected people with opportunities to ask questions, and understand the reasons why changes are being proposed;
- To provide AAATA with a better understanding of how riders use service and the effects of a proposed change;
- To encourage affected people to state objections to proposed changes and make suggestions for revisions;

- To provide AAATA with the opportunity to revise proposed changes based on public input to reduce negative effects.

The methods and level of effort to accomplish these goals depend on the size of the proposed change and the number of people/riders affected.

Major Service Changes

- A change affecting more than 25% of weekly revenue service hours or miles for any transit route or service at one time or cumulatively within a period of thirty-six months, or
- Implementation of a new route, or
- Elimination of a route.

Fare Changes

- Any change in the fare, or
- Any change to payment or fare media that would be subject to the fare change.

Notification of Proposed Changes

People must first know about proposed changes in order to have the opportunity to provide input. The public input period is a minimum of 30 days. The notification methods to be used include the following:

- AAATA Website. The AAATA website provides multiple opportunities to provide notification. Notice of proposed changes appears on the front page, typically in the “What’s Happening” section and in a section on the website that provides further details on the proposed changes. Typical details include a presentation or document of information and information on how to provide feedback via website, phone, email, letter. In addition, for any public meetings, they also appear on the “Events” page on the website.
- Social Media. AAATA regularly uses social media to promote public engagement opportunities. Facebook, Twitter and LinkedIn are used for these initiatives.
- Press Releases – AAATA issues a press release for all proposed major service changes and fare changes which describe the proposed change and how to provide input. Press releases are distributed to all media outlets, posted on our website, and shared on social media.
- E-Newsletter – AAATA includes information on public engagement opportunities in monthly newsletters. E-newsletters are sent to community leaders and individuals who have elected to sign-up to receive monthly emails from TheRide on current projects.
- On-Board Bus Communications – AAATA can utilize on-board bus communications such as bus cards and bus seat stickers to communicate information on the public engagement opportunities, depending on the level of impact of the proposed change.
- Presentations – AAATA develops presentations as needed, dependent on the level of impact of the change and share the presentations at public meeting and online
- Paid Media – Dependent on the level of impact of proposed change, paid media will be utilized to announce to public the engagement opportunity. This includes, but not limited to: Public Notice in MLive, other print ads, radio ads, paid social media, digital ads.
- Stakeholder and Community Leaders Notification – As Needed, AAATA notifies key stakeholders that will be affected by proposed changes and provides a notification of them.

- Public Meetings – AAATA hosts meetings in strategic locations with epicenters of general, minority, limited English proficiency (LEP), and low-income populations, and typically allows for a virtual public meeting.
- Translations – AAATA notifies the public that translations of the public engagement information materials is available upon request in Spanish, Korean, Chinese, and Arabic.

All of these methods would be used for major service changes and fare changes. For other changes, the methods used will be tailored to the scale of the proposed change. In addition, paid media may be used for some proposed changes.

Opportunities for Public Input

AAATA's intention is to make it possible for people to choose how they wish to provide input and whether they want to only comment or whether they desire a response or to engage in a conversation. As part of the notification methods above, people are provided with several possibilities for making comments and asking questions including:

- E-Mail – E-Mail goes to a mailbox set up specifically to receive input.
- Telephone – A hotline is set up to receive comments with a callback by AAATA staff upon request.
- Written – Letters provide a means for more formal communication.
- Form on Website – a form directly on our website that individuals can fill out with feedback will be made available.
- Face-to-Face – At meetings and by appointment. For major service changes and fare changes, meetings are provided at multiple times and locations, with an emphasis on meeting locations in the area(s) affected by the proposed change. Meetings are typically scheduled as drop-in sessions for a 2-5-hour period to permit people to attend at their convenience and to encourage dialogue. Virtual meetings are also often provided as an option.

Whatever method is used, AAATA staff provides a response to public comments if requested or needed. The nature of AAATA's response depends on the comments. AAATA answers questions, explains the rationale for the aspects of the proposed change that is the subject of the comments, and replies to suggestions. In some cases, AAATA's response includes questions to make sure staff understands the input and suggestions. In many cases, input and response is a dialogue, rather than a single communication. AAATA staff summarize received comments for consideration.

In addition, public time is provided at all meetings of the AAATA Board of Directors. While an opportunity for dialogue is not always available at these meetings, staff follows up with people who comment about proposed service and fare changes after the meetings for clarity and applicability.

Use of Public Input

During the public input period, AAATA staff considers the input that is being received. Depending on both the quantity as well as the specific concerns that are raised, potential alternatives may be developed.

At the end of the public input period, the input is compiled. Recommended service or fare changes are developed taking into consideration the public input. The public input summary is provided to the decision makers along with the recommended changes.

Revised Procedures for Exceptional Circumstances

Under exceptional circumstances which require a service change or fare change to be adopted and implemented on short notice, the procedures above may be altered to the extent necessary. However, at a minimum, the public will be afforded an opportunity to be heard at the AAATA Board meeting at which any action is taken and a notice of the proposed change with the date and time of the Board meeting will be published on the AAATA website before the Board meeting.

Figure 37: Board Resolution adopting the revised Public Input Policy for Service and Fare Changes

Resolution 04/2023

ADOPTION OF REVISED PUBLIC INPUT POLICY FOR SERVICE AND FARE CHANGES

WHEREAS, the Ann Arbor Area Transportation Authority (AAATA) is required to have a policy for public input before major service and fare changes as a condition of federal assistance, and

WHEREAS, the current policy meets the minimum requirements, but is out of date and is no longer consistent with how AAATA collects and uses public input, and

WHEREAS, staff has prepared a draft policy that reflects the importance that AAATA places on soliciting and receiving public input before making service and fare changes, and

WHEREAS, the AAATA published the draft policy, solicited comments from the public and groups, and received no concerns with or suggested changes to the draft policy,

NOW THEREFORE, BE IT RESOLVED that the Ann Arbor Area Transportation Authority Board of Directors hereby adopts the attached *Public Input Policy for Service and Fare Changes* dated September 2023.


Kathleen M. Mozak, Chair

September 21, 2023


Jesse Miller, Secretary

September 21, 2023

Equity Analysis Policy for Service and Fare Changes

This policy supersedes the previous policy which was most recently revised in April 2014.

The Ann Arbor Area Transportation Authority (AAATA) has been identified by the Federal Transit Administration (FTA) as a transit provider that operates 50 or more fixed-route vehicles in peak service and is located in an Urbanized Area of 200,000 or more in population. As a result, the AAATA is required to complete equity analyses for the proposed major service and fare changes as described in FTA Circular 4702.1B. In promulgating these requirements and guidelines, the FTA is acting under authority of federal law (Title VI of the Civil Rights Act of 1964 42 U.S.C §2000 et. seq.) and regulations (49 CFR part 21).

Service Change Equity Analysis Policy and Requirements

When Is a Service Equity Analysis Required?

The FTA Circular requires transit agencies to prepare an equity analysis for all major service changes. Each agency is responsible for defining what constitutes a major service change. At the AAATA, the definition of a major service change is

- A change affecting more than 25% of weekly revenue service hours or miles for any transit route or service at one time or cumulatively within a period of thirty-six months, or
- Implementation of a new route, or
- Elimination of a route.

These thresholds are based on the actual service being provided, and they fully meet the FTA requirement to define a major service change.

Increases in service for experimental or demonstration service or changes in emergency service may be implemented for twelve months or less without preparation of an equity analysis. If the experimental, demonstration, or emergency services are operated for more than twelve months, then a service equity analysis must be completed before the end of the twelve-month period.

How Are Disparate Impacts and Disproportionate Burdens Determined?

Public Transit agencies are required by FTA Circular 4702.1B to develop and approve a local threshold for identifying a disparate impact and a disproportionate burden caused by service changes.

Disparate impact's threshold will be used to evaluate the impact of a service change on minority riders or populations. Minority is defined as all persons who self-identify as not being white or white and Hispanic, or Latino.

A possible disparate impact is determined by either

- Comparing the proportion of the minority population within a quarter mile of the changed route or segment of the bus route with the proportion of the population that is a minority for the entire service area, or
- Comparing the proportion of minority riders on the route or segment of the route being changed with the proportion of minority riders on the entire system.

A possible disparate impact is deemed to occur when the difference between the two measures (existing riders or the population and system-wide ridership or the service area population) is 10 percent or greater. The rate of 10 percent is consistent with the commonly used standard for disparate impact and allows for variations in the statistical reliability of the underlying data.

A disproportionate burden threshold will be used to evaluate the impact of a service change on riders or populations with low income. AAATA has determined that low-income individuals are those persons whose income is at or below 150% of the poverty guidelines defined by the Department of Health and Human Services or the poverty thresholds used by the US Census Bureau.

A possible disproportionate burden is determined by either

- Comparing the proportion of the low-income population within a quarter mile of the changed route or segment of the bus route with the proportion of the population that is low-income for the entire service area, or
- Comparing the proportion of low-income riders on the route or segment of the route being changed with the proportion of low-income riders on the entire system.

A possible disproportionate burden is deemed to occur when the difference between the two comparators (existing riders, or population and system-wide ridership, or service area population) is 10 percent or greater.

The FTA prefers that actual rider demographics, rather than census data, are used for determining disparate impact and/or disproportionate burden; however, up-to-date surveys of rider demographics may not always be available. Also, if a service change only affects a particular geographic or temporal segment of a route, then the margin of error for the survey data may be unacceptable. There is low margin of error when using data from the decennial US census, but the data can quickly go out of date. Data from the US Census Bureau American Community Survey (ACS) are usually more current. However, the data are based on sampling techniques rather than a full census and are reported with a margin of error of 10 percent with a 90 percent confidence level. The AAATA will prioritize the use of rider demographics over census data if available.

What if There Is a Finding of Disparate Impact and/or Disproportionate Burden?

If the analysis shows that the proposed transit service change(s) creates a disparate impact, then the AAATA will evaluate whether there is an alternative that would serve the same objectives without a disparate impact. The AAATA may implement the proposed service change with the disparate impact only if there is a substantial justification for the change and there are no alternatives that would have a less disparate impact but would still accomplish AAATA's legitimate program goals.

If the results of the analysis show a finding of disproportionate burden, then the AAATA will take steps to avoid, minimize, or mitigate the impacts where possible. However, if there is no alternative that avoids, minimizes, or mitigates the disproportionate burden, then the service change may proceed with proper documentation of the analysis that identifies attempts to avoid, minimize, or mitigate the disproportionate burden.

Data Types

As stated above, the FTA allows transit agencies to use either rider demographics (minority status and income) or census data (the decennial census or American Community Survey) when preparing an equity analysis for a service change. Although the AAATA can choose which data source can be used, the same data source must be used for all changes analyzed at the same time. The AAATA will describe the data set being used for the analysis and will select from rider surveys, census blocks, or block groups for minority status. The smallest unit of geography for which poverty data are available is a census tract.

Cumulative Changes

When preparing a service equity analysis, The AAATA will evaluate the changes by consolidating and totaling results from each individual change and consider them cumulatively as a cohesive whole. Only the cumulative results for each change will be used to determine whether there is a disparate impact. Results for individual routes

will not be evaluated for disparate impacts unless fully eliminated or added. During the tabulation of cumulative impacts, the effects of service improvements will be used to offset the effects of service reductions or vice versa.

Change Equity Analysis Policy and Requirements

When Is a Fare Equity Analysis Required?

The FTA Circular requires transit agencies to prepare equity analyses each time there is a fare, fare media, or fare system change. Every fare change, regardless of size or scope, is subject to this requirement. This includes changes such as increases or decreases in price and any change of fare rules, fare media, or distribution of fare media. The fare change equity analysis must determine whether there are impacts on minority (disparate impacts) or low-income populations (disproportionate burdens).

A fare change equity analysis is not required in three special cases:

- When the AAATA has declared that all rides are free.
- For temporary fare reductions that are mitigating measures for other actions such as detours or closures.
- Promotion fare reductions for up to six months. If a promotion reduction lasts longer than six months, then a fare equity analysis must be completed before the end of the six-month period for the reductions to continue in place.

In the service change equity analysis, the impacts are looked at cumulatively. That is not possible with fare changes since the amount of the fare increase for each fare category must be assessed individually in conjunction with the proportionality of the ridership based on income or minority status.

How Are Fare Change Disparate Impacts and/or Disproportionate Burden Determined?

The AAATA is required by FTA Circular 4702.1B to develop and approve a local threshold for identifying a disparate impact for fare changes.

Disparate Impact's threshold will be used to evaluate the impact of a fare change on minority riders. A minority is defined as all riders who self-identify as not being white, Hispanic, or Latino.

A possible disparate impact is determined by comparing the fare changes for fare categories used disproportionately by minorities with the fare changes for the entire system. A possible disparate impact is deemed to occur when particular fare categories are increased more than the average overall system fare increase and the proportion of minority riders in the fare category is more than 10 percent greater than the proportion of minority riders system-wide.

A disproportionate burden threshold will be used to evaluate the impact of a fare change on riders with low income. The AAATA has determined that low-income individuals are those persons whose income is at or below the poverty guidelines defined by the Department of Health and Human Services or the poverty thresholds used by the US Census Bureau.

A possible disproportionate burden is determined by comparing the fare changes for fare categories used disproportionately by persons with low incomes with the fare changes for the entire system. A possible disparate impact is deemed to occur when particular fare categories are increased more than the average overall system fare increase and the proportion of low-income riders in the fare category are more than 10 percent greater than the proportion of low-income riders system-wide.

What if There Is a Finding of Disparate Impact and/or Disproportionate Burden?

If the analysis shows that the proposed transit fare change creates a disparate impact, then the AAATA will evaluate whether there is an alternative that would serve the same objectives without a disparate impact.

Disparate impacts derived from fare changes can be eliminated by adjusting the fare increases or decreases. The AAATA may implement the proposed fare change with the disparate impact only if there is a substantial justification for the change and there are no alternatives that would have a less disparate impact but would still accomplish AAATA's legitimate program goals.

If the results of the analysis show a finding of disproportionate burden, then the AAATA will take steps to avoid, minimize, or mitigate the impacts where possible. However, if there is no alternative that avoids, minimizes, or mitigates the disproportionate burden, then the fare change may proceed with proper documentation of the analysis that identifies attempts to avoid, minimize, or mitigate the disproportionate burden. In the case of changes in fare prices, adjusting the amount of the increase (or decrease) can be cited as a minimizing or mitigation strategy.

Figure 38: Board Resolution adopting the revised Equity Analysis Policy for Service and Fare Changes

Resolution 05/2023

ADOPTION OF REVISED EQUITY ANALYSIS POLICY FOR SERVICE AND FARE
CHANGES

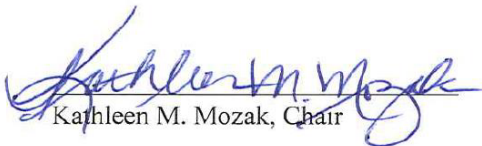
WHEREAS, the Ann Arbor Area Transportation Authority (AAATA) conducts an equity analysis prior to adopting major service changes or fare changes, and

WHEREAS, Federal guidance requires the AAATA to define thresholds for when a proposed service change will have a disparate impact on minorities or disproportionate burden on low-income population, and

WHEREAS, the AAATA has developed the required thresholds as part of the attached Service Equity Analysis Policy, and

WHEREAS, the AAATA published the draft policy, solicited comments from the public and groups, and received no concerns with or suggested changes to the draft policy,

NOW THEREFORE, BE IT RESOLVED, that the Ann Arbor Area Transportation Authority Board of Directors hereby adopts the attached *Equity Analysis Policy for Service and Fare Changes* dated September 2023.


Kathleen M. Mozak, Chair

September 21, 2023


Jesse Miller, Secretary

September 21, 2023

Summary of Major Service Changes and Fare Equity Analyses

Service changes made since the 2023 Title VI Program Update are listed in Figure 39. A complete list of service changes and any accompanying analyses are included in Appendix F.

Figure 39: Summary of Major Service Changes, November 2023–March 2026

Effective Date	Major Service Change?	Title VI Analysis?
January 28, 2024	No major service changes	-
May 5, 2024	Major service change (new route)	Title VI Analysis conducted
August 25, 2024	Major service change	Title VI Analysis conducted
January 26, 2025	No major service changes	-
May 4, 2025	No major service changes	-
August 24, 2025	No major service changes	-
January 25, 2026	No major service changes	-

Appendices

- A. Review and Approval: Letter of Approval from CEO, Board meeting minutes recording approval, and public comments received in response to the 2026 Title VI Program Update**
- B. Notice to the Public (all languages)**
- C. Title VI Complaint Procedure (all languages)**
- D. Title VI Complaint Form (all languages)**
- E. Title VI Complaints, 2023-2026**
- F. Major Service Changes or Fare Equity Analyses since 2023 Title VI Program Update**
- G. Fleet Profile**

Appendix A: Review and Approval: Letter of Approval from CEO, Board meeting minutes recording approval, and public comments received in response to the 2026 Title VI Program Update

[To be added upon completion and approval of 2026 Title VI Program Update]

Appendix B: Notice to the Public

AAATA Title VI Notification Procedure – English

Title VI Notification Procedure

Ann Arbor Area Transportation Authority (TheRide) provides programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. For information about TheRide's non-discrimination obligations, or to file a complaint if you believe you have been subject to unlawful discrimination, please contact TheRide.

By Mail

Ann Arbor Area Transportation Authority
Attn: Title VI
2700 S. Industrial Hwy.
Ann Arbor, MI 48104

Online

TellUs@TheRide.org

AAATA Title VI Notification Procedure – Spanish

Procedimiento de reclamación en virtud del Título VI

La Ann Arbor Area Transportation Authority (TheRide) ofrece programas y servicios sin distinción de raza, color y nacionalidad de conformidad con el Título VI de la Civil Rights Act (Ley de Derechos Civiles). Para obtener información sobre las obligaciones de no discriminación que se le exigen a TheRide o para presentar un reclamo si cree que usted fue víctima de discriminación ilegal, póngase en contacto con TheRide.

Por correo

Ann Arbor Area Transportation Authority
Attn: Title VI
2700 S. Industrial Hwy.
Ann Arbor, MI 48104

Por Internet

TellUs@TheRide.org

AAATA Title VI Notification Procedure – Chinese**第六篇通知程序**

安娜堡地区交通管理局 (TheRide) 依据《民权法案》第六篇提供计划与服务, 无关种族、肤色和国籍。如需了解关于 TheRide 非歧视义务的信息, 或者如果您认为自己遭受了非法歧视并希望提起投诉, 请联系 TheRide。

邮寄方式

安娜堡地区交通管理局
接收者: Title VI
2700 S. Industrial Hwy.
Ann Arbor, MI 48104

线上方式

TellUs@TheRide.org

AAATA Title VI Notification Procedure – Korean**민권법 제6장 통지 절차**

앤아버 지역 교통국(TheRide)은 민권법 제6장에 따라 인종, 피부색 및 출신 국가에 관계없이 프로그램과 서비스를 제공합니다. TheRide의 차별 금지 의무에 대한 자세한 내용을 확인하거나 불법적인 차별을 당했다고 판단되는 경우 민원을 제기하려면 TheRide에 문의하십시오.

우편

Ann Arbor Area Transportation Authority
Attn: Title VI
2700 S. Industrial Hwy.
Ann Arbor, MI 48104

온라인

TellUs@TheRide.org

AAATA Title VI Notification Procedure – Arabic**إجراءات تقديم الشكاوى بموجب الباب السادس**

تتيح هيئة النقل في منطقة آن أربور (AAATA)، التي تحمل علامة "ذا رايد"/"TheRide" برامجها وخدماتها بغض النظر عن اختلافات العرق واللون والأصل القومي وذلك وفقاً لما ينص عليه الباب السادس من قانون الحقوق المدنية لعام 1964. للاطلاع على مزيد من المعلومات حول التزام "ذا رايد" بتطبيق عدم التمييز، أو لتقديم شكوى إذا كنت تعتقد أنك تعرضت لتمييز غير قانوني، يرجى المبادرة بالاتصال بـ "ذا رايد" عن طريق:

التواصل عبر الإنترنت
TellUs@TheRide.org

إرسال خطاب بالبريد العادي إلى:
هيئة النقل في منطقة آن أربور
بخصوص: ما ينص عليه الباب السادس
2700 جنوب الطريق السريع الصناعي.
آن أربور، ميشيغان 48104

Appendix C: Title VI Complaint Procedure

AAATA Title VI Complaint Procedure – English

Title VI Complaint Procedure

Each complaint received that alleges discrimination based on race, color, or national origin will be investigated using the procedure below, whether it specifically references Title VI or not. All complaints must be received within 180 days of the alleged discrimination incident/occurrence. The complainant will be notified within 7 days confirming receipt and advised it is being investigated. This notice may include a request for additional information necessary to investigate the complaint (e.g. specific time of an incident). A written response of the determination will be provided by mail to the complainant within 30 days of the date of complaint.

If the allegation concerns a specific incident involving an operator or customer service staff member, a preliminary investigation of the facts will be conducted by AAATA Transportation Department management staff. It should be noted that all AAATA's buses and facilities are equipped with cameras. Cameras have proved to be extremely useful in resolving alleged complaints about specific incidents. Transportation Management Staff will make a preliminary determination about the facts, recommend any disciplinary measures, and transmit the complaint to the Chief Executive Officer (CEO), Deputy CEO, or their delegate.

For more general allegations, such as AAATA service design or fares, the CEO, Deputy CEO, or their delegate will determine the appropriate senior staff member to conduct the preliminary investigation and report the findings and recommendations for corrective action to the CEO, Deputy CEO, or their delegate.

The CEO, Deputy CEO, or their delegate will review all alleged discrimination complaints based on race, color, or national origin and the results of the preliminary investigation. The CEO, Deputy CEO, or their delegate will make a determination as to whether the alleged discrimination based on race, color, or national origin was valid, and any corrective action that Tab C: Complaint Procedure Title VI Program Update 2023 23 will be taken. Note that even if the alleged discrimination is determined to be invalid, corrective action may still be warranted in some cases.

Title VI Complaint Procedure

The CEO, Deputy CEO, or their delegate will provide her or his findings in writing (by mail) to the complainant within 30 days of the date of the complaint, including whether the alleged discrimination was found to be valid based on race, color, or national origin, and the corrective actions AAATA has taken or promises to take. The letter will inform the complainant of the opportunity to provide additional information that may lead AAATA to reconsider its decision and of the complainant's right to file a complaint with the Federal Transit Administration (FTA). In addition to this policy, AAATA also follows up on informal complaints made by telephone, Internet, social media and email.

*AAATA Title VI Complaint Procedure – Spanish***Procedimiento de Quejas del Título VI**

Cada queja recibida que alegue discriminación por raza, color u origen nacional será investigada utilizando el procedimiento a continuación, ya sea que haga referencia específicamente al Título VI o no. Todas las quejas deben ser recibidas dentro de los 180 días posteriores al incidente/ocurrencia de la presunta discriminación. El denunciante será notificado dentro de 7 días confirmando la recepción y se le informará que está siendo investigado. Este aviso puede incluir una solicitud de información adicional necesaria para investigar la queja (p. ej. hora específica de un incidente). Se proporcionará una respuesta escrita de la determinación por correo al denunciante dentro de los 30 días a partir de la fecha de la queja.

Si la acusación se refiere a un incidente específico que involucra a un operador o miembro del personal de servicio al cliente, el personal de gestión del Departamento de Transporte de AAATA llevará a cabo una investigación preliminar de los hechos. Cabe señalar que todos los autobuses e instalaciones de AAATA están equipados con cámaras. Las cámaras han demostrado ser extremadamente útiles para resolver quejas alegadas sobre incidentes específicos. El personal de Gestión de Transporte hará una determinación preliminar sobre los hechos, recomendará cualquier medida disciplinaria y transmitirá la queja al Chief Executive Officer (CEO), Deputy CEO, o su delegado.

Para acusaciones más generales, como el diseño del servicio de AAATA o las tarifas, el CEO, el Subdirector Ejecutivo o su delegado determinarán el miembro del personal senior apropiado para llevar a cabo la investigación preliminar y reportar los hallazgos y recomendaciones para acciones correctivas al CEO, Subdirector Ejecutivo o su delegado.

El CEO, el Deputy CEO, o su delegado revisarán todas las quejas de discriminación alegadas basadas en raza, color, u origen nacional y los

Procedimiento de Quejas del Título VI

resultados de la investigación preliminar. El CEO, el Subdirector Ejecutivo, o su delegado tomarán una determinación sobre si la supuesta discriminación basada en raza, color, o origen nacional fue válida, y cualquier acción correctiva que Tab C: Complaint Procedure Title VI Program Update 2023 23 se tomará. Tenga en cuenta que incluso si se determina que la supuesta discriminación es inválida, en algunos casos aún puede ser necesario tomar medidas correctivas.

El CEO, el Subdirector Ejecutivo, o su delegado proporcionará sus hallazgos por escrito (por correo) al demandante dentro de los 30 días a partir de la fecha de la queja, incluyendo si se determinó que la supuesta discriminación era válida basada en raza, color, o origen nacional, y las acciones correctivas que AAATA ha tomado o promete tomar. La carta informará al reclamante de la oportunidad de proporcionar información adicional que pueda llevar a AAATA a reconsiderar su decisión y del derecho del reclamante a presentar una queja ante la Federal Transit Administration (FTA). Además de esta política, AAATA también da seguimiento a las quejas informales realizadas por teléfono, Internet, redes sociales y correo electrónico.

*AAATA Title VI Complaint Procedure – Chinese***Title VI 投诉程序**

在收到的每一份投诉中，凡是指控基于种族、肤色或原国籍的歧视行为的，无论其是否具体提到 Title VI，均将依照下述程序进行调查。所有投诉必须在所指控的歧视事件/行为发生后的 180 天内提交。投诉人将在 7 日内收到确认提交投诉的通知，并获知该投诉正在调查中。此通知可能包括要求提供调查投诉所需的补充信息（如：事件发生的具体时间）。在提交投诉之日起的 30 天内，投诉人将通过邮寄方式获得书面答复。

如果指控内容涉及与运营人员或客服人员相关的具体事件，AAATA 交通部门管理人员将对事实开展初步调查。需要注意的是，所有 AAATA 的公交车和设施都配备了摄像头。事实证明，摄像头在解决针对具体事件的投诉时极为有用。运输管理人员将对事实作出初步判断，提出纪律处分建议，并将投诉传达给首席执行官 (CEO)、副首席执行官或其代表。

对于更为普遍的指控（如：AAATA 服务设计或票价），首席执行官、副首席执行官或其代表将确定合适的高级员工开展初步调查，并由该高级员工将调查结果和整改措施建议汇报给首席执行官、副首席执行官或其代表。

首席执行官、副首席执行官或其代表将审查所有指控存在种族、肤色或原国籍的歧视投诉以及初步调查结果。首席执行官、副首席执行官或其代表将做出最终裁决，判定所指控的基于种族、肤色或原国籍的歧视是否成立，并确定将采取的任何整改措施（见《附表 C：Title VI 项目 2023 年度更新——投诉

Title VI 投诉程序

程序》第 23 页)。 请注意，即使所指控的歧视行为被判定不成立，在某些情况下仍可能需要采取整改措施。

首席执行官、副首席执行官或其代表将在投诉之日起 30 天内通过邮件形式向投诉人提供书面调查结果，其中包括基于种族、肤色或原国籍的歧视指控是否被判定成立，以及 AAATA 已采取或承诺采取的整改措施。 该信函将告知投诉人：有机会提供可能导致 AAATA 重新审议其决定的补充信息，同时有权向美国联邦运输管理局 (FTA) 提出投诉。 除了这项政策外，AAATA 还会跟进通过电话、互联网、社交媒体和电子邮件提出的非正式投诉。

*AAATA Title VI Complaint Procedure – Korean***Title VI 민원 처리 절차**

인종, 피부색 또는 출신 국가를 이유로 한 차별을 주장하는 모든 민원은 Title VI를 구체적으로 언급하는지 여부와 관계없이 아래 절차에 따라 조사합니다. 모든 민원은 차별이 있었다고 주장하는 사건/상황이 발생한 날로부터 180일 이내에 접수해야 합니다. 민원인에게는 7일 이내에 민원이 접수되었음을 확인하고 해당 민원이 조사 중임을 통지합니다. 이 통지에는 민원 조사에 필요한 추가 정보(예: 특정 사건의 구체적인 발생 시간)에 대한 요청이 포함될 수 있습니다. 민원 접수일로부터 30일 이내에 결정 결과에 대한 서면 답변을 민원인에게 우편으로 발송합니다.

주장 내용이 운전원 또는 고객 서비스 담당 직원이 관련된 특정 사건에 관한 것이라면, AAATA 교통부 관리 직원이 사실관계에 대한 예비 조사를 실시합니다. AAATA의 모든 버스와 시설에는 카메라가 설치되어 있다는 점에 유의해야 합니다. 카메라는 특정 사건과 관련하여 제기된 민원을 해결하는 데 매우 유용한 것으로 입증되었습니다. 교통부 관리 직원은 사실관계에 대한 예비 판단을 내리고, 징계 조치를 권고하며, 해당 민원을 최고경영자(CEO), 부최고경영자(Deputy CEO) 또는 그 위임을 받은 자에게 전달합니다.

AAATA의 서비스 설계 또는 요금과 같은 보다 일반적인 주장에 대해서는 최고경영자(CEO), 부최고경영자 또는 그 위임을 받은 자가 예비 조사를 실시할 적절한 고위 직원을 지정하고, 조사 결과 및 시정 조치 권고 사항을 최고경영자(CEO), 부최고경영자 또는 그 위임을 받은 자에게 보고하도록 합니다.

Title VI 민원 처리 절차

최고경영자(CEO), 부최고경영자 또는 그 위임을 받은 자는 인종, 피부색 또는 출신 국가를 이유로 한 모든 차별 민원과 예비 조사 결과를 검토합니다.

최고경영자(CEO), 부최고경영자 또는 그 위임을 받은 자는 인종, 피부색 또는 출신 국가를 이유로 한 차별 주장이 타당한지 여부와 취할 시정 조치를 결정합니다. 차별 주장이 타당하지 않은 것으로 판단되더라도 경우에 따라 시정 조치가 필요할 수 있다는 점에 유의해야 합니다.

최고경영자(CEO), 부최고경영자 또는 그 위임을 받은 자는 민원 접수일로부터 30일 이내에 조사 결과를 서면(우편)으로 민원인에게 발송합니다. 여기에는 인종, 피부색 또는 출신 국가를 이유로 한 차별 주장이 타당한 것으로 확인되었는지 여부와 AAATA가 이미 취했거나 향후 취하기로 약속하는 시정 조치가 포함됩니다. 해당 서신에서는 민원인에게 AAATA로 하여금 결정을 재검토하도록 할 수 있는 추가 정보를 제출할 기회가 있음을 안내하고, 연방교통청(FTA)에 민원을 제기할 수 있는 민원인의 권리를 고지합니다. AAATA는 본 정책에 따른 절차 외에도 전화, 인터넷, 소셜 미디어 및 이메일을 통해 제기된 비공식 민원에 대해서도 후속 조치를 취합니다.

AAATA Title VI Complaint Procedure – Arabic

إجراءات تقديم الشكاوى بموجب الباب السادس

سيتم التحقيق في كل شكوى ترد إلينا تتضمن ادعاء بوجود تمييز على أساس العرق أو اللون أو الأصل القومي، وفقاً للإجراءات الموضحة أدناه، سواء أشارت الشكاوى صراحةً إلى الباب السادس أم لم تُنشر إليه. ويجب تقديم جميع الشكاوى خلال 180 يوماً من تاريخ وقوع حادثة التمييز المزعومة. وسيتم إخطار مقدم الشكاوى خلال 7 أيام لتأكيد استلام الشكاوى وإبلاغه بأنها قيد التحقيق. وقد يتضمن هذا الإخطار طلباً للحصول على معلومات إضافية لازمة لاستكمال التحقيق (مثل الوقت المحدد لوقوع الحادثة). كما سيتم إرسال رد مكتوب يتضمن نتيجة التحقيق إلى مقدم الشكاوى بالبريد خلال 30 يوماً من تاريخ تقديم الشكاوى.

إذا كان الادعاء يتعلق بحادثة محددة تورط فيها أحد السائقين أو أحد موظفي خدمة العملاء، فسيجري فريق إدارة النقل في هيئة النقل في منطقة أن أربور (AAATA) تحقيقاً أولياً في الوقف. وتجدر الإشارة إلى أن جميع حافلات ومرافق هيئة النقل في منطقة أن أربور (AAATA) مزودة بكاميرات مراقبة، وقد أثبتت هذه الكاميرات فعالية كبيرة في المساعدة على الفصل في الشكاوى المتعلقة بحوادث محددة. وبعد ذلك، يحدد فريق إدارة النقل الوقائع بشكل أولي، ويوصي بأي إجراءات تأديبية مناسبة، ثم يحيل الشكاوى إلى الرئيس التنفيذي أو نائب الرئيس التنفيذي أو من يفوضه.

أما بالنسبة للادعاءات ذات الطابع العام، مثل تصميم خدمات هيئة النقل في منطقة أن أربور (AAATA) أو أسعار تعريف الركوب، فإن الرئيس التنفيذي أو نائب الرئيس التنفيذي أو من يفوضه يحدد الموظف الإداري المختص لإجراء التحقيق الأولي، ورفع النتائج والتوصيات الخاصة بالإجراءات التصحيحية إلى الرئيس التنفيذي أو نائبه أو من يفوضه.

يقوم الرئيس التنفيذي أو نائب الرئيس التنفيذي أو من يفوضه بمراجعة جميع شكاوى التمييز المزعوم القائمة على العرق أو اللون أو الأصل القومي، إلى جانب نتائج التحقيق الأولي. كما يقرر ما إذا كانت مزاعم التمييز صحيحة، ويحدد الإجراءات التصحيحية التي ستتخذها هيئة النقل في منطقة أن أربور (AAATA) وفقاً للتبويب (ج): إجراءات تقديم الشكاوى – تحديث برنامج الباب السادس لعام 2023. وتجدر الإشارة إلى أنه حتى في حال ثبوت عدم صحة ادعاء التمييز، فقد تظل هناك حاجة إلى اتخاذ إجراءات تصحيحية في بعض الحالات.

يقدم الرئيس التنفيذي أو نائب الرئيس التنفيذي أو من يفوضه النتائج كتابياً إلى مقدم الشكاوى عن طريق البريد خلال 30 يوماً من تاريخ تقديم الشكاوى، موضحاً ما إذا ثبتت صحة ادعاء التمييز على أساس العرق أو اللون أو الأصل القومي، والإجراءات التصحيحية التي اتخذتها هيئة النقل في منطقة أن أربور (AAATA) أو التي تعتزم اتخاذها. كما توضح الرسالة حق مقدم الشكاوى في تقديم معلومات إضافية قد

إجراءات تقديم الشكاوى بموجب الباب السادس

تدفع هيئة النقل في منطقة آن أربور (AAATA) إلى إعادة النظر في قرارها، وحقه أيضًا في تقديم شكاوى إلى إدارة النقل الفيدرالية (FTA). وبالإضافة إلى هذه السياسة، تتابع هيئة النقل في منطقة آن أربور (AAATA) أيضًا الشكاوى غير الرسمية المقدمة عبر الهاتف أو الإنترنت أو وسائل التواصل الاجتماعي أو البريد الإلكتروني.

Appendix D: Title VI Complaint Form

AAATA Title VI Complaint Form – English

Figure C-1

AAATA TITLE VI COMPLAINT FORM

[illegible]

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

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

Signature and date required below

Signature

Date

Please submit this form in person at the address below, or mail this form to:

Ann Arbor Area Transportation Authority
Attention: Title VI Coordinator
2700 South Industrial Highway
Ann Arbor, MI 48103

AAATA Title VI Complaint Form – Spanish

Figura C-1

**FORMULARIO DE QUEJAS SEGÚN EL TÍTULO VI DE LA AUTORIDAD DE TRANSPORTE
DEL ÁREA DE ANN ARBOR**

Sección I				
Nombre:				
Dirección:				
Teléfono (domicilio):			Teléfono (trabajo):	
Dirección de correo electrónico:				
¿Requiere algún formato	Letra grande		Audio	
	TDD		Otro	
Sección II				
¿Presenta esta queja en nombre propio?			Sí*	No
*Si respondió "Sí" a esta pregunta, pase a la Sección III.				
De lo contrario, indique el nombre y su relación con la persona para la cual presenta esta queja:				
Explique por qué realiza la presentación por un tercero: _____				
Si presenta la queja en nombre de un tercero, confirme que obtuvo el permiso de la parte afectada.			Sí	No
Sección III				
Creo que la discriminación de la que fui víctima fue por motivos de (marque todas las opciones que correspondan): ☐ Raza ☐ Color ☐ Nacionalidad Fecha de la presunta discriminación (mes, día, año): _____ Explique con la mayor claridad posible qué sucedió y por qué considera que fue víctima de discriminación. Describa a todas las personas involucradas. Incluya el nombre y la información de contacto de las personas que lo discriminaron (si conoce esta información), así como los nombres y la información de contacto de algún testigo. Si necesita más espacio, adjunte los detalles adicionales. _____ _____ _____ _____ _____ _____ _____ _____ _____				

Sección IV		
¿Presentó anteriormente ante esta agencia una queja según el Título VI?	☐ Sí	☐ No
Sección V		
¿Presentó esta queja ante alguna otra agencia federal, estatal o local, o ante algún tribunal federal o estatal?		
☐ Sí ☐ No		
Si la respuesta es afirmativa, marque todas las opciones que correspondan:		
☐ Agencia federal _____		
☐ Tribunal federal _____	☐ Agencia estatal _____	
☐ Tribunal estatal _____	☐ Agencia local _____	
Proporcione información sobre una persona de contacto de la agencia o el tribunal donde se presentó la queja.		
Nombre:		
Cargo:		
Agencia:		
Dirección:		
Teléfono:		
Sección VI		
Nombre de la agencia en contra de la cual se presenta la queja:		
Persona de contacto:		
Cargo:		
Número de teléfono:		

Puede adjuntar documentos escritos u otra información que considere relevante para su queja.

Firme y escriba la fecha a continuación

Firma

Fecha

Entregue este formulario en persona en la dirección que se indica a continuación o envíelo por correo a esta dirección:

Ann Arbor Area Transportation Authority
Attention: Title VI Coordinator
2700 South Industrial Highway Ann
Arbor, MI 48103

AAATA Title VI Complaint Form – Chinese

图 C-1

AAATA 标题 六 申诉表

第一部分:				
姓名:				
地址:				
电话 (住宅):			电话 (工作):	
电子邮件地址:				
访问格式要求?	大号字体		录音带	
	TDD		其它	
第二部分:				
您是代表自己提出申诉的吗?			是*	否
*如果您对这个问题的回答“是”，请转到第三部分。				
如果回答“否”，请提供您所投诉的人的姓名和关系:				
请解释您代表第三方提出的原因:				
如果您是代表第三方提交文件，请确认您已获得受害方的允许。			是	否
第三部分				

图 C-1

我相信我所经历的歧视是基于以下原因（勾选所有适用的选项）：☐

种族 ☐ 肤色 ☐ 国籍

指控的歧视日期 _____

尽可能清楚地解释发生了什么，以及为什么您认为自己受到了歧视。描述所有参与的人。包括歧视您的人员姓名和联系信息(如果知道)，以及任何证人的姓名和联系信息。如果需要更多的空间，请附上任何其他细节。

图 C-1

第四部分		
您是否曾向本机构提交过第六章的投诉？	☐ 是	☐ 否
第五部分		
您是否向任何其它联邦、州或地方机构，或任何联邦或州法院提出过这一申诉？		
☐ 是 ☐ 否		
如果是，勾选所有适用的选项。		
☐ 联邦机构： _____		
☐ 联邦法院 _____ ☐ 州政府机构 _____		
☐ 州法院 _____ ☐ 地方机关 _____		
请提供关于提出申诉的机构/法院的联系人的资料。		
姓名： _____		
职务： _____		
机构： _____		
地址： _____		
电话： _____		
第六部分		
向机构投诉的对象： _____		
联系人： _____		
职务： _____		
电话号码： _____		

您可以附上您认为与您的投诉有关的任何书面材料或其它资料。

签署和日期要求如下

簽名

日期

Ann Arbor Area Transportation Authority
Attention: Title VI Coordinator
2700 South Industrial Highway
Ann Arbor, MI 48103

AAATA Title VI Complaint Form – Korean

AAATA TITLE VI 불만 신고서

양식 C-1

섹션 I:				
이름:				
주소:				
전화번호 (집):			전화번호 (회사):	
이메일 주소:				
이용 가능한 형식 필요사항	큰 활자 인쇄본 TDD		오디오 테이프 기타	
섹션 II:				
본인과 관련된 불만 사항을 제기하시는 겁니까?			예*	아니오*
이 질문에 "예"라고 답한 경우, 섹션 III 으로 넘어가십시오.				
그렇지 않은 경우, 불만을 제기하는 사람의 이름과 그 사람과의 관계를 명시하십시오.				
왜 제 3 자를 대신하여 본 불만 신청서를 작성하게 되었는지 설명하십시오.				
제 3 자를 대신하여 불만 신청서를 작성하시는 경우 불만을 가진 당사자의 허락을 받았는지 확인하십시오.			예	아니오
섹션 III:				
본인이 당한 차별과 관련된 사항에 모두 표시하십시오. [] 인종 [] 피부색 [] 출신국가 차별을 경험한 날짜 (월, 일, 년): _____ 가능한 무슨 일이 일어났는지, 왜 차별을 당했다고 생각하는 지 자세히 설명하십시오. 연관된 모든 사람들에 대해 설명하십시오. 차별을 가한 사람(들)의 이름과 연락처 정보 (알고있는 경우)와 증인의 이름과 연락처 정보를 기입하십시오. 더 많은 공간이 필요한 경우 추가 세부 정보를 첨부하십시오. _____ _____ _____ _____ _____ _____ _____ _____				

섹션 IV		
이전에도 기관에 Title VI 불만 사항을 제출 한적이 있습니까?	☐ 예	☐ 아니오
섹션 V		
연방, 주 또는 지방 정부 기관 또는 연방 또는 주 법원에 이 신고서를 제출 했습니까?		
☐ 예 ☐ 아니오		
'예'인 경우, 해당 사항을 모두 표시하십시오.		
☐ 연방 기관: _____		
☐ 연방 법원 _____ ☐ 주정부 기관 _____		
차별 불만 사항이 접수 된 기관 / 법원에 연락 담당자에 대한 정보를 작성해주십시오.		
이름:		
타이틀:		
기관:		
주소:		
전화번호:		
섹션 VI		
불만 신고한 기관의 이름:		
연락인:		
호칭:		
전화번호:		

귀하는 본 불만과 관련이 있다고 생각하는 서면 자료 또는 기타 정보를 첨부할 수 있습니다.

아래에 서명 및 날짜를 작성해주시요.

서명

날짜

이 신고서를 아래 주소로 직접 제출하거나, 우편으로 보내주십시오:

Ann Arbor Area Transportation Authority
Attention: Title VI Coordinator
2700 South Industrial Highway
Ann Arbor, MI 48103

AAATA Title VI Complaint Form – Arabic

الشكل (C-1)

نموذج هيئة النقل في منطقة آن أربور
للتشكوى المتعلقة بما ينص عليه الباب السادس

القسم الأول (I):			
الاسم:			
العنوان:			
رقم الهاتف (المنزل):		رقم الهاتف (العمل):	
عنوان البريد الإلكتروني:			
متطلبات إتاحة شكل ميسر للاطلاع؟	الطباعة بخط كبير	شريط صوتي	
	جهاز اتصال لأصحاب الإعاقة السمعية	أخرى	
القسم الثاني (II):			
هل تقدم هذه الشكوى نيابة عن نفسك؟			
لا	نعم*		
*إذا أجبت بـ "نعم" على هذا السؤال، فانتقل إلى القسم الثالث.			
إذا لم يكن الأمر كذلك، فيرجى ذكر اسم الشخص الذي تشتكي من أجله وعلاقتك به:			
يرجى توضيح سبب التقدم بطلب لصالح الغير:			
يرجى تأكيد حصولك على تصريح من الطرف المتضرر إذا كنت تقدم الشكوى نيابة عن الغير.			
لا	نعم		
القسم الثالث (III):			
أعتقد أن التمييز الذي تعرضت له كان على أساس (ضع علامة على كل ما ينطبق):			
[] العرق		[] اللون	
[] الأصل الوطني			
تاريخ التعرض لواقعة التمييز المزعومة (الشهر، اليوم، السنة):			
أشرح بأكبر قدر ممكن من الوضوح ما حدث أثناء الواقعة، ولماذا تعتقد أنك تعرضت للتمييز. صف جميع الأشخاص الذين شاركوا في الواقعة. اذكر اسم الشخص (الأشخاص) الذين مارسوا التمييز ضدك ومعلومات الاتصال بهم (حال معرفتك إياها)، بالإضافة إلى أسماء أي شهود على الواقعة ومعلومات الاتصال الخاصة بهم. إذا كنت بحاجة لمزيد من المساحة لوصف الواقعة، يرجى إرفاق أي تفاصيل إضافية.			

القسم الرابع (IV):		
هل سبق لك تقديم شكوى تتعلق بما ينص عليه الباب السادس إلى هذه الوكالة؟	[] نعم	[] لا
القسم الخامس (V):		
هل سبق لك تقديم نفس الشكوى إلى أي وكالة اتحادية أو حكومية أو محلية أخرى، أو إلى أي محكمة اتحادية أو محكمة ولاية؟		
[] نعم [] لا		
إذا كان الجواب على السؤال السابق بـ (نعم)، ضع علامة أمام جميع الأجوبة التي تنطبق.		
[] وكالة اتحادية:		
[] محكمة اتحادية	[] وكالة حكومية	
[] محكمة ولاية	[] وكالة محلية	
يرجى توفير معلومات عن جهة الاتصال في الوكالة/المحكمة التي قدمت إليها الشكوى.		
الاسم:		
المنصب:		
الوكالة:		
العنوان:		
رقم الهاتف:		
القسم السادس (VI):		
اسم الوكالة المقدم ضدها الشكوى:		
مسؤول الاتصال:		
المنصب:		
رقم الهاتف:		

بإمكانك إرفاق أي مستندات مكتوبة أو معلومات أخرى تعتقد أنها ذات صلة بشكواك.

يرجى التوقيع وذكر التاريخ أدناه

التوقيع _____ التاريخ _____

يرجى تسليم هذا النموذج شخصيًا على العنوان أدناه، أو إرسال هذا النموذج بالبريد إلى العنوان التالي:

هيئة النقل في منطقة آن أربور
 عناية: منسق تطبيق ما ينص عليه الباب السادس
 2700 الطريق السريع الصناعي الجنوبي
 آن أربور، ميشيغان 48103

Appendix E: Title VI Complaints, 2023-2026

From 2023 through 2026 to date, AAATA received 20 complaints alleging discrimination. All were submitted as informal complaints, and none of the complainants chose to complete the Title VI complaint form that they were offered. Nineteen of the complaints were found to be invalid following investigation, and one was found to be undetermined due to lack of video available. There were no other investigations or lawsuits during this period. A list of the complaints is provided below.

AAATA Title VI Complaints received 2023-2026

Month and Year	Complaint Form Received?	Informal or Formal Complaint?	Nature of Complaint	Finding
March 2023	Customer did not complete a form	Informal	Passenger claimed discrimination due to being asked to move cart from blocking the aisle.	Investigation found discrimination complaint was not valid.
March 2023	Customer did not complete a form	Informal	Passenger claimed discrimination due to shared ride being extended to accommodate another passenger's pick-up window.	Investigation found complaint of bad shared ride was valid but complaint about discrimination was not valid.
April 2023	Customer did not complete a form	Informal	Passenger claimed discrimination due to not being permitted to board as bus was pulling away from stop.	Investigation found discrimination complaint was not valid.
April 2023	Customer did not complete a form	Informal	Passenger claimed discrimination due to bus not stopping to pick them up.	Investigation found discrimination complaint was not valid.
February 2024	Customer did not complete a form	Informal	Passenger claimed discrimination due to tone of driver.	Investigation closed due to insufficient evidence and lack of response from passenger.
March 2024	Customer did not complete a form	Informal	Passenger claimed discrimination due to tone of driver.	Investigation found discrimination complaint was not valid based on video evidence.
July 2024	Customer did not complete a form	Informal	Passenger claimed discrimination due to conflict when trying to pay fare while boarding bus.	Investigation found discrimination complaint was not valid based on video evidence.
September 2024	Customer did not complete a form	Informal	Passenger claimed discrimination due to verbal harassment from another passenger.	Investigation closed due to insufficient evidence and lack of response from passenger.

Month and Year	Complaint Form Received?	Informal or Formal Complaint?	Nature of Complaint	Finding
September 2024	Customer did not complete a form	Informal	Passenger claimed discrimination due to driver pulling away from bus stop.	Investigation found discrimination complaint was not valid due to lack of evidence.
October 2024	Customer did not complete a form	Informal	Passenger claimed discrimination, circumstances unclear from complaint.	Investigation closed due to lack of information from the passenger.
October 2024	Customer did not complete a form	Informal	Passenger claimed discrimination due to driver behavior.	Investigation found discrimination complaint was not valid based on video evidence.
January 2025	Customer did not complete a form	Informal	Passenger claimed discrimination due to interaction with transit center security personnel.	Investigation found discrimination complaint was not valid based on video evidence.
February 2025	Customer did not complete a form	Informal	Passenger claimed discrimination due to bus passing stop and not being permitted to board.	Investigation found discrimination complaint was invalid due to lack of evidence and required driver practices.
May 2025	Customer did not complete a form	Informal	Passenger claimed discrimination due to driver expression and not kneeling the bus.	Investigation found discrimination complaint was invalid based on video evidence.
June 2025	Customer did not complete a form	Informal	Passenger claimed discrimination due to being asked for fare card after swiping fare card.	Investigation closed due to lack of information and lack of response from passenger.
August 2025	Customer did not complete a form	Informal	Passenger claimed discrimination, circumstances unclear from complaint.	Investigation closed due to lack of information from the passenger.
September 2025	Customer did not complete a form	Informal	Passenger claimed discrimination due to not being permitted to board bus when it was departing.	Investigation found discrimination complaint was not valid.
October 2025	Customer did not complete a form	Informal	Passenger claimed discrimination due to observed behavior of transit center security personnel.	Investigation closed due to lack of information from the passenger.
October 2025	Customer did not complete a form	Informal	Passenger claimed discrimination due to driver behavior.	Discrimination complaint unable to be determined due to lack of video available.

Month and Year	Complaint Form Received?	Informal or Formal Complaint?	Nature of Complaint	Finding
November 2025	Customer did not complete a form	Informal	Passenger claimed discrimination due to fare payment and transfer conflict.	Investigation found discrimination complaint was invalid based on video evidence.

Appendix F: Major Service Changes or Fare Equity Analyses since 2023 Title VI Program Update

Effective January 28, 2024

Route 22: Pontiac–Dhu Varren
To Pierpont Commons

- Change routing from Blake Transit Center to north on Fourth Ave. to Liberty St. to Division St. to resume current routing.

Route 24: Eisenhower–Golfside

- Schedules will include a timepoint for the 'Northbrook & Oakbrook' bus stop.

Route 66: Carpenter–Huron Pkwy

- All trips will pull into VA Hospital on weekdays before 7:00pm only. Buses will not pull into the VA after 7pm and on Saturdays.

➔ *No major service changes*

Effective May 5, 2024

NEW - Route 104: Washtenaw Avenue Express

- A new limited-stop express bus route between Ann Arbor and Ypsilanti along Washtenaw Avenue operating every 30 minutes Monday-Friday from 6:00 a.m. – 6:45 p.m.
- Buses will stop at 4 locations between the Blake Transit Center in Ann Arbor and the Ypsilanti Transit Center in Ypsilanti:
 - The University of Michigan Central Campus Transit Center
 - Washtenaw Ave & Pittsfield Blvd in Ann Arbor
 - Washtenaw Ave & Golfside Rd in Ypsilanti Township
 - Washtenaw Ave & Cross St in Ypsilanti City near the Eastern Michigan University Main Campus

➔ *Major Service change, Title VI Analysis conducted in conjunction with August 2024 bid*

Route 4: Washtenaw

- Multiple timepoints will be adjusted to improve on-time performance
- Spring/Summer schedule goes into effect due to school breaks

Route 62: UM – State

- Spring/Summer schedule goes into effect due to school breaks

➔ *No major service changes for routes 4 + 62*

Effective August 25, 2024

Expanded hours of weekday service:

- Weekday service hours are expanding to: 6:00 a.m. – 11:30 p.m.
 - Routes 3, 4, 5, 6, 22, 23, 25, 26, 27, 28, 30, 31, 32, 33, 42, 44, 45, 46, 47, 62, 66, 67, 68
- NOTE: starting/ending times may vary by route.

Expanded hours of Saturday service:

- Saturday service hours are expanding to: 7:00 a.m. – 11:30 p.m.
 - Routes 3, 4, 5, 6, 22, 23, 25, 26, 27, 28, 30, 31, 32, 42, 43, 44, 45, 46, 47, 66, 67
- NOTE: starting/ending times may vary by route.

Expanded hours of Sunday service:

- Sunday service hours are expanding to: 8:00 a.m. – 9:00 p.m.
 - Routes 3, 4, 5, 6, 22, 23, 25, 26, 27, 28, 30, 31, 32, 42, 43, 44, 45, 46, 47, 67
- NOTE: starting/ending times may vary by route.

Frequency of service increased to every 30 minutes before 6:00pm on Saturdays:

- Routes 3, 5, 6, 22, 25, 26/29, 27, 28, 30, 31, 32, 42, 43, 44, 45, 46, 47, 66, 67

Frequency of service increased to every 30 minutes before 6:00pm on Sundays:

- Routes 3, 5, 6, 22, 23, 25, 26, 27, 28, 30, 31, 32, 42, 43, 44, 45, 46, 47, 67

Route 4: Washtenaw – Local

- Seasonal changes - restore fall/winter schedule.

Route 6: Ellsworth

- New route variations:
 - 6A trips will serve Ann Arbor to Ypsilanti using existing routing 7 days a week.
 - 6B trips will replace Route 24 to serve downtown Ann Arbor to Briarwood Mall Monday - Friday.
- Multiple timepoint adjustments to improve on-time performance.

Route 22: Pontiac – Dhu Varren

- The Dhu Varren + Omlesaad timepoint location is being moved to Traver + Logan School.
- Multiple timepoint adjustments to improve on-time performance.

Route 23: Plymouth

- The E Medical Center Dr + Taubman timepoint location is being moved to E Medical Center Dr + Mott Hospital.

Route 24: Eisenhower – Golfside

- Route 24 will be replaced by two routes:

- 6B will use routing from the Blake Transit Center to Briarwood Mall.
- Route 67 will use routing from Briarwood Mall to Washtenaw Community College and Trinity Health Ann Arbor Hospital.

Route 29: Liberty

- To Scio Ridge: The Liberty + Maple timepoint location will be moved to Liberty + Stadium.
- To Blake Transit Center: The final Saturday evening trip will depart at 6:26 p.m.
- To Scio Ridge: The final Saturday evening trip will depart at 6:15 p.m.

Route 31: Dexter Ave

- To Blake Transit Center: Saturday and Sunday evening trips adjusted at depart to X:24 past the hour.
- To Jackson & Wagner: Saturday and Sunday evening trips adjusted to depart at X:15 past the hour.

Route 33: Newport

- The morning Rudolf Steiner School trip will be removed.

Route 42: Forest – MacArthur

- First 'to Ypsilanti Transit Center' trip of morning to start at Clark East Tower 7 days a week.
- The Cross + Prospect timepoint location will be moved to Forest + Campbell.
- The Ford + Holmes timepoint will be removed.
- Multiple timepoint adjustments to improve on-time performance.

Route 43: E. Michigan Ave

- Adjust routing to the following:
- To Holmes & Ridge: Start at YTC – west on Pearl St. – (L) Adams St. – (L) Michigan Ave. – (L) Holmes Rd. – end at Homes + Ridge.
- To Ypsilanti Transit Center: Start at Holmes + Ridge – west on Holmes Rd. – (L) Spencer Ln. – (R) Michigan Ave. (R) Huron St. – (L) Pearl St. – end at YTC.

Route 46: Huron – Paint Creek

- The Ypsilanti Township District Library timepoint location will move to Ypsilanti Township Civic Center.

Route 62: U-M – State

- Seasonal changes - restore fall/winter schedule.

Route 63: U-M - Pontiac

- The E Medical Center Dr + Taubman timepoint location will move to E Medical Center Dr + Mott Hospital.

Route 64: Geddes – E. Stadium

- The Geddes + Arlington timepoint will be removed.

Route 67: Eisenhower - Golfside – NEW Route

- New route will replace Route 24, operating 7 days a week.
- Will serve Briarwood Mall, Northbrook + Oakbrook, Washtenaw Community College, and Trinity Health Ann Arbor Hospital before 6:30pm.

- Will serve Briarwood Mall to WCC after 6:30pm.
- Service will be extended to the WCC/Trinity Health Ann Arbor Hospital area on Sundays.

Route 104: Washtenaw Express

- To Blake Transit Center: New trip starting at 6:15am. Last trip of evening to depart at 5:45pm.
- To Ypsilanti Transit Center: First trip of morning to depart at 6:30am. New trip starting at 6:00pm.

FlexRide Night service

- Expanded service area to include all of Ypsilanti City and Ypsilanti Township, north of Textile Road, to match the fixed-route bus service area.
- Greater booking capacity and new service provider and technologies.

➔ *Major Service Changes. Title VI Analysis conducted*

Effective January 26, 2025

Route 33, 63, 64, 65, 67:

- Multiple timepoints adjusted

Route 6:

- Route name will be changed from “Ellsworth” to “Ellsworth-State”
- Weekday evening service will increase to every 30 minutes
- 6A trips will depart the Blake Transit Center at X:45 minutes past the hour
- 6B trips will depart at X:15 minutes past the hour
- All 6B trips will connect to Route 67 at Briarwood

Route 22 to Pierpont Commons:

- Routing moved to directly serve UM North Campus Research Complex campus
- New bus stop in front of Building 18

Route 65:

- Route name will be changed from “UM-Downtown-Green” to “UM-Plymouth-Greenhills”
- The Eastern end of route will be adjusted to serve Greenhills School area

➔ *No major service changes*

Effective May 4, 2025

Route 4: Washtenaw

- Spring/Summer schedule goes into effect due to school breaks

Route 62:

- Spring/Summer schedule goes into effect due to school breaks

➔ *No major service changes*

Effective August 24, 2025

Route 4: Washtenaw - Local

- Seasonal changes to restore fall/winter schedule.
- Adjust multiple timepoints.
- New 3:43pm inbound trip added to Blake Transit Center.

Route 22: Pontiac – Dhu Varren

- Multiple timepoint adjustments for weekday schedules.

Route 23: Plymouth

- New 9:07am inbound trip added to Blake Transit Center to address overcrowding issues.
- Adjust multiple timepoints.
- Remove evening service to Plymouth Rd Park & Ride lot from inbound trips to improve on-time performance.

Route 28: Pauline

- Adjust multiple timepoints.
- Adjust departure frequencies at Blake Transit Center to every 20 minutes during rush hours to improve rider experience.

Route 30: Jackson Rd

- Adjust multiple timepoints.

Route 32: Miller - Maple

- Adjust routing to reverse loop on south end of route to eliminate a sharp and complicated right turn from Stadium onto Pauline.
- Adjust multiple timepoints.

Route 44: Ecorse - Tyler

- Adjust routing to reverse loop on Harris Rd, Russell St, and Ford Blvd. to help with on-time performance and create opportunities for future bus stop amenities.
- Multiple timepoint adjustments.

Route 62: U-M - State

- Seasonal changes to restore fall/winter schedule.

Route 66: Carpenter - Huron Pkwy

- New 7:07am northbound trip to Green Rd Park & Ride Lot to address overcrowding.
- New 2:58pm southbound trip to Meijer to address overcrowding.

Route 104: Washtenaw Express

- New stops at Washtenaw Ave and Sheridan Dr in both directions.
- Multiple timepoint adjustments.

➔ *No major service changes*

Effective January 25, 2026**Route 62:**

- Remove service from Wolverine Tower parking lots. Buses will stay on State St. to serve a stop south of the Wolverine Tower entrance drive.

➔ *No major service changes*

Effective May 3, 2026**Temporarily Closed: Blake Transit Center & Fourth Ave.**

As of May 3rd, 2026, the Blake Transit Center is temporarily closed for the 4th Ave. Street and Transit Improvements Construction Project. The following routes will temporarily change their Blake Transit Center boarding locations to the Fifth Ave./Washington St. area:

- 5th Ave. between Huron St. and Liberty St:
 - Routes 22, 25, 26, 27, 28, 32, 33, 34, and 104
- Washington St. between 5th Ave. and just east of Division St:
 - Routes 3, 4, 5, 6, 23, 30, and 31

In addition to boarding location changes, the following updates will be made:**Route 4: Washtenaw Local**

- Spring/Summer schedule goes into effect

Route 25: Ann Arbor–Saline Rd.

- Schedule adjustments

Route 26: Scio Church

- Midday frequency increased to every 30 minutes

Route 27: W. Stadium–Oak Valley

- Temporary BTC departure times moved from X:15/X:45 to X:00/X:30

Route 29: Liberty

- Temporarily suspended due to construction in the downtown Ann Arbor area (use Route 26: Scio Church as an alternative)

Route 34: Maple-Dexter

- Temporary BTC departure times moved from X:15/X:45 to X:00/X:30

Route 62: U-M–State

- Spring/Summer schedule goes into effect

Route 66: Carpenter–Huron Pkwy

- Temporarily suspend 2:58 p.m. school trip

Route 104: Washtenaw Express

- Routing and schedule adjustments

➔ *Defined as temporary service changes (less than one year). No major service changes*

Appendix G: Fleet Inventory

AAATA Fleet Inventory 2026

Mode	Vehicle #	Model & Manufacturer	VIN	Seats
A. Fixed Rt	461	GILLIG HYBRID LOW FLOOR 40' 2011	15GGD3018B1180072	36
A. Fixed Rt	462	GILLIG HYBRID LOW FLOOR 40' 2011	15GGD301XB1180073	36
A. Fixed Rt	465	GILLIG HYBRID LOW FLOOR 40' 2011	15GGD3015B1180076	36
A. Fixed Rt	466	GILLIG HYBRID LOW FLOOR 40' 2011	15GGD3017B1180077	36
A. Fixed Rt	469	GILLIG HYBRID LOW FLOOR 40' 2011	15GGD3017B1180080	36
A. Fixed Rt	470	GILLIG HYBRID LOW FLOOR 40' 2011	15GGD3019B1180081	36
A. Fixed Rt	471	GILLIG HYBRID LOW FLOOR 40' 2013	15GGD3012D1181351	36
A. Fixed Rt	472	GILLIG HYBRID LOW FLOOR 40' 2013	15GGD3014D1181352	36
A. Fixed Rt	473	GILLIG HYBRID LOW FLOOR 40' 2013	15GGD3016D1181353	36
A. Fixed Rt	474	GILLIG HYBRID LOW FLOOR 40' 2013	15GGD3018D1181354	36
A. Fixed Rt	475	GILLIG HYBRID LOW FLOOR 40' 2013	15GGD301XD1181355	36
A. Fixed Rt	476	GILLIG HYBRID LOW FLOOR 40' 2013	15GGD3015D1181327	36
A. Fixed Rt	477	GILLIG HYBRID LOW FLOOR 40' 2013	15GGD3017D1181328	36
A. Fixed Rt	478	GILLIG HYBRID LOW FLOOR 40' 2013	15GGD3019D1181329	36
A. Fixed Rt	479	GILLIG HYBRID LOW FLOOR 40' 2013	15GGD3015D1181330	36
A. Fixed Rt	480	GILLIG HYBRID LOW FLOOR 40' 2013	15GGD3017D1181331	36

Mode	Vehicle #	Model & Manufacturer	VIN	Seats
A. Fixed Rt	481	GILLIG HYBRID LOW FLOOR 40' 2013	15GGD3019D1181332	36
A. Fixed Rt	482	GILLIG LOW FLOOR 40' 2013	15GGD2716D1181322	38
A. Fixed Rt	483	GILLIG LOW FLOOR 40' 2013	15GGD2718D1181323	38
A. Fixed Rt	484	GILLIG LOW FLOOR 40' 2013	15GGD271XD1181324	38
A. Fixed Rt	485	GILLIG LOW FLOOR 40' 2013	15GGD2711D1181325	38
A. Fixed Rt	486	GILLIG LOW FLOOR 40' 2013	15GGD2713D1181326	38
A. Fixed Rt	487	GILLIG LOW FLOOR 35' 2015	15GGB2718F1187129	32
A. Fixed Rt	488	GILLIG LOW FLOOR 35' 2015	15GGB2714F1187130	32
A. Fixed Rt	489	GILLIG LOW FLOOR 35' 2015	15GGB2716F1187131	32
A. Fixed Rt	490	GILLIG LOW FLOOR 35' 2015	15GGB2718F1187132	32
A. Fixed Rt	491	GILLIG LOW FLOOR 40' 2015	15GGD2718F1187125	36
A. Fixed Rt	492	GILLIG LOW FLOOR 40' 2015	15GGD271XF1187126	36
A. Fixed Rt	493	GILLIG LOW FLOOR 40' 2015	15GGD2711F1187127	36
A. Fixed Rt	494	GILLIG LOW FLOOR 40' 2015	15GGD2713F1187128	36
A. Fixed Rt	495	GILLIG LOW FLOOR 40' 2015	15GGD2715F1187115	36
A. Fixed Rt	496	GILLIG LOW FLOOR 40' 2015	15GGD2717F1187116	36
A. Fixed Rt	497	GILLIG LOW FLOOR 40' 2015	15GGD2719F1187117	36
A. Fixed Rt	498	GILLIG LOW FLOOR 35' 2015	15GGB2713F1187118	32
A. Fixed Rt	499	GILLIG LOW FLOOR 35' 2015	15GGB2715F1187119	32

Mode	Vehicle #	Model & Manufacturer	VIN	Seats
A. Fixed Rt	500	GILLIG LOW FLOOR 35' 2015	15GGB2711F1187120	32
A. Fixed Rt	501	GILLIG LOW FLOOR 35' 2015	15GGB2713F1187121	32
A. Fixed Rt	502	GILLIG HYBRID LOW FLOOR 40' 2015	15GGD3012F1187122	36
A. Fixed Rt	503	GILLIG HYBRID LOW FLOOR 40' 2015	15GGD3014F1187123	36
A. Fixed Rt	504	GILLIG HYBRID LOW FLOOR 40' 2015	15GGD3016F1187124	36
A. Fixed Rt	505	GILLIG LOW FLOOR 40' 2016	15GGD2717G1187683	36
A. Fixed Rt	506	GILLIG LOW FLOOR 40' 2016	15GGD2719G1187684	36
A. Fixed Rt	507	GILLIG LOW FLOOR 40' 2016	15GGD2710G1187685	36
A. Fixed Rt	508	GILLIG LOW FLOOR 40' 2016	15GGD2712G1187686	36
A. Fixed Rt	509	GILLIG LOW FLOOR 40' 2016	15GGD2714G1187687	36
A. Fixed Rt	510	GILLIG LOW FLOOR 40' 2016	15GGD2716G1187688	36
A. Fixed Rt	511	GILLIG LOW FLOOR 40' 2016	15GGD2718G1187689	36
A. Fixed Rt	512	GILLIG LOW FLOOR 40' 2016	15GGD2714G1187690	36
A. Fixed Rt	513	GILLIG LOW FLOOR 40' 2016	15GGD2716G1187691	36
A. Fixed Rt	514	GILLIG LOW FLOOR 40' 2017	15GGD2716H3187759	36
A. Fixed Rt	515	GILLIG LOW FLOOR 40' 2017	15GGD2712H3187760	36
A. Fixed Rt	516	GILLIG LOW FLOOR 40' 2017	15GGD2714H3187761	36
A. Fixed Rt	517	GILLIG LOW FLOOR 40' 2017	15GGD2716H3187762	36
A. Fixed Rt	518	GILLIG LOW FLOOR 40' 2017	15GGD2718H3187763	36

Mode	Vehicle #	Model & Manufacturer	VIN	Seats
A. Fixed Rt	519	GILLIG LOW FLOOR 40' 2017	15GGD271XH3187764	36
A. Fixed Rt	520	GILLIG LOW FLOOR 40' 2017	15GGD2711H3187765	36
A. Fixed Rt	523	GILLIG HYBRID LOW FLOOR 40' 2017	15GGD3017H3187768	36
A. Fixed Rt	524	GILLIG HYBRID LOW FLOOR 40' 2017	15GGD3019H3187769	36
A. Fixed Rt	525	GILLIG HYBRID LOW FLOOR 40' 2017	15GGD3015H3187770	36
A. Fixed Rt	521	GILLIG LOW FLOOR 40' 2018	15GGD2716J3187766	36
A. Fixed Rt	522	GILLIG LOW FLOOR 40' 2018	15GGD2718J3187767	36
A. Fixed Rt	526	GILLIG LOW FLOOR 40' 2018	15GGD2715J3190562	36
A. Fixed Rt	527	GILLIG LOW FLOOR 40' 2018	15GGD2717J3190563	36
A. Fixed Rt	528	GILLIG LOW FLOOR 40' 2018	15GGD2710J3192591	36
A. Fixed Rt	529	GILLIG LOW FLOOR 40' 2018	15GGD2712J3192592	36
A. Fixed Rt	1930	GILLIG LOW FLOOR 40' 2019	15GGD2715K3193771	36
A. Fixed Rt	1931	GILLIG LOW FLOOR 40' 2019	15GGD2715K3193772	36
A. Fixed Rt	1932	GILLIG LOW FLOOR 40' 2019	15GGD2715K3193773	36
A. Fixed Rt	1933	GILLIG LOW FLOOR 40' 2019	15GGD2715K3193774	36
A. Fixed Rt	1934	GILLIG LOW FLOOR 40' 2019	15GGD2715K3193775	36
A. Fixed Rt	1935	GILLIG LOW FLOOR 40' 2019	15GGD2715K3193776	36
A. Fixed Rt	1936	GILLIG LOW FLOOR 40' 2019	15GGD2715K3193777	36
A. Fixed Rt	1937	GILLIG LOW FLOOR 40' 2019	15GGD2715K3193778	36

Mode	Vehicle #	Model & Manufacturer	VIN	Seats
A. Fixed Rt	2000	NOVB LFS-40 Bus	4RKYL82J9L9777669	36
A. Fixed Rt	2001	NOVB LFS-40 Bus	4RKYL82J1M9777893	36
A. Fixed Rt	2002	NOVB LFS-40 Bus	4RKYL82J3M9777894	36
A. Fixed Rt	2003	NOVB LFS-40 Bus	4RKYL82J5M9777895	36
A. Fixed Rt	2004	NOVB LFS-40 Bus	4RKYL82J7M9777896	36
A. Fixed Rt	2005	NOVB LFS-40 Bus	4RKYL82J9M9777897	36
A. Fixed Rt	2006	NOVB LFS-40 Bus	4RKYL82J0M9777898	36
A. Fixed Rt	2007	NOVB LFS-40 Bus	4RKYL82J2M9777899	36
A. Fixed Rt	538	NOVB LFS-40 Bus	4RKYL82JXN9778509	36
A. Fixed Rt	539	NOVB LFS-40 Bus	4RKYL82J6N9778510	36
A. Fixed Rt	540	NOVB LFS-40 Bus	4RKYL82J8N9778511	36
A. Fixed Rt	541	NOVB LFS-40 Bus	4RKYL82JXN9778512	36
A. Fixed Rt	542	NOVB LFS-40 Bus	4RKYL82J1N9778513	36
A. Fixed Rt	543	NOVB LFS-40 Bus	4RKYL82J3N9778514	36
A. Fixed Rt	544	NOVB LFS-40 Bus	4RKYL82J5N9778515	36
A. Fixed Rt	545	NOVB LFS-40 Bus	4RKYL82J7N9778516	36
A. Fixed Rt	546	GILLIG Low Floor 40' Bus	15GGD2718R3201436	37
A. Fixed Rt	547	GILLIG Low Floor 40' Bus	15GGD271XR3201437	37
A. Fixed Rt	548	GILLIG Low Floor 40' Bus	15GGD2711R3201438	37

Mode	Vehicle #	Model & Manufacturer	VIN	Seats
A. Fixed Rt	549	GILLIG Low Floor 40' Bus	15GGD2713R3201439	37
A. Fixed Rt	550	GILLIG Low Floor 40' Bus	15GGD271XR3201440	37
A. Fixed Rt	551	GILLIG Low Floor 40' Bus	15GGD2711R3201441	37
A. Fixed Rt	552	GILLIG Low Floor 40' Bus	15GGD2715R3201443	37
A. Fixed Rt	553	GILLIG Low Floor 40' Bus	15GGD2713R3201442	37
A. Fixed Rt	554	GILLIG Low Floor 40' Bus	15GGD2717R3201444	37
A. Fixed Rt	555	GILLIG Low Floor 40' Bus	15GGD2719R3201445	37
A. Fixed Rt	556	GILLIG Low Floor 40' Bus	15GGD2710R3201446	37
A. Fixed Rt	557	GILLIG Low Floor 40' Bus	15GGD2717S3202924	37
A. Fixed Rt	558	GILLIG Low Floor 40' Bus	15GGD2719S3202925	37
A. Fixed Rt	559	GILLIG Low Floor 40' Bus	15GGD2710S3202926	37
A. Fixed Rt	560	GILLIG Low Floor 40' Bus	15GGD2712S3202927	37
A. Fixed Rt	561	GILLIG Low Floor 40' Bus	15GGD2714S3202928	37
A. Fixed Rt	562	GILLIG Low Floor 40' Bus	15GGD2716S3202929	37
A. Fixed Rt	563	GILLIG Low Floor 40' Bus	15GGD2712S3202930	37
A. Fixed Rt	564	GILLIG Low Floor 40' Bus	15GGD2714S3202931	37

DRAFT CEO Ends Interpretations v4.1
Oct 2026

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Introduction

The CEO is attempting to incorporate several new directions in writing interpretations:

A. Structure/Formatting:

- a. The key elements of a reasonable interpretation (definition and rationale, measure and rationale, target and rationale) are now located together.
- b. A wider use of interim targets. These break long-term goals into smaller steps to demonstrate progress, and are the targets for their monitoring period.
- c. Tables for displaying targets and evidence. Often these are presented together in the Evidence sections to save space. Blank mockups included below.

B. Aiming Higher: Ends are intended to drive advancement, so the interpretations should be ambitious. These interpretations are therefore bolder with more ambitious definitions and targets. Many minimum legal standards will be relocated to Exec Limitation policies (legal or grant requirements). This means the previous “ceiling” for performance is now becoming the “floor”.

- a. Once finalized, all other operational plans will need to be redone to take their direction from these interpretations (strategic plans, Long Range Plan, budgets, etc). For example, the interpretations drive the LRP, not the other way around.

C. Managing Expectations: A vision can be bold, but it still must demonstrate ‘value and cost efficient stewardship’, and not violate Exec Limitations policies such as being imprudent or risking fiscal jeopardy. Consequently, there are more references to ‘cost effectiveness’ even as we become more open to targets without a clear source of funding. The importance of relative prioritization increases but is not a part of the interpretation (delegated to CEO).

- a. The agency does not yet have the resources to achieve all of the new targets. More ambitious goals that do not have to be ‘fiscally constrained’ may attract even higher expectations and demands.
- b. With fewer limitations on a vision, the CEO’s role in choosing Means (budgets, activities, operations, etc) may attract more criticism. The CEO will rely even more on the Board to follow the Any Reasonable Interpretation rule.
- c. With higher targets, we may fall short more often (ie over promise and under deliver) How the Board reacts will send important signals to the CEO.

1.0 TheRide exists to advance a robust transportation system in the service area *(at a cost)* that demonstrates value and efficient stewardship of resources.

Definitions & Rationales

I define a **robust transportation system** to be one that meets the targets set forth below for policies 1.1-1.5. This is reasonable because the CEO's interpretations of those policies reflect the Board's discussions during creation of the Ends and fully define 'robust'.

I define **demonstrating value and efficient stewardship of resources** to mean that advancing the Ends is constrained by these requirements (as well as the Executive Limitations). Specially, this means that the agency delivers passenger trips at a reasonable overall average cost per trip. This is reasonable because passenger trips are the Outcome closest to the original policy impact we can track, and dividing overall costs by all trips produces a high-level statistic that reflects the overall investment and the benefit received. It reduces all effort and outcomes into a single figure. The ratio also creates a suitable replacement for a profit motive: an internal impulse to increase revenues & grants, control costs¹, and increase ridership.

Indicators, Targets for Achievement and Rationales

Achievement will be demonstrated when

- A. **Lower-Level Policy Achievement:** All lower-level policies in the Ends have achieved their targets during the monitoring period. The measures and targets are reasonable because the Board has articulated their concept of robust in the lower policies.
- B. **Net Cost per Passenger Trip:** Our overall corporate Net Average Operating Cost per Passenger Trip (total corporate operating costs minus non-grant revenues divided by all rides) stays the same or declines [or increases no faster than inflation?].

This measure is reasonable because it merges all operational spending into a single figure (corporate operating costs), removes revenues (net) and divides by

¹ More information on how the CEO achieves value and stewardship can be seen under their interpretation of prudence in policy 2.0.

Commented [MC1]: Structure: Definitions are numbered (1, 2, 3) while measures and targets are lettered (A, B, C).

passenger trips to create an easy-to-understand ratio. It can be tracked over time and benchmarking with other agencies may be possible in the future. Excluding capital is reasonable as it is largely paid for by outside sources.

The target is reasonable because it is ambitious but achievable and represents a ‘sweet spot’ where TheRide has attracted all riders whom it is cost-effective to attract to the services given preference and subsidies for automobiles.

Evidence of Achieving Target for Period

A. Lower-Level Policy Achievement: The rest of this report illustrates compliance with lower-level Ends policies. Results indicate...(TBD).

Source of Data: XXXXXX
Date of Data Review: XX/XX/XXXX as verified by XXXXXX

B. Net Cost per Passenger

The table below illustrates TheRide’s overall net operating cost per passenger trip. It demonstrates that we are within industry norms when compared with similar agencies in our state.

Figure 1: Cost per Passenger

	2019	2024	2026	2027	2028	2030	2035	2040	2045
AAATA Target			?	?	?	?	?	?	?
AAATA Actual	\$ 4.92	\$ 9.87							
Lansing	\$ 4.17	\$ 5.90							
Grand Rapids	\$ 3.64	\$ 6.48							
Flint MTA	\$ 6.89	\$13.93							

Source of Data: XXXXXX
Date of Data Review: XX/XX/XXXX as verified by XXXXXX

Commented [MC2]: This table will be replaced. Used here to illustrate concept.
All tables are fair game for comment/critique.

Compliance History

Policy	2024	2025	2026
X.X.X			

Commented [MC3]: New feature: compliance icon for each policy.

1.1 TheRide's service area has an integrated, multi-modal transportation ecosystem that favors active, shared, micro-mobility and regionally connected transportation.

Definitions & Rationales

I define “**service area**” to mean:

1. **Membership Area:** People receive services from TheRide within the areas of the municipalities that are members of the Authority (presently Ann Arbor, Ypsilanti, Ypsilanti Twp). This is reasonable because the members incorporated the Authority and we exist to create benefits for these areas, voters in these areas have approved taxes for TheRide and we have made a commitment to provide services, and no other organization can perform this function in those spaces.
2. **Extended Areas:** People within about 35 miles of the Membership Area (i.e. regional) *may* receive service from TheRide as long as the program: A) advances the Ends *within* the member municipalities, B) is cost-effective, and C) does not violate any Executive Limitations or create other unacceptable risks. This is reasonable because it enables pursuit of Ends *for our members* while allowing us to pursue longer-distance travel markets and sets clear limits that prevent risk to the Authority and its core service obligations. 35 miles is roughly one hour of travel time for a bus service and is at the limit of practical commuting to our area; downtown Detroit, Howell, Flint, and Jackson are at the edge of this range.

I define “...**an integrated, multi-modal transportation ecosystem that favors active, shared, micro-mobility and regionally connected transportation**” to mean:

3. **Intermodal Connectivity with TheRide:** Easy passenger connections between TheRide and other modes/operators allow frictionless transfers. This is reasonable because 1) overlapping services with seamless connections are mutually reinforcing and enable and encourage a car-free lifestyle, 2) TheRide overlaps with most other services creating a common standard, and 3) TheRide can control changes to its own services. Connections must be cost-effective given the number of transfers.
4. **Ecosystem Expansion/Enhancement:** Proposals exist for new services (including regional services) or other improvements that address under-served travel markets in a viable, cost-effective and affordable manner, and that other modes are prioritized ahead of personal automobiles. This is reasonable because addressing unmet needs creates a more effective ecosystem (i.e. more destinations, flexibility, transfers, etc) and advances this policy goal. The higher priority for non-auto modes reflects the policy language for ‘favors’. This

approach requires exploration of ideas before viability is known. (This captures the R&D or “Think Tank” function of TheRide and creates the opportunities to demonstrate leadership in this space.)

Cost-effectiveness and relative prioritization are factors in all definitions, measures and targets. With limited time and resources, solutions must be cost-effective, affordable, and otherwise viable over time to avoid wasted effort. Some popular ideas may be cost-prohibitive given low number of passengers. We will not be able to say ‘yes’ to every idea and will need to prioritize limited resources to the greatest impact in order to advance Ends goals. The CEO feels we can either do a few things well *or* many things poorly, and intends to focus the agency’s energy on a few achievable goals at a time.

Indicators, Targets for Achievement and Rationales

Achievement will be demonstrated when:

- A. **Service Areas:** Records for the period reflect that
 - a. Memberships communities did receive services as described in TheRide’s Service Standards,
 - b. That outside communities did receive services as described in POSA documents.
 - c. Any other corridors or areas did receive services per terms of those agreements (e.g. grants, contracts, etc).

These measures and targets are reasonable because Service Standards, POSAs, and other scoping documents set out the shape and costs of services to be provided beforehand. Records capture whether the service was provided. Each area has a separate scope. One exclusion exists for extreme weather or events that make service provision unsafe.

- B. **Intermodal Connectivity at TheRide:** The measures and targets for further integrating TheRide’s services with other modes appear in the table in the next section. These are reasonable because they address all intermodal or inter-operator transfer opportunities (aside from those being explored in section C).
- C. **Ecosystem Expansion/Enhancement:** The measures, targets and timelines for determining viability of potential expansion opportunities are illustrated below. These measures and targets are reasonable because the opportunities identified have a reasonable chance of becoming viable and sustainable and could significantly improve the local non-auto transportation systems.

Evidence of Achieving Target for Period

A. Service Areas

A review of service planning and provision records found that services were designed to meet documented service standards and that actual service delivery met those guidelines as well. Services in POSA or outside areas were found to have met the parameters of relevant agreements.

Source of Data: XXXXXX

Date of Data Review: XX/XX/XXXX as verified by XXXXXX

B. Intermodal Connectivity with TheRide

A review of decisions during the monitoring period and physical inspection of assets produced the results seen in the table below.

Figure 2: Intermodal Connectivity at TheRide

		2024 (Baseline)	2026	2027	2030	2035	2040	2045
Bikes, scooters, etc can be secured at hubs and terminals	Target	2	2	2	2	3	3	4
	Actual	1	1					
Bikes can be repaired at terminals	Target	0	2	2	2	2	2	2
	Actual	0						
Bike loading can be practiced at terminals	Target	NA	0	2	2	2	2	2
	Actual	0	0					
All eligible bus pads are paved (see policy1.3.2)	Target	NA	70%	80%	90%	100%	100%	100%
	Actual	0						
Rail station(s) has bus stop	Target	1	1	1	1	1	1	1
	Actual	1	1					
Car/rideshare Drop Off space at both Terminals (ie Kiss n Ride)	Target	NA	0	0	1	2	2	2
	Actual	NA						

Commented [MC4]: This interpretation creates many new projects that are not in the current LRP or Business Plan. Those documents will need to be updated to reflect the final interpretations. This illustrates alignment with the Board's policies. Legacy documents, like the LRP, will need to be updated to align.

Note: Existing intermodal connections will continue to exist but are not used to demonstrate future achievement. These include continuation of bike racks on buses, MRide w/UM, clear rules regarding bringing personal mobility devices onto buses, shared bus stops, ...

Source of Data: XXXXXX

Date of Data Review: XX/XX/XXXX as verified by XXXXXX

C. Ecosystem Expansion/Enhancement:

Figure 3: Service/Infrastructure Goals

Commented [MC5]: I'm not entirely satisfied with this definition as it uses activities (outputs) as proxies for outcomes. TBD

	Calendar Year							
	2026	2027	2028	2029	2030	2035	2040	2045
Feasibility of Regional PnR Clarified	X							
Needs for Transit through Washtenaw County documented		X						
Potential for Multi-Agency Fare Collection/Passenger Info Assessed		X						
Potential for Bus Rapid Transit Clarified			X					
Washtenaw Ave			X					
Ann Arbor N/S Corridor					?			
Washtenaw Ave Bus Lanes (See BRT)	X	X	X					
Incorporated in MDOT Interchange Decision (US-23)	☐							
Incorporated in MDOT Repaving Decision (S University-Stadium)	X							
Incorporated in MDOT Repaving Plans (Carpenter Rd-EMU)	☐							
Potential for Expanded Youth Transportation Assessed		X						
Potential for Additional Transit Priority Measures Assessed								
Bus Lane Join Proposal Completed (w/UM)	☐							
Potential for Transit Signal Priority outside Ann Arbor Assessed					X			
State Street	☐							
Best Practices for Transit-Supportive Land Use Defined			X					
Potential for Non-Emergency Medical Transportation Assessed						X		
Potential for Mobility Manager Assessed							X	
Potential for Expanded/Consolidated Terminal Operations				X				
☐ =Completed X=Target Deadline								

Source of Data: XXXXXX

Date of Data Review: XX/XX/XXXX as verified by XXXXXX

Compliance History

Policy	2024	2025	2026
X.X.X			

1.2 An increasing proportion of residents, workers, and students in the service area use TheRide's services to access their intended destinations.

Definitions & Rationales

I define **workers** to mean those traveling for work (i.e. commuters), and **students** as those traveling to receive education or training. **Residents** are people who make their primary residence in the areas we serve. These definitions are reasonable because they are common understandings of the terms. Categories of travelers are sometimes called "market segments" to help distinguish their needs from the larger market of travelers.

I define "...**increasing proportion of...**" to mean that, in each market segment, the *share* of travelers using transit should increase. For example, the percentage of workers commuting on transit should grow. This is reasonable because it refines the policy's language into a mathematically testable format.

Finally, to "...**use TheRide's service to access their intended destinations**" simply means to take a trip on a service TheRide operates or is party to. This is reasonable as trips are measurable outputs and we can only assume that passengers reached their *intended* destination.

Indicators, Targets for Achievement and Rationales

Achievement will be demonstrated when ridership patterns meet or exceed the following targets:

- A. **Workers/commuters:** The share of **workers/commuters** will be measured by mode share figures (like market share) produced by SEMCOG. This is reasonable because, although infrequent and covering broad areas, SEMCOG's figures represent a scientifically valid and impartial calculation of how workers travel (fixed-route bus and cars only). Targets provided in the Evidence section are reasonable because they reflect historic performance, are linked with planned improvements in the long-range plan, and reflect the limit of performance within available resources and relative priority. Further they are realistic in an auto-oriented society where the cost of attracting additional riders may be prohibitive.
- B. **Students:** The share of students will be derived from comparing the size of the student populations (high school and university) with the number of alightings

recorded at campuses. This would give us a proxy measure similar to mode share. However, since it will be impossible to distinguish students from other travelers with current technologies, the figures will only be general. Targets provided in the Evidence section are reasonable because they reflect historic performance, are linked with planned improvements in the long-range plan, and reflect the limit of performance within available resources and relative priority. Further they are realistic in an auto-oriented society where the cost of attracting additional riders may be prohibitive.

- C. **Residents:** Total annual trips per capita (total ridership divided by area population) grows faster than total population. In this case, total ridership includes fixed-route and demand response, but not vanpool or football shuttles. This measure is reasonable because

- a. Aside from a small number of park n ride users, most users of the local service reside in the area (otherwise how did they get to the service?). This is confirmed by surveys. Most visitors to the area arrive by car and do not use transit. Excluding football shuttles and vanpools is reasonable as they are geared towards, and predominately used by, non-residents of our area.
- b. It demonstrates that ridership is growing faster than population and therefore a larger *share* of residents are using the service.

Targets provided in the Evidence section are reasonable because they reflect historic performance, are linked with planned improvements in the long-range plan, and reflect the limit of performance within available resources and relative priority. Further they are realistic in an auto-oriented society where the cost of attracting additional riders may be prohibitive.

Evidence of Achieving Target for Period

A. Commuting Mode Share

Figure 4: Commuting by Mode (Mode Share) & Targets

		2015 (pre-COVID)	2025 (Baseline)	2030	2035	2040	2045
Ann Arbor	Target	NA	NA				
	Actual						
Ypsilanti	Target	NA	NA				
	Actual						
Ypsilanti Twp	Target	NA	NA				
	Actual						

Note: There is likely overlap in these figures, for example Ypsi Twp residents commuting to Ann Arbor.

Source of Data: XXXXXX

Date of Data Review: XX/XX/XXXX as verified by XXXXXX

B. Students

Figure 5: Student Ridership & Targets

		2024 (Baseline)	2026	2028	2030	2032	2034	2036
U of M	Target	Could come from Mride						
	Actual							
EMU	Target	No way to measure						
	Actual							
WCCC	Target	No way to measure						
	Actual							
AAPS (high school)	Target	Might be able to use farebox data						
	Actual							
YCS (high school)	Target	Might be able to use farebox data						
	Actual							

Source of Data: XXXXXX

Date of Data Review: XX/XX/XXXX as verified by XXXXXX

C. Ridership per Capita

Figure 6: Ridership Targets

			Baseline	2030	2035	2040	2045
Transit Ridership	Absolute Total Ridership (Unlinked Trips)	Target	7.2% (2024)				11%
		Actual					
	Proportional Ridership (Riders per Capita)	Target					
		Actual					

Source of Data: XXXXXX
Date of Data Review: XX/XX/XXXX as verified by XXXXXX

Compliance History

Policy	2024	2025	2026
X.X.X			

1.2.1. People are highly satisfied with TheRide's transportation services.

Definitions & Rationales

For this policy I interpret "**people**" to mean users of TheRide's services (ie customers or passengers) and residents of the service area(s). This is reasonable because those are the groups we exist to serve.

I define "**highly satisfied**" to mean statistically valid feedback from representative group of customers finds a high degree of self-reported feelings of "satisfaction". This is reasonable because general feelings of satisfaction are sufficient as it allows the respondent to use whatever framing they prefer to define 'satisfied', and because deeper analysis is not required to satisfy this policy (although staff generally do ask additional questions). For non-riders, a generally favorable opinion is sufficient. Further, properly aggregated feedback can be more accurate than estimates or individual anecdotes.

Indicators, Targets for Achievement and Rationales

Progress will be measured via on-board surveys for customers and telephone surveys for residents. This is reasonable because user surveys are the most scientifically valid means of measuring the subjective perspectives of large numbers of people. Surveys are already cost-effectively administered regularly. Passenger surveys are conducted every two years because the results don't change quickly and surveys are expensive. Telephone surveys of residents will be conducted at least every five years as those perspectives change slowly, the dates allow information gathering for millage decisions, and more frequent surveying may be unnecessary and cost prohibitive.

Achievement with this policy will be achieved when

- A. **Bus Passenger 80%-90% Satisfied.** The target is reasonable because it reflects continuity with historic performance, planned improvements (LRP), and natural fluctuations in public opinion; for example the temporary relocations of the BTC in 2026. Annual targets are illustrated in the table below.
- B. **Demand response and Vanpool Surveys (interim):** As an interim measure, achievement will be demonstrated when passenger surveys for demand response and vanpools are conducted for the first time in 2026 and targets are developed for future years. This is reasonable because no such surveys have been conducted previously and baseline performance is unknown.
- C. **Resident Satisfaction scores are between 75%-85%.** The target is reasonable because it reflects continuity with historic performance, planned improvements

(LRP), and natural fluctuations in public opinion; for example the temporary relocations of the BTC in 2026.

All of the above targets are reasonable because they reflect historic performance, are linked with planned improvements in the long-range plan, and reflect the limit of performance within available resources and relative priority. Further they are realistic in an auto-oriented society where the cost of attracting additional riders may be prohibitive.

Evidence of Achieving Target for Period

A. Passenger Satisfaction Scores

The table below illustrates historic survey results and future targets.

Figure 7: Passenger Survey Results

Passengers		2024 (Baseline)	2026	2028	2030	2032
Fixed-Route (Local)	Target	NA	80%-90%	80%-90%	80%-90%	80%-90%
	Actual	88%				
Paratransit (ARide)	Target	NA	In development			
	Actual	NA				
Vanpool	Target	NA	In development			
	Actual	NA				

Source of Data: On-Board Survey Results

Date of Data Review: 11/18/2025 as verified by Manager of Service Planning?

B. Demand response and Vanpool Surveys (interim):

Evidence due late 2027. Will be incorporated into table above.

C. Telephone Survey Scores

Residents		2021 (Baseline)	2027	2032
Telephone	Target	NA	75%-85%	75%-85%
	Actual	81%		

Compliance History

Policy	2024	2025	2026
X.X.X			

1.3 People experience no barriers to access and use of TheRide's transportation services.

Definitions & Rationales

This policy is about reducing and eliminating obstacles to accessing transit services. I define '**barrier**' to mean any agency decision or obstruction that slows or impedes access to our services, is within TheRide's control, is affordable, and does not serve a necessary purpose that cannot be met in a less intrusive way (e.g safety rules, legal requirements, payment for services, etc). This includes all aspects of agency operations.

This interpretation is reasonable because eliminating obstructions that we control is within our authority and helps and enable people to use transit independently. However, some limitations/restriction are reasonable because they serve a constructive purpose and are not intended to inhibit peoples' mobility. For example, safety barriers restrict access to construction sites, and program limitations create important cost-controls. Eliminating such limitations would likely undermine pursuit of other Ends and lead to violations of Executive Limitations.

Indicators, Targets for Achievement and Rationales

Achievement will be demonstrated when:

- A. **Affordability:** Targets for policy 1.3.1 (economic barriers) have been achieved. This is reasonable because policy 1.3.1 specifies expectations for pricing as a barrier and the interpretation illustrates how achievement will be met.
- B. **Ease of Access & Specific Groups:** Targets for policy 1.3.2 (ease of access & specific groups) have been achieved. This is reasonable because policy 1.3.2 specifies expectations for pricing as a barrier and the interpretation illustrates how achievement will be met.

Interim targets: These steps are intended to help determine what additional targets and degrees of achievement might be feasible and cost-effective.

- C. **Potential for Universal Design (interim):** By 202X, the CEO will have conducted a review to determine to what extent explicit internal requirements for universal design could lead to additional improvements. This will include a review of user perceptions of barriers. This is reasonable because universal design improve accessibility for everyone and is generally thought to be a higher standard than ADA requirements.
- D. **Snow Removal (Interim):** By 202?, the CEO update the target for snow removal at bus stops. This is reasonable because municipal snow plowing operations

create rows of snow along curbs (aka windrows) that become barriers to boarding and alighting buses safely.

Evidence of Achieving Target for Period

- A. Affordability:** See evidence in policy 1.3.1 below.
- B. Ease of Access & Specific Groups:** See evidence in policy 1.3.2 below.
- C. User Perceptions (interim):** Evidence due 202X.
- D. Snow Removal Targets (Interim):** Evidence due XXX.

Compliance History

Policy	2024	2025	2026
X.X.X			

1.3.1 People with economic challenges have affordable transportation options from TheRide.

Definitions & Rationales

In this context I define the term **people with economic challenges** to mean any *resident* of the area (membership or POSA) with a household income at or below 138% of the Federal Poverty Level (FPL). This eligibility *threshold* is reasonable because:

1. It clearly, consistently and efficiently defines the intended beneficiaries. 138% of FPL is a clear demarcation on an established gauge and reflects a broader consensus on how to define low-income. It is also an automatically adjusting annual figure. For example, if average household income declines, more people will be eligible; if it rises, fewer will be. Any needs-based program will require some threshold that is transparent, impartial, and can be consistently and easily applied. This also reduces the administrative burden by remaining consistent with related federal rules². 138% is the same threshold as for Medicaid, allowing us to use Medicare eligibility as a proxy and avoid the additional expense of independent income-verification procedures.
2. A residency requirement limits the expense of the programs and ensures the benefits are aligned with those communities who are contributing resources. This threshold covers XX% of our service area population (XXXXXX people) and reserves the subsidy for them alone.
 - a. It places students in the context of their parents household, an important element due to the large number of students in our area and their low income when evaluated individually. (Note: student discounts are available through other programs.)

I define “**affordable transportation options**” to mean a 50% discount for fixed-route service from the full adult cash fare. This discount percentage is reasonable because:

- It clearly identifies a single consistent discount under this policy.
- It is a substantial additional discount on top of taxpayer subsidies for transit.
- It is administratively efficient and consistent with existing federal requirements to provide discounts for those eligible for Medicaid, resulting in no additional lost revenue or redundant requirements.

² Part 609.23 requires transit agencies accepting federal grants to provide 50% reduced fares outside rush hours to persons 65 or older, persons with disabilities, and persons with Medicare. The current Fare Deal program extends this to

- It results in average annual transportation costs *far* below one federal definition of affordable transportation³. Based on current fares, a family of four earning 138% of FPL would spend 4% of annual household income using Fare Deal (if each person traveled twice daily, six days a week all year). A single person would need to travel 12 times daily, every day for a year to reach 15% of household income, underscoring the depth of the discount.
- This discount only applies to fixed-route services. This is reasonable because vanpools are used for people coming from outside the taxing area and the users are not generally residents. Demand response is far more expensive per trip and already receives a similar discount to the one described above; an ARide fare (although higher) covers a lower share of the costs, and FlexRide fares are lower than fixed-route with higher costs/passenger.
- The agency still needs fare revenue to pay for services and there is a social expectation that low-income residents will pay for *some* of the services they consume. As full priced fares are heavily subsidized by taxpayers, further discounts may risk creating equity concerns that can jeopardize political support for the agency.

These terms are the same as today's Fare Deal program.

The CEO acknowledges that there is no societal or industry consensus on what counts as 'affordable' and that there will always be differing individual perspectives. Nevertheless, it is the CEO's responsibility to create a single, objective definition to allow program development, consistent and transparent application, and monitoring.

I further define the appropriate degree of achievement with this policy to include that a reasonable share of the targeted population has signed up to receive the discount.

Indicators, Targets for Achievement and Rationales

The current Fare Deal program meets the criteria of this policy and the CEO cannot change fares without approval from the Board. Therefore, achievement will be demonstrated when:

- A. **Discount Continuity:** Any CEO recommendations for changes to fares includes a discount program as described above. This is reasonable because it ensures

³ Starting in 2006, the Center for Neighborhood Technology (an advocacy group) and the federal government noted that lower housing costs in suburbia (traditionally 30% of income) were offset by higher transportation costs. They created a new rule of thumb that advised that households should not spend more than 30% of annual income on housing *and* 15% on transport. This was not designed to guide transit fare levels, only to raise awareness that transportation costs are higher in suburbia. Spending less than 10% of income on transport is considered 'ultra affordable'.

the Board is always provided with a recommendation that includes satisfying this interpretation.

Interim targets: These steps are intended to help determine what additional targets and degrees of achievement might be feasible and cost-effective.

B. **Potential for Measuring Enrollment and Utilization (interim):** By 2028 the CEO will develop a method of estimating what proportion of the eligible population is enrolled in the low-income discount program and investigate whether measuring utilization of the discounted fare is possible. Either could lead to additional targets. This is reasonable because no such method exists today and will have to be created. This timeline is within agency resources.

Evidence of Achieving Target for Period

A. **Discount Continuity:** During the monitoring period the CEO did not make any recommendations to change any fares. The existing Fare Deal program was maintained throughout the period and complies with this interpretation.

Source of Data: XXXXXX

Date of Data Review: XX/XX/XXXX as verified by XXXXXX

B. **Enrollment Potential (interim):** Evidence due 2028.

Compliance History

Policy	2024	2025	2026
X.X.X			

1.3.2 People with disabilities, people with impairments, older adults, minors and non-English speakers and visitors easily access and navigate to desired destinations using TheRide’s options for transportation.

Definitions & Rationales

I define “...**easily access and navigate to desired destinations using TheRide’s options for transportation**” to mean that members of the named groups are able to use TheRide’s services with a high degree of *independence*. This is reasonable because independence is a functional definition of easy, and it prioritizes personal autonomy and avoids expensive individualized assistance.

Other key terms are defined thusly:

- **A person with a disability** – an individual *with a verifiable mobility limitation sufficient to prevent them from using fixed-route transit (Same as the Americans with Disabilities Act)*. This is reasonable because it is the legal definition of the term for the transit industry⁴ and multiple definitions would create confusion.
 - An **impairment** is any other subjective reduced ability. This is reasonable as it reflects the common usage of the term. TheRide is not legally required to accommodate this category.
 - **Older adults** are defined as anyone 65 years old or older *and* who has a mobility limitation that would qualify as a disability. 65 years is reasonable as it reflects a widely accepted threshold. The requirement for a disability is reasonable because it is the limitation, not age per se, that creates barriers. A fully capable 70-year-old may need no additional consideration to use our services.

By law, TheRide *must* provide costly additional services and accommodation for persons with “disabilities”. However, not every limitation or impairment meets the definition of disability.

- **Minors** (<18 years) are defined as anyone less than 18 years of age. This is reasonable because this is the common legal threshold.
- **Non-English speakers** are those who cannot receive or transmit enough information in written or spoken English to allow them to independently use the service. This is reasonable because it relates to a person’s functional ability to navigate independently.

⁴ See Americans with Disabilities Act.

- **Visitors** do not reside in the area and are likely to be using TheRide's services for the first time. This is reasonable because it relates to a person's functional ability to navigate independently.

Indicators, Targets for Achievement and Rationales

Achievement will be demonstrated **when**:

- ADA Minimum Standards:** Policy 2.5.2 is compliant regarding compliance with the Americans with Disabilities Act. This is reasonable as it clarifies that legal minimum standards are being met. It establishes a 'floor' for performance.
- Title VI Minimum Standards for Translated Trip Planning Material:** Policy 2.5.2 is found to be compliance for Title VI requirements to provide hardcopy Ride Guides (i.e. timetable booklet) in the three most common languages. This is reasonable because it is a funding requirement that aids non-English speakers. It establishes a 'floor' for performance.
- Website Accessibility:** TheRide's website graded as 100% accessible by **XXXXX**. This is reasonable because there are outside standards for how websites can be best developed to aid accessibility. A higher target is not possible.
- Website Ease of Use:** TheRide's website is graded annually by a third party and performs better than industry standards for ease of use and comprehensibility. This is reasonable as third party standards help gauge our website in context to industry standards and benchmarking. **The target is reasonable because....**
- In-Person Translation:** That in-person translation services are available at staff service outlets. This is reasonable because it exceeds minimum requirements, is already provided, and is affordable.
- Lead Walks:** A paved pathway between sidewalks and curbs (i.e. lead walks) exist at 100% bus stops that are eligible. About XXX of YYYY stops are eligible by being near a sidewalk. This is reasonable because lead walks enable access for wheelchair and make transit more attractive for all other users. 100% is a reasonable target as it maximizes independence. The limitation to eligible stops is because sidewalks, a legally required precursor to lead walks, are not present at many stops and are a municipal responsibility outside TheRide's control. The timeline for targets is reasonable as it reflects available resources and outside permitting.
- Paratransit Enhancements (Interim):** By 202X the CEO will conduct a review to identify opportunities are resources needs to exceed ADA minimum standards for paratransit (ARide). This is reasonable because additional work will be necessary to determine what improvements would be most valued and which can be affordable.

Commented [MC6]: I am not entirely satisfied with these measures as they use activities rather than outcomes.

- H. **Wayfinding Review (Interim Target):** By 202X a Wayfinding Review will examine the potential to aid *anyone* in navigating our services with an emphasis on eliminating any points of potential confusion and exceeding minimum requirements for disabilities, as well as aiding minors, seniors, non-English speakers, and visitors, and the general public. It will include signs, audio announcements, website organization, training/education for new riders, etc. This review may establish new measures, targets or initiatives, and will consider cost-effectiveness. This target is reasonable because people in these groups already use TheRide's services today and additional effort will be necessary to identify targets for additional achievement.

Broadly these measures and targets are reasonable because they meet and seek to exceed legal minimum requirements for the identified groups within the financial capacity of the organization. The timelines are reasonable because they reflect the cumulatively workload and organizational capacity, the CEO's judgment on relative priority, and available resources.

Evidence of Achieving Target for Period

- A. **ADA Minimum Standards** – During the most recent monitoring, policy 2.5.2 was found to be compliant and TheRide was meeting minimum ADA standards. Further, the most recent FTA Triennial Review (202?) also found **no** deficiencies with the paratransit program or ADA compliance.

Source of Data: XXXXXX

Date of Data Review: XX/XX/XXXX as verified by XXXXXX

- B. **Title VI Minimum Standards for Translated Trip Planning Material:** During the most recent monitoring, policy 2.5.2 was found to be compliant and TheRide was meeting minimum ADA standards. Further, the most recent FTA Triennial Review (202?) also found **no** deficiencies regarding Title VI compliance.

Source of Data: XXXXXX

Date of Data Review: XX/XX/XXXX as verified by XXXXXX

- C. **Website Accessibility:** A third-party assessment of TheRide's website found the site met standards for..... with a score of _____. The summary of the review is provided below.

Source of Data: XXXXXX

Date of Data Review: XX/XX/XXXX as verified by XXXXXX

- D. **Website Ease of Use:** A third-party assessment of TheRide's website found the site met standards for..... with a score of _____. The summary of the review is provided below.

Source of Data: XXXXXX

Date of Data Review: XX/XX/XXXX as verified by XXXXXX

- E. **In-Person Translation:** A review of procurement documents confirms that contracts for real-time telephonic translation services are in place and the service is available at the DGOC, BTC, and YTC.

Source of Data: XXXXXX

Date of Data Review: XX/XX/XXXX as verified by XXXXXX

- F. **Lead Walks:** A review of construction contracts found that TheRide did not meet the target for paving lead walks during the monitoring period. The delays were caused by challenges in obtaining permits from municipalities. We expect to be back on schedule for the next monitoring period.

Figure 8: Bus Stop Paving Targets

Year	Target (# of completed bus-stops).	Actual bus stops completed.	Target achieved
2022	New construction: 5 (1.3%)	3 (0.8%)	No , only 3 permits were issued in this monitoring period.
2023	New construction: 8 Total complete: 13 (3.4%)	10 Total 13 (3.4%)	Yes , 2 more stops completed. On target to have 3.4% complete at this time.
2024	New construction: 12 Total complete: 25 (6.6%)	12 Total 25 (6.6%)	Yes . Completed 12 stops as scheduled.
2025	New construction: 18 Total complete: 43 (11.4%)		
2026	New construction: 25 Total complete: 68 (18%)		
2027	New construction: 30 Total complete: 98 (26%)		
2028	New construction: 35 Total complete: 133 (35.3%)		
2029	New construction: 40 Total complete: 173 (45.9%)		
2030	New construction: 45 Total complete: 218 (57.8%)		
2031	New construction: 50 Total complete: 268 (71.1%)		
2032	New construction: 54 Total complete: 322 (85.4%)		
2033	New construction: 55 Total complete: 377 (100%)		

Source of Data: XXXXXX

Date of Data Review: XX/XX/XXXX as verified by XXXXXX

G. Paratransit Enhancement Targets (Interim): Due 202?

H. Wayfinding Review (Interim): Evidence due 202?

Compliance History

Policy	2024	2025	2026
X.X.X			

1.3.3 People perceive TheRide's services as safe, reliable, and convenient.

Definitions & Rationales

I define **people** in this context to mean:

- **Riders.** This is reasonable because their perceptions are very important; riders are our direct customers, they are informed by personal experience, and these are the people the service needs to be able to satisfy.
- **Non-Riders/General Public.** This is reasonable because the perceptions of the general public (i.e. voters) can affect the degree of confidence in TheRide and public support for transit services.

This policy is intentionally about **perceptions**, not objective facts or actual performance. This is reasonable because the focus on perceptions was the explicit intent of the Board in December 2025, and because factual performance data on these issues is provided in policy 2.1 Treatment of the Traveling Public. I further define perceptions to mean statistically valid feedback from representative groups. This is reasonable because aggregated feedback can be more accurate than estimates or individual anecdotes.

I interpret this policy to be about the perceptions of **personal security**, **on-time performance**, and two proxies for convenience: **travel time and dependability of transfers**. Rationales, measures and targets are provided below.

Indicators, Targets for Achievement and Rationales

Achievement will be demonstrated when:

- A. Rider Survey Scores:** On-board survey responses achieve the targeted performance or better (see table in evidence section for specific targets). Surveys are reasonable because they are the most direct way to measure public perception in a statistical way. Surveys will be conducted every two years which is cost-effective, and such perceptions are unlikely to change quickly. Targets are:
 - a. Personal Security** – Target of 90% satisfied. This is reasonable because it is a high level, and 2024 scores were 84%. Further, higher performance will be challenge given the open, public nature of our services; costs and concerns of invasiveness; and the inherent subjectiveness of the issue.
 - b. On-Time Performance (Predictability of Arrivals)** – This is reasonable because on-time performance is the best measure of reliability. Target of

65%-75% satisfied. The range reflects planned disruptions to terminals. The 2024 score was 68%.

- c. **Travel Time** – Travel time is an important cost to passengers when choosing how to travel and a factor in determining convenience. Target of 80% satisfied is reasonable because 2024 score was 77%, and shorter times are likely cost-prohibitive.
- d. **Transfer Dependability** – Anxiety about missing transfers is a major inconvenience. A target of 68%-75% is reasonable as it reflects terminal disruptions and bus vulnerability to traffic congestion. The 2024 score was 71%.

These measures and targets are also reasonable because they are derived from long-used survey questions and so allow us to track historic trends in a cost-effective manner.

Interim targets: These steps are intended to help what additional targets and degrees of achievement might be feasible and cost-effective.

1. **Non-Rider Perceptions (interim):** Achievement here will be demonstrated when staff identify the best ways to collect and report on perceptions of non-riders by 202Y (interim). Once identified, targets and actual performance will appear in the table below. This is reasonable because perceptions of non-riders will require a new form of survey or new questions. No previous AAATA survey has tried to ask non-users about perceptions of a service they do not use, so there is no existing data from which to draw. These new surveys will need to be developed and conducted. It is not yet clear how such questions could be cost-effectively incorporated in to the existing 5-year telephone survey.

Evidence of Achieving Target for Period

A. Rider Perceptions: Survey Scores and Targets

Figure 9: Rider Perceptions: Security, Reliability, Convenience

Reported Rider Satsifaction with...		2024 (Baseline)	2026	2028	2030	2032	2034	2036
Personal Security	Target	NA	90%	90%	90%	90%	90%	90%
	Actual	84%		TBD	TBD	TBD	TBD	TBD
Predictability of Arrivals	Target	NA	60%*	65%*	75%	75%	75%	75%
	Actual	68%		TBD	TBD	TBD	TBD	TBD
Duration of Travel Time	Target	NA	70%	78%	80%	80%	80%	80%
	Actual	77%		TBD	TBD	TBD	TBD	TBD
Reliablely of Transfers	Target	NA	65%*	68%*	75%	75%	75%	75%
	Actual	71%		TBD	TBD	TBD	TBD	TBD
*Construction impacts.								

Source of Data: XXXXXX
Date of Data Review: XX/XX/XXXX as verified by XXXXXX

B. Non-Rider Perceptions and Scores (Interim): Evidence due 2028.

Compliance History

Policy	2024	2025	2026
X.X.X			

1.4 TheRide positively impacts the environment and carbon emissions are reduced.

Definitions & Rationales

For us, to “**positively impact the environment**” means *reducing the negative impacts* of transportation on the natural environment, especially reducing pollution created by cars and our agency’s own operations without jeopardizing other Ends. This is reasonable because, 1) transportation is a source of harmful environmental impacts (externalities) that can be minimized to a point, 2) attracting riders away from cars and towards more energy efficient travel reduces average pollution, 3) our operations create impacts that we control and may be able to reduce, and 4) we must reduce our impacts while achieving the other Ends, not instead of them, to maintain broad public credibility.

Indicators, Targets for Achievement and Rationales

Achievement will be demonstrated when:

- A. **Mode Shift:** Achievement with policy 1.1 (multi-modal) will also demonstrate achievement here. This is reasonable because the same metric (mode share) can serve as a proxy for environmental impacts – the greater shift to non-car modes suggests less pollution.
- B. **Transit ridership Increases:** Achievement with policy 1.2 (ridership) will demonstrate achievement here. This is reasonable because mass transportation is less polluting per trip than automobile use. Mode share (the measure in policy 1.2) illustrates the proportion of the travel market using these two modes.
- C. **Impact from Transit Operations Decreases:** This includes emissions, waste, energy use, and localized impacts. This is reasonable because, every impact falls into one of these categories. Areas of operations are listed in descending order of impact and priority below. Achievement will be specifically demonstrated when:
 - a. **Large Buses** (largest source of emission)
 - i. Carbon emissions from large buses decrease in absolute terms (gallons) and per mile until no emissions are produced anywhere in the energy supply chain. This is reasonable because reducing and eliminating our own emissions advances the policy goals and are within our control.
Further, carbon is a proxy for methane, nitrous oxide and other greenhouse gas emissions (not reported) which would also decrease in tandem. This is reasonable because carbon and GHG

emissions are all directly related to the amount of diesel fuel used. If one goes down, they all do, and further evidence is unnecessary. The alternative is a very large evidence table.

b. Facilities (interim)

- i. *(DRAFT) Natural gas use decreases and energy efficiency improves within limits of technologies and funding available. This covers the two terminals, one garage/office, and two park n ride lots we own. It is measured in energy consumed (e.g. kilowatt hour, etc) per hour of facility operation. Specific targets are in development (interim) as shown in the table below.*
- ii. Possibility for EV charging at park n ride lots is determined. This is reasonable because it could encourage EV adoption and reduce those emissions (interim).

c. Other Vehicles (interim)

- i. *(DRAFT) Carbon emissions in absolute terms and per mile decrease (estimates). Carbon is also a proxy for other greenhouse gas emissions (not reported). This is reasonable because there is no value in displaying multiple estimates of the same issue. Specific targets are in development (interim) as shown in the table below.*

d. Materials (interim)

- i. Specific targets for waste reduction are established by January 2027 (interim). This is reasonable because realistic targets depend on establishing a clear baseline and assessing the viability and costs-effectiveness of solutions, underway.

e. Indirect emissions for fuel and electricity (interim)

- i. Determine how to calculate indirect emissions. (Interim) This is reasonable because we do not currently have a methodology for estimating indirect emissions.

The measures and targets described above and in the following section are reasonable because they are achievable considering available technology and resources. As a lower priority, these outcomes will be pursued as long as they do not divert resources from other Ends priorities. We will be pursuing outside funding to enable these goals.

Evidence of Achieving Target for Period

A. Mode Shift: See evidence in policy XXX above.

B. Transit Ridership Increases: See evidence in policy XXX above.

C. Impact from Transit Operations Decreases

The following table illustrates targets and evidence for reducing emissions across the organization. A study of facilities is in progress and additional targets will be added when finalized. Studies for small buses, other vehicles, and waste reduction are planned for future years.

Figure 10: Emission Reductions

		2020 (Context)	2025 (Baseline)	2026 (Current Period)	2030	2035	2040	2045	2050
Large Bus	Carbon per Mile (Target)				7,616 (-10%)	5,077 (-40%)	1,692 (-80%)	0 (-100%)	
	Carbon per Mile (Actual)								
	Carbon Emissions (est tons)								
	Annual Miles Operated								
Small Bus & Other Vehicles*	Carbon per Mile (Target)				In Development				
	Carbon per Mile (Actual)								
	Carbon Emissions (est tons)								
	Annual Miles Operated								
Facilities (3)*	Carbon per Hour (Target)				In Development				
	Carbon per Hour (Actual)								
	Electricity (Watts)								
	Natural Gas (?)								
	Carbon per Hour (Actual)								
	Annual Operating Hours								

* Development of targets in progress. See Business Plan for timelines.

Source of Data: XXXXXX
Date of Data Review: XX/XX/XXXX as verified by XXXXXX

Localized impacts [insert evidence of local water impacts from previous report]

Source of Data: XXXXXX
Date of Data Review: XX/XX/XXXX as verified by XXXXXX

Compliance History

Policy	2024	2025	2026
X.X.X			

1.5 Residents of the area recognize the positive contributions of TheRide to the area's quality of life.

Definitions & Rationales

In this case I define **residents** as people who make their primary residence in the service areas identified in policy 1.1 (above). This is reasonable because we exist to serve the people in these areas.

I define “**recognize the positive contributions ... to the area's quality of life**” to mean that statistically valid feedback from representative group of residents finds a high degree of self-reported feelings that the agency *creates a positive amount of value* to the broader community. This is reasonable because generalized, self-defined feelings of value/worth are sufficient as it allows the respondent to use whatever framing they prefer to define ‘quality of life’, and because deeper analysis is not necessary for this interpretation and may be cost-prohibitive (although staff often ask additional questions). Further, properly aggregated feedback can be more accurate than estimates or individual anecdotes.

Indicators, Targets for Achievement and Rationales

Progress will be measured via telephone surveys for likely voters/residents of the area. This is reasonable because surveys are the most scientifically valid means of measuring the subjective perspectives of large numbers of people. Telephone surveys of residents will be conducted at least every five years as those perspectives change slowly, the dates allow information gathering for millage decisions, and more frequent surveying may be unnecessary and cost prohibitive.

Achievement with this policy will be demonstrated when 75%-85% or respondents in a telephone survey or residents respond that ‘They can't imagine the area without TheRide.’

This target range is reasonable because it reflects historic performance, natural fluctuations, and a high degree of feeling that TheRide creates value.

The wording of the statement is reasonable because it reflects a value choice; life with or without TheRide. The full question reads: *Some people say it is hard to imagine the Ann Arbor/Ypsilanti area without TheRide bus service, while others say TheRide does not matter much to the area. Which do you agree with; Does not matter much, Can't imagine without, Not sure?* This question is also reasonable because it has been asked for several years and can provide trend information if necessary.

Telephone surveys of residents will be conducted at least every five years as those perspectives change slowly, the dates allow information gathering for millage decisions, and more frequent surveying may be unnecessary and cost-prohibitive.

Evidence of Achieving Target for Period

The table below illustrates the answers from all respondents from several years of telephone surveys along with the 75% target.

Figure 11: Public Survey Responses

Resident Responses		2021 (Baseline)	2027	2032
"Can't image the area without TheRide"	Target		75%-85%	75%-85%
	Actual	84%		

Source of Data: XXXXXX

Date of Data Review: XX/XX/XXXX as verified by XXXXXX

Compliance History

Policy	2024	2025	2026
X.X.X			