Board of Directors Meeting Agenda

Meeting Date/Time: November 19, 2026 - 6:00pm – 8:30pm

Location: Ann Arbor District Library (4th Floor) - Virtual via Zoom Passcode: 983308

Members: Kathleen Mozak (Chair), Mike Allemang (Treasurer), Praveena Ramaswami (Secretary), Rich Chang, Travis, Gonyou, Julie Grand, Samuel Kachuck, 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: October 15, 2026	D	6:10		3
2.2 Committee Meeting Summaries	D			8
2.3 Treatment of the Traveling Public (2.1)	D			14
2.4 Title VI Approval	D			34
2.5 Annual Public Transit Agency Safety Plan Approval	D			36
2.6 Governance Consultant Contract Renewal	D			39
3. BOARD EDUCATION				
3.1 Guest Lecture: Land Use PPT Pg. 284	O	6:10	Mozak / Levine	40
4. OWNERSHIP LINKAGE				
4.1 OLTF	O	7:00	Chang	Verbal
5. POLICY MONITORING				
5.1 Compensation & Benefits (2.3)	D	7:10	Carpenter	41
5.2 Policy Language Discussion (if needed)	D	7:20	Mozak	Verbal
6. OPERATIONAL UPDATES				
6.1 Legislative Updates	O	7:40	Pfeifer	Verbal
6.2 CEO's Draft Ends Interpretations (V1)	O	7:50	Carpenter	58
6.3 FY2026 Q4 Financial Report	O	8:10	Reed	62
6.4 CEO Report & Election Day Fare Debrief	O	8:20	Carpenter	66
7. CLOSING ITEMS				
7.1 Action Item Recap	O		Holt	
7.2 Topics for Next Meeting: Preliminary Millage Recommendation FY26 Q4 Service Report Ends (1.0) LAC Feedback on Ends Future: Ridership Trends & Utilization, Draft Fare Scope, AI			December 17, 2026 6:00-8:30pm	
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?	Completed
2. OLTF	
3. (FYI: Millage decision likely in FY2027)	

Topics of Board Education

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

Board of Directors Meeting Minutes

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

Location: Riverside Arts Center, Ypsilanti (4th Floor) - Virtual via Zoom

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

Chairwoman Mozak called the meeting to order at 6:01pm

1. OPENING ITEMS

1.1 Approve Agenda

No additions or changes noted to the agenda.

Mr. Barr motioned to approve the agenda, seconded by Ms. Pollay.

No discussion on the motion.

All in favor of approving the agenda:

Mr. Simi Barr: Yes
Mr. Rich Chang: Yes
Ms. Susan Pollay: Yes
Ms. Praveena Ramaswami: Yes
Ms. Georgia Valentine: Yes
Chairwoman Kathleen Mozak: Yes

The motion to approve the agenda passed unanimously.

1.2 Public Comment

No public commenters.

1.3 General Announcements

Mr. Barr announced that this would be his last meeting and he would be stepping down from the Board. He thanked Board members for the experience and exposure to working on a Board. Chairwoman Mozak and Board members thanked him for his service.

Chairwoman Mozak shared that Mr. Miller would be stepping into the role of Service Committee Chair. She also reminded Board members that Audit Task Force member volunteers were needed as the task force would be having their first meeting in November.

*** Mr. Allemang joined the meeting at 6:04pm*

DRAFT

2. CONSENT AGENDA

2.1 Board Meeting Minutes: August 20, 2026

2.2 Committee Meeting Summaries

2.3 Construction (2.10)

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

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
Ms. Susan Pollay: Yes
Ms. Praveena Ramaswami: Yes
Ms. Georgia Valentine: Yes
Chairwoman Kathleen Mozak: Yes

The motion to accept the Consent Agenda passed unanimously.

*** Mr. Gonyou joined the meeting at 6:07pm*

3. OWNERSHIP LINKAGE

3.1 OLTF

Mr. Chang provided an update on the progress of scheduling outreach meetings with local leadership / legal owners.

4. POLICY MONITORING

4.1 Sustainability Policy Proposal

Mr. Barr introduced suggested revisions to the sustainability policy that he and Mr. Carpenter worked on with the assistance of the Policy Governance Consultant. He noted that the original sustainability policy had been created as an Ends and then moved into Executive Limitations policies which inadvertently created inconsistencies between the Ends / Executive Limitations. The Service Committee reviewed the suggested revisions and agreed to recommending the Board accept the revisions as presented in the packet.

*** Mr. Miller joined the meeting at 6:15pm*

Ms. Pollay motioned to accept the proposed language changes to Ends Policy 1.4, Policy 2.9.1.5 Communication & Support to the Board, and Policy 2.11 Environmental Sustainability, seconded by Mr. Allemang as follows:

Delete:
1.4. TheRide positively impacts the environment and carbon emissions are reduced.

DRAFT

Revised:
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.

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

Add to 2.9.1.5:
J. An annual update on goals, activities, impacts and trends regarding environmental initiatives.

Delete:
Policy 2.11 Environmental Sustainability

No discussion on the motion.

All in favor of accepting the proposed language changes (noted above):

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

The motion to accept the proposed language changes (noted above), passed unanimously.

The Board Policy Manual will be revised accordingly.

4.2 Policy Language Discussion

No discussion.

5. EMERGENT ITEMS

5.1 Election Day Fare Payments by County

Mr. Carpenter presented a recommendation to suspend fares on Election Day – November 3rd. He shared that the county had initiated the proposal and verbally agreed to reimburse the one day cost of fixed-route, A-Ride, FlexRide and GoldRide Senior operating services. The county plans to lead communications and TheRide will amplify the messaging. Board members responded favorably and discussed demand-response capacity and the short planning window for implementation.

Mr. Gonyou motioned to authorize the CEO to suspend fare collection for a single day on November 3, 2026 (Election Day) subject to the CEO reaching an acceptable cost-sharing agreement with Washtenaw County that reimburses TheRide for fare revenue, seconded by Ms. Pollay.

No discussion on the motion.

All in favor of authorizing the CEO to suspend fare collection for a single day on November 3, 2026 (Election Day) subject to the CEO reaching an acceptable cost-sharing agreement with Washtenaw County that reimburses TheRide for fare revenue:

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

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

5.2 Title VI Introduction

Mr. Yang introduced the Title VI program update and noted slight changes had been made in accordance with revised guidelines. He noted that board committees will be discussing at their November meetings and public comment is open for input. The final approval decision will be made by the Board at the November Board Meeting.

6. OPERATIONAL UPDATES

6.1 Legislative Updates

Mr. Pfeifer information on a recently proposed gas tax suspension but the Senate has declined to advance the proposal. Currently, there are no federal reauthorization updates to report.

6.2 CEO Report

MS. Reed shared information related to a recent $6.6M state grant awarding which will be used for planning and NEPA review for the bus rapid transit project. Additional funding will still be needed to deliver the full project but the grant will support initial planning.

Mr. Carpenter shared that he, several staff and two board members recently attended the APTA TRANSform Conference / Expo in Chicago.

6.3 CEO's Draft Ends Interpretations (V1)

Mr. Carpenter provided an overview presentation (Board packet, pg. 195) of his preliminary Ends interpretations – he highlighted higher achievement ambitions, proposed measurement targets, and a new report structure. The new interpretations will be discussed at November committee meetings, followed by a fuller review at the November Board meeting.

7. CLOSING ITEMS

7.1 Action Item Recap

- Board members interested in participating on the Audit Task Force can contact Chairwoman Mozak
- Board Policy Manual will be updated with changes approved within the Sustainability policy proposal
- Title VI Program will be discussed at November committee meetings.

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

7.3 Public Comment

Mr. Jim Mogensen shared his thoughts on the relevance of Title VI guidance and will be providing further input. He also shared he is part of distributing bus tokens to unhoused within the community and looks forward to receiving information about fare pricing / free fares when the fare study has concluded.

7.4 Adjournment

Ms. Ramaswami motioned to adjourn the meeting, seconded by Mr. Chang.

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. Susan Pollay: Yes
Ms. Praveena Ramaswami: Yes
Ms. Georgia Valentine: Yes
Chairwoman Kathleen Mozak: Yes

Chairwoman Mozak adjourned the meeting at 8:05pm.

Respectfully Submitted by Deborah Holt

DRAFT

Governance Committee Meeting Notes

Meeting Date/Time: Monday, October 19, 2026, 3:00pm – 5:00pm

Members Present: Kathleen Mozak (Chair), Mike Allemang, Rich Chang, Jesse Miller

Staff: Matt Carpenter, Dina Reed, Forest Yang, George Brooks, Jeff Pfeifer, Deb Holt

Location: REMOTE – Via Zoom

Chairwoman Mozak called the meeting to order at 3:02 pm

1. OPENING ITEMS

1.1 Agenda (Additions, Approval)

No additions or changes noted to the agenda.

1.2 Communications

Chairwoman Mozak noted that the meeting would be wrapping up by 4pm due to scheduling conflicts – no other communications.

2. BOARD DEVELOPMENT

2.1 Recruitment / Training / Attendance

The committee discussed the recent resignation of a board member representing the city of Ann Arbor – staff will be monitoring board appointments on upcoming A2 City Council meeting agendas. The committee also reviewed board attendance and survey participation from the past year.

2.2 OLTF & Linkage Opportunities

Mr. Chang provided updates on the strategies / priorities for board member engagement with local leadership.

2.3 Board Retreat

The committee discussed planning a retreat and what educational topics and priorities are beneficial for both seasoned and newer board members. The committee discussed the possibility of planning a retreat by February. They will discuss it again at the November Governance Committee meeting.

3. POLICY MONITORING & DEVELOPMENT

No policy monitoring or development discussion.

DRAFT

4. STRATEGY & OPERATIONAL UPDATES: CEO

4.1 Title VI Program

Mr. Yang shared updates on the Title VI Program review / updates. The Board received a draft copy and noted that the service standards and guidelines have been updated.

4.2 Legislative Updates

Mr. Pfeifer noted that there have been no new legislative updates at the state or federal level since the Board meeting. He noted that all focus is on the upcoming election in 15 days.

5. EMERGENT ITEMS

5.1 CEO Interpretations

Mr. Carpenter shared that feedback is being received and will be incorporated and shared at the November committee meetings.

6. CLOSING ITEMS

6.1 Committee Agendas

Service Committee – Add “Free Election Day Fares” update to the agenda

Finance Committee – No changes noted to the agenda

Board Meeting – No changes noted to the agenda

6.2 Action Item Recap

Update to Service Committee agenda and add Board retreat discussion to November Governance Committee meeting agenda.

6.3 Topics for Next Meeting

Board Retreat

Future:
Governance Training Options
Vice Chair Succession Planning (Summer)
POSA Update
OLTF: TF/Committee Language
Digital Board Library
Policy Manual Mock-Up

6.4 Adjournment

Chairwoman Mozak thanked the committee and staff and adjourned the meeting at 3:51pm.

Respectfully Submitted by Deborah Holt

DRAFT

Service Committee Meeting Notes

Meeting Date/Time: Monday, November 2, 2026, 3:00pm – 5:00pm

Members Present: Jesse Miller (Chair), Rich Chang, Susan Pollay, Praveena Ramaswami

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

Location: REMOTE – Via Zoom

Mr. Miller called the meeting to order at 3:03 pm

1. OPENING ITEMS

1.1 Agenda (Additions, Approval)

No changes noted for the agenda.

1.2 Communications

Mr. Miller shared that he would be stepping in as the Service Committee Chair after Mr. Barr's recent resignation from the Board.

2. POLICY MONITORING & DEVELOPMENT

2.1 Treatment of the Traveling Public (2.1)

Mr. Carpenter provided an overview of the monitoring report and noted non-compliance for 2.1.1 due to delayed bus stop paving. He outlined a plan to contact local municipalities for a timeline on the paving projects. The committee and staff discussed the challenge of installing/paving new bus stops in the past few years.

The committee agreed to recommend the monitoring report be approved by the Board as (B) *a reasonable interpretation, except for the CEO's stated non-compliance with items 2.1.1, which the Board acknowledges and accepts the proposed dates for compliance.* The monitoring report survey will be added to the November Board meeting consent agenda.

3. STRATEGY & OPERATIONAL UPDATES: CEO

3.1 Title VI Program

Mr. Yang provided an update on the status of the Title VI Program updates which are required by the FTA every 3 years. He noted the only updates were with the service standards – after a period of public input, the report is being finalized. The deadline is November 30th and the program approval will be added to the November Board meeting consent agenda.

3.2 CEO Interpretations

Mr. Carpenter provided an updated preliminary draft of CEO interpretations for the End's policies for committee discussion. He was able to add initial interpretations for the revised environmental sustainability policy. Committee members discussed and will be providing input to be shared at the November Board meeting.

3.3 Election Fare Updates

Staff provided an update on the progress of implementing free Election Day fares on November 3rd. Committee members made positive note of social media communications and overall messaging community wide.

3.4 POSA Updates

Mr. Carpenter shared updates on POSA agreements and meetings with local municipalities

3.5 Legislative Update

Mr. Pfeifer shared brief legislative updates noting that mid-term elections are November 3rd and he will be sending an election outcome overview once results have been determined.

4. EMERGENT ITEMS

None.

5. CLOSING ITEMS

5.1 Action Item Recap

- The committee will recommend the Board approve Treatment of the Traveling Public monitoring report as (B) – the monitoring report will be added to the November Board meeting Consent Agenda.

5.2 Topics for the Next Meeting

FY2026 Q4 Service Report

Future:
POSA Updates
Draft Fare Scope

5.3 Adjournment

Mr. Miller thanked the committee and staff and adjourned the meeting at 3:50pm.

Respectfully Submitted by Deborah Holt

DRAFT

Finance Committee Meeting Notes

Meeting Date/Time: Tuesday, November 10, 2026, 3:00pm – 5:00pm

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

Staff: Matt Carpenter, Dina Reed, Forest Yang, Jeff Pfeifer, Rosa-Maria Kamau, Andy Huber, Deb Holt

Location: REMOTE – Via Zoom

Mr. Allemang called the meeting to order at 3:04 pm

1. OPENING ITEMS

1.1 Agenda (Additions, Approval)

No changes or additions noted to the agenda.

1.2 Communications

No new communications.

2. POLICY MONITORING & DEVELOPMENT

2.1 Compensation & Benefits (2.3)

Ms. Kamau shared an overview of the Compensation & Benefits (2.3) monitoring report. She noted that policy 2.3.1 was non-compliant as the CEO has been unable to develop a satisfactory interpretation. The CEO requested that the Board consider whether the policy should be revised or eliminated as the language of "highly qualified" is challenging to interpret.

The committee reviewed the monitoring report survey responses from Board members and specifically discussed policy 2.3.1 (especially the term "highly qualified") and redundancies with policy 2.3.2.

The committee will recommend that the Board accept the policy as (C)2 – For policy items 2.3.1 the interpretation is not reasonable. Also, that the board should consider deleting 2.3.1 and revising 2.3.2 to include recruiting and retaining employees.

3. STRATEGY & OPERATIONAL UPDATES: CEO

3.1 Legislative Update

Mr. Pfeifer provided an overview of local, state and national election results. He noted that the state transit association (MPTA) is working closely with the Governor-elect's transition team to continue the work of prioritizing public transportation funding. He also shared that the Free Fare Election Day data is still being compiled and will be shared at the Board meeting. He noted that community feedback had been positive.

DRAFT

3.2 Title VI Program

Mr. Yang provided updates with the status of the Title VI Program updates that are required by the FTA every 3 years. The only updates were with the service standards – after a period of public input, the report is being finalized. The submission deadline is November 30th and the program approval will be added to the November Board meeting consent agenda.

3.3 CEO Interpretations

Mr. Carpenter shared an updated preliminary draft of CEO interpretations for the End's policies for committee discussion. He has added initial interpretations for the revised environmental sustainability policy which was approved by the Board in October. He is still receiving input from Board members which will be shared at the November Board meeting.

3.4 FY2026 Q4 Financial Report

Ms. Reed shared the FY2026 Q4 Financial Report highlighting that the next step will be final journal entries before the quarter is finished and the audit takes place. There was a $4.4M favorable net variance - revenues were slightly higher than budgeted due to good performance with local property taxes and with investments and expenses were slightly below budget.

She fielded questions related to the favorable net variance and placing additional money from the net variance within the fund balance.

She also provided a quick overview of the upcoming audit process timeline.

4. EMERGENT ITEMS

None.

5. CLOSING ITEMS

5.1 Action Item Recap

- The committee will recommend that the Board accept the Compensation & Benefits monitoring report as (C) 2 – For policy items 2.3.1 the interpretation is not reasonable.
- The committee will also recommend the board consider reviewing policy 2.3.1 during Policy Language Discussion at the Board meeting.

5.2 Topics for Next Meeting

Draft Fare Study Scope

5.3 Adjournment

Mr. Allemang thanked the committee and staff and adjourned the meeting at 4:24pm.

Respectfully Submitted by Deborah Holt

DRAFT

Monitoring Report: Treatment of the Traveling Public
Monitoring Period: FY 2026 (Oct 1st, 2025-Sept 30th, 2026)

Service Committee Meeting Review Date: November 2th, 2026

Board of Directors Meeting Review Date: November 19th, 2026

INFORMATION TYPE
Monitoring
RECOMMENDED ACTION(S)
The Service committee reviewed the monitoring report at their November 2, 2026 meeting and recommend that the Board review this monitoring report and 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) 2.1.1, 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 establish 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 November and was submitted in November.

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**
	October 22, 2026

ATTACHMENTS

1. Monitoring report for Treatment of the Traveling Public (Policy 2.1)

Table of Contents

POLICY TITLE: TREATMENT OF THE TRAVELING PUBLIC	Page#	Compliance
2.1 With respect to the agency's operations and interactions with riders, potential riders, pedestrians, cyclists, other road users, and the general public the CEO shall not cause, allow or fail to address conditions, procedures, or decisions that are unsafe, undignified, disrespectful, unclear, or overly intrusive. Further, without limiting the scope of the foregoing by this enumeration, the CEO shall not:	4	🔴
2.1.1. Allow facilities, bus stops, vehicles, or services to lack reasonable accessibility for potential riders regardless of mobility limitations.	5	🔴
2.1.2 Operate without providing effective, comprehensible, accessible, and timely information with respect to services offered and safe, respectful conduct	8	🟢
2.1.2.1 Permit unfair, inconsistent, or untimely responses to questions or complaints from the traveling public.	10	🟢
2.1.3 Operate in a manner that jeopardizes the safety of the traveling public.	12	🟢
2.1.4 Use methods of collecting, reviewing, transmitting, or storing personal information that allows improper access or inappropriate disclosure	14	🟢
2.1.4.1 Use forms that elicit personal information for which there is no clear necessity.	15	🟢

🟢 Fully Compliant 🔴 Non-Compliant

Preliminary CEO Interpretations and Evidence

POLICY 2.1
With respect to the agency's operations and interactions with riders, potential riders, pedestrians, cyclists, other road users, and the general public the CEO shall not cause, allow or fail to address conditions, procedures, or decisions that are unsafe, undignified, disrespectful, unclear, or overly intrusive.

Further, without limiting the scope of the foregoing by this enumeration, the CEO shall not:

Degree of Compliance

Not compliant 

Interpretation

Operational Details

I interpret this policy to mean that the agency must create a safe and attractive traveling environment for transit users, potential travelers, and others in public rights of way such as roads.

Measure/Standards & Achievement

Compliance with this policy will be demonstrated when all lower policies are compliant.

Rationale

The Board has fully defined its intent in lower-level policies as follows

- **Safety:** Policy 2.1.3 addresses safety of the public including pedestrians, cyclists and other road users.
- **Dignified and Respectful Service:** Policy 2.1.3 addresses customer service
- **Clarity of expectations:** Policy 2.1.2 addresses passenger code of conduct
- **Non-intrusive procedures**: Policy 2.1.4 and 2.1.4.1 addresses collection of customer information

Evidence

Source of Data: Lower-level policies

Date of Data Review: 10/13/2026 as verified by Corporate Strategy and Performance Officer

Data:

All lower-level policies are compliant except for policy 2.1.1.

POLICY 2.1.1
Allow facilities, bus stops, vehicles, or services to lack reasonable accessibility for potential riders regardless of mobility limitations.

Degree of Compliance

Not Compliant due to delayed bus stop paving 

Interpretation

Operational Definition

I interpret this policy to mean that all aspects of TheRide's operations, buses, bus stops, and facilities, will comply with the Americans with Disabilities Act (ADA) requirements for accessibility or a plan is in place to reach compliance within a reasonable timeline.

Measure/Standards & Achievement

Compliance with will be demonstrated when during operations (in service) the following conditions are met

A. All fixed-route buses are wheelchair accessible with functioning ramps or lifts and appropriate tie-down equipment,
B. All fixed-route buses have functional visual and auditory stop announcements,
C. All contracted service vehicles are wheelchair accessible,
D. All buildings, park n ride lots and other general structures are wheelchair accessible, and
E. Financial and staff resources are available to ensure that all bus stops near sidewalks are made wheelchair accessible by 2033.

Rationale

This is reasonable because

Using ADA minimum requirements as the "floor" and definition of "reasonable accessibility" in this interpretation is reasonable because:

1. As federal legislation, the ADA represents our society's agreed-upon standard for accommodating most persons with disabilities.
2. The FTA audits the agency's compliance with these rules every three years.
3. All generally available vehicles and equipment are built to meet ADA standards. Using these standards allows us to buy from readily available and cost-effective sources.
4. Exceeding ADA minimum requirements is possible but would be arbitrary, create precedents and expectations that could be hard to manage in the future, and expose the agency to higher costs and other risks. It would be unreasonable to expect the CEO to take such risks without clear Board direction.

A-D. These measures address all elements necessary for passengers to be able to use transit services, are within the AAATA's financial resources to afford, and align with

legal accessibility requirements found in the ADA which can be objectively determined by an outside authority (FTA). For contracted services, the start and stop points are predetermined and hence no audio, visual stop announcements are necessary.

Note: This policy interpretation addresses only in-service operations. It is reasonable to expect that when out of service accessibility requirements may not always be met e.g., a bus with a failed ramp in the maintenance shop.

E. Financial and staff resources are within the agency's ability to control. Additionally, only bus stops near sidewalks can be made wheelchair accessible.

Evidence

Source of Data: Operational and planning records
Date of Data Review: as noted below
Data: During the monitoring period:

A. 100% of buses were wheelchair accessible with ramps or lifts, wheelchair spaces, and appropriate tie-down equipment. An inspection of maintenance procedures and records indicate that ramps, lifts, and ties downs were functional before a bus was put into or returned to public service. Verified by Manager of Fleet 10/02/2026
B. An inspection of fleet inventory records confirms that all fixed-route buses had auditory announcements and visual signs indicating stops which were functional during the monitoring period. Verified by Manager of Fleet 10/02/2026
C. An inspection of all facilities (i.e., two bus terminals, two park n ride lots, and one office building) confirmed that all buildings were accessible to wheelchairs. All buildings had automatic doors which were functional or repaired promptly. Verified by Manager of Facilities 10/02/2026
D. A review of our contracted services i.e., A-Ride, GoldRide and FlexRide confirm that all vehicles in service were wheel chair accessible. Verified by Manager of Mobility Services 10/05/2026
E. A review of the FY26 Budget confirms that there were funds dedicated to the construction of bus stops, bus pads and lead walks. During the monitoring period, 6 bus stops near sidewalks were made accessible. Verified by Manager of Facilities 10/02/2026

Year	Target (# of completed bus-stops).	Actual bus stops completed.	Target achieved
2022	New construction: **5** (1.3%)	**3** (0.8%)	**No. O**nly 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%)	**10 new** **Total 35** (9.2%)	**No.** Construction activities started late due to a delayed

			NEPA review caused by staffing shortages at FTA Region 5. See below for more info.
2026	New construction: **25** Total complete: **68** (18%)	New construction: **18** Total **53** (14%)	**No.** Only 18 permits were issued during the monitoring period.
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%)		

Non-Compliance Explanation, Timeline of Compliance & Mitigation Strategies:

TheRide has the financial and operational capacity to meet set targets. However, external factors such as permitting and NEPA clearance processes continue to slow down this project. Staff are actively reviewing options to navigate these external constraints and maintain target deadlines. The CEO will provide the Board with an updated implementation plan and revised compliance timeline in the next 3 months once internal review are complete. In light of the external constraints, he may need to revise the targets or push back the deadline.

POLICY 2.1.2
Operate without providing effective, comprehensible, accessible, and timely information with respect to services offered and safe, respectful conduct.

Degree of Compliance

Compliant 

Interpretation

Operational Definition

I interpret this policy to mean that accurate information on the following matters is easily accessible and user friendly:

1. How to use our services (i.e., fixed route timetables and maps, paratransit information, staff contact information) and general information about the agency is available prior to travel,
2. Expected conduct of the traveling public (i.e., Passenger Code of Conduct).

Measure/Standards & Achievement

Compliance with this policy will be demonstrated by:

A. Availability of:
    a. **Printed Material:** Printed RideGuides available in English, Spanish, Arabic, and Mandarin (per federal requirements).
    b. **On-Line:** TheRide's website with features allowing use for persons with sight limitations and in non-English languages.
    c. **Real-Time Information**: Available on TheRide's website and as a live feed for use in third-party apps
    d. **Personal Responses:** Staff are available by phone or at the terminal during regular business hours.
B. TheRide publishes a Code of Conduct or riding rules and policies on all buses, terminals, website, and on the printed RideGuide.
C. Compliance with policy 2.1.2.1

Rationale

The interpretations are reasonable because

A. These sources of information are easily accessible measurable, falls within the agency's operational control, satisfies federal mandates under the ADA and Title VI, is cost-effective based on available resources, and meets the primary needs of the public for trip planning and special accommodations.

B. This is reasonable because the code of conduct or riding rules and policies outline expectations for public behavior on agency property and in buses. Publishing written material in transit centers, on all buses, in the Ride Guide, and on the website is reasonable as those are the areas that the public can readily access/see them.

C. The Board defines each policy in descending levels of detail to the point it is willing to accept ANY reasonable interpretation. Therefore, compliance with policy 2.1.2.1 constitutes compliance with this policy.

Evidence

Source of Data: Public Affairs and Community Engagement documents
Date of Data Review: 9/24/2026 as verified by Manager of Public Affairs and Community Engagement, Manager of Mobility Services.
Data:

A. Evidence of availability and quality of service information is provided below.

	Available during the monitoring period? Y/N
o Printed material	Y
o On-line material	Y
o Real-time information	Y
o Staff were available throughout the monitoring period as follows:	
Via Phone: o 6:30AM to 10:00PM on weekdays o 7:00AM-6:00PM on weekends In Person o Blake Transit Center 7:00AM to 7:00PM on weekdays 8:00AM-5:45PM on weekends. o Dawn Gabay Operations Center: 8:00am to 5:00pm on weekdays. And 7:00AM- 6:00PM on the weekends.	

B. The code of conduct was posted at transit centers, buses, available online and in printed in the RideGuides
C. Policy 2.1.2.1 is compliant

POLICY 2.1.2.1
Permit unfair, inconsistent, or untimely responses to questions or complaints from the traveling public.

Degree of Compliance

Compliant

Interpretation

Operational Definition

I interpret this policy to mean that the agency will consistently acknowledge and respond to customer inquiries as determined by pre-determined guidelines that include the timeline of acknowledgement, response, and resolution.

Measure/Standards & Achievement

Compliance with this policy will be demonstrated when:

A. Acknowledgement:

i. All written inquiries and concerns received through the customer service website are acknowledged within 2 business days
ii. All phone calls entered in the customer concern tracking database are acknowledged within 5 days.

B. Waiting times:

i. Waiting time for responses to general phone inquiries about how to use AAATA services during business hours is less than 2 minutes.

C. Resolution:

Open cases are reviewed, solved and closed within the following timelines:

ii. 90% of inquiries and concerns are resolved within 20 business days
iii. 99% of inquiries and concerns are resolved within 30 business days.
iv.

Rationale

These standards are reasonable because they provide a consistent way of addressing most concerns in a timely fashion. These timelines are also within the limits of resources available.

Evidence

Source of Data: Customer service records
Date of Data Review: 10/02/2026 as verified by Manager of Mobility Services and Customer Service Officer

	Target	Average Performance	Target achieved (Y/N)
A. Acknowledgment of inquiries (in business days)			
i. written inquiries and concerns	=/< 2	Same day	Y
ii. phone calls	=/< 5	5	Y
B. Wait time of phone calls on general inquiries (in minutes)	=/< 2	28 sec	Y
C. Resolving of inquiries and concerns (in business days)			
i. 90% of inquiries and concerns	=/< 20	14	Y
ii. 99% of inquiries and concerns	=/< 30	20	Y

POLICY 2.1.3
Operate in a manner that jeopardizes the safety of the traveling public.

Degree of Compliance

Compliant

Interpretation

Operational Definition

I interpret this policy to mean that physical injuries are minimized, that the agency complies with all federal, state, and local safety laws, and the agency takes all prudent steps to proactively minimize the likelihood of injuries (including fatalities). This includes passengers, pedestrians, bicyclists, and other road users. The scope is limited to elements of safety over which the agency has direct control (e.g., vehicles, training, etc.) but does not include elements we cannot control such as decisions of other road users.

Measure/Standards & Achievement

Compliance with this policy will be achieved when

A. There are no fatalities.
B. Injuries per 100,000 vehicle revenue miles (VRM) are less than 0.26
C. Major safety incidents per 100,000 VRM are less than 1.06.
D. Collisions per 100,000 VRM are less than 0.5
E. Safety-related legal liability claims per 100, 000 VRM are less than 0.1

Rationale

This operational definition is appropriate given that transportation involves inherent safety risks that can be reduced but not fully eliminated, many of which lie beyond the agency's control (e.g., other road users, weather). Prioritizing physical safety and injury is justified as it poses the greatest risk and is objectively measurable. Perceptions of safety are addressed in the Ends policy, and worker safety is covered under Policy 2.2 (Treatment of Staff).

A–D. Aligned with FTA regulatory standards, these practical safety measures target our highest-risk operational areas using existing agency resources. Measuring incident frequency per Vehicle Revenue Mile (VRM) allows us to gauge the impact of core safety protocols, such as driver training, traffic law enforcement, and substance control standards. Pursuant to FTA Public Transportation Agency Safety Plan (PTASP) guidelines, targets are progressively lowered each year as safety strategies mature. Target setting, mitigation strategies, and safety performance undergo annual FTA review and approval.

E. In addition to the incident rates above, tracking safety liability claims is reasonable as it further reflects the outcomes of safety efforts and serves as a gauge for the effectiveness of broader safety protocols including regulatory compliance, and operational safeguards. A target of 0.1 per 100,000 VRM is reasonable as its 1 legal claim for every 1 million

vehicle revenue miles operated. This indicates that TheRide is committed to a strong safety record and takes a zero-tolerance approach to avoidable safety risks.

Evidence

Source of Data: Operational records

Date of Data Review: 10/14/2026 as verified by Safety Coordinator and Operations Manager

Safety Measure *Rate=safety measure/100,000 vehicle revenue miles*	Target	Performance	Target achieved Y/N
A. No. of fatalities	0	0	Y
B. Injury rate	<0.26	0.04	Y
C. Major incident rate	<1.06	0.01	Y
D. Collision rate	<0.5	0.09	Y
E. Safety liability claims rate	<0.1	0.000005	Y

POLICY 2.1.4
Use methods of collecting, reviewing, transmitting, or storing personal information that allows improper access or inappropriate disclosure.

Degree of Compliance

Compliant

Interpretation

Operational Definition

I interpret this policy to mean that all customer information will be safeguarded and only disclosed to staff for a legitimate operational purpose.

Measure/Standards & Achievement

Compliance with this policy will be achieved when

A. Sensitive personal information collected through the paratransit program (ARide) is handled in accordance with the Confidentiality of Applicant Information provisions of the Americans with Disabilities Act.
B. Policy 2.1.4.1 below is compliant

Rationale

This is reasonable because

A. Relevant personal information is collected for the paratransit (ARide) program only. (GoldRide, and the Fare Deal program users may need to verify demographic information at the time of purchase, but their information is not collected or stored by the agency.) ARide is operated in line with the America with Disabilities Act which provides guidelines on how to keep such information confidential and only accessible/disclosed to appropriate persons for the right reasons. Compliance with ADA requirements is reviewed during the Federal Transit Administration (FTA) triennial review.
B. Policy 2.1.4.1 requires that the agency not *collect* unnecessary information to begin with, reducing the risk of disclosure. Compliance with 2.1.4.1 demonstrates a step toward reducing the risks captured in this policy.

Evidence

Source of Data: Operational records
Date of Data Review: 10/2/2026 as verified by Manager of Mobility Services
Data:

A. During the monitoring period customer information was secured in accordance with the Americans with Disabilities Act confidentiality requirements.
B. Policy 2.1.4.1 is compliant

POLICY 2.1.4.1
Use forms that elicit personal information for which there is no clear necessity.

Degree of Compliance

Compliant

Interpretation

Operational Definition

I interpret this policy to mean that the agency will collect personal information from members of the public only when it serves a clearly defined and necessary legal, administrative, or security purpose.

Measure/Standards & Achievement

Compliance with this policy will be demonstrated when

A. Forms (electronic or hardcopy) are periodically reviewed to ensure that no unnecessary information is being sought.
B. The Deputy CEO of Finance and Administration approves any new form requesting personal information from members of the public

Rationale

This is reasonable because

A. This review ensures that customer information collecting forms have an operational need.
B. Requiring that the Deputy CEO of Finance and Administration approve new forms places a guard that reviews and validates the necessity of any such form that would be used in the future.

Evidence

Source of Data: Customer data systems
Date of Data Review: 10/02/2026 as verified by DCEO, Finance and Administration and the Manager of Mobility Services.
Data:

A. A review of the forms used to collect personal data indicates that the only personal information gathered from members of the public pertained to the A-Ride program, and that such data was considered necessary to provide services under the American with Disabilities Act (ADA).
B. No new forms requesting personal information were developed or approved in the monitoring period.

	Policy Trendlines			
Policy	FY23	FY24	FY25	FY26
2.1				
2.1.1				
2.1.2				
2.1.2.1				
2.1.3				
2.1.3.1				
2.1.4				
2.1.4.1				

LEGEND	
	Policy is not compliant
	Policy is compliant

Note: The Board eliminated policy 2.1.3.1 as it was redundant with policy 2.1.2

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

Treatment of the Traveling Public (Policy 2.1)

Participants: (7) Board Members
Mike Allemang, Rich Chang, Julie Grand, Kathleen Mozak,
Susan Pollay, Praveena Ramaswami, Georgia Valentine

Performance on reasonable interpretation and verifiable evidence

Policy 2.1
With respect to the agency's operations and interactions with riders, potential riders, pedestrians, cyclists, other road users, and the general public the CEO shall not cause, allow or fail to address conditions, procedures, or decisions that are unsafe, undignified, disrespectful, unclear, or overly intrusive. Further, without limiting the scope of the foregoing by this enumeration, the CEO shall not:

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

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

Policy 2.1.1
Allow facilities, bus stops, vehicles, or services to lack reasonable accessibility for potential riders regardless of mobility limitations.

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

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

Policy 2.1.2
Operate without providing effective, comprehensible, accessible, and timely information with respect to services offered and safe, respectful conduct.

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

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

Policy 2.1.2.1
Permit unfair, inconsistent, or untimely responses to questions or complaints from the traveling public.

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

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

Policy 2.1.3
Operate in a manner that jeopardizes the safety of the traveling public.

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

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

Policy 2.1.4
Use methods of collecting, reviewing, transmitting, or storing personal information that allows improper access or inappropriate disclosure.

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

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

Policy 2.1.4.1
Use forms that elicit personal information for which there is no clear necessity.

Percent of Board members that find the interpretation reasonable	**100%**
Percent of Board members that find the evidence verificable	**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?**

   NO – (1)
   - Although the report includes annual milestones, bus-stop construction has fallen behind its targets. Is there a plan to get back on track, including how to address delays in permits and NEPA review? The possibility of extending the 2033 deadline is a concern. I hope the three-month update will provide a clear plan to address these delays and a revised compliance timeline that keeps the agency on track to meet the 2033 deadline without pushing it back.

   YES – (5)
   - Comment: I look forward to the new timeline for 2.1.1.

   N/A – (1)
   - I chose "n/a" because these are "the work was done or not" so we can't go back in time to build the expected, missing compliant bus stop. And, the low number was due to permitting issues out of the CEO and staff's control.

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 – (7)

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

   25, 16, 10, 17, N/A, 7, 25

Agenda Item: 2.4

Title VI Program Update Approval

Meeting: Board of Directors

Meeting Date: November 19, 2026

INFORMATION TYPE

Decision

RECOMMENDED ACTION(S)

Approve the attached Title VI Program

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 a timely completion of this update, staff have engaged an external consulting firm to review and update AAATA's 2026 Title VI program that was submitted to FTA on 11/30/2026.

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

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

Agenda Item: 2.5

Annual Approval of Public Transit Agency Safety Plan

Meeting: Board of Directors

Meeting Date: November 19, 2026

INFORMATION TYPE:
Decision
RECOMMENDED ACTION(S):
That the Board adopt the resolution approving the AAATA's 2026 Public Transportation Agency Safety Plan (PTASP) Version 5.1.
PRIOR RELEVANT BOARD ACTIONS & POLICIES
3.4.8 – "Mandatory Approvals" required by outside organizations are placed in the Consent Agenda. 2.0 & 2.5.2 – Comply with laws and federal regulations, do not jeopardize funding.
ISSUE SUMMARY:
As a prerequisite for receiving federal transit funding, transit agencies are required to submit a Board approved, annual Public Transportation Agency Safety Plan (PTASP). This year's plan has already received approval from both the Safety Committee and the CEO. The PTASP must be approved by the board no later than December 31, 2026. Failure to meet this deadline could put federal funding at risk, as outlined in Policy 2.5.2. Staff affirm that the attached PTASP is in full compliance with all federal regulations.
BACKGROUND:
Policy Governance acknowledges that external funders or regulators may occasionally necessitate board approval for detailed staff tasks, referred to as "Means." To maintain clear delegation to the CEO and prevent conflicting expectations, Policy Governance recommends including such approvals in a "Mandatory Approvals" consent agenda. The board has previously approved PTASPs for the years 2021 and 2022 through this mechanism. These earlier plans were accepted by the Federal Transit Administration (FTA), and no safety concerns were raised during the 2025 Triennial FTA Audit. The PTASP (Public Transportation Agency Safety Plan) for TheRide is governed by federal regulation 49 CFR Part 673, which sets forth the requirements. Developed to align with a Safety Management Systems (SMS) approach, the PTASP integrates policies, processes, and behaviors to ensure a proactive and data-driven approach to safety risk management. The plan incorporates the core elements of SMS: • Safety Management Policy • Safety Risk Management • Safety Assurance • Safety Promotion The 2021 Bipartisan Infrastructure Bill introduced new PTASP requirements, all of which have been successfully incorporated:

- Formation of a Safety Committee comprising equal numbers of frontline workforce and management representatives. The existing AAATA Safety Committee was adapted for this purpose.
- Plan approval by the Safety Committee, followed by the CEO and Board of Directors. Both the Committee and the CEO have approved the PTASP.
- Implementation of a risk reduction program aimed at lowering accident, injury, and assault rates among transit workers. The plan includes specific metrics and targets.
- A comprehensive staff training program for operations and maintenance personnel, encompassing safety training, ongoing education, and de-escalation techniques.

IMPACTS OF RECOMMENDED ACTION(S):

- **Budgetary/Fiscal**: Board approval necessary to ensure federal funding.
- **Social**: The PTASP helps to minimize risk to the employees and public.
- **Environmental**: NA
- **Governance**: The federal government required approval by the Board. Policy Governance requires such approvals be placed in the Consent Agenda.

ATTACHMENTS:

1. Resolution approving the AAATA's 2026 Public Transportation Agency Safety Plan (PTASP)
2. Draft PTASP

Resolution 04/2026

PUBLIC TRANSPORTATION AGENCY SAFETY PLAN

RESOLUTION OF THE BOARD OF DIRECTORS

OF THE

ANN ARBOR AREA TRANSPORTATION AUTHORITY

WHEREAS, the Public Transportation Agency Safety Plans (PTASP) regulation (49 CFR Part 673) requires certain operators of public transportation systems that receive federal funds under the FTA Urbanized Area Formula Grants to develop an Agency Safety Plan (ASP) that includes the processes and procedures to implement a Safety Management System (SMS), a comprehensive, collaborative, and systematic approach to managing safety, and

WHEREAS, the Federal Transit Administration requires the Board of Directors of the Ann Arbor Area Transportation Authority to annually approve a Public Transit Agency Safety Plan, and

WHEREAS, the Chief Executive Officer (the AAATA Accountable Executive) has signed the 2026 Public Transit Agency Safety Plan, as approved by staff at the Safety Committee.

THEREFORE, BE IT RESOLVED, that the Board of Directors of the Ann Arbor Area Transportation Authority hereby approves the 2026 Public Transit Agency Safety Plan and directs the Chief Executive Officer to submit it to the Federal Transit Administration by the end of the calendar year.

I hereby certify that the following Resolution was duly approved and adopted by the Board of Directors of the Ann Arbor Area Transportation Authority at a meeting held on November 19, 2026, at which a quorum was present and acting throughout.

Kathleen M. Mozak, Chair
November 19, 2026

Praveena Ramaswami, Secretary
November 19, 2026

DRAFT

Agenda Item: 2.6

Contract Renewal of Governance Consultant – Sue Radwan

Meeting: Board of Director's

Meeting Date: November 19, 2026

INFORMATION TYPE
Decision
RECOMMENDED ACTION(S)
That the Board consider and approve a one-year extension of the current contract of the governance consultant, Susan Radwan-Leading Edge Mentoring. This action would extend the contract to January 2028.
BACKGROUND
In January of 2024, Susan Radwan – Leading Edge Mentoring was awarded a 2-year contract with the possibility of 3 one-year extensions. She has been active in her role as Governance Consultant by supporting both the Board and CEO in improving policy considerations that enhance policy writing and policy monitoring.
PRIOR RELEVANT BOARD ACTIONS & POLICIES
3.0 GLOBAL GOVERNANCE PROCESS The purpose of the Board, on behalf of the residents and workers of the member jurisdictions and government jurisdictions with whom we have service agreements (Ownership), and as stewards of the future, is to see to it that the Ann Arbor Area Transportation Authority (AAATA) (a) achieves appropriate results for appropriate persons at an appropriate cost, and (b) avoids unacceptable actions and situations. 3.1 GOVERNING STYLE The Board will govern lawfully, observing the principles of the policy governance… 3.1.3 The Board will direct, control and inspire the organization through careful establishment of broad written policies reflecting the Board's values and perspectives. The Board's major policy focus will be on the intended long-term impacts outside the organization, not on the administrative or programmatic means of attaining those effects. 3.2.13 Participate in the procurement process of both General Legal Counsel and Auditing firm alongside staff. Be the definitive decision maker in the procurement of a Governance consultant.
IMPACTS OF RECOMMENDED ACTION(S)
• Budgetary/Fiscal: Yes • Social: N/A • Environmental: N/A • Governance: N/A
ATTACHMENTS
None

Agenda Item: 3.1

Guest Lecture: Transit / Land Use

Meeting: Board of Directors

Meeting Date: November 19, 2026

INFORMATION TYPE
Other
RECOMMENDED ACTION(S)
Receive for information
ISSUE SUMMARY
As an education topic approved by the Board, Professor Jonathan Levine will present an overview of transportation, transit and land use.

Monitoring Report:
Compensation and Benefits (Policy 2.3)
Monitoring Period: FY 2024-FY26 (Oct 1st, 2023 - Sep 30th, 2026)

Finance Committee Meeting Review Date: Nov 10, 2026

Board of Directors Meeting Review Date: Nov 19, 2026

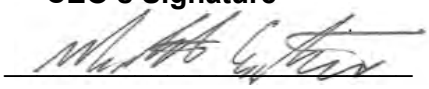
INFORMATION TYPE
Monitoring
RECOMMENDED ACTION(S)
The Finance Committee reviewed the monitoring report and their November 10, 2026 meeting and recommend that the Board review this monitoring report and consider accepting it as (C) 2: (A) a reasonable interpretation for **all** policy items and that the 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 2.3.1 – 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 establish 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 November. The monitoring period for this report is FY 2024- FY 2026 (October 1st, 2023, September 30th, 2026). The monitoring policy report for 2.3.6-2.3.8 (labor negotiations) was provided to the Board in July 2026 and hence excluded from this report.

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
October 21, 2026

ATTACHMENTS

1. Monitoring report for Compensation and Benefits (Policy 2.3)

Table of Contents

POLICY TITLE: COMPENSATION AND BENEFITS	Page#	Comp.
2.3 With respect to employment, compensation and benefits, the CEO shall not cause or allow jeopardy to the agency's fiscal integrity or public image. Further, without limiting the scope of the above statement by the following list, the CEO shall not:	4	
2.3.1. Operate without a compensation and benefits program that attracts and retains highly qualified employees.	5	
2.3.1.1 Offer a benefits program that does not include health insurance.	6	
2.3.2 Establish compensation and benefits that deviate materially from the geographic or professional market for the skills employed.	7	
2.3.3 Change the CEO's own paid compensation and benefits, except to make his or her benefits consistent with a package for all other non-unionized employees, without Board approval.	8	
2.3.4 Operate without a robust, impartial, and transparent process for determining employee compensation.	9	
2.3.4.1 Allow compensation for agency employees (union and non- union), suppliers, or contracted employees to be less than a "living wage," as defined by ordinance of the City of Ann Arbor.	10	
2.3.5 Establish or change retirement benefits so as to cause unpredictable or inequitable situations, including those that: A. Incur unfunded liabilities. B. Provide less than some basic level of benefits to all full-time employees. C. Treat the CEO differently from other senior employees.	11	

Fully Compliant Non-Compliant

Preliminary CEO Interpretations and Evidence

POLICY 2.3
With respect to employment, compensation and benefits, the CEO shall not cause or allow jeopardy to the agency's fiscal integrity or public image.

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

Degree of Compliance

Not Compliant

Interpretation

Operational Definition

I interpret the policy to mean that:

A. The agency will provide competitive wages and offer a benefits package that align with regional and professional benchmarks for the skills hired. This is reasonable as it attracts and retains skilled professionals and substandard compensation creates operational jeopardy through high turnover, recruitment difficulties, and diminished service quality that threatens the agency's ability to achieve Ends.
B. The compensation and benefits structure will remain fully sustainable within current budgetary limits and will not result in future financial liabilities. This is reasonable because current limited resources have to be prioritized to support the agency's Ends and the cost-benefit of the compensation and wages must be carefully balanced to remain competitive but within financial capacities. Avoiding unfunded deferred contributions protects long-term financial health without shifting unexpected financial burdens onto future budgets.
C. Public image is maintained when compensation and benefit practices are transparent, equitable, and structured such that an independent, credible audit would consistently validate them as fair and responsible stewardship of public or stakeholder resources.

Measure/Standards & Achievement

Compliance of this policy will be demonstrated when all lower-level policies are found to be compliant. This is reasonable because those specific policies comprehensively fulfill the board's intent:

A. Competitive Wages and Benefits: Addressed in policies 2.3.1, 2.3.1.1, and 2.3.2.
B. Fiscal Sustainability: Addressed in policy 2.3.5.
C. Fairness and Transparency: Addressed in policies 2.3.3, 2.3.4, and 2.3.4.1.

Evidence

Source of Data: Lower-level policies
Date of Data Review: 9/30/2026 as verified by Corporate Strategy & Performance Officer
Data: All lower-level policies are compliant except policy 2.3.1. Therefore, this policy is not compliant.

POLICY 2.3.1
Operate without a compensation and benefits program that attracts and retains highly qualified employees.

Degree of Compliance

Not compliant 

Interpretation

Over many years, the CEO has been unable to develop a satisfactory interpretation for this policy and is therefore self-reporting non-compliance.

Defining 'highly qualified' in a diverse workplace that includes formally educated professionals and hourly labor with on-the-job skills without details about every individual has proven impossible. Demonstrating the compensation system is the *cause* of their employment is also challenging. Additionally, the policy appears to conflict with others:

- Policy 2.3.2 states that compensation and benefits program shall not deviate materially from the geographic market for the skills employed. These are two different instructions for how compensation should be structured, and they may contradict each other.
- Monitoring whether the agency retains "highly qualified" employee's may conflict with Policy 4.2.2, which states that *"The Board will not evaluate, either formally or informally, any staff other than the CEO."*
- Policy 4.3.2: The Board will never prescribe organizational Means delegated to the CEO. John Carver explains that using a limitation policy to mandate specific operational methods rather than setting a risk boundary violates the intent of Executive Limitations and acts as a backdoor means of prescribing staff operations (*Boards That Make a Difference*, 3rd Edition, pp. 126–127). Policy 2.3.1 is not an extension of an unethical or imprudent outcome but appears to be a prescription for how internal business must be conducted. This may explain the CEO's challenges in creating a satisfactory definition as the policy itself *is* an instruction on what to do.

The CEO respectfully asks that the Board consider whether policies 2.3.1 and 2.3.1.1 are inadvertent Means prescription, and if the policies should be revised or eliminated.

POLICY 2.3.1.1
Offer a benefits program that does not include health insurance.

Degree of Compliance

Compliant 

Interpretation

Operational Definition

I interpret this policy to mean that the agency will offer a benefit program that includes health insurance to all eligible employees. See CEO notes on page 12.

Measure/Standards & Achievement

Compliance with this policy will be demonstrated when all full and/or part-time employees (union and non-union) who have been with the agency for more than 90 days are *offered* a benefits package that includes some level of health insurance coverage.

Rationale

This interpretation is reasonable because it covers all employees and gives employees the flexibility to opt out if they are already covered. (e.g., through their spouse's insurance). A 90-day waiting period is the standard waiting period as regulated by the US Department of Labor.

Evidence

Source of Data: Employee Health Plan Enrollment
Date of Data Review: 10/06/2026 as verified by the Manager of Human Resources
Data: 352 out of 380 employees (92.6%) participated in the agency's healthcare plan. The 28 employees who opted out provided proof of alternative coverage, such as a spouse's policy.

POLICY 2.3.2
Establish compensation and benefits that deviate materially from the geographic or professional market for the skills employed.

Degree of Compliance

Compliant 

Interpretation

Operational Definition

I interpret this policy to mean that renumeration for agency staff (union and non-union) will remain within or near the norms of our regional market (southeast Michigan) and industry sectors (local government, public transit, sub-specialties). This is reasonable as it controls costs and avoids the appearance of favoritism or poor management. Additionally, within groups there are always ranges and outliers. There may also be sound reasons to diverge from norms (e.g., a competitive advantage, labor shortages, rare skill sets, etc.). A material deviation in this case would be a substantial departure from norms that is not necessary to achieve business goals and cannot be reasonably explained.

This applies to the recommendation for negotiated wages brought to the board by the CEO.

Measure/Standards & Achievement

Compliance will be demonstrated when the salaries for staff positions are benchmarked against similar positions in the region and transit industry. This is reasonable because benchmarking against regional and industry is reasonable as those are the labor markets in which we need to remain competitive

Evidence

Source of Data: Compensation and Benefits Packages
Date of Data Review: 10/01/2026 as verified by Manager of Human Resources
Data:
A review of current compensation and benefits packages indicates that there is no unreasonable material deviation from current geographic and professional markets. The process of determining compensation is detailed in policy 2.3.4

POLICY 2.3.3
Change the CEO's own paid compensation and benefits, except to make his or her benefits consistent with a package for all other non-unionized employees, without Board approval.

Degree of Compliance

Compliant 

Interpretation

Operational Definition

I interpret this policy to mean that the Board reserves the exclusive right to change CEO's compensation and benefits. This policy does not address agency-wide benefits (agency-wide dental plans), which the CEO can modify for the good of the organization (e.g., cost-effective)

Measure/Standards & Achievement

Compliance with this policy will be demonstrated when Corporate Counsel or auditors validate that the compensation and benefits available only to the CEO (i.e., salary or benefits) are adjusted only by act of the Board of Directors.

Rationale

These interpretations are reasonable because the policy is self-explanatory and requires little additional clarification. Further, this is reasonable because it clearly identifies the only mechanism by which CEO compensation can be adjusted (i.e., by the Board). Further, using third parties that do not report to the CEO to make the confirmation is reasonable as the CEO cannot influence the result.

Evidence

Source of Data: AAATA salary and benefits review and audit records
Date of Data Review: 10/05/2026 as verified by Manager of Finance and Human Resources.

The CEO compensation and benefits have not been adjusted except by the action of the Board. A review of the CEO pay and benefits records by staff confirms this was true during the monitoring period.

POLICY 2.3.4
Operate without a robust, impartial, and transparent process for determining employee compensation.

Degree of Compliance

Compliant 

Interpretation

Operational Definition

I interpret this policy to mean that management's tools for determining and setting total compensations (e.g., wages, benefits, bonuses, etc.) can be demonstrated to be explainable, equally applied and not arbitrary, and legally defensible. This does not mean that all employees need to agree with management's conclusions or decisions. There will be different approaches for non-union and unionized employees.

Measure/Standards & Achievement

Compliance with this policy will be demonstrated when AAATA uses an objective, transparent process from a third-party source for determining staff wages. The process must create internal equity between AAATA positions (impartial), be documented in advance (transparent) and is used consistently (robust).

Rationale

This is reasonable because such a process removes arbitrary considerations from the act of determining compensation for each position. It also determines the range of compensation for each role based on the value created by the position and ensures similar roles are treated in a similar fashion, regardless of the individual in the position.

Evidence

Source of Data: Human Resource Documents
Date of Data Review: 10/01/2026 as verified by Manager of Human Resources
Data:
During the monitoring period, the American Society of Employers benchmarked our program against local, industry, and government markets. Their findings enabled the agency to implement clear salary bands, and also independently confirmed the soundness of our existing pay ranges and operational processes.

POLICY 2.3.4.1
Allow compensation for agency employees (union and non-union), suppliers, or contracted employees to be less than a "living wage," as defined by ordinance of the City of Ann Arbor.

Degree of Compliance

Compliant

Interpretation

Operational Definition

I interpret this policy to mean that all individuals employed by or providing services to AAATA, whether directly or through contracted arrangements, receive compensation that meets or exceeds the living wage established by the City of Ann Arbor ordinance.

Measure/Standards & Achievement

Compliance with this policy will be determined when all direct employees (full or part-time) of the AAATA, and employees of our suppliers and contractors are paid an hourly wage at or above the living wage as defined by the City of Ann Arbor. Suppliers with contracts under $10,000 annually, 5 for-profit employees , or 20 non-profit employees are exempt (Source: Living Wage Declaration Poster for 2021-2020, available at www.a2gov.org).

Rationale

This is reasonable as it covers all individuals who work directly or indirectly for the AAATA and follows the outside ordinance called for in the policy.

Evidence

Source of Data: AAATA wages and contractor wages
Date of Data Review: 10/01/2026 as verified by Manager of Human Resources and the Manager of Purchasing
Data:
Ann Arbor's current living wage (2026) is a minimum of $17.42/hour with health care and $19.42/hour without health care. During the monitoring period the lowest hourly rate paid to any AAATA regular staff was $21.50 (intern). A review of AAATA contracts with suppliers indicate that all employees covered under this ordinance were paid at or above the living wage.

POLICY 2.3.5
Establish or change retirement benefits so as to cause unpredictable or inequitable situations, including those that:
A. Incur unfunded liabilities.
B. Provide less than some basic level of benefits to all full-time employees.
C. Treat the CEO differently from other senior employees.

Degree of Compliance

Compliant 

Interpretation

Operational Definition

I interpret this policy to mean that the creation or adjustment of retirement benefits should be done in a way that enables full-time employees to plan for retirement with confidence, promote fair and consistent treatment across the organization employees and preserve the agency's financial stability.

Measure/Standards & Achievement

Compliance with this policy will be demonstrated when, if retirement benefits are created or altered, they must meet the following criteria:

A. The AAATA will provide only a defined-contribution pension/retirement benefit program.
B. All eligible employees working in full-time positions participate in the defined contribution (pension) program.
C. The CEO does not allow the creation of any post-employment benefit that applies only to themselves (aside from what the Board allows in the CEO's contract).

Rationale

This interpretation is reasonable because

A. A define-contribution program facilitates an affordable organization contribution to employee retirement benefits without incurring unaffordable future liabilities.
B. Participation of all eligible employees in the pension plan ensures equity in provision. Eligibility is determined after completing the standard waiting period as stipulated by the US department of labor (not less than 90 days).
C. CEO compensation and benefits are determined only by the Board.

Evidence

Source of Data: AAATA retirement benefits
Date of Data Review: 10/01/2026 as verified by Manager of Human Resources
Data:
During the monitoring period, no retirement benefits were created or altered. Existing retirement benefits comply with this policy's requirements as follows:
During the monitoring period there was a defined contribution pension program.
At any given time 91-93% of employees were enrolled in the retirement program. The remaining 7-9% were in the waiting period (new hires with less than 90 days).

Other than provisions in the Board-approved 2020 CEO contract regarding a supplemental disability benefit and a separate deferred comp plan, the CEO has the same benefits plans as all other non-unionized AAATA employees.

Policy Trendlines

Policy	FY 21	FY 22	FY24-FY26
2.3			
2.3.1			
2.3.1.1			
2.3.2			
2.3.3			
2.3.4			
2.3.4.1			
2.3.5			

LEGEND	
	Policy is not compliant
	Policy is compliant

CEO Notes:

1. The CEO requests the Board review and addresses the policy language in 2.3.1 and 2.3.1.1. These policies were created by the AAATA Board in 2017 and are not a part of the standard Carver policy template.
2. CEO recommends that the Board review policy 2.3.4 as it addresses elements of policy 2.3.2 and may be considered a sub-policy of 2.3.2.

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

Compensation & Benefits (Policy 2.3)

Participants: (6) Board Members
Mike Allemang, Rich Chang, Julie Grand, Kathleen Mozak,
Praveena Ramaswami, Georgia Valentine

Performance on reasonable interpretation and verifiable evidence

Policy 2.3
With respect to employment, compensation and benefits, the CEO shall not cause or allow jeopardy to the agency's fiscal integrity or public image.

Further, without limiting the scope of the above statement 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*

*If you stated **YES**, kindly provide additional context:*

- Not compliant due to 2.3.1
- The CEO explains that it has been difficult to develop a clear interpretation of the policy. The Board should consider whether to revisit or clarify the policy. The CEO notes that the policy appears to conflict with policy 2.3.2, 4.2.2, and 4.3.2."

Policy 2.3.1
Operate without a compensation and benefits program that attracts and retains highly qualified employees.

Percent of Board members that find the interpretation reasonable	**50%**
Percent of Board members that find the evidence verifiable	**50%**

*If you stated **NO**, kindly provide additional context:*

- I agree that the current policy requires some unreasonable interpretations regarding "highly qualified" and the cause of employment. However, I'm less convinced about the "prescription" statement. For example, 2.3.1.1 requires health insurance. (See later comments about having a policy about employee retention.)
- No Interpretation was given.

- The CEO explains that it has been difficult to develop a clear interpretation of the policy. However, the report does not clearly explain how success would be measured or what the expectations should be. It also lacks specific information on hiring, employee retention, or turnover to show whether the compensation and benefits program attracts and retains qualified employees. More clarity and supporting information are needed to properly evaluate this policy. The Board can also consider whether to revisit or clarify the policy.

*If you stated **YES**, kindly provide additional context:*

- I understand the concerns, but actually find the interpretation reasonable. Our employees are highly skilled and our retention rates are enviable.

- We should consider the CEO's recommendation to evaluate this policy.

Policy 2.3.1.1
Offer a benefits program that does not include health insurance.

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

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

Policy 2.3.2
Establish compensation and benefits that deviate materially from the geographic or professional market for the skills employed

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

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

Policy 2.3.3
Change the CEO's own paid compensation and benefits, except to make his or her benefits consistent with a package for all other non-unionized employees, without Board approval.

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

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

Policy 2.3.4
Operate without a robust, impartial, and transparent process for determining employee compensation.

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

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

Policy 2.3.4.1
Allow compensation for agency employees (union and non-union), suppliers, or contracted employees to be less than a "living wage", as defined by ordinance of the City of Ann Arbor.

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*

*If you stated **YES**, kindly provide additional context:*

- Granted, we have to take supplies and vendors at their word that they meet our living wages threshold.

Policy 2.3.5
Establish or change retirement benefits so as to cause unpredictable or inequitable situations, including those that:

A. Incur unfunded liabilities.
B. Provide less than some basic level of benefits to all full-time employees.
C. Treat the CEO differently from other senior employees.

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 - (6)

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?**

   YES – (1)

   N/A – (2)
   - The compliance timeline/need will depend on the board's discussion around 2.3.1 (and 3.2.1.1)

   NO – (3)
   - There was not a time frame provided, given the ask to reconsider the policy language.

NO responses continued …

- The CEO reported non-compliance on 2.3.1 stating he has had difficulty over the years to develop a satisfactory interpretation of this policy and chose not to provide any interpretation/rationale/data for this monitoring period. The Board has found past interpretations for policy 2.3.1 acceptable and I am disappointed that no attempt was made to provide an interpretation for this monitoring period but rather places the onus on the Board to consider revision or elimination of the policiy.

- The report explains that the CEO wants the Board to consider revising or removing the policy, but it doesn't provide a timeline for when compliance could be expected. A clearer plan and expected timeframe for addressing the issue would be beneficial.

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 – (1)

   YES – (5)

   - I agree with the CEO that 2.3.1 should be eliminated. However, employee retention should be addressed somewhere and probably separate union and non-union employee data.

   - Based on the CEO's request, I believe that we should at a minimum, hold a discussion about this language.

   - I do not agree with the CEO's recommendation to eliminate 2.3.1 Operate without a compensation and benefits program that attracts and retains highly qualified employees and 2.3.1.1 Offer a benefits program that does not include health insurance. I would be open to his suggestion of a revision. The 2 policies could be combined to read something like this - 2.3.1 Operate without a compensation and benefits program which is to include health insurance.

   - Yes, we should discuss 2.3.1 and 2.3.1.1 per the reasoning from the CEO

   - The report raises valid questions about how to define and measure the compensation program's effectiveness in attracting and retaining qualified employees. The Board may want to revisit the policy to determine whether it needs clarification or revision to make expectations clearer and easier to measure.

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

   30, 10, 25, 25, 23, 35

Agenda Item: 6.2

Draft CEO Ends Interpretations for Feedback

Meeting: Board of Directors

Meeting Date: November 19, 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 clearer.

The CEO intends to introduce the draft interpretations in October for an initial orientation and return in November for a more fulsome discussion. The CEO has added draft interpretations for the new environmental policies (1.4, 1.4.1) in this version starting on page 28.

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 4.1b

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 artbiter 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.

Agenda Item: 6.3

FY2026 Q4 Financial Statement

Meeting: Board of Directors

Meeting Date: November 19, 2026

INFORMATION TYPE

Other – Financial Update

RECOMMENDED ACTION(S)

Receive for information

ISSUE SUMMARY

Staff presents the preliminary Fourth Quarter Financial Statements with currently available and reportable financial information for the period ending September 30, 2026.

BACKGROUND

Financial highlights for Fiscal Year 2026 (October 2025 to September 2026) include:

- TheRide's operating expenses for Fiscal Year 2026, excluding depreciation, were $69.6 million, $1.9 million below the Board-adopted budget of $71.5 million.
- Year-end adjustments prepared with the annual audit are still to be recorded. These are not expected to change operating expenses materially compared to budget.
- TheRide has a $4.4 million favorable net variance, operating actuals to budget, at the end of Fiscal Year 2026.
- Revenues were $2.5 million higher than budget. State operating assistance, which reflects the estimated year-end adjustment, finished $1.1 million higher than expected due to a higher state rate than used for budgeting. Property tax ran $1.0 million and investment income $1.1 million above targets.
- Expenses were $1.9 million below budget. Fringe benefit costs were lower than anticipated, federal grant pass-through spending fell in line with its revenue, and other expenses came in $1.1 million under due to lower utilities, training, media, and insurance costs. Property tax write-offs, budgeted at $0.2 million, were not needed. Collections on older taxes written off last year produced a $0.1 million credit instead. Fuel, materials and supplies finished $1.1 million above budget on higher repair parts costs and diesel prices.
- The four board-approved reserves were not used. They are held at $12.9 million operating, or 2.0 months based on the FY27 approved budget, $33.3 million capital, $1.0 million vehicle damage and $0.5 million insurance.
- Cash and investments were $84.9 million at the end of Q4 2026.

PRIOR RELEVANT BOARD ACTIONS & POLICIES

- Board adoption of the FY2026 operating budget

IMPACTS OF RECOMMENDED ACTION(S)

- Budgetary/Fiscal: Demonstrates financial performance for the reporting period
- Governance: Supports Board in financial oversight/fiduciary responsibility

ATTACHMENTS

FY2026 Q4 Financial Statements (Income Statement and Balance Sheet)

TheRide

Ann Arbor Area Transportation Authority

Income Statement - Preliminary

For the Period Ended September 30, 2026

Q4 Financial Statement

Revenue and Expense (Budget to Actual)

($ in thousands)

BLACK = FAVORABLE
RED = UNFAVORABLE

REVENUES	Actual Quarter 1	Actual Quarter 2	Actual Quarter 3	Actual Quarter 4	Actual YTD	Budgeted YTD	Budget Variance $	Budget Variance %
Fares and Contracts	$1,925	$1,883	$1,892	$1,896	$7,595	$7,199	$397	5.5%
Local Property Taxes	10,412	10,925	10,668	10,638	42,643	41,648	995	2.4%
State Operating Assistance	5,224	5,223	5,282	4,349	20,079	19,015	1,063	5.6%
Other Federal Programs	241	206	202	219	868	1,970	(1,102)	-55.9%
Other Revenues	899	606	667	584	2,756	1,646	1,110	67.4%
Total Operating Revenues	**$18,701**	**$18,843**	**$18,711**	**$17,686**	**$73,940**	**$71,477**	**$2,463**	**3.4%**
EXPENSES								
Salaries, Wages, Benefits	$9,211	$9,017	$9,206	$11,232	$38,665	$39,657	991	2.5%
Purchased Transportation	3,061	3,329	3,361	3,444	13,194	13,902	708	5.1%
Fuel, Material, Supplies	1,703	1,827	2,172	2,481	8,184	7,069	(1,115)	-15.8%
Contracted Services	1,470	1,328	1,144	1,682	5,623	5,885	262	4.5%
Other Expenses	980	1,021	1,042	857	3,900	4,964	1,064	21.4%
Total Operating Expenses	**$16,424**	**$16,521**	**$16,925**	**$19,696**	**$69,566**	**$71,477**	**$1,911**	**2.7%**
Surplus (Deficit)	**$2,277**	**$2,321**	**$1,786**	**($2,010)**	**$4,374**	**$0**	**$4,374**	
Capital Reserve Transfer	-	-	-	-	-	-		
Operating Reserve Transfer	-	-	-	-	-	-		
OPERATING BALANCE	**$2,277**	**$2,321**	**$1,786**	**($2,010)**	**$4,374**	**$0**		

☑ TheRide has a **$4.4 million favorable net variance**, operating actuals to budget, at the end of Fiscal Year 2026.

Revenues were **$2.5 million higher than budget**. State operating assistance, which reflects the estimated year-end adjustment, finished $1.1 million higher than expected due to a higher state rate than used for budgeting. Property tax ran $1.0 million and investment income $1.1 million above targets.

Expenses were **$1.9 million below budget**. Fringe benefit costs were lower than anticipated, federal grant pass-through spending fell in line with its revenue, and other expenses came in $1.1 million under due to lower utilities, training, media, and insurance costs. Property tax write-offs, budgeted at $0.2 million, were not needed. Collections on older taxes written off last year produced a $0.1 million credit instead. Fuel, materials and supplies finished $1.1 million above budget on higher repair parts costs and diesel prices.

YTD Revenue and Expense By Mode

($ in thousands)

DIRECT REVENUE	Fixed Route *Fixed Route Bus*	Demand Response *A-Ride*	Other Demand Response *FlexRide, GoldRide, NightRide*	Non-Urban *WAVE, Peoples Express*	VanRide *VanRide, Ride Sharing*	TOTAL
Fare Revenue	$3,277	$163	$293	$143	$0	$3,876
Contract Revenues	1,752	-	80	1,888	-	3,719
Advertising, Interest, Other	2,756	-	-	-	-	2,756
Federal Operating	-	-	-	812	56	868
State Operating	14,338	2,143	1,831	1,513	253	20,079
Total Direct Revenue	**$22,122**	**$2,305**	**$2,205**	**$4,357**	**$309**	**$31,298**
TOTAL EXPENSE						
Salaries, Wages, Benefits	$36,614	$1,579	$143	$225	$105	$38,665
Purchased Transportation	-	5,092	2,782	4,556	764	13,194
Fuel, Materials, Supplies	7,223	961	-	-	-	8,184
Contracted Services	5,337	202	-	85	-	5,623
Other Expenses	3,699	89	47	55	11	3,900
Total Operating Expense	**$52,872**	**$7,922**	**$2,971**	**$4,920**	**$880**	**$69,566**
Surplus (Deficit) from OPS	**($30,751)**	**($5,617)**	**($767)**	**($564)**	**($571)**	**($38,268)**
ALLOCATED REVENUE						
Local Property Taxes	$35,688	$5,617	$767	$0	$571	$42,643
Federal Pandemic Relief Funds	-	-	-	-	-	0
SURPLUS (DEFICIT):	**$4,938**	**$0**	**$0**	**($564)**	**$0**	**$4,374**

TheRide

Ann Arbor Area Transportation Authority

Q4 Financial Statement

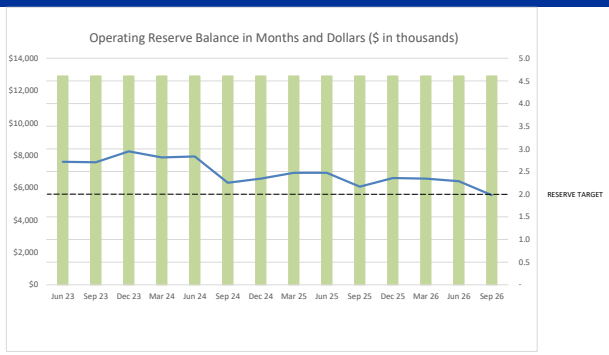
Balance Sheet - Preliminary

For the Period Ended September 30, 2026

Balance Sheet and Reserve

$ in thousands, with Prior Year comparison.

	Q3 2026 6/30/2026	Q4 2025 9/30/2025	Q4 2026 9/30/2026
ASSETS			
Cash	$42,480	$63,217	$64,784
Investments	20,198	19,758	20,091
Other Current Assets	35,979	12,646	12,288
Capital Assets	54,646	48,758	55,965
Total Assets	**153,304**	**144,379**	**153,128**
LIABILITIES	**6,878**	**9,366**	**8,629**
TOTAL NET POSITION	**$146,426**	**135,013**	**$144,499**
RESERVES:	**Balances**		
Capital	$33,260	$33,260	$33,260
Vehicle Damage	$1,000	$0	$1,000
Insurance	$500	$500	$500
Operating	$12,905	$12,905	$12,905
Months in Operating Reserve	**2.3**	**2.2**	**2.0**



Statement of Cash Flows ($ in thousands)

	FY 2024				FY 2025				FY 2026			
Historical Cash Flows	**Quarter 1**	**Quarter 2**	**Quarter 3**	**Quarter 4**	**Quarter 1**	**Quarter 2**	**Quarter 3**	**Quarter 4**	**Quarter 1**	**Quarter 2**	**Quarter 3**	**Quarter 4**
Beginning Balance:	$54,630	$51,875	$50,527	$48,437	$77,559	$72,076	$64,393	$52,683	$82,975	$79,216	$63,452	$62,678
Cash Flow from Operations	(3,045)	(2,402)	(2,444)	26,564	(1,512)	(11,465)	(10,972)	27,217	(7,104)	(9,075)	(7,139)	22,747
Cash Flow from Capital	53	870	182	2,193	(4,109)	3,605	(1,002)	2,900	3,080	(6,711)	6,211	(443)
Cash Flow from Investments	237	184	171	364	138	178	264	175	265	21	153	(107)
Cash Flow:	**($2,755)**	**($1,348)**	**($2,090)**	**$29,122**	**($5,483)**	**($7,682)**	**($11,710)**	**$30,292**	**($3,759)**	**($15,764)**	**($775)**	**$22,197**
Ending Balance:	$51,875	$50,527	$48,437	$77,559	$72,076	$64,393	$52,683	$82,975	$79,216	$63,452	$62,678	$84,875

Q4 cash flow was positive at $22.2 million

The Statement of Cash Flows summarizes the amount of cash and cash equivalents entering and leaving AAATA during the reporting period. It measures how AAATA generates cash to fund its operating, capital, and investing needs. Typically negative cash flow is normal for all quarters except the 4th quarter, when property tax receipts generate positive cash flow. Summer property tax collections, received mainly in August, raised cash and investments to $84.9 million at September 30, 2026. FY 2026 Quarter 2 and Quarter 3 capital and operating cash flows have been restated for a misclassification. Ending balances for all previous quarters are unchanged.

Investments Summary

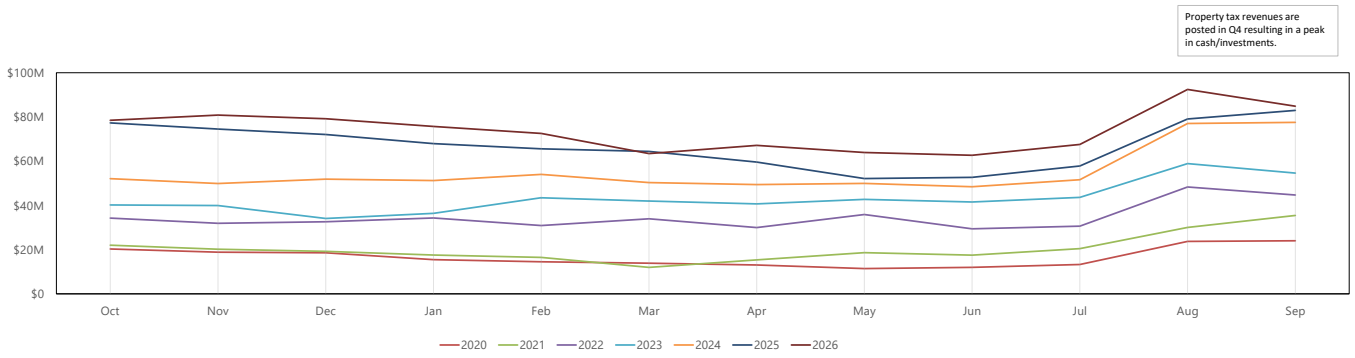
($ in thousands)

Investment Instrument	Date of Maturity	Interest Rate	Value on 6/30/2026	Transactions	Value on 9/30/2026
U.S. Treasury Notes	10/31/2026	4.13%	1,300	0	1,300
U.S. Agency Bond	2/3/2027	1.63%	250	0	250
U.S. Treasury Notes	5/15/2027	4.50%	1,000	0	1,000
U.S. Treasury Notes	10/31/2027	4.13%	750	0	750
U.S. Agency Bond	11/1/2027	4.00%	2,500	0	2,500
U.S. Treasury Notes	11/15/2027	2.25%	2,200	0	2,200
U.S. Agency Bond	12/27/2027	4.25%	2,200	0	2,200
U.S. Treasury Notes	1/31/2028	3.50%	1,500	0	1,500
U.S. Agency Bond	2/24/2028	4.25%	1,400	0	1,400
U.S. Agency Bond	6/9/2028	4.00%	2,300	0	2,300
U.S. Treasury Notes	11/15/2028	3.50%	1,500	0	1,500
U.S. Treasury Notes	2/28/2029	4.25%	850	0	850
U.S. Agency Bond	4/9/2029	3.75%	1,000	0	1,000
U.S. Agency Bond	5/15/2029	6.25%	750	500	1,250
Money Market Funds	N/A	3.65%	760	(462)	298
Mark-to-Market Adjustment			(62)	(145)	(207)
Total Investments:			**$20,198**	**($107)**	**$20,091**

FY2026 YTD Investment Gain *($ in thousands):* **$439**

U.S. Treasury Bills, Notes, & Agency Bonds are short term bonds (several months to 10 years) backed by the Treasury Department of the U.S. Government. The rates shown for the current investments represent the gross yield-to-maturity rates (before the annual fee of .28%). An FDIC-insured cash sweep account or accounts that have balances above the FDIC insurance threshold are used for day-to-day working capital.

Cash and Investments History



Agenda Item: 6.4

CEO Report

Meeting: Board of Director's

Meeting Date: November 19, 2026

INFORMATION TYPE

Other

EMERGENT ITEM

ELECTION DAY FARE SUSPENSION

AAATA partnered with Washtenaw County to provide fare-free rides across the agency's service area on Election Day, Tuesday, November 3rd. The County sponsored all fares, while AAATA implemented a robust communications plan to promote the pilot program and raise public awareness.



Operationally the day unfolded without incident, fares were not collected and passengers were counted manually. All services were included. There were no significant complications or complaints. Staff will be working to invoice the County, and costs initially appear to be within the range agreed to beforehand.
0
Key ridership observations include:

- Overall system ridership decreased slightly (-1%) compared to Election Day 2025.
- Ridership in Ann Arbor (largest market) decreased slightly. All schools are closed on election days to serve as polling stations.
- Ridership increased notably on Ypsilanti local routes (29%) and FlexRide East (83%).
- GoldRide, ARide saw modest increases, while late night service saw a drop.

Daily Ridership	11/04/25	11/03/26	% Change
Fixed-Route Total	**19,255**	**19,077**	**-1%**
Intercity Routes (4, 6, etc)	7,638	7,237	-5%
Ann Arbor Locals	9,824	9,519	-3%
Ypsilanti Locals	1,793	2,321	29%
FlexRide Total	**183**	**206**	**13%**
FlexRide East (Ypsi)	46	84	83%
FlexRide Late Night	129	110	-15%
FlexRide GoldRide	8	12	50%
A-Ride	**294**	**305**	**4%**
System Total	**19,732**	**19,588**	**-1%**

The CEO will reiterate that no conclusions should be drawn from a one-day experience.

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, with the intersection of Liberty St and 4th Ave now reopened to traffic. Canopy installation went well in October and will continue throughout November. TheRide's return to BTC/4th Ave is still uncertain but will most likely be in January 2027.

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 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

October was a busy month for the YTC project with many positive developments. Staff finalized the property acquisition of the two parking lot parcels adjacent to the existing YTC, and transition planning is underway. The City of Ypsilanti's Historic District Commission also approved the YTC work permit (the demolition permit was approved earlier this summer) for most major elements of the project. Staff also reached 60% design at the end of the month. The permitting process still has many steps, the next of which will be the PUD/site plan approval. The design team submitted their application in late October, and the commission's first review will be in mid-November. The next cost estimates for the design from the construction manager (CM) are underway, as well as construction phasing planning.

DEDICATED BUS LANES & BUS RAPID TRANSIT

As was verbally reported at the October Board meeting, TheRide received $6.6 million dollars from the State of Michigan through their Infrastructure Projects Authority Fund (IPAF) for the Washtenaw/Huron/Jackson BRT. This funding is intended to fund two different contracts: 1) an Owner's Representative/Project Manager that can help define the strategic direction of the project and provide quality control; and 2) a technical consultant to perform planning, preliminary engineering, and gain federal NEPA clearance of the locally preferred alternative for a bus rapid transit project from approximately downtown Ypsilanti to the Westgate Shopping center. Staff is currently researching best practices, and procurement is expected to launch in the coming months.

OPERATIONAL UPDATES

FARE STUDY

Staff work continues to develop the initial draft scope for the study of fares and fare collection technology. Initial draft is expected to be completed by December.

BUS OPERATOR COUNT/MCO CLASSES

AAATA's current operator count is 196, with 9 MCO's set to graduate by December 4th. A class of 8 MCO's is set to begin on November 17th.

LOCAL ADVISORY COMMITTEE (LAC)
The LAC met on November 10th virtually and discussed board report, service updates, and feedback on the board ends.

ANN ARBOR CITY COUNCIL
CEO Matt Carpenter provided an operational update to Ann Arbor City Council on October 19th.

TRANSPORTATION COMMISSION (ANN ARBOR)
The Ann Arbor Transportation Commission met on October 21st and received a presentation from Ann Arbor Public Schools regarding school transportation initiatives, including electric school buses, Safe Routes to School programming, and coordination with AAATA. The Commission also discussed pedestrian safety, neighborhood traffic-calming initiatives, and ongoing transportation infrastructure projects, including the Broadway Bridge/Plymouth Road safety improvements

WATS POLICY COMMITTEE UPDATE
The WATS Policy Committee met on October 21st, 2026. The committee discussed the WATS Public Participation Plan, approved CMAQ Performance measures, and received a presentation from People's Express describing the Washtenaw Transit Needs Assessment.

COMMUNITY ENGAGEMENT

UNHOUSED ADVOCATES MEETING
AAATA met with a group of advocates serving the unhoused community on Thursday, November 5th. The meeting was the culmination of several months of ongoing engagement with local stakeholders, including representatives from the faith-based community, Ypsilanti District Library, Washtenaw County, the Shelter Association of Washtenaw County, and other community organizations.

The discussion focused on recent updates to the Fare Deal enrollment process, as well as listening to the needs and concerns of community advocates. As a follow-up to these discussions, AAATA will be on-site at the Delonis Center on Friday, November 13th, from 11:00 a.m. to 1:00 p.m. and 4:00 p.m. to 6:00 p.m. to assist eligible individuals with enrollment in Fare Deal and GoldRide.

THERIDE/RTA COLLABORATION
TheRide and RTA partnered on a social media collaboration video targeted at our efforts with Transit App. DCEO Dina Reed was featured in the video.

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

As approved in the FY2027 budget, on October 19th, 2026, the CEO authorized contracts for Snow Removal Services with RNA Facilities Management and Margolis Companies, for a base of one (1) year with four (4) additional one-year options. The total Not-to-Exceed price for the two contracts is $200,000 for the base year, and $1,000,000 over the life of the contracts.



Ann Arbor Area Transportation Authority

Title VI Program Update 2026

DRAFT

November 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 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

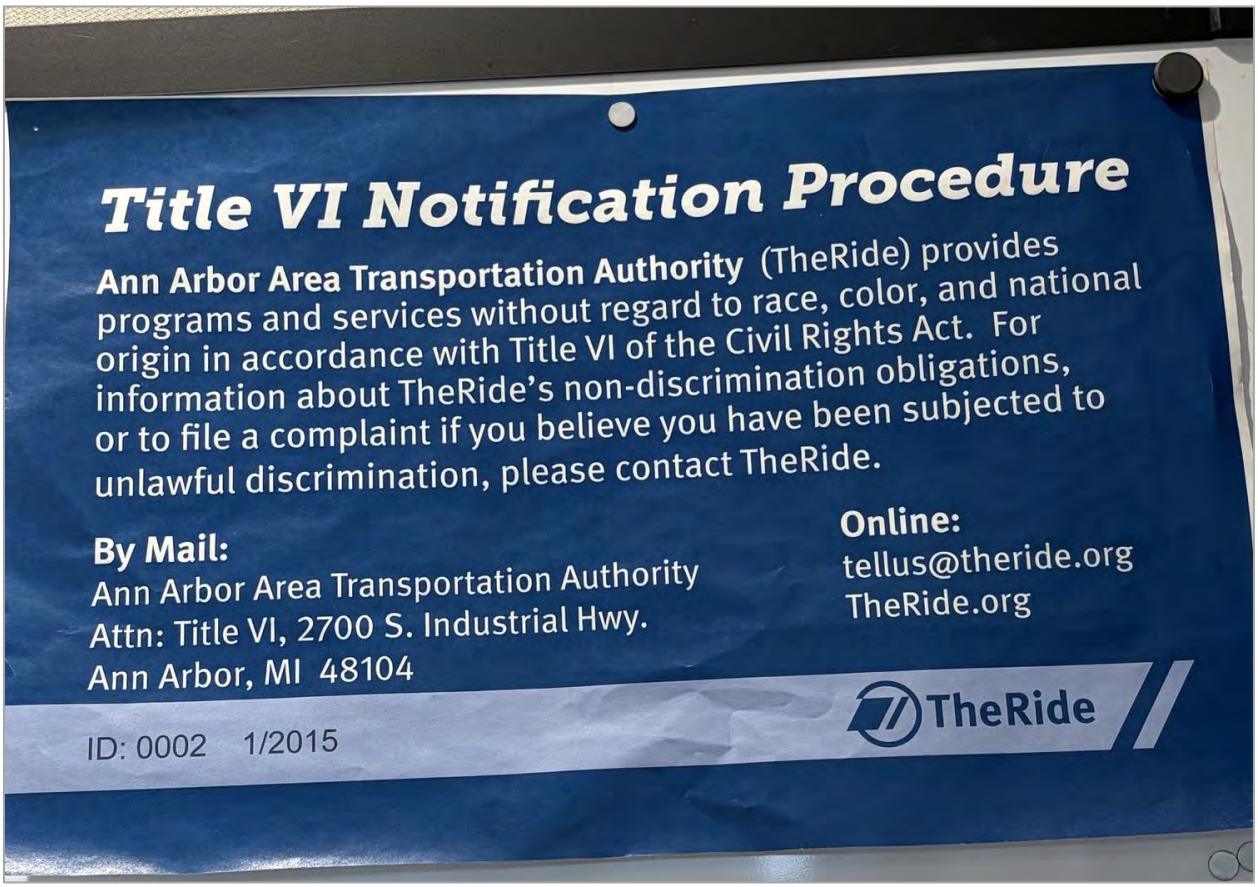
Title VI Notification Procedure

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 3: AAATA Title VI Complaint Form

Figure C-1

AAATA TITLE VI COMPLAINT FORM

Section I:				
Name:				
Address:				
Phone (home):		Phone (work):		
E-mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party:				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
Section III:				

I believe the discrimination I experienced was based on (check all that apply):

[ ] Race [ ] Color [ ] National Origin

Date of Alleged Discrimination (Month, Day, Year): _____

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please attach any additional details.

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 21 complaints alleging discrimination. Twenty were submitted as informal complaints, where the offered complaint form was not filed. Nineteen of these complaints were found to be invalid following investigation, and one was found to be undetermined due to lack of video available. The last complaint was formally filed with Michigan, but through review, the complaint had no merit and was dismissed. A list of 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:

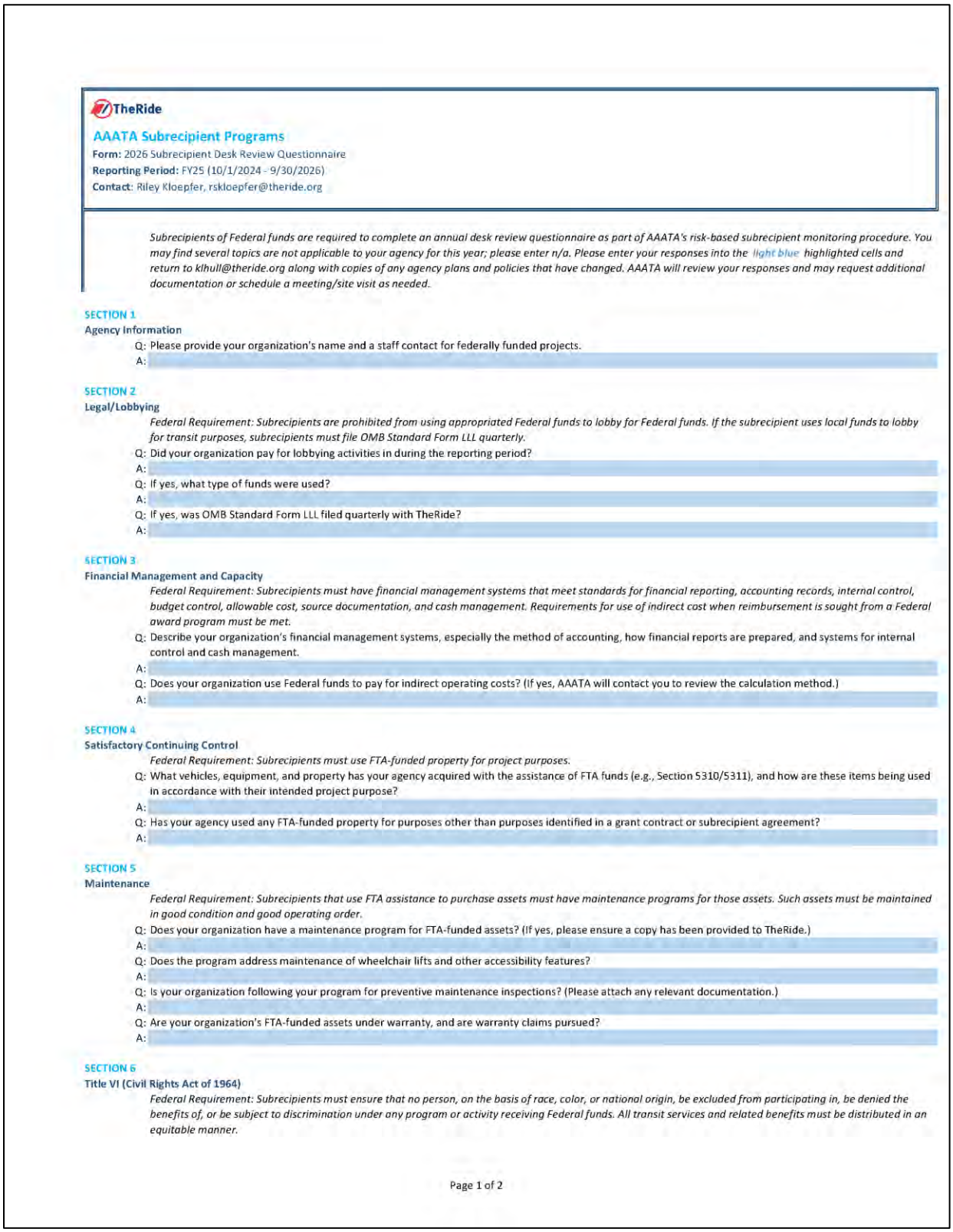
- Western Washtenaw Area Value Express
- People's Express
- Avalon Housing
- Jewish Family Services
- Programs to Educate All Cyclists
- Milan Seniors for Healthy Living (MSHL)

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. Tile 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



TheRide

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 klhull@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.

Page 1 of 2

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, 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

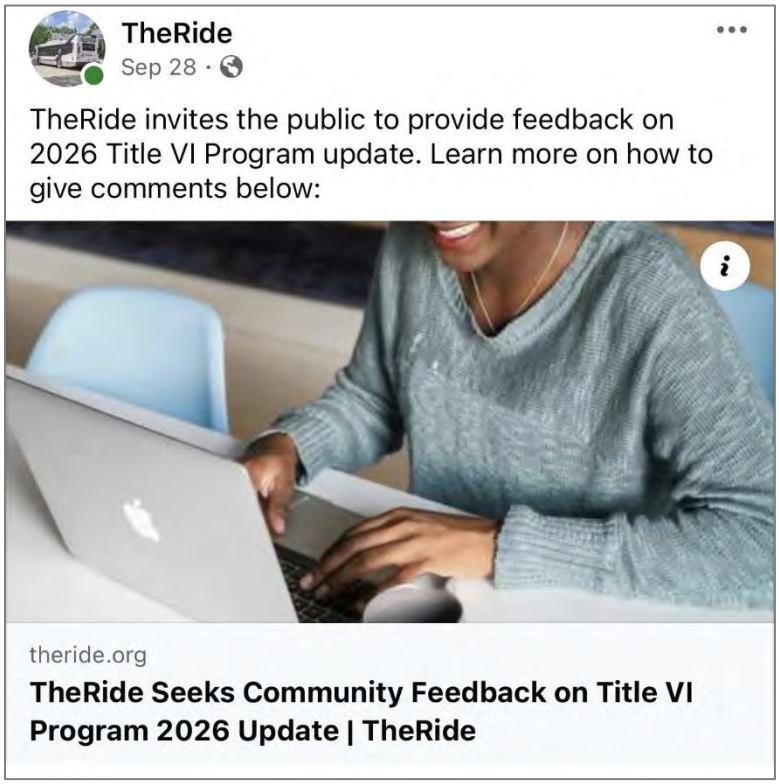
Public communication materials for the 2026 Title VI Program Update included:

- Bus card, placed on all buses (see Figure 7)
- Social media posts (see Figure 8)
- Press release (see Figure 9)
- Title VI webpage on the AAATA website (see Figure 10)
- FAQ sheet posted on the Title VI webpage (see Figure 11)

Figure 7: AAATA Title VI Program Update Bus Card



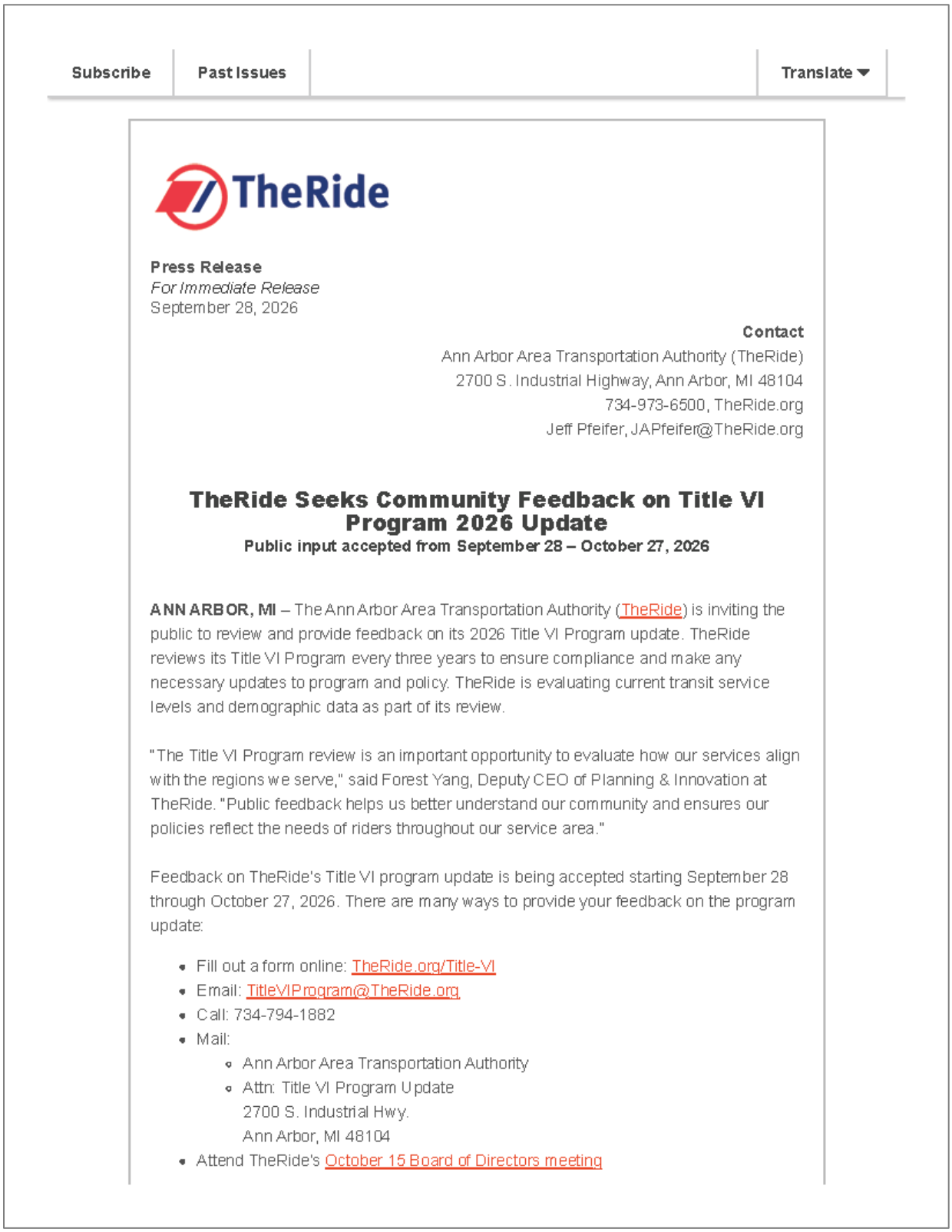
Figure 8: AAATA Title VI Program Update Social Media Posts




TheRide
Oct 12 ·
Have you reviewed TheRide's Title VI Program update? Share your feedback through October 27. Fill out the quick form online or find other ways to provide input at: TheRide.org/Title-VI.
Title VI Program Updates
Public input accepted from September 28 through October 27
Learn More at TheRide.org/Title-VI
TheRide


TheRide
3d ·
Every 3 years, TheRide reviews its Title VI Program and invites the public to share feedback on any updates. Public comments on the current Title VI Program update are being accepted through October 27. Fill out the quick form online or find other ways to provide input at: TheRide.org/Title-VI.
Title VI Program Updates
Public input accepted from September 28 through October 27
Learn More at TheRide.org/Title-VI
TheRide

Figure 9: AAATA Title VI Program Update Press Release



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Press Release
For Immediate Release
September 28, 2026

Contact
Ann Arbor Area Transportation Authority (TheRide)
2700 S. Industrial Highway, Ann Arbor, MI 48104
734-973-6500, TheRide.org
Jeff Pfeifer, JAPfeifer@TheRide.org

TheRide Seeks Community Feedback on Title VI Program 2026 Update

Public input accepted from September 28 – October 27, 2026

ANN ARBOR, MI – The Ann Arbor Area Transportation Authority (TheRide) is inviting the public to review and provide feedback on its 2026 Title VI Program update. TheRide reviews its Title VI Program every three years to ensure compliance and make any necessary updates to program and policy. TheRide is evaluating current transit service levels and demographic data as part of its review.

"The Title VI Program review is an important opportunity to evaluate how our services align with the regions we serve," said Forest Yang, Deputy CEO of Planning & Innovation at TheRide. "Public feedback helps us better understand our community and ensures our policies reflect the needs of riders throughout our service area."

Feedback on TheRide's Title VI program update is being accepted starting September 28 through October 27, 2026. There are many ways to provide your feedback on the program update:

- Fill out a form online: TheRide.org/Title-VI
- Email: TitleVIProgram@TheRide.org
- Call: 734-794-1882
- Mail:
  - Ann Arbor Area Transportation Authority
  - Attn: Title VI Program Update
    2700 S. Industrial Hwy.
    Ann Arbor, MI 48104
- Attend TheRide's October 15 Board of Directors meeting

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76 N. Huron Street
Ypsilanti, MI 48197

Community members are encouraged to visit TheRide.org/Title-VI to review the program update and learn more about the Title VI Policy.

The latest information on TheRide's routes, schedules, and detours is available at 734-996-0400 and on TheRide.org.



-##-

The Ann Arbor Area Transportation Authority (TheRide) was chartered in 1969 by the City of Ann Arbor, Michigan, as a not-for-profit unit of government. TheRide operates the local public transit system for the greater Ann Arbor-Ypsilanti area, enabling the area's residents to reach their destinations at reasonable cost, and offers the region efficient, environmentally sound transportation alternatives. For more information, please visit TheRide.org.

E-mail updates on bus routes, schedules, detours and other news from TheRide are available by free subscription to MyAlerts at TheRide.org.

Connect with TheRide on Facebook.com/CatchTheRide, Twitter.com/CatchTheRide, YouTube.com/CatchTheRide, and Instagram.com/CatchTheRide.

Copyright © 2026 Ann Arbor Area Transportation Authority/TheRide. All rights reserved.
This email is being sent to community leaders, businesses, and riders in the Washtenaw County and Metro Detroit areas.

Our mailing address is:
TheRide
2700 S. Industrial Hwy.
Ann Arbor, MI 48104

unsubscribe from this list update subscription preferences

Figure 10: AAATA Title VI Webpage



10/1/26, 9:03 AM Title VI | TheRide

Title VI

The Ann Arbor Area Transportation Authority (TheRide) is committed to ensuring that no person is excluded from participation in, or denied the benefits of its programs and services on the basis of race, color, and national origin in accordance with Title VI of the Civil Rights Act of 1964.

If you need translation assistance, please call 734-973-6500 or email TitleVIProgram@TheRide.org.
번역 지원이 필요한 경우 734-973-6500으로 전화를 주시거나 TitleVIProgram@TheRide.org로 이메일을 보내주십시오
如果您需要翻译方面的帮助，请致电 734-973-6500 或发送电子邮件至 TitleVIProgram@TheRide.org.
Si necesita ayuda con la traducción, llame al 734-973-6500 o escriba a TitleVIProgram@TheRide.org.
ذا كنت تحتاج إلى خدمات مساعدة فيما يتعلق بالترجمة، فيرجى الاتصال على رقم: 6500-973-734 أو إرسال بريد إلكتروني إلى العنوان التالي: TitleVIProgram@TheRide.org.

Title VI Program Updates 2026 - Public Engagement

September 28 – October 27

- View the Draft Program Report

DOWNLOAD THE FAQS

Public Comments

https://www.theride.org/title-vi 1/4

The public is invited to provide comments in a variety of ways:

- Fill out the webform below
- Send us an email
- Call 734-794-1882
- Mail a letter to:
  Ann Arbor Area Transportation Authority
  Attn: Title VI Program Update
  2700 S. Industrial Hwy.
  Ann Arbor, MI 48104
- Attend TheRide's October 15 Board of Directors meeting from 6:00 - 8:30 PM
  4th Floor, Riverside Arts Center
  76 N. Huron Street
  Ypsilanti, MI 48197

Public input accepted September 28 through October 27.

First Name*

Last Name*

Phone Number

Email*

Message*

SUBMIT

File a Complaint

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.

Mail hard copy complaint forms to:

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

Download complaint forms:

- Title VI Complaint Form - English
- Title VI Complaint Form - Spanish
- Title VI Complaint Form - Chinese
- Title VI Complaint Form - Korean
- Title VI Complaint Form - Arabic

Title VI Notification Procedure

Download the Title VI Notification Procedure:

- Title VI Notification Procedure - English
- Title VI Notification Procedure - Arabic
- Title VI Notification Procedure - Chinese
- Title VI Notification Procedure - Korean
- Title VI Notification Procedure - Spanish

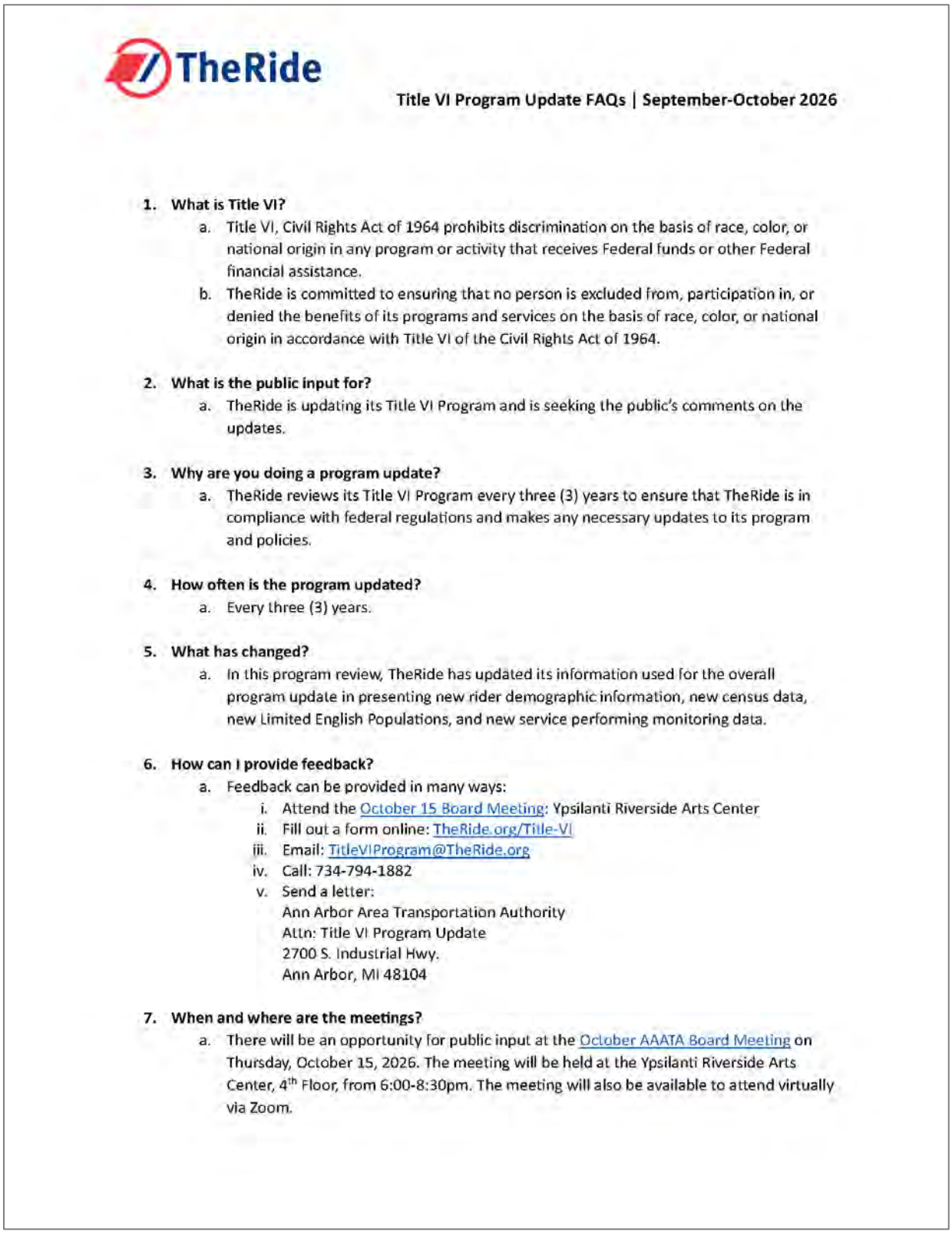
Title VI Complaint Procedure

Download the Title VI Complaint Procedure:

- Title VI Complaint Procedure - English
- Title VI Complaint Procedure - Arabic
- Title VI Complaint Procedure - Chinese
- Title VI Complaint Procedure - Korean
- Title VI Complaint Procedure - Spanish

AAATA 2023 TITLE VI PROGRAM UPDATE

Figure 11: AAATA Title VI Program Update FAQs



TheRide

Title VI Program Update FAQs | September-October 2026

1. **What is Title VI?**
   a. Title VI, Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in any program or activity that receives Federal funds or other Federal financial assistance.
   b. TheRide is committed to ensuring that no person is excluded from, participation in, or denied the benefits of its programs and services on the basis of race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964.

2. **What is the public input for?**
   a. TheRide is updating its Title VI Program and is seeking the public's comments on the updates.

3. **Why are you doing a program update?**
   a. TheRide reviews its Title VI Program every three (3) years to ensure that TheRide is in compliance with federal regulations and makes any necessary updates to its program and policies.

4. **How often is the program updated?**
   a. Every three (3) years.

5. **What has changed?**
   a. In this program review, TheRide has updated its information used for the overall program update in presenting new rider demographic information, new census data, new Limited English Populations, and new service performing monitoring data.

6. **How can I provide feedback?**
   a. Feedback can be provided in many ways:
      i. Attend the October 15 Board Meeting: Ypsilanti Riverside Arts Center
      ii. Fill out a form online: TheRide.org/Title-VI
      iii. Email: TitleVIProgram@TheRide.org
      iv. Call: 734-794-1882
      v. Send a letter:
      Ann Arbor Area Transportation Authority
      Attn: Title VI Program Update
      2700 S. Industrial Hwy.
      Ann Arbor, MI 48104

7. **When and where are the meetings?**
   a. There will be an opportunity for public input at the October AAATA Board Meeting on Thursday, October 15, 2026. The meeting will be held at the Ypsilanti Riverside Arts Center, 4th Floor, from 6:00-8:30pm. The meeting will also be available to attend virtually via Zoom.

8. **How long is public engagement?**
    a. Public engagement runs from September 28 – October 27.

9. **Where can I learn more?**
    a. More information is available at TheRide.org/Title-VI or by calling 734-794-1882.

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

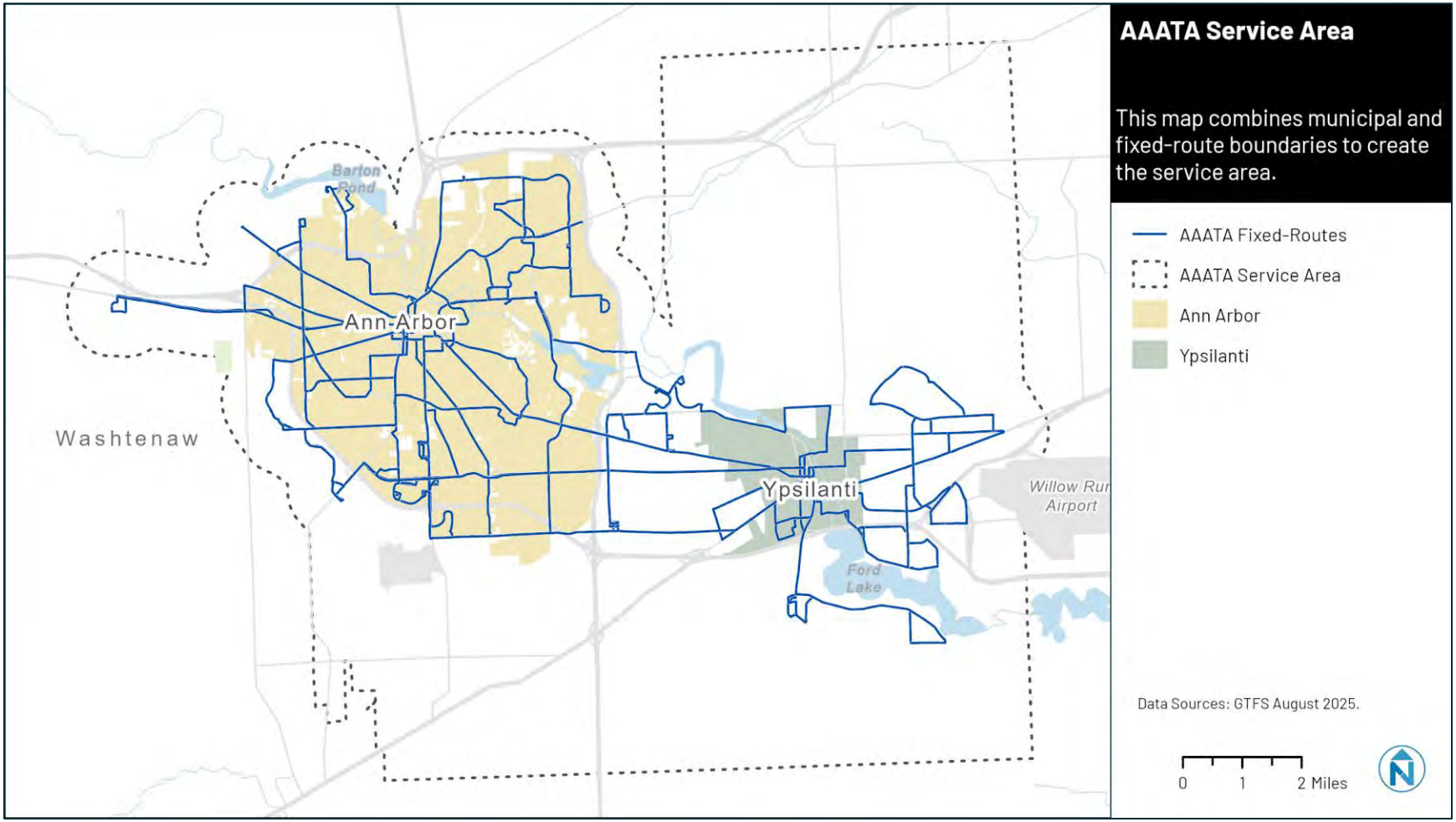
3. An assessment of the importance of the AAATA to LEP persons
4. The resources available to assist the LEP population

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 12: 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 13, 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 13: 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 14 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 15 through Figure 17. 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 14: LEP Population Rate by Census Tract

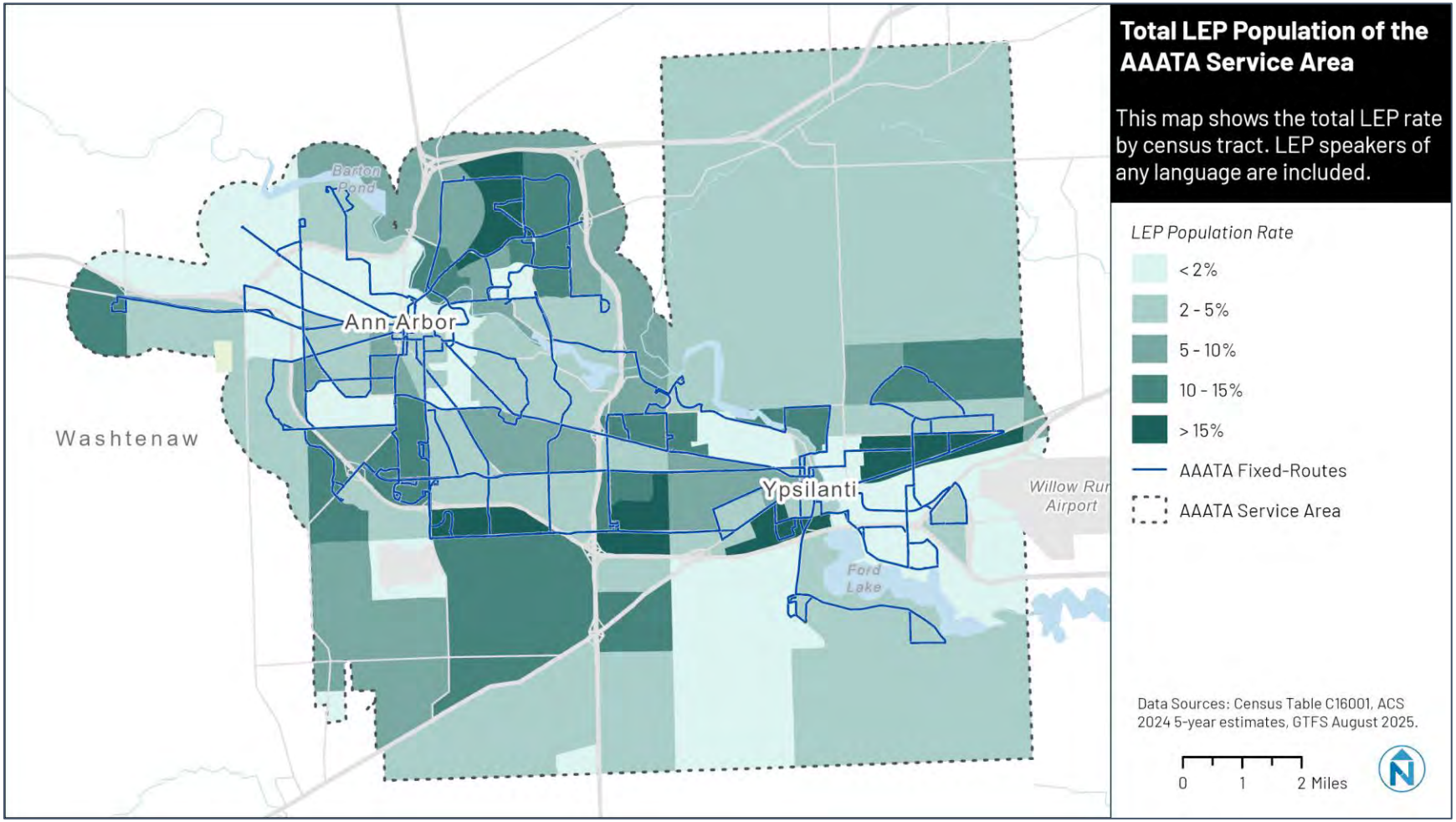


Figure 15: Spanish LEP Population Rate by Census Tract

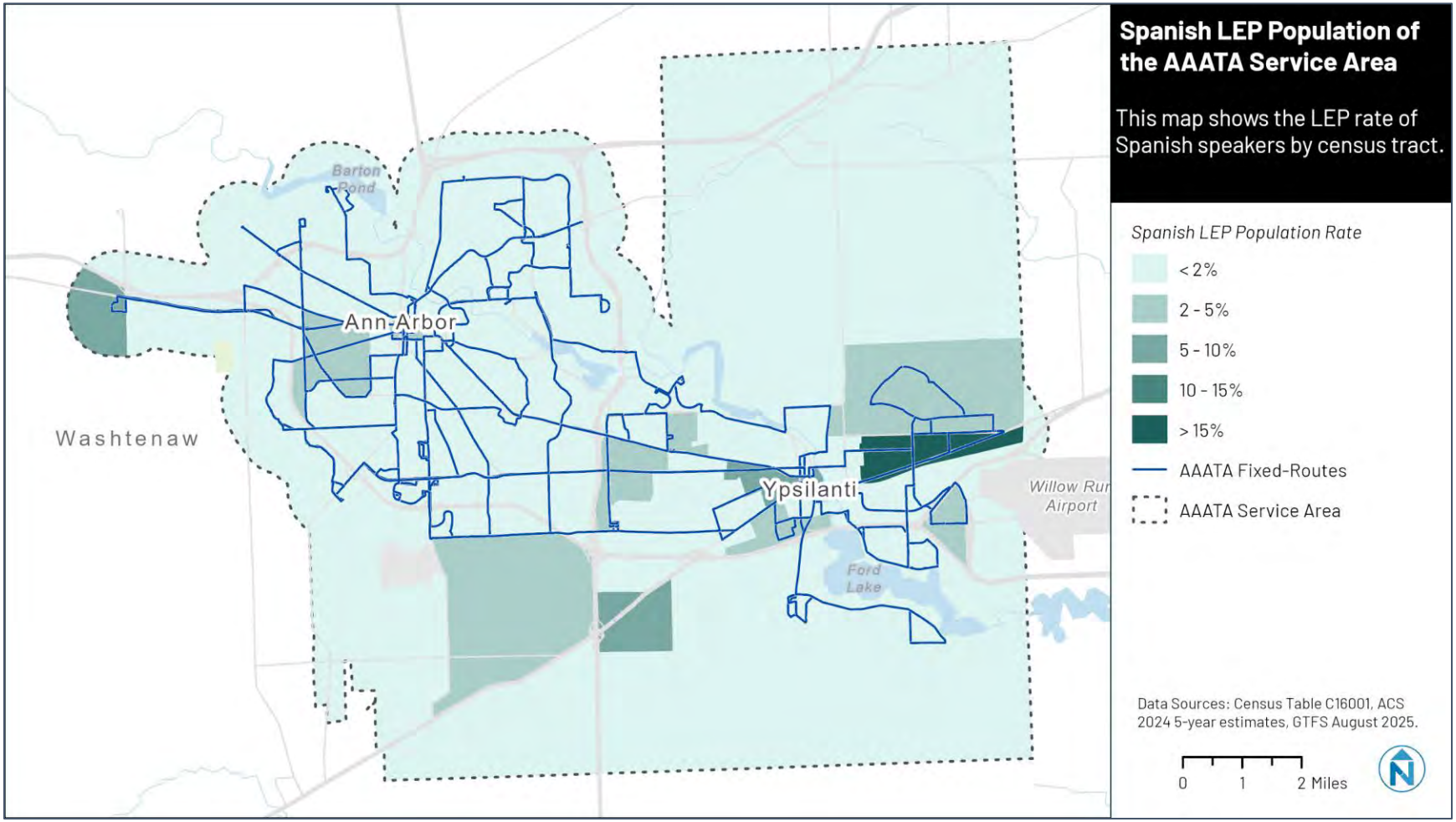


Figure 16: Chinese LEP Population Rate by Census Tract

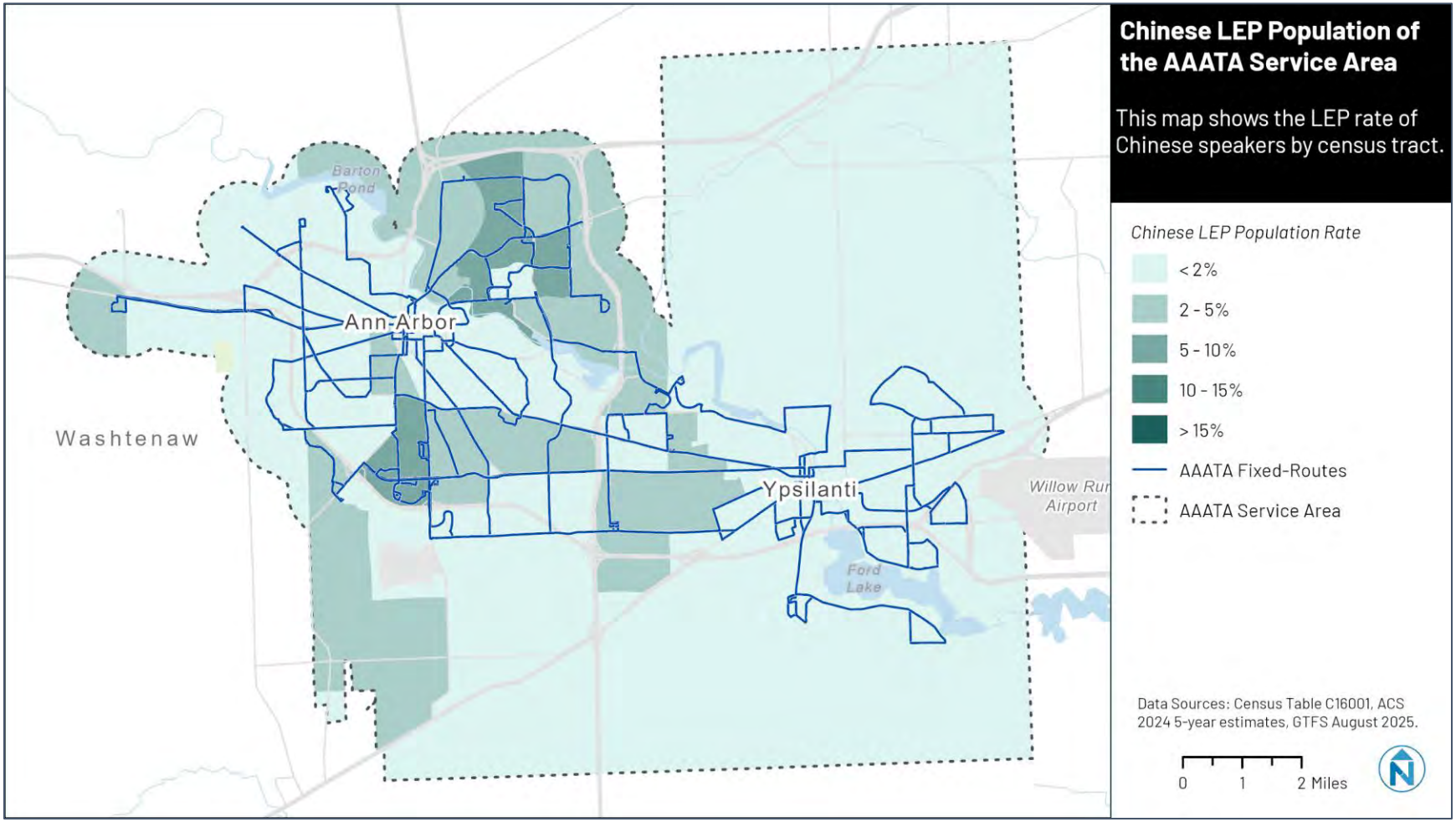
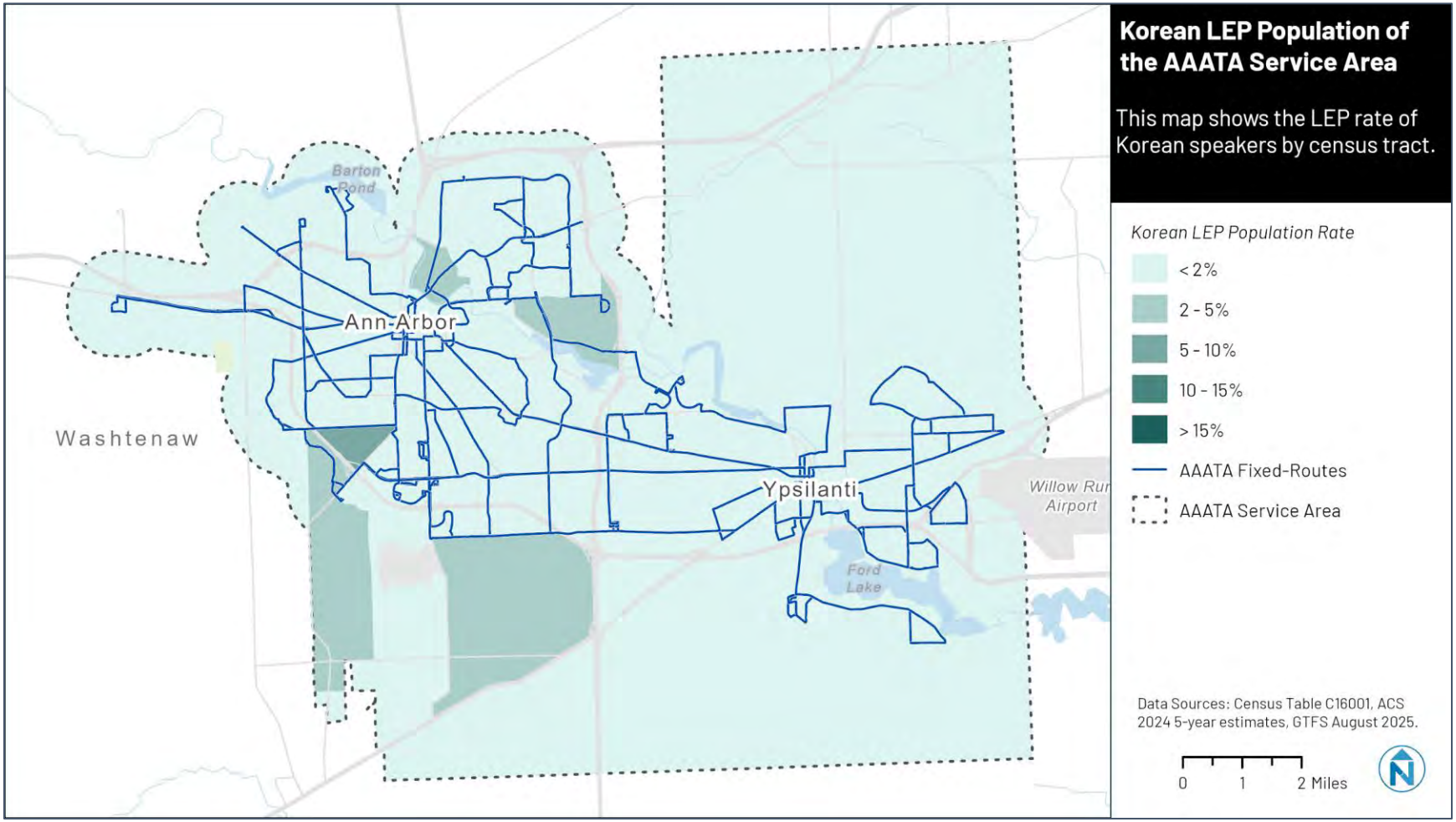


Figure 17: Korean LEP Population by Census Tract



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 18, 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 18: 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 19. This includes both the "Contact Us" webpage and the "Title VI" webpage. A log of the telephone calls by language is included in Figure 20.

[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 19: Agency website conveying translation assistance services



Figure 20: 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.jfsannarbor.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 21 and Figure 22 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 21: Block groups with minority populations above the AAATA service area average

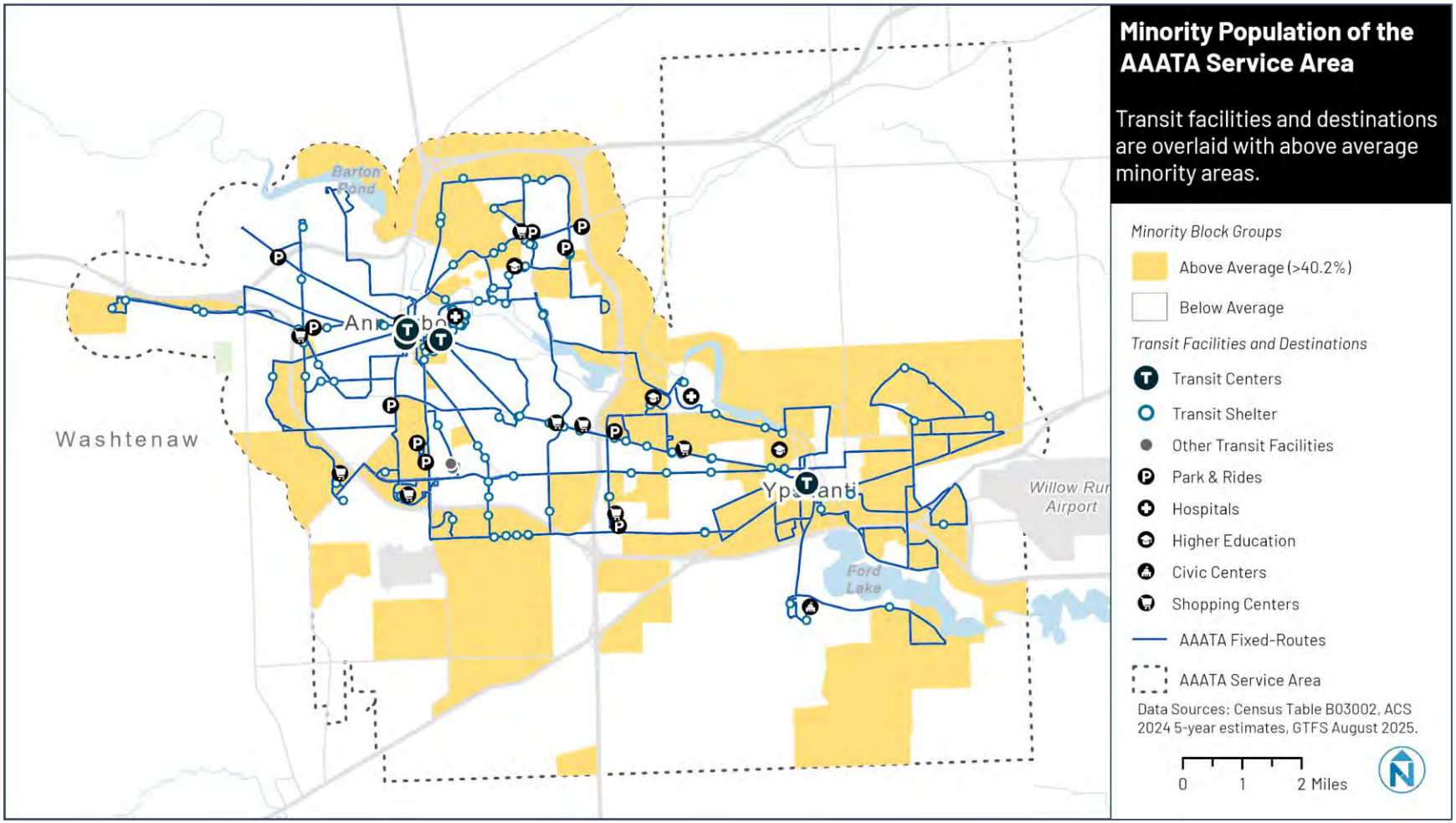
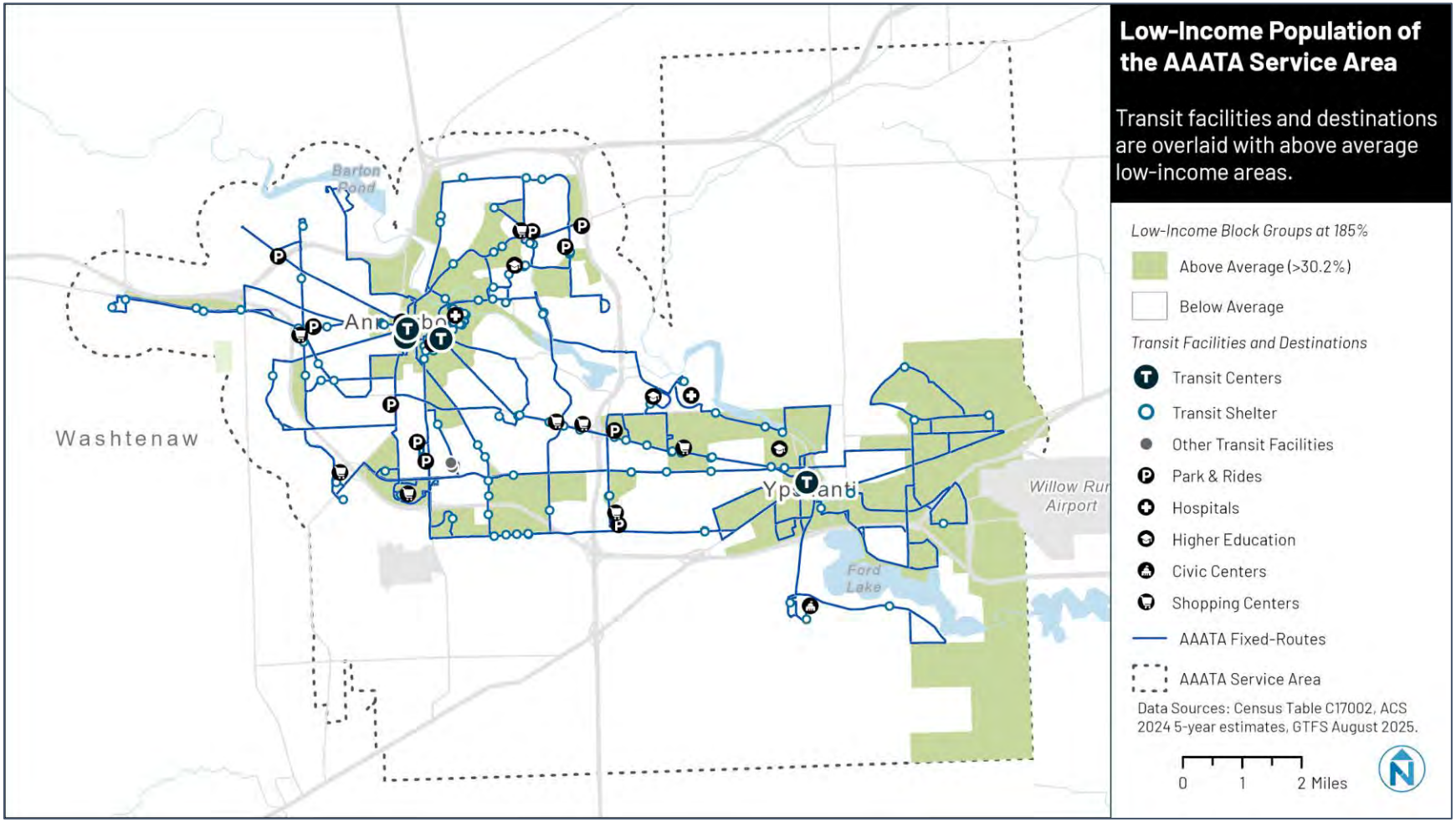


Figure 22: Block groups with low-income populations above the AAATA service area average



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 23**, 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.

Figure 23: AAATA Passenger Survey, October 2024

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?
1 ☐ Home 2 ☐ Work 3 ☐ Shopping 4 ☐ School / college
5 ☐ Social visit or recreation 6 ☐ Doctor / medical 7 ☐ Church
8 ☐ Other_____

2. Will you transfer to another TheRide bus during this trip? 1 ☐ Yes 2 ☐ No

3. What are the cross streets at the place you are coming from now?
Street: _____
Cross street: _____

4. What city/Twp? *(Circle one)*: 1 ☐ Ann Arbor City 2 ☐ Ypsilanti City 3 ☐ Pittsfield Twp
4 ☐ Scio Twp 5 ☐ Superior Twp 6 ☐ Ypsilanti Twp 7 ☐ Other: _____

5. How did you get to the first bus stop you used on this trip?
1 ☐ Walked 2 ☐ Wheelchair/scooter 3 ☐ Bike 4 ☐ Drove 5 ☐ 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?
1 ☐ Home 2 ☐ Work 3 ☐ Shopping 4 ☐ School / college
5 ☐ Social visit or recreation 6 ☐ Doctor / medical 7 ☐ Church
8 ☐ Other_____

8. What are the cross streets at your final destination?
Street: _____
Cross street: _____

9. What city/Twp? *(Circle one)*: 1 ☐ Ann Arbor City 2 ☐ Ypsilanti City 3 ☐ Pittsfield Twp
4 ☐ Scio Twp 5 ☐ Superior Twp 6 ☐ Ypsilanti Twp 7 ☐ 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?
1 ☐ Cash 2 ☐ EZFare 3 ☐ MCard 4 ☐ Transfer 5 ☐ 30-Day pass
6 ☐ go!pass 7 ☐ Token 8 ☐ EMU Pass 9 ☐ Other _____

13. Do you have one of the following:
1 ☐ An ADA *(green)* card 2 ☐ GoldRide card *(senior card)* 3 ☐ Fare Deal card *(for disability)*
4 ☐ Fare Deal card *(for low income)* 5 ☐ 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

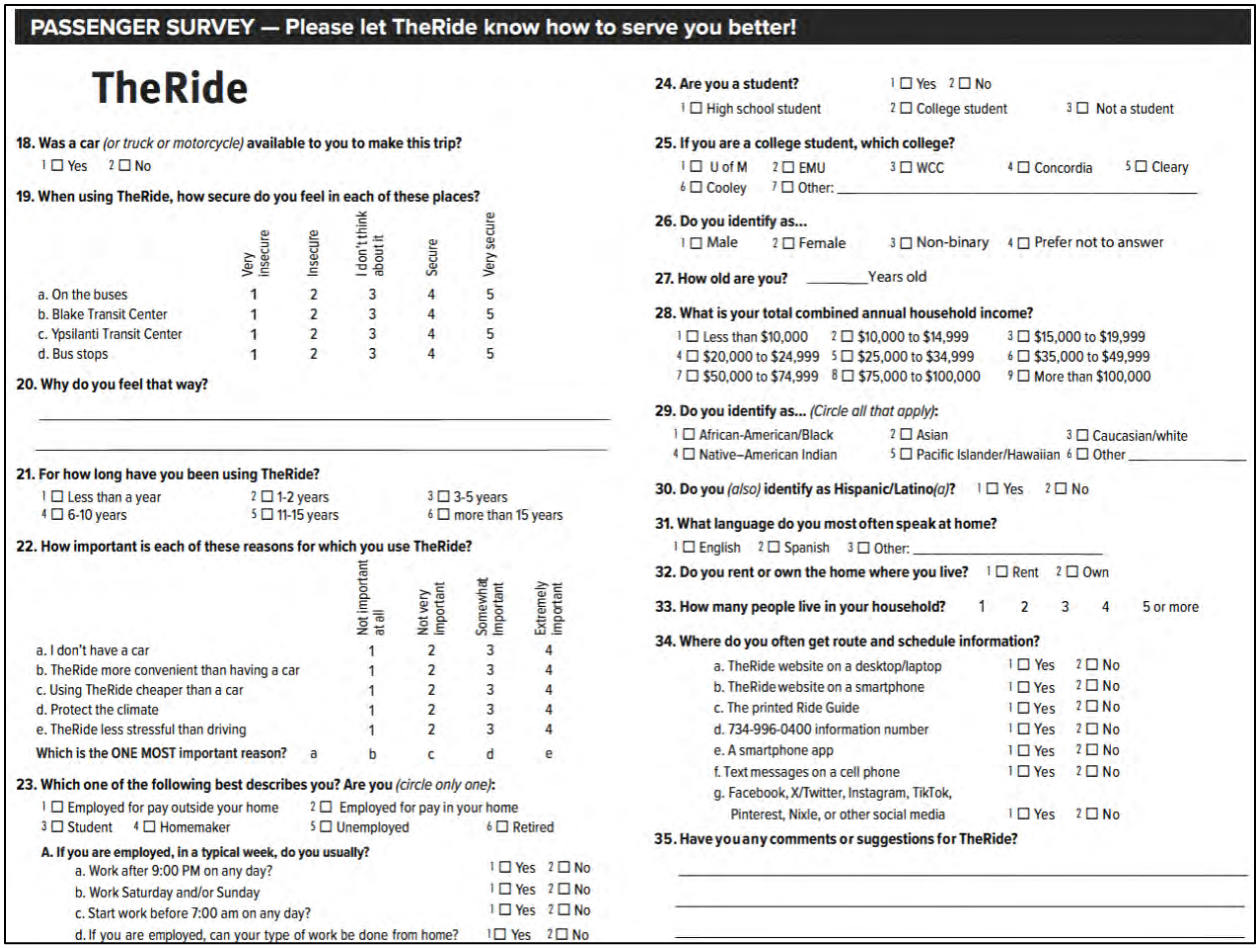
15. Including today, on which of the past seven days have you ridden on TheRide?
(All that apply)
1 ☐ Mon 2 ☐ Tue 3 ☐ Wed 4 ☐ Thurs 5 ☐ Fri 6 ☐ Sat 7 ☐ Sun 8 ☐ All 7 days

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 quesions 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?**
1 ☐ Yes 2 ☐ 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?
1 ☐ Less than a year 2 ☐ 1-2 years 3 ☐ 3-5 years
4 ☐ 6-10 years 5 ☐ 11-15 years 6 ☐ 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)*:
1 ☐ Employed for pay outside your home 2 ☐ Employed for pay in your home
3 ☐ Student 4 ☐ Homemaker 5 ☐ Unemployed 6 ☐ Retired

A. If you are employed, in a typical week, do you usually?
a. Work after 9:00 PM on any day? 1 ☐ Yes 2 ☐ No
b. Work Saturday and/or Sunday 1 ☐ Yes 2 ☐ No
c. Start work before 7:00 am on any day? 1 ☐ Yes 2 ☐ No
d. If you are employed, can your type of work be done from home? 1 ☐ Yes 2 ☐ No

24. Are you a student? 1 ☐ Yes 2 ☐ No
1 ☐ High school student 2 ☐ College student 3 ☐ Not a student

25. If you are a college student, which college?
1 ☐ U of M 2 ☐ EMU 3 ☐ WCC 4 ☐ Concordia 5 ☐ Cleary
6 ☐ Cooley 7 ☐ Other: _____

26. Do you identify as...
1 ☐ Male 2 ☐ Female 3 ☐ Non-binary 4 ☐ Prefer not to answer

27. How old are you? _____Years old

28. What is your total combined annual household income?
1 ☐ Less than $10,000 2 ☐ $10,000 to $14,999 3 ☐ $15,000 to $19,999
4 ☐ $20,000 to $24,999 5 ☐ $25,000 to $34,999 6 ☐ $35,000 to $49,999
7 ☐ $50,000 to $74,999 8 ☐ $75,000 to $100,000 9 ☐ More than $100,000

29. Do you identify as... *(Circle all that apply)*:
1 ☐ African-American/Black 2 ☐ Asian 3 ☐ Caucasian/white
4 ☐ Native–American Indian 5 ☐ Pacific Islander/Hawaiian 6 ☐ Other _____

30. Do you *(also)* **identify as Hispanic/Latino***(a)*? 1 ☐ Yes 2 ☐ No

31. What language do you most often speak at home?
1 ☐ English 2 ☐ Spanish 3 ☐ Other: _____

32. Do you rent or own the home where you live? 1 ☐ Rent 2 ☐ 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 1 ☐ Yes 2 ☐ No
b. TheRide website on a smartphone 1 ☐ Yes 2 ☐ No
c. The printed Ride Guide 1 ☐ Yes 2 ☐ No
d. 734-996-0400 information number 1 ☐ Yes 2 ☐ No
e. A smartphone app 1 ☐ Yes 2 ☐ No
f. Text messages on a cell phone 1 ☐ Yes 2 ☐ No
g. Facebook, X/Twitter, Instagram, TikTok, Pinterest, Nixle, or other social media 1 ☐ Yes 2 ☐ 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 24 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 24: 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 25 through Figure 27. 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 27), 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 25: Minority and Non-Minority Fare Usage Comparison

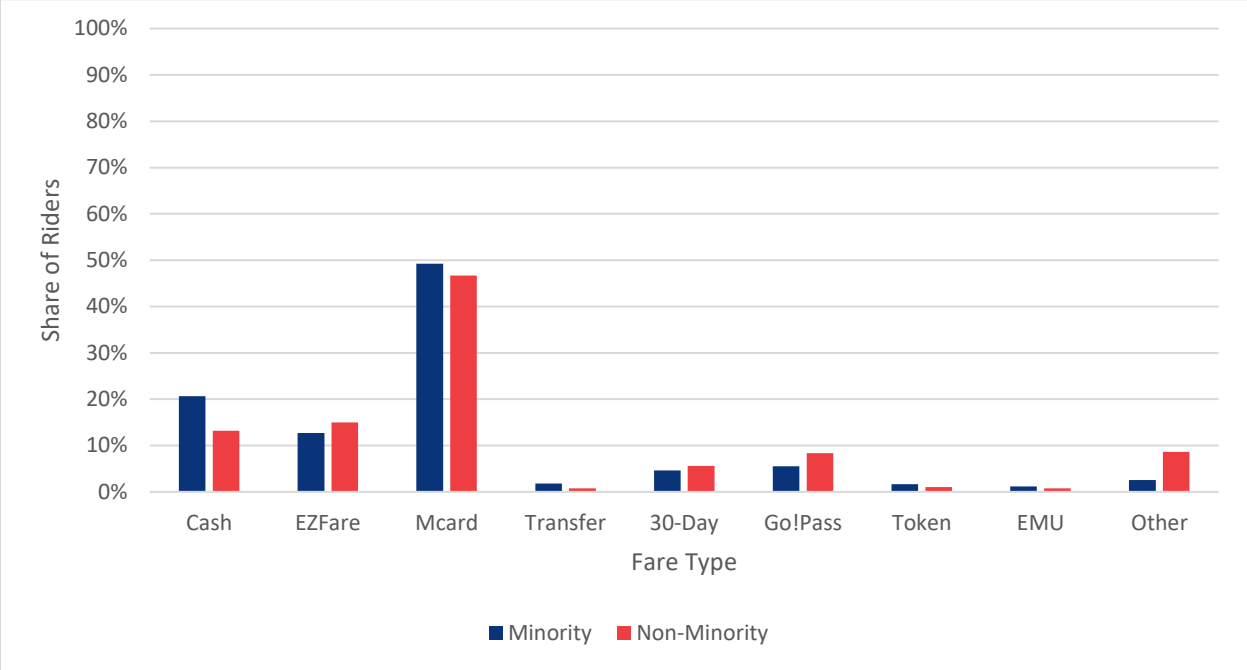


Figure 26: Minority and Non-Minority Information Source Comparison

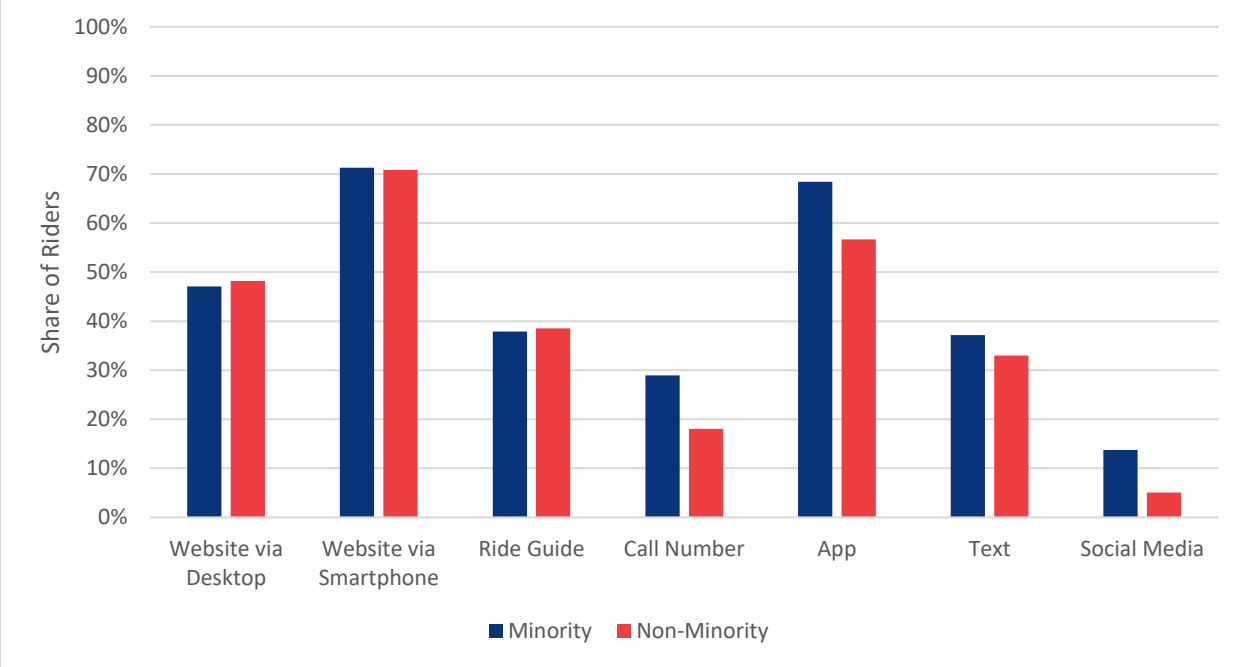
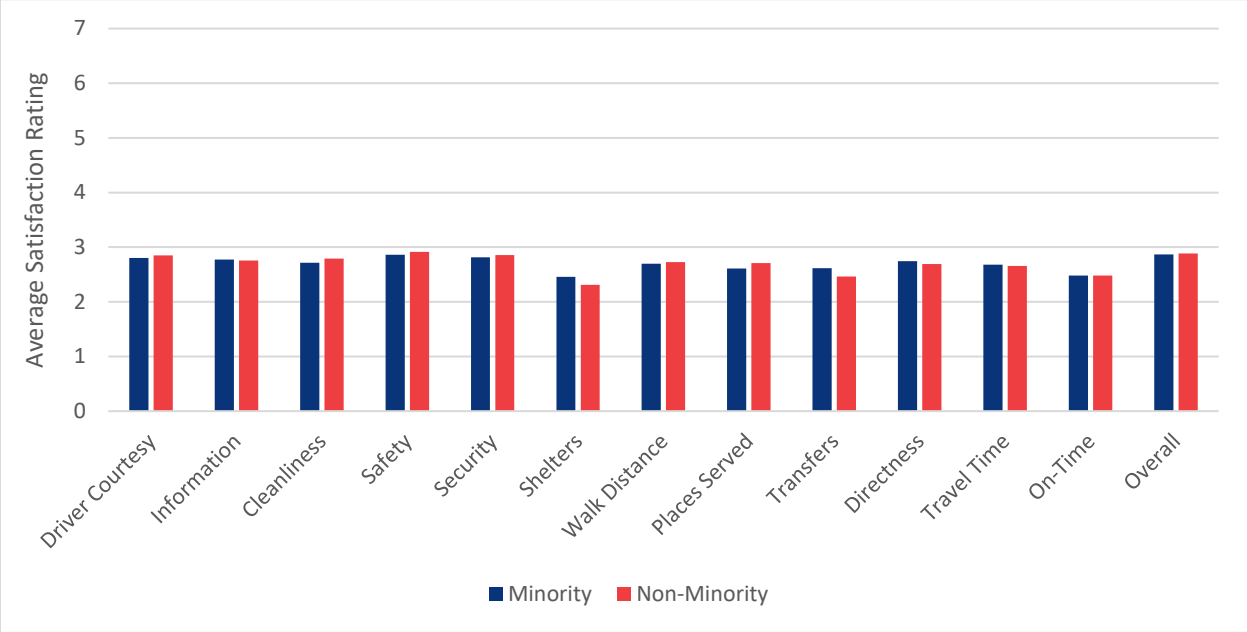


Figure 27: Minority and Non-Minority Rider Satisfaction Comparison



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 28 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 28: 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 29 through Figure 31. 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. forms a. 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 30, 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 29: Low-Income and Non-Low-Income Fare Usage Comparison

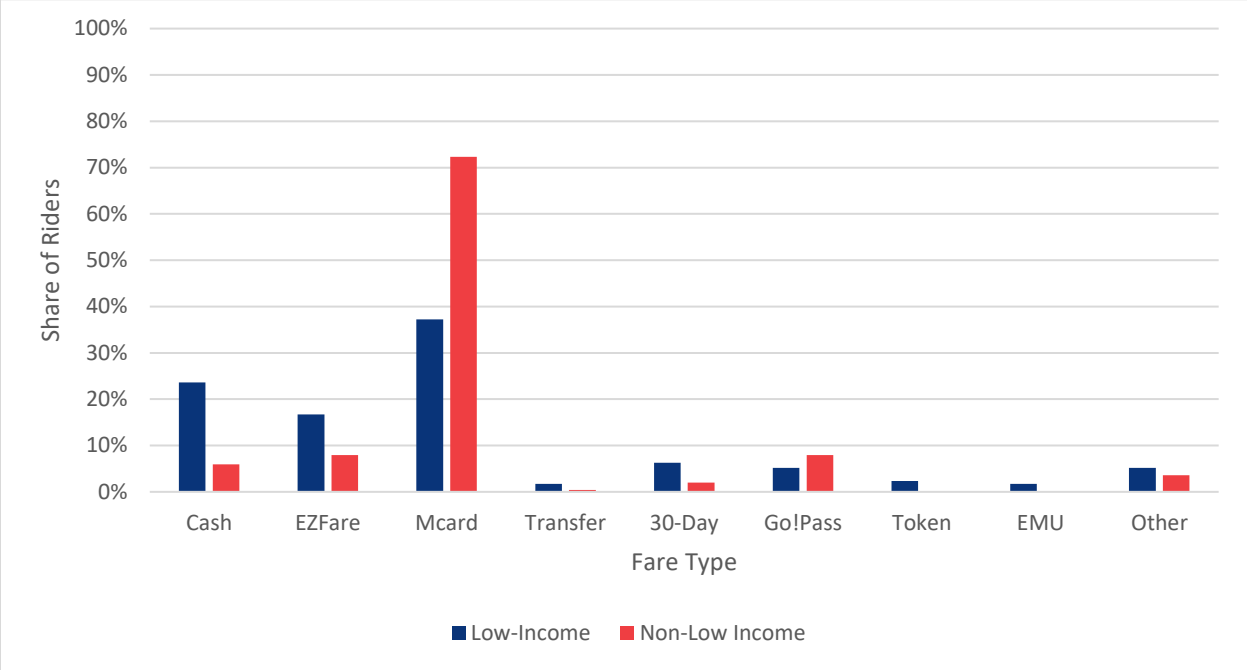


Figure 30: Low-Income and Non-Low-Income Information Source Comparison

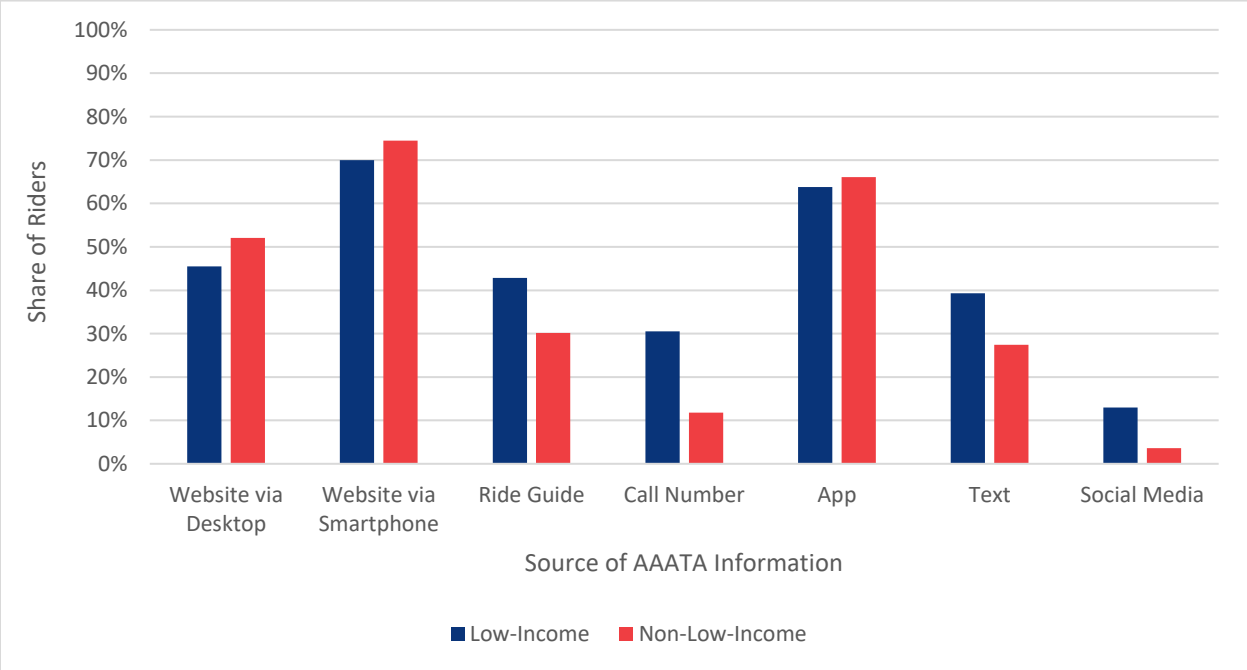
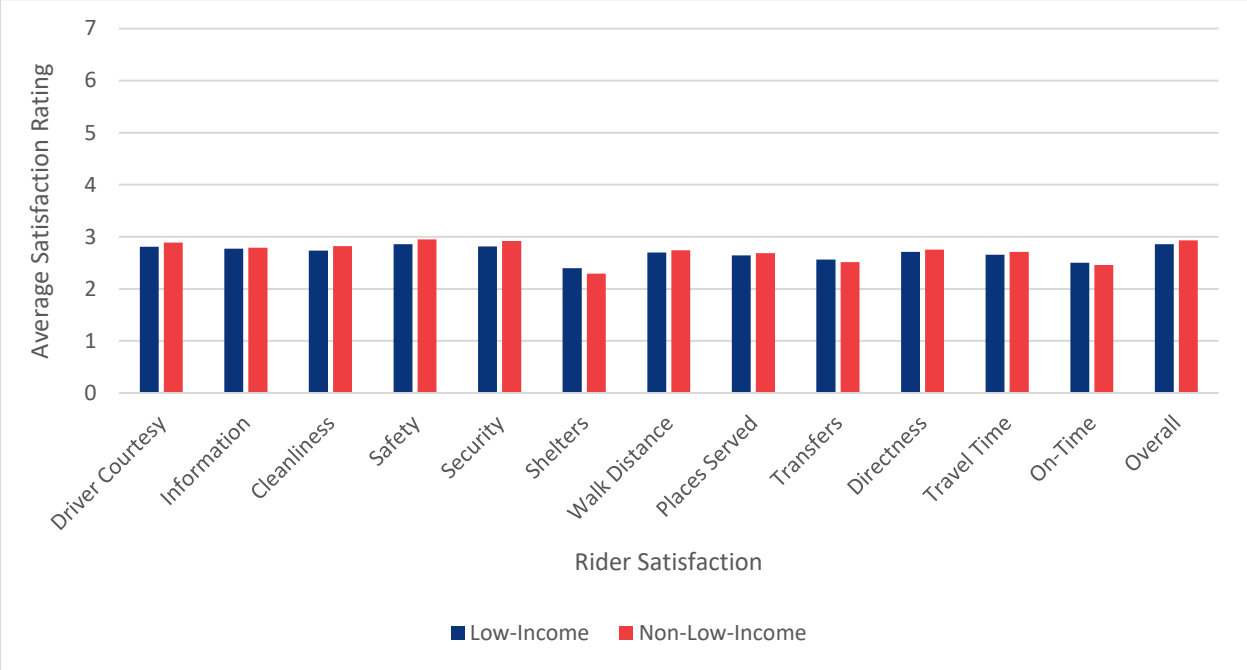


Figure 31: Low-Income and Non-Low-Income Rider Satisfaction Comparison



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 32. 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 32: 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

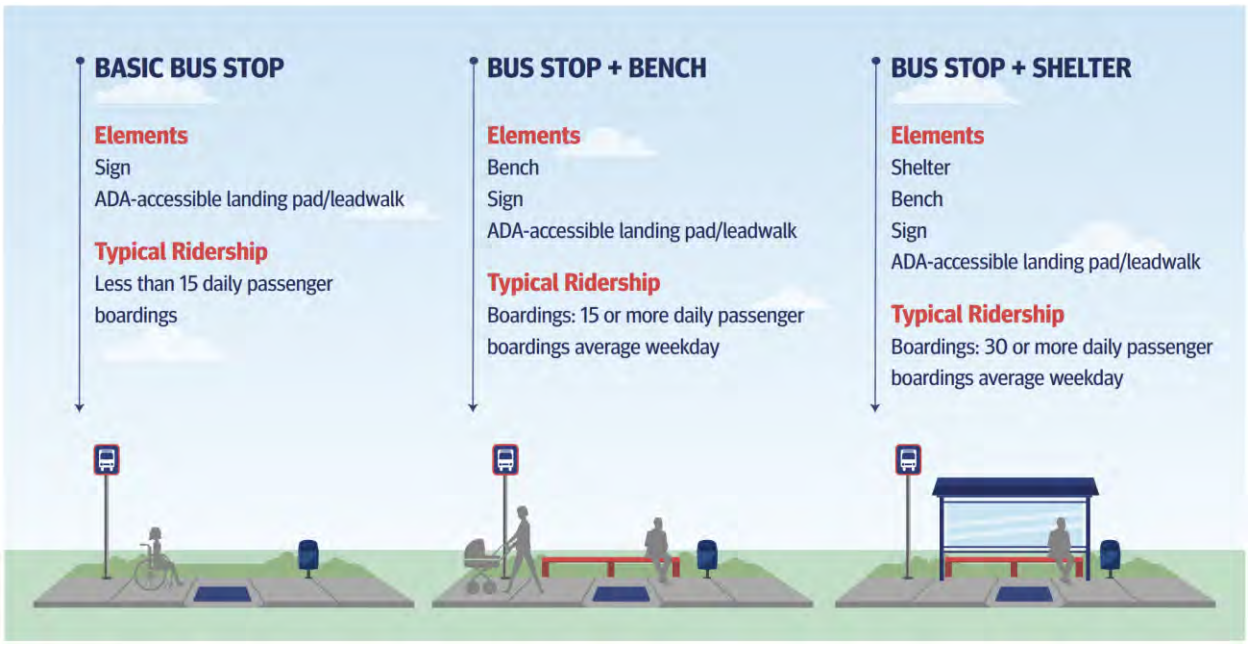
Bus stop amenities are the features and facilities provided at bus stops to improve the comfort, convenience, and safety of passengers. These amenities are designed to enhance the overall rider experience, making it easier for people to wait for and use public transportation. The right combination of 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 33and Figure 34, and documented in AAATA's 2025 Design Guidelines and Service Standards.

Figure 33: 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 34: 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 35. 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 35: 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 36. 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 37, 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 36: 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 37: 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 32, 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 38: 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 39. Percentages that did not meet or exceed the service standard of 85% are bolded. from A comparison of the on-time performance of minority and non-minority routes are detailed in Figure 40. 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 39: 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 40: 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 41. 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 41: 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 42: 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 43: 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 44. A complete list of service changes and any accompanying analyses are included in Appendix F.

Figure 44: 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

Letter of Approval from CEO

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

Board Meeting Minutes Recording Approval

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

Public Comments Received in Response to the 2026 Title VI Program Update

On September 28, 2026, AAATA announced via its website, press release, bus cards, and social media that it would be seeking public input on its proposed Title VI program changes, and detailed the ways in which interested persons could provide public input. The draft Title VI Program Update report and appendices were made available on AAATA's website at this time. The public comment period was open from September 28 through October 27, 2026. AAATA presented its proposed Title VI program update to the AAATA Board of Directors and members of the public on October 15, 2026, at the regularly scheduled Board Meeting. Public input was received at this meeting.

All public input received through the board meeting, website contact form, mail, email, and phone were logged, summarized, and considered by AAATA and its Board of Directors prior to approval of the final Title VI program update. The log of public comments received is presented in Figure 45.

Figure 45: Public Comment Log for Title VI Program Update

Name	Date	Contact Forum	Comments and Questions
Susan Hartman	10/14/2026	Online Form	Thank you for preparing and sharing this document, and for working to assure fair and good quality service for all riders.
Diane Scarpace	10/14/2026	Online Form	Wonderful. I wish more businesses and organizations were this transparent and accommodating. Thanks for providing great service and for all the work behind the scenes.

Name	Date	Contact Forum	Comments and Questions
Jim Mogensen	10/15/2026	October Board Meeting	Mr. Jim Mogensen shared his thoughts on the relevance of Title VI guidance and will be providing further input. He also shared he is part of distributing bus tokens to unhoused within the community and looks forward to receiving information about fare pricing / free fares when the fare study has concluded.
Jim Mogensen	10/27/2026	Email	One feature of the way AAATA is funded can impact how routes and schedules are decided: Community Purchase of Service Agreements (P.O.S.A.'s) and the University of Michigan agreements. The current agreements are between public entities and the AAATA and should be included in the Final version of the Title VI Program 2026 update as appendices. Examples of why this is important for the public to understand include MacArthur Blvd service in Superior Township; service to Trinity Health; and the eventual proposed transit hub on Carpenter and Ellsworth that is in Pittsfield Township. The University of Michigan agreement will help explain the impacts of Mcard use demand on particular route decisions. The University of Michigan agreement can be made public without disclosing personal rider data. The metric used for potential disparate impact was provided by a consultant who used the technique used nationally so that transit systems can always be in compliance even when transit authorities make ridership versus coverage decisions that have disparate impact ramifications. This needs to be considered given the discussion on Ends reporting at the October 15, 2026 Board meeting. Title VI complaints were never really supposed to be about direct rider complaints about staff/rider interaction. When I was developing a case regarding disparate service between Ann Arbor and Ypsilanti I was planning to direct the complaint to the FTA Civil Right Office in Washington DC. As it turned out I never had to because of the structural funding changes that provided more equitable service. I appreciate all the data and analysis provided in the current versions of the Title VI Program Update.

Appendix B: Notice to the Public

Figure 46: 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

Figure 47: 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

Figure 48: 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

Figure 49: 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

Figure 50: 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 وفقًا 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:

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

التواصل عبر الإنترنت
TellUs@TheRide.org

Appendix C: Title VI Complaint Procedure

Figure 51: 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.

Figure 52: 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.

Figure 53: 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。

Figure 54: 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 것이면, 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.

Figure 55: AAATA Title VI Complaint Procedure – Arabic

إجراءات تقديم الشكاوى بموجب الباب السادس

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

إذا كان الادعاء يتعلق بحادثة محددة تورط فيها أحد السائقين أو أحد موظفي خدمة العملاء، فسيُجري فريق إدارة النقل في هيئة النقل في منطقة آن أربور (AAATA) تحقيقًا أوليًا في الوقائع. وتجدر الإشارة إلى أن جميع حافلات ومرافق هيئة النقل في منطقة آن 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 الشكوى إلى الرئيس التنفيذي أو نائب الرئيس التنفيذي أو من يفوضانه.

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

يقوم الرئيس التنفيذي أو نائب الرئيس التنفيذي أو من يفوضانه بمراجعة جميع شكاوى التمييز المزعوم القائمة على العِرق 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 آن أربور (AAATA) وفقًا 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 يفوضانه النتائج كتابيًا إلى مقدم الشكوى عن طريق البريد خلال 30 يومًا من تاريخ تقديم الشكوى، موضحًا ما إذا ثبتت صحة ادعاء التمييز على أساس العِرق أو اللون أو الأصل القومي، والإجراءات التصحيحية التي اتخذتها هيئة النقل في منطقة آن أربور (AAATA) أو التي تعتزم اتخاذها. كما توضح الرسالة حق مقدم الشكوى 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 شكوى 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

Figure 56: AAATA Title VI Complaint Form – English

Figure C-1

AAATA TITLE VI COMPLAINT FORM

Section I:				
Name:				
Address:				
Phone (home):		Phone (work):		
E-mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party:				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
Section III:				

I believe the discrimination I experienced was based on (check all that apply):

[ ] Race [ ] Color [ ] National Origin

Date of Alleged Discrimination (Month, Day, Year): _____

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please attach any additional details.

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

Figure 57: 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

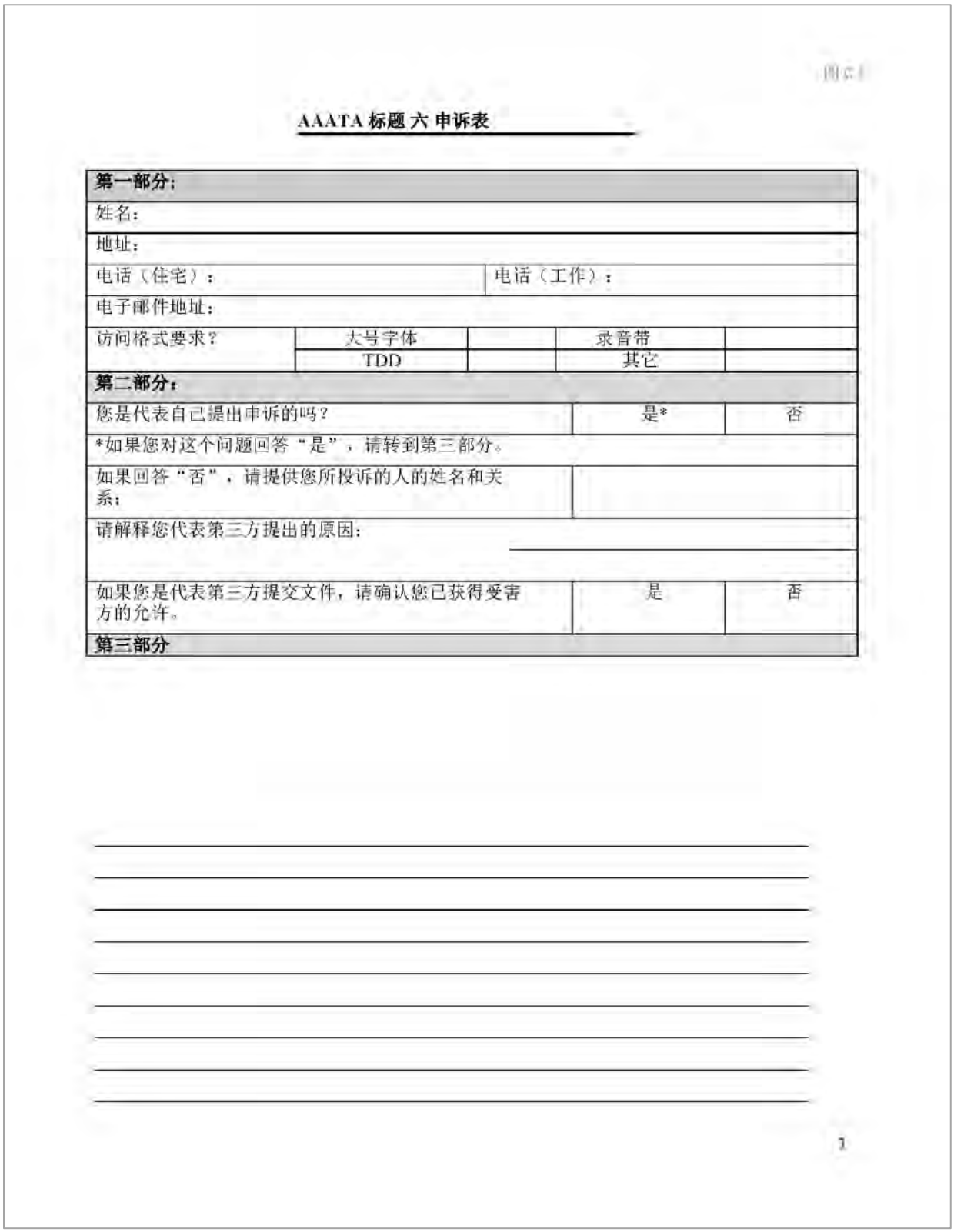
_____ _____

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

Figure 58: AAATA Title VI Complaint Form – Chinese



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				

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。

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

_____ _____

签名 日期

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

3

Figure 59: 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		오디오 테이프	
	TDD		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 일어 났는지, 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.				

1

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 작성해주십시오.

_____ _____

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

Figure 60: AAATA Title VI Complaint Form – Arabic

الشكل (C-1)

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

القسم الأول (I):				
الاسم:				
العنوان:				
رقم الهاتف (المنزل):		رقم الهاتف (العمل):		
عنوان البريد الإلكتروني:				
متطلبات بإتاحة شكل ميسر للاطلاع؟	الطباعة بخط كبير		شريط صوتي	
	جهاز اتصال لأصحاب الإعاقة السمعية		أخرى	
القسم الثاني (II):				
هل تقدم هذه الشكوى نيابة عن نفسك؟		نعم*		لا
*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.		نعم		لا
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): _____				
اشرح 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.				

1

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 21 complaints alleging discrimination. Twenty were submitted as informal complaints, where the offered complaint form was not filed. Nineteen of these complaints were found to be invalid following investigation, and one was found to be undetermined due to lack of video available. The last complaint was formally filed with Michigan, but through review, the complaint had no merit and was dismissed. A list of the complaints is provided below.

Figure 61: 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's facial 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 observation of 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
October 2025	Yes	Formal	Complainant was denied A-Ride services based on the inability to show through the application process that there were severe limitations that would prevent them from using fixed-route services.	Through the appeals process it was determined there was no merit to the complaint of discrimination, therefore this complaint was dismissed.
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 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

Figure 62: 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
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

Mode	Vehicle #	Model & Manufacturer	VIN	Seats
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
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
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

Mode	Vehicle #	Model & Manufacturer	VIN	Seats
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
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

Mode	Vehicle #	Model & Manufacturer	VIN	Seats
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
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



PUBLIC TRANSPORTATION AGENCY SAFETY PLAN
October 2026

2700 SOUTH
INDUSTRIAL HIGHWAY
ANN ARBOR, MICHIGAN
48104

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Executive Summary:

The Ann Arbor Area Transportation Authority (AAATA) Public Transportation Agency Safety Plan (PTASP) outlines our commitment to safety across all operations. This plan, developed in compliance with Federal Transit Administration (FTA) regulations, establishes a comprehensive Safety Management System (SMS) framework.

Key components of our PTASP include:

1. Safety Management Policy: Defines our safety objectives and outlines responsibilities across the organization.
2. Safety Risk Management: Details our processes for hazard identification, risk assessment, and mitigation strategies.
3. Safety Assurance: Outlines our approach to performance monitoring, improvement, and safety promotion.
4. Safety Promotion: Describes our safety training programs and communication strategies.

Our plan emphasizes the critical role of our Safety Committee, comprising equal representation from management and frontline workers. This committee is responsible for reviewing and approving the PTASP, setting safety performance targets, and recommending risk reduction strategies.

We've established specific safety performance targets based on National Transit Database metrics, including fatalities, injuries, safety events, and system reliability. Our Safety Risk Reduction Program focuses on reducing vehicular and pedestrian accidents and mitigating assaults on transit workers.

The PTASP also details our Employee Safety Reporting Program, ensuring all staff can report safety concerns without fear of reprisal. We're committed to continual improvement, regularly reviewing and updating our safety processes to maintain the highest standards of safety for our employees, passengers, and the communities we serve.

This plan represents AAATA's unwavering commitment to safety as our top priority, fostering a culture where every employee is empowered and responsible for maintaining a safe transit environment.

SECTION 0 GENERAL DOCUMENT INFORMATION

0.1 PURPOSE

As a Safety-First organization, AAATA is committed to creating a top-down and bottom-up Safety Culture where Safety is everyone's duty. Everyone is responsible for safety and pursues it daily because they want to and not because they must. A strong Safety Culture is one where:

- Nothing takes precedence over safety.
- All employees share equal responsibility for safety.
- The organization is constantly improving its safety efforts.
- There is open communication between the workers and management.
- Leadership leads by example by demonstrating safety is a top priority and gives safety the attention it deserves.
- Stopping work for legitimate safety concerns is met with positivity.
- Key safety performance indicators show improvement over time.
- The Safety Committee plays a crucial role in fostering this safety culture and ensuring the effectiveness of our safety management system.

0.2 SCOPE

This ASP shall apply to all departments, operations, and personnel of AAATA as its core foundation is rooted in the intent of providing safe and exceptional public transportation to the communities in which we serve. The success of this required plan is dependent upon the efforts of AAATA staff across the agency, everyone plays a key role in our ability to provide a safe environment for our customers and ourselves daily. The leadership of AAATA is committed to the SMS approach to safety management and will incorporate this into its decision-making processes to continue to build a culture of safety throughout the organization.

To comply with recent amendments to 49 USC 5329, AAATA has established a Safety Committee with equal membership from front-line labor representatives appointed by TWU-171 and management staff. This committee is responsible for approving the agency Safety Plan, establishing safety performance targets, monitoring performance, and identifying and recommending risk reduction mitigation strategies.

The AAATA also recognizes that the contracted agencies that provide transit services on behalf of AAATA play a significant role in the management of transit safety. To that the AAATA acknowledges that it must communicate the expectations and monitor the compliance of the FTA requirements of SMS and this ASP not only within its organization but also that of the contracted transit agencies as well.

It is this ASP along with its related processes and procedures (SMS) that will allow AAATA to reduce the likelihood of safety events and their potential negative impacts upon the traveling public and this agency, as it will promote awareness and responsiveness to safety risks.

To the extent any term of any collective bargaining agreement between AAATA and TWU-171 conflicts with anything in this plan, any such bargaining agreement shall remain in effect and unchanged pursuant to their terms. Recent amendments to 49 USC 5329 require equal membership on the Safety Committee from front line labor representatives appointed to the committee by TWU-171 and management staff appointed by organization leadership. The safety committee shall, among other requirements imposed by law, approve any agency Safety Plan, establish safety performance targets, monitor performance targets, and identify and recommend risk reduction mitigation strategies in the service area covered by AAATA.

0.3 AGENCY INFORMATION/DESCRIPTION

Transit Agency Name and Address	ANN ARBOR AREA TRANSPORTATION AUTHORITY 2700 S. Industrial Highway, Ann Arbor, MI 48104			
Accountable Executive	MATT CARPENTER	CHIEF EXECUTIVE OFFICER		
SMS Executive	GEORGE BROOKS	DEPUTY CEO, OPERATIONS		
SMS Project Manager	LARRY GIBSON	SAFETY OFFICER		
Mode(s) of Service Covered by This Plan				
Fixed Bus Route		Non-Fixed Route Bus		
List of All FTA Funding Types (e.g., 5307, 5310, 5311)		5307, 5310, 5311, 5339		
	Fixed Bus Route		Directly Operated	
	Paratransit		Contractor Operated	
Does the agency provide transit services on behalf of another transit agency or entity?	Yes X	No ☐	Description of Arrangement(s)	Purchase of Service Agreements for both fixed-route and demand response services provided in Pittsfield, Scio and Superior Townships
Name and Address of Transit Agency(ies) or Entity(ies) for Which Service Is Provided	Pittsfield Township Scio Township Superior Township			

0.4 ASP Development, Certification and Updates

This ASP has been developed by the AAATA. The AAATA shall, as required (49 CFR Part 673) maintain this safety plan and all related documents (programs, policies and procedures, etc.) that are utilized by the AAATA in regards to its activities and implementation. The AAATA shall maintain these documents for a minimum of three years, shall make available said documents for review upon request by the Federal Transit Administration (FTA) or other authority having jurisdiction.

Plan Drafted By	Larry D. Gibson, Safety Officer, Ann Arbor Transportation Authority
Certification of Compliance This Public Transportation Agency Safety Plan for the Ann Arbor Area Transportation Authority, as required by (673.11(a)(1), has been reviewed and approved by the Safety Committee, and by signature below is hereby approved for implementation by the Accountable Executive and the Board of Directors.	
Accountable Executive	Matt Carpenter, Chief Executive Officer
Signature	 Date: October 27, 2026
Approval by the Safety Committee	Ann Arbor Area Transportation Authority Safety Committee Approval Date: 10/22/2026
Approval by Board of Directors	Ann Arbor Area Transportation Authority Board of Directors Approval Date:
Ann Arbor Area Transportation Authority Public Transportation Agency Safety Plan	Version No: 5.1
The approval of this Ann Arbor Area Transportation Authority Agency Safety Plan is documented by way of this certification of compliance and is noted in the ASP Activity Log while being maintained on file by the SMS Project Manager.	

0.5 ASP Annual Review and Update

AAATA shall, as it pertains to this ASP, annually review and update the document as necessary, implement the changes within a timeframe that will allow for the document to be submitted for annual self-certification of compliance.

The annual review of the ASP will be conducted by the Safety Committee and routed to the Accountable Executive for review and signature. Upon the Accountable Executive's review, the Safety Committee will then review and approve the ASP. Following the Safety Committee approval, the Accountable Executive will present the ASP to the board of directors for review and approval no later than the December meeting.

All necessary updates affecting this plan occurring outside the annual update window, shall be addressed as addenda, which will be incorporated into the body of the ASP. All reviews, updates and addenda, adoptions, and distribution activities will be recorded in the ASP Activity Log in this document.

Completion of the annual review process shall be targeted for March 1st of each year to allow for time to complete the arbitration process if necessary.

The annual self-certification process will consist of a review, and approval by the safety committee. It will then consist of the review, approval, signing and dating of the document by the AAATA Board of Directors. The self-certification shall be documented in each of the following locations:

- FTA Transit Award Management System(TrAMS)
- Ann Arbor Area Transportation Authority ASP Activity Log

0.6 Ann Arbor Area Transportation Authority PTASP Activity Log

It is imperative that the complete history and all successive versions of the Public Transportation Agency Safety Plan (PTASP) for Ann Arbor Area Transportation Authority is maintained.

The AAATA shall record any document changes (Reviews/Update/s Addendum/Adoption/Distributions) and record them in this activity log.

Version Number	Reason for Change	Affected PTASP Areas	Responsible Person (Signature)	Date
1.0	Original PTASP	N/A	Bryan Smith	11.19.2021
1.1	Addendum to correct previous Safety Performance Targets and to show current target information	Safety Performance Targets	Scott E. Robinson	03.04.2022
2.0	Revised Version of PTASP Safety Coordinator – New Position Approval By Board of Directors – Removed Resolution	Organizational: Authorities and Responsibilities PTASP: SMS/PTASP Roles and Responsibilities PTASP: Development, Certification and Updates	Bryan Smith	03.22.2022
2.2	2022 ASP (Approved and Certified)	Organizational: Authorities and Responsibilities PTASP: SMS/PTASP Roles and Responsibilities PTASP: Development,	AAATA Board of Directors	11.9.2022

		Certification and Updates Bipartisan Infrastructure Law Updates		
2.3	2023 ASP (Approved and Certified)	Complete document review and revision by the Safety Committee	AAATA Board of Directors/Safety Committee	09.29.2023 Approved in TrAMS on 12.28.2023
3.0	2024 ASP (Approved and Certified)	Complete review and revision by the Safety Committee.	AAATA Board or Directors/Safety Committee	11.21.2024 Approved in TrAMS on
4.0	Revised Version of PTASP	Additional Training Requirements added for MCO's and Information Specialists	Larry D. Gibson	03.27.2025
4.1	2025 ASP (Approved and Certified)	Complete review and revision by the Safety Committee.	AAATA Board of Directors/Safety Committee	10.16.2025 Approved in TrAMS on
5.0	Revised Version of PTASP	Complete Review of 2026 SPT's with New Mitigations by Safety Committee	Larry D. Gibson	08.24.2026
5.1	2026 ASP (Approved and Certified)	Complete review and revision by the Safety Committee	AAATA Board Of Directors/Safety Committee	11.19.2026

SECTION 1 SAFETY MANAGEMENT

1.1 Safety Management Policy Statement

The AAATA considers the management of safety as a top priority for the success of the organization. AAATA understands the necessary commitment to safety and how it relates to employees and the customers that we serve. As an organization we will utilize a systematic approach to identify hazards and risks that can affect our daily and long-term operations and maintenance functions.

> We are committed to implementing, maintaining, and constantly improving processes to ensure that all our operational and maintenance activities are supported by an appropriate allocation of organizational resources aimed at achieving the highest level of transit safety performance. AAATA, in the development of this ASP has adopted a SMS framework as a core element of the agency's safety responsibility by the establishment of safety policy; identifying hazards and controlling risks; setting of goals; planning and performance monitoring and measurement.

AAATA has adopted SMS as a means by which to encourage and grow agency-wide support for transit safety. This starts with the Chief Executive Officer (CEO) and the development of a culture where all levels of management and front-line employees are active and accountable for the delivery of the highest level of safety performance.

In accordance with the Occupational Safety and Health Act of 1970, employees have the right to refuse any work they feel places them in imminent danger or harm until the employer has taken actions to mitigate the hazard. Employees should immediately report these conditions to their supervisor or employer and give them a reasonable opportunity to address the issue. If there is a disagreement as to whether the safety concern was appropriately mitigated, the Safety Officer or Safety Coordinator will conduct a hazard assessment and make a final decision on the mitigations to render the work safe.

This commitment to comply with all provisions of this ASP and the SMS shall extend to all contractors of AAATA who provide services on behalf of the agency. The AAATA shall incorporate these expectations in all applicable federally funded contracts, initially or by way of addendum, with providers of transit services on behalf of AAATA. It shall be identified in the contract language that each contractor of transit services shall be required to certify compliance to AAATA on an annual basis.

AAATA has established a Safety Committee with equal representation from frontline workers and management. This committee plays a crucial role in our SMS by reviewing and approving the ASP, setting safety performance targets, and recommending safety risk mitigations. The committee's involvement ensures that safety decisions benefit from diverse perspectives and expertise across our organization.

The Ann Arbor Area Transportation Authority commits to:

- Support the management of safety by providing appropriate resources to support an organizational culture that promotes safe operational practices, encourages effective safety reporting and communication, and actively manages safety with the same attention as that given to the other management systems of this agency.
- Integrate the management of safety as a clear responsibility of all department managers and employees.
- Clearly define for all department managers and employees their accountabilities and responsibilities for the delivery of safe transit services and the performance of our safety management system.
- Establish and operate a safety reporting program as a fundamental part of the hazard and risk identification and evaluation process. This reported information is essential to our efforts to eliminate or mitigate the safety hazards and risks that are affecting our operations or maintenance activities, to a point that is as low as reasonably practicable (ALARP).
- Comply with and, wherever possible, exceed any applicable legislative and regulatory transit/safety related requirements and standards.
- Warrant that trained and skilled personnel are available and assigned to implement the agency's safety management processes and activities.
- Confirm that all transit staff are formally provided with adequate and appropriate safety management information, are competent in safety management system activities, and are assigned only safety related tasks commensurate with their skills.
- Establish and measure agency safety performance against realistic safety performance indicators and safety performance targets.
- Continually improve safety performance through management processes that ensure relevant safety action is taken in a timely manner and is effective when carried out.
- Ensure contracted services that support our transit mission are delivered applicable to our own safety performance standards.

Signature: 

Title: Chief Executive Officer Date: October 27, 2026

1.2 Safety Management Policy Communication

The AAATA has adopted the Safety Management Policy Statement and its contents as an organizational directive towards the management of safety as it applies to all its operations. This policy statement also exemplifies the commitment on the part of the Chief Executive Officer (CEO) to the positive management of safety through the establishment of an organization wide SMS. The CEO and management of AAATA feel that this policy and ASP will help establish the SMS, by providing the foundation for the existing and forthcoming safety procedures and policies.

To continue to be successful AAATA recognizes the importance of effective communication and is therefore committed to clearly communicating its safety goals and objectives. The adopted Safety Management Policy Statement, its intent and expectations and other SMS and ASP information shall be communicated and distributed to all departments and employees of AAATA using approved internal methods.

The AAATA as an agency, understanding the need to safeguard agency safety related information with external sources, clearly recognizes the important role the contracted agencies play in delivering services to the traveling public. The agency shall communicate this Safety Management Policy Statement and all ASP and SMS expectations to its contractors to ensure the success of this plan on every level.

Approved communication methods to be utilized include but are not limited to:

- Departmental staff meeting
- Organizational staff meetings
- Notice board postings
- Safety Committee meetings
- Email communications
- Other current or future available methods.
- Safety Committee meetings and reports

1.3 Employee Safety Reporting Program (ESRP)

The AAATA is committed to providing the safest transit operating standards possible. AAATA recognizes that to realize this, it is of the utmost importance that we encourage and attain uninhibited reporting of all incidents and occurrences. It is our understanding that without this our ability to conduct our operations safely will be compromised. With this identified, AAATA specifies that every employee shall be responsible for communicating to management any information that may hinder the integrity of transit safety.

The AAATA has developed an ESRP that will include but not be limited to the following attributes:

- Ease of Reporting
- Training - Clear instructions on the process of reporting
- Feedback that is timely and informative
- Protection of information

Employees are encouraged to report all identified safety concerns and hazardous conditions to department supervisory staff or to the safety office so that SRM procedures and mitigation efforts can begin. Every employee who submits a report will be provided feedback on the outcome regarding his/her report, if indicated on the report form. As part of this program each employee shall have the option to submit a report anonymously if desired. Such reports will be received and entered anonymously with no record of who created and submitted the report.

The available channels of communicating these concerns or issues are:

- Direct Communication to supervisory staff
- Employee Safety Reporting Form
- Email
- Department Drop Box
- Phone Message
- QR Code Reporting

The ESRP, provides procedures that will ensure that all communicated reports of safety concerns or issues are managed appropriately from initial reporting through actual mitigation when applicable.

The agency will utilize the relevant ESRP forms and personnel to document the process and progress made as it relates to the reporting, hazard assessment and mitigation of each reported safety concern. The process will involve the following agency personnel:

- Reporting Employee
- Department Staff (Supervisor, Manager)
- Safety Officer
- Safety Committee
- SMS Manager

The established method of collection, recording and disseminating of information obtained from the agency's Employee Safety Reporting Program has been created to protect, to the extent permissible by law, the identity of any employee who provides transit safety information as it applies to this ASP and the functions of AAATA. The ESRP provides procedures that will ensure that all communications received will be used for the intended purpose of safety management.

The responsibility for safety is shared by all employees, it is understood by our employees the significant role that we play in providing a high level of transit safety for the traveling public. The AAATA in its efforts to provide the highest level of quality service, urges all staff members in all departments to practice the concepts of the SMS and those outlined in this agency safety plan.

Key factors related to the established ESRP include:

- Reporting - Every employee who submits a report will be provided feedback on the outcome regarding his/her report, if indicated on the report form.

- Immediate Threats - The recognition of any hazardous condition(s) by an employee that can be deemed as an immediate threat to safety shall be reported to the employee's direct supervisor or the safety office immediately.

    - Such reported hazardous conditions that may be deemed to be an immediate threat to safety, are expected to be addressed immediately.

- Other Hazards - The identification of other hazardous conditions that can affect the safety of employees, customers, and the operations of AAATA shall be reported to be investigated, evaluated, and addressed via the development of a mitigation plan as needed.

- Involvement – AAATA management staff, department safety committee employees are planned to be involved in the processing of each report received to bring about a satisfactory resolution that will mitigate the hazard to an acceptable level.

The ESRP and its intent, as identified by FTA requirements shall be communicated to the employees of AAATA as well as the contracted agencies that provide transit services on behalf of AAATA. The contracted agencies shall submit to AAATA documentation identifying and describing the existence of an employee safety reporting program that meets the FTA identified requirements. The submitted documentation shall include references to modes of communication that are available to employees to communicate and receive feedback concerning safety issues. The appointed AAATA staff member charged with monitoring the contracted service providers shall document that this has been verified annually.

The Safety Committee will regularly review aggregated data from the ESRP to identify trends, assess the effectiveness of existing safety risk mitigations, and recommend new safety initiatives as needed. This review process ensures that frontline insights are incorporated into our broader safety management strategies.

1.4 ASP/SMS Contacts

Ann Arbor Area Transportation Authority ASP/SMS Contacts			
Name	Role	Office Phone	Cell Phone
Matt Carpenter	CEO/Accountable Executive	734-794-1767	
Dina Reed	Deputy CEO Finance and Administration	734-794-1768	
George Brooks	Deputy CEO of Operations/SMS Executive	734-794-1761	
Forest Yang	Deputy CEO of Innovation and Planning	734-794-1752	
Ron Carr	HR Manager	734-794-1830	
Yvette Washington	Bus Operations Manager	734-794-1717	
Robert Williams	Mobility Services Manager	734-794-1702	
Troy Lundquist	Fleet Services Manager	734-794-1750	
Gail Roose	Facilities Service Manager	734-794-1780	
Larry Gibson	Safety Coordinator / SMS Project Manager	734-794-1899	734-771-9890
Delisa Brown	Union President TWU-171	734-794-1707	

1.5 Key SMS/ASP Roles and Responsibilities

Accountable Executive: The CEO is designated as the Accountable Executive for the agency's SMS and this ASP. The CEO is accountable for ensuring that the SMS is effectively implemented and resourced throughout all operations of AAATA, by being responsible for the following:

- Implementation and maintenance of the SMS
- Responsible for the Transit Asset Management Plan (TAMP)
- Control of human and capitol resources to develop and maintain the ASP and TAMP
- Ensures safety concerns are considered in the ongoing budget planning process
- Maintains transparency in safety management priorities (Board of Directors and Employees)

- Provides guidance as to the level of safety risk acceptability
- Ensures that the safety management policy is aligned with the ideals of the agency and communicated throughout the organization
- Must implement safety risk mitigations for the safety risk reduction program and receive and consider all other safety risk mitigations recommended by the Safety Committee. If the accountable executive declines to implement any safety risk mitigations unrelated to the safety risk reduction program, he or she must prepare a written statement explaining the decision and submit and present this explanation to the Safety Committee and Board of Directors.
- Allocates resources to address safety concerns raised by the Safety Committee.

SMS Executive: The Ann Arbor Area Transportation Authority Deputy CEO of Operations has been designated as the SMS Executive for the agency's SMS and this ASP. The SMS Executive, as it pertains to SMS and this ASP shall report directly to the CEO, and has responsibility for the day-to-day implementation and operations thereof. Provides leadership in the operation, performance, and improvement of SMS, by fostering the development and implementation of strategies that support departmental, customer, and corporate business plans, goals, and objectives.

Examples of such responsibilities may include:

- Facilitating full implementation of the SMS across AAATA
- Advocating for a safety culture
- Conducting strategic planning for the SMS
- Ensures the continual management and updating SMS related processes and procedures
- Ensures the compliance requirement for the annual review and updating of the ASP
- Provides guidance and oversight to the management of the SRM and Safety Assurance processes and outputs
- Facilitating coordination of SRM, evaluations and investigations, and controls with special attention to cross-organizational impacts
- Monitoring the safety performance of all AAATA operations and activities
- Require that all relevant safety-related information be communicated and used in decision making
- Review of internal and external safety audit reports
- Review and approval of the SMS safety training requirements and matrix
- Ensures that Safety Committee recommendations are properly considered and implemented.

Safety Officer: The Safety Officer for AAATA has been designated as the SMS Project Manger and has safety responsibilities related to all operations of AAATA concerning the development and implementation of the SMS and ASP. The Safety Officer shall:

- Advocate and promote for an effective safety culture
- Ensure the coordinated development, implementation, and maintenance of the ASP
- Assist the SMS Executive with facilitating the full implementation of the SMS across the organization
- Managing and updating SMS processes based on experiences and lessons learned
- Ensures the compliance requirement for the annual review and updating of the ASP
- Providing additional guidance material (as required) to further strengthen and clarify the SMS processes
- Managing the SRM and Safety Assurance processes and outputs; including related evaluations, investigations, and mitigations
- Managing and monitoring the employee safety reporting program for success
- Monitoring the safety performance of AAATA operations and activities through formal data collection and analysis; and
- Leading and facilitating hazard analyses with appropriate subject matter experts
- Developing and Leading internal and external safety audits
- Developing and coordinating the collection of safety performance data, including review and reporting
- Develops and Provides guidance as it relates to organizational safety training requirements
- Promoting safety awareness throughout the organization
- Ensuring that safety documentation is current
- Tracking and monitoring the effectiveness of corrective actions (hazard mitigations) to conclusion
- Providing periodic reports on safety performance
- Provides independent safety advice to department managers, and staff as needed
- Provides support to the Safety Committee, including data analysis and report preparation.
- Facilitates Safety Committee meetings and activities in coordination with the Safety Committee Co-Chair

Safety Coordinator

- Advocating for a safety culture
- Assist the Safety Officer with the management and communications of all phases of ASP across the entire organization to ensure its applicability and success.
- Assist the Safety Officer with facilitating the full implementation of the SMS across the organization
- Assist the Safety Officer with managing the SRM and Safety Assurance processes and outputs, including related evaluations, investigations, and mitigations
- Assist the Safety Officer with managing and monitoring the employee safety reporting program for success, including regular checks of the reporting process.
- Assist the Safety Officer with the management of safety training activities across the organization

- Assists with the coordination and administration of safety office daily responsibilities
- Manages the Job Safety Analysis Program across the affected departments

Department Managers: The department managers of AAATA are accountable and responsible for the following based upon the SMS and ASP for this agency:

- Upholding and promoting safety policies, and SRM safety assurance, and safety training and communication protocols
- Developing safety performance measures and targets
- Fostering a strong safety culture within their department
- Allocating the appropriate staffing resources necessary to become compliant with and maintain compliance with the requirements SMS and this ASP
- Identifying the necessary funds to meet the affected identified safety performance requirements and incorporate them into budgeting plans, prioritizing, and allocating expenditures according to safety risk
- Works collectively with the Safety Officer to effectively address information brought forth via the employee safety reporting program
- Implementing the SRM, safety assurance, and safety training and communication protocols within their department
- Ensuring that departmental procedures are consistent with the SMS
- Determining and implementing mitigation efforts to counteract and manage identified safety risks and the negative consequences
- Ensuring that all department employees received agency SMS training
- Supporting and requiring employees within their department to participate in safety training activities
- Integrating SRM into existing processes
- Requiring that all relevant safety information be communicated and used in decision-making
- Ensuring that all system changes are coordinated, documented, and go through the SRM & SA process

Supervisor Role and Responsibilities: The Supervisory staff of AAATA are accountable and responsible for:

- The safety performance of all personnel and equipment under their supervision
- Implementing and maintaining safety-related control measures/mitigations
- Familiarizing employees with the safety requirements and hazards associated with the work to be performed
- Responding to identified hazards that may impact safety performance
- Reporting all mishaps and incidents
- Sharing lessons learned from incidents
- Implementing and adhering to SMS procedures and processes within their span of control

Employees: The employees of AAATA have the following reposibilities as it relates to the SMS and the agency ASP such as the following:

- Becoming familiar with the safety procedures for their assigned work activity
- Performing their work safely
- Following procedures and rules
- Reporting hazardous conditions or safety suggestion through the utilization of the “Employee Safety Reporting Program”
- Reporting accidents and incidents in accordance with established requirements for the protection of themselves, co-workers, customers, facilities, and equipment

Safety Committee: The AAATA uses an established safety committee to assist with the continual management of safety for its operations. The safety committee is composed of an equal number of frontline employee representatives (selected by TWU 171) and management representatives, in compliance with recent amendments to 49 USC 5329. This committee plays a crucial role in our SMS by performing various functions and tasks related to the overall management of safety for the agency, including but not limited to:

- Reviewing and approving the Agency Safety Plan (ASP) and any updates annually, prior to submission to the board of directors
- Setting annual safety performance targets based on the measures outlined in the National Safety Plan
- Identifying and recommending risk-based mitigation strategies necessary to reduce the likelihood and severity of consequences identified through AAATA's Safety Risk Assessment
- Identifying any mitigation strategies that may be ineffective, inappropriate, or not implemented as intended
- Identifying safety deficiencies for purposes of improving the organization's continuous improvement
- Assisting and supporting the overall safety program, rules, procedures, and policies
- Working positively to reduce accident frequency and severity rates
- Facilitating communication and cooperation between all levels of the workforce on matters of safety
- Recommending new safety policies, procedures, and programs
- Reviewing accident report summaries and analyses
- Participating in or reviewing safety inspections
- Participating in safety training
- Discussing relevant safety objectives and goals
- Participating in the investigation of identified/reported potential hazards to personnel or operations
- Reviewing semi-annually, or more frequently, if necessary, the list of accessible bathrooms for Motor Coach Operators while on route. Any routes that do not have accessible bathrooms due to safety reasons will have a risk hazard assessment

completed by the Safety Committee with recommended mitigations forwarded to Accountable Executive for review and implementation
Reviewing semi-annually, or more frequently as needed, any bus routes that pose safety concerns. For routes with unaddressed safety concerns (not previously handled by the route committee) or that pose an imminent safety risk, the Safety Committee will complete a risk hazard assessment and recommend mitigations to the Accountable Executive. The Accountable Executive shall implement any mitigations related to the safety risk reduction program and receive and consider all other recommended mitigations. If declining to implement any safety risk mitigations unrelated to the safety risk reduction program, the Accountable Executive must prepare a written statement explaining the decision and submit and present this explanation to both the Safety Committee and Board of Directors.

The Safety Committee has responsibility for safety throughout the organization, which may require additional responsibilities beyond those listed above. The committee's involvement ensures that safety decisions benefit from diverse perspectives and expertise across our organization.

The AAATA Safety Committee operates according to the Safety Committee Guidelines, document version 1, which is incorporated by reference into this PTASP. The full text of the Safety Committee Guidelines is available on the AAATA K Drive under Safety Information.

All official decisions of the Safety Committee, including but not limited to approval of the PTASP, setting safety performance targets, and recommending safety risk mitigations, will follow the formal voting process outlined in the Safety Committee Guidelines. This process ensures equal representation and thorough consideration of all perspectives in safety-related decision-making.

Any disputes arising within the Safety Committee that cannot be resolved through normal processes will be subject to the dispute resolution mechanism outlined in the Safety Committee Guidelines. This process ensures fair and timely resolution of safety-related disagreements.

The Safety Committee meets at least quarterly. Meeting agendas and minutes are distributed according to the procedures outlined in the Safety Committee Guidelines.

External Service Providers

Contractor agencies play an important role in supporting and implementing the intent of this ASP and the related SMS activities. Contractors who provide transit services on behalf of AAATA have been informed of the need to provide to AAATA as required by the FTA documentation that includes at minimum, descriptions identifying internal positions that have safety related roles, responsibilities, and authorities for their respective agency. It is imperative that the individuals in these positions understand and effectively manage their safety responsibilities.

The AAATA Manager of Mobility Services or the Safety Officer shall communicate this

requirement to the contracted agencies, the information upon receipt will be kept on file in the safety officer's office. The Manager of Mobility Services is charged with monitoring the contracted service providers in terms of compliance and shall document that this has been verified annually.

1.6 Safety Promotion, Culture and Training

The AAATA believes safety promotion to be another critical component of this ASP and its overall success. It is understood by AAATA that to achieve the desired results of this agency safety plan we must ensure that the entire organization understands and trusts in the developed policies and procedures, as well as how they relate to the adopted SMS structure. It involves establishing a positive-minded culture that recognizes safety as a fundamental value, training of employees in safety principles, and allowing open communications of safety issues.

1.6.1 Safety Culture

The AAATA recognizes that the development of a positive organization wide safety culture must be generated from the top-down. We have identified that the actions, attitudes, and decisions made at the management level must demonstrate a sincere commitment to safety.

It is affirmed that safety is a responsibility of each employee with the ultimate safety responsibility and accountability resting with the CEO and the Board of Directors.

All employees must have confidence that management will support decisions that are made with safety in mind.

As part of this ASP, a primary goal is that of safety promotion and the development of a positive safety culture. The intent is to have organizational safety culture will provide a means for the safety plan and the safety management system to function successfully. At AAATA it is desired to have a thriving positive safety culture that can be described as one that encompasses these four elements:

A. An Informed Culture where
   - Employees understand the hazards and risks involved in their areas of operation
   - Employees are provided with the necessary knowledge, training, and resources; and
   - Employees work continuously to identify and overcome threats to safety.

B. A Just Culture where
   - Employees know and agree on what is acceptable and unacceptable behavior; and
   - Human errors must be understood and fairly investigated.

C. A Reporting Culture where

- Employees are encouraged to voice safety concerns and to share critical safety information without the threat of punitive action; and
- When safety concerns are reported they are analyzed, and appropriate action is taken.

D. A Learning Culture where
   - Learning is valued as a lifetime process beyond basic skills training
   - Employees are encouraged to develop and apply their own skills and knowledge to enhance safety; and
   - Employees are updated on safety issues by management and safety reports are fed back to staff so that everyone learns the pertinent lessons.

1.6.2 Safety Training

The AAATA shall require that all employees receive safety training appropriate with their job classification. Initial safety training will be provided as part of the new hire on-boarding process to ensure that employees understand the overall safety expectations of AAATA. To confirm the Authority's commitment to providing a safe working environment, additional training shall be provided to explain the agency's safety culture and describe how SMS works and the expectations of the ASP.

The Safety Officer is the resource person for providing a corporate perspective on the approach to safety management and training. The level of training and content provided will be based upon the specific job classification and the safety responsibilities and tasks performed. A safety training matrix has been developed and will be utilized as a reference source for agency safety training. Safety management training will address but not be limited to the following groups and content:

- Initial Safety Training for All Staff
  - Basic principles – Review of the basic principles of safety management.
  - AAATA safety philosophy – Shall include a review of safety philosophy, safety policy and safety goals and objectives.
  - Compliance factors – Discuss the importance of complying with the safety policy and SMS procedures, and the approach to disciplinary actions.
  - AAATA Responsibilities - Organizational structure, roles, and responsibilities of staff in relation to safety.
  - AAATA Safety Management Key Factors
    - Transit agency's safety record.
    - Continuous internal assessment of organizational safety performance
      - (e.g. employee surveys, safety audits, and assessments)
    - Review the importance and benefits of reporting accidents, incidents, and perceived hazards

        - Communication
    - Review the importance of safety communication for the organization and each department
    - Feedback and communication of safety information.
- Safety promotion and information dissemination.

- Safety Training for Operations Personnel
  - Hazard Identification
  - Review of seasonal safety hazards and procedures (e.g. winter operations)
  - Procedures and expectations related to
    - Hazard reporting.
    - Reporting accidents and incidents; and
  - Review of emergency procedures
  - Deescalation Training (Fleet Maintenance, Motor Coach Operators, Supervisors and Information Specialists)
  - Ergonomics Safety Training for Operator Personnel
  - Subject specific safety training (required or as needed)
  - Other departmental safety policies and expectations

- Safety Training for Management Staff
  - Principles of the SMS.
  - Management responsibilities and accountabilities for safety; and
  - Legal issues (e.g. liability).

- Training for Safety -Personnel
  - Familiarization with different transit modes, types of operation, routes, and so forth
  - Principles and Operation of SMS
  - Accident / Incident Investigating
  - De-escalation Training
  - Emergency management and response planning
  - Safety promotion and communication
  - Performing safety audits and assessments
  - Monitoring safety performance; and
  - National Transit Database (NTD) incident reporting requirements

  - Training for the Contractor Safety Personnel

    The AAATA shall ensure that the contractor personnel with safety responsibilities are informed of the contents of this agency safety plan and its intent to comply with identified FTA requirements for SMS. The contractor shall inform and provide documentation to the AAATA denoting the type of safety training that it requires and provides for its employees who are responsible, have authorities and duties related to safety management within their respective

organizations. Key safety subject matter training that AAATA will look for the contractor to have incorporated into their programs shall include but not be limited to the following:

- FTA Principles and Operation of SMS
- Accident / Incident reporting and investigating
- SRM
- Other Subject Matter Safety Training relevant to position and duties

- Training for Safety Committee Personnel
  - In accordance with the Safety Committee Guidelines

- Training for Maintenance Personnel
  - Specific safety procedures for all maintenance activities
  - Proper use and maintenance of maintenance equipment and personal protective equipment
  - Hazard identification and reporting in maintenance settings
  - Safe handling and disposal of hazardous materials
  - De-escalation training
  - Emergency response procedures specific to maintenance facilities
  - De-Escalation Training

De-escalation Training

AAATA provides comprehensive de-escalation training to all frontline staff, including operators, customer service representatives, supervisors, and maintenance personnel who interact with the public. This training is provided as part of initial training and through annual refresher courses. The de-escalation training program covers:

- Recognizing potential conflict situations
- Understanding triggers and escalation patterns
- Verbal and non-verbal de-escalation techniques
- Active listening and empathy skills
- Proper procedures for requesting assistance in escalating situations
- Post-incident reporting and debriefing
- Self-care and stress management for frontline staff

AAATA ensures that all safety-critical personnel, including maintenance staff and frontline employees, receive refresher training at least annually or more frequently if required based on performance evaluations or changes in procedures.

The effectiveness of the training program is regularly evaluated through performance metrics, employee feedback, and incident analysis. The Safety Committee reviews these evaluations

annually and recommends updates or additions to the training program as needed to address emerging safety concerns or changes in operational procedures.

1.6.3 Safety Communication

The AAATA recognizes that communication is an essential component in the success of the SMS and this ASP. All levels of management understand that they must actively engage employees to ensure that communication lines remain open and active. The agency identifies that for both SMS and this ASP to be successful it must:

- Ensure that all personnel are aware of the SMS and their role in its success
- Communicate the necessary information that individuals need to do their job effectively and safely
- Communicate safety critical information
- The employer must ensure that the information communicated is understandable, accurate and up to date
- Consider privacy or security concerns when sharing information
- Explain why particular safety measures are taken
- Clarify why safety procedures are introduced or changed
- The more informed an employee is about safety measures, the more at ease they will be in performing their duties daily
- Provide feedback on identified hazards and safety concerns received as part of its employee safety reporting program

AAATA recognizes that its most important source of information is its employees and shall continue to utilize all platforms and tools at its disposal to maintain effective internal communications with its employees. Examples shall include but are not limited to the following:

- Safety Management Policy Statement
- Employee Safety Reporting Program
- Safety Meetings
- Safety Bulletins/Boards
- Training (Initial & Refresher)
- Intranet or social media
- Safety policies and notices
- Toolbox Talks
- Other

Effective communication is only attained when the intended message has been both heard and understood. As part of the Safety Promotion component of the SMS, the agency shall work to continually improve upon its efforts and abilities to motivate others to want to communicate openly and without concern for reprisal. AAATA is responsible for communicating events and safety information to all employees as appropriate, utilizing the authorized communication process.

The Safety Officer and the appointed staff contact shall work with and monitor contractor internal and external safety communication activities to ensure that each contractor is supporting and is compliant with the intent of this agency safety plan and SMS requirements. Such monitoring shall be conducted in a way to identify and confirm the use of previously identified means such as:

- Safety bulletin boards,
- Training sessions,
- Memorandums,
- Dept. meetings
- And other

Information from regular monitoring activities shall be documented and reported to the agency safety officer for reporting to the SMS Executive.

It is understood that external communications of SMS related operational information has the potential to subject the AAATA to an undetermined level of risks including that of security, employee safety and other. Therefore, the agency will not communicate SMS related information externally unless required by federal, state, or local regulations and only with the approval of the Chief Executive Officer, SMS Executive, or his/her designee.

1.7 Safety Committee Communication to Leadership

It is crucial to the success of the AAATA SMS that a formalized process be in place to communicate recommendations to leadership from the Safety Committee. Upon discovery of a safety hazard/concern, the following procedures will apply:

1. When the concern is received, it will be logged by the Safety Office in the Safety Risk Register.
2. The Safety Office and the respective department in charge of the concern will conduct independent reviews and risk assessments of the safety concern using the processes outlined in our SMS.
3. The Safety Coordinator will provide these risk assessments to the Safety Committee to develop mitigations and recommended solutions to reduce or eliminate the risk. If there is a disagreement on the mitigation recommendations within the Safety Committee, we will use our existing dispute resolution process to manage the dispute.
4. The Safety Committee will provide the mitigation recommendations to the respective departmental managers for implementation. If the respective department is unable to implement the mitigations due to resource constraints, the Safety Committee will present this mitigation recommendation, in writing, to the Accountable Executive. The Accountable Executive will provide a written response to all formal Safety Committee recommendations within 30 days, detailing: a. Planned actions to address the

recommendation b. Timeline for implementation c. If the recommendation is not to be implemented, a detailed explanation of the decision shall be provided to the board and safety committee. (line-item “C” is not applicable to mitigations in the Safety Risk Reduction program as these require implementation as per part 673.

5. For urgent safety matters that require immediate attention from top leadership: a. The Safety Committee Chair will communicate directly with the Accountable Executive within 24 hours of the committee identifying the issue. b. The Accountable Executive will provide an initial response within 48 hours, outlining immediate actions to be taken.
6. The departmental manager will acknowledge receipt of these recommendations via email. Once reviewed, the departmental manager will follow up with the committee to either concur with the recommendations and proceed forward or to provide their own recommendations in which the Safety Committee will evaluate to ensure it mitigates the risk to an acceptable level.
7. The departmental manager will provide updates at a period of time as determined by the Safety Committee not to exceed 90 days until the mitigation is implemented.
8. The Safety Office and respective Department will continue to monitor the mitigations in place to assess the effectiveness at a period determined by the level of risk and in conversation with the Safety Committee.
9. All communications between the Safety Committee, Accountable Executive, and Board of Directors will be documented and maintained as part of the safety records.

SECTION 2 SAFETY RISK MANAGEMENT (SRM)

2.1 Risk Management

The Ann Arbor Area Transportation Authority understands that as a component of having a successful safety management system in place it must effectively identify, analyze, and address hazards faced by its operations. The AAATA clearly defines a hazard as being any real or potential situation that can cause injury, illness, or death; damage to or loss of facilities, equipment or infrastructure, damage to the environment; or a reduction of its ability to perform a prescribed agency function. An unacceptable hazard is a condition that may endanger human life, property, or result in system loss. This includes harm to passengers, employees, contractors, equipment, and to the public. These hazardous conditions must be mitigated or eliminated.

2.2 Hazard Management

The management of hazards applies to all employees and thereby obligates everyone to constantly observe hazards in their work areas and report them to their department supervisor and/or manager, or to the Safety Officer. The management of hazards employs system-wide processes that includes activities such as:

- Identification
- Investigation
- Evaluation and analysis
- Mitigate or elimination
- Tracking
- Reporting to regulatory agencies as required

AAATA department managers and supervisory staff play a key role in the hazard management process and ensure that the process has been fully integrated within their departments. Managers can also make sure the following elements of the hazard management process are present and operating within their departments:

- Ensure the employees are informed and can report hazardous conditions to management in person or by the “Employee Safety Reporting Program”
- Confirm that reported hazards that require immediate attention are addressed and reported as per the “Employee Safety Reporting Program”
- Confirm that reported hazardous conditions are documented and tracked as per procedure
- Provide departmental management representation to the safety committee as designed in the AAATA Safety Committee Guidelines
- Ensure each hazard has been assigned to a department contact person to assist with mitigation efforts
- Make certain that employees receive the appropriate level hazard management training.
- Ensure that any identified hazards and proposed mitigations are communicated to the Safety Committee for review and recommendations.

2.3 Hazard Identification

The establishment of efficient hazard identification programs are key to the SRM function of this ASP and will be fundamental to overall safety management. The hazard identification processes can be classified as being reactive or proactive in nature, but our focus will be on the resulting changes to whatever the stimulus is.

To be successful, hazard identification must take place within a non-punitive and just safety culture. The AAATA shall utilize an organized approach to identify potential hazards and weaknesses faced by its operations to enact measures that will result in improvements.

The AAATA hazard identification processes and activities will seek, and use feedback received from observations and the analysis of reported data from its operations. The processes, methods and activities may include:

- Safety Assessments: Internal
- Safety Assessments: External
- Trend monitoring
- Accident/Incident Reporting & Investigation
- On-the-Job Injury Reporting & Investigation
- Hazard reporting
- Near-Miss reporting
- Safety surveys
- Customer Reporting: Evaluating customer suggestions and complaints.
- Safety Committee reviews and recommendations

Safety Assessments/Audits: The AAATA has committed itself to regular internal and external safety auditing of its facilities and operations. Internal and External safety auditing will be conducted annually. As a function of SRM, the AAATA personnel will utilize the “Safety Assessment and System Review” and “Facility Safety and Security Assessment” for documentation of the internal auditing process.

The AAATA as part of efforts to identify and mitigate safety hazards within its workplace will utilize the external safety audits process. These audits shall be conducted by the local fire authority having jurisdiction and a safety consultant contracted by AAATA to provide unbiased observations and recommendations for corrective actions. It is felt that these objective observations by subject matter experts will continue to further the safety-related efforts of the agency. These reports will be reviewed by the Safety Committee. If action is warranted, based on these reports, the Safety Committee will develop initiatives geared at correcting any deficiencies.

The resulting information provided as part of the auditing process (internal and external) shall be reported by the Safety Officer to the HR Manager, SMS Executive, and affected department managers. All affected department managers shall work with the Safety Officer to develop mitigation plans to address all negative findings. These findings and the subsequent mitigation plans shall be tracked and documented through until completion; this information shall be reported to the SMS Executive by the Safety Officer.

Trend Monitoring: The monitoring and analysis of collected data often identifies trends, patterns or changes that may be related to behavior, or other operational factors. Example safety trend

data identified might be that of specific accidents and incident types related to identifiable time periods.

The AAATA as part of its efforts to effectively identify hazards that may affect its operations shall also monitor information obtained from industry associations, manufacturers, and other vendors, as well as oversight authorities, such as the National Transportation Safety Board and the Federal Motor Carrier Safety Administration along with other state and local transportation and safety agencies. The agency also monitors information generated by the FTA, including recommended practices, regulations (new or revised), safety directives, bulletins, alerts, and technical assistance, that applies to our operations.

Accident/Incident Reporting & Investigation: The reporting and subsequent required investigation of accidents and incidents (safety events) is a major function of the hazard identification and SRM process. The review and analysis of this information leads to the identification of hazardous conditions and practices as well as mitigation efforts that can impact the safe operations of AAATA.

Hazard Reporting: The importance of the accurate identification of hazards that may affect the safe operations of AAATA cannot be overlooked. The agency utilizes the Employee Safety Reporting Program as one source of collecting information on hazards that can negatively affect our operations. The success of this type of reporting system relies on the front-line employee, aa very important source of information becoming the eyes of safety for AAATA. The agency through this program encourages employees who observe potentially negative safety concerns to make the proper notifications before a resulting safety event occurs.

Near-Miss Reporting: The number of near-miss incidents is normally significantly greater than the amount of actual accidents for similar types of events. A Near Miss is defined as an "unplanned event that did not result in injury, illness, or damage – but had the potential to do so. Only a fortunate break in the chain of events prevented an injury, fatality, or damage; in other words, a miss that was nonetheless very near". The AAATA must encourage the practice of identifying and reporting these near-miss incidents but shall also endeavor to learn from them. These accident precursors are a valuable resource and will serve as a complement to other hazard identification practices actively used.

Safety Surveys: In an effort to further safety related collect information that will assist in the SRM process AAATA at times may utilize internal and or external surveys for this purpose. It is recognized that surveys provide a means to examine elements and or activities of our agency's operations.

Surveys can give insight into the perceptions and attitudes of staff members regarding how the agency is managing safety. The collection and analysis of potential strengths and weaknesses can support the overall safety assurance process. The information can permit the agency to improve upon its approach to safety by formulating proactive strategies to correct identified weaknesses.

Customer Reporting: The satisfaction and safety of the traveling public is the primary purpose of this agency and the foundation of all agency operations. The AAATA recognizes that the ability to hear from its customer base is essential to the measurement of its operations as well as both the SMS and this ASP. The agency has dedicated a specific office, personnel, and processes (Customers Relations Management (CRM) software for this purpose.

The current established process is such that several different avenues of data collection are utilized to communicate with customers who wish to provide:

- Comments,
- Complaints,
- Suggestions,
- Compliments,
- Questions and other

The information received is documented and passed along to the affected department for further investigation and mitigation along with the Customer Service office. Safety staff members are contacted if the information received is a direct safety-related issue, for the appropriate form of processing.

2.4 Risk Assessment

As part of the SRM component of this ASP the AAATA has established an analysis process to assess the safety risks associated with identified safety hazards faced by its operations. This "Hazard-Risk Analysis" process will require that identified hazards are assessed to determine their probable effects upon the organization.

Once hazards have been identified, the AAATA will conduct a review to determine their potential consequences. The review process will include consideration of the following:

- the likelihood of occurrence,
- the severity of the consequences
- frequency of past occurrences
- and the level of exposure to the hazard

AAATA will utilize experienced personnel within the affected department, working with the safety officer to assess the identified risks subjectively by using the "Hazard/Risk Assessment Matrix" and the "Hazard-Risk Analysis Form" guidance. Results of the risk assessment process will help determine whether the risk is being appropriately managed or controlled. If the risks are acceptable, the hazard will simply need monitoring. If the risks are unacceptable, steps will be taken by AAATA to lower the risk to an acceptable or tolerable level, or to remove or avoid the hazard.

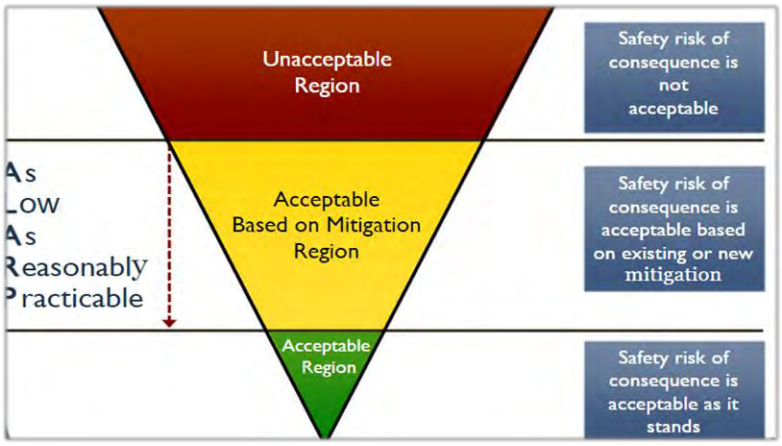
The Safety Committee plays a crucial role in the risk assessment process. The committee reviews the results of risk assessments, particularly for high and serious risk hazards, and provides recommendations for mitigation strategies. The committee's diverse perspectives ensure a comprehensive evaluation of safety risks.

2.4.1 Safety Hazard/Risk Tolerance

The agency shall utilize this diagram and thought process as it evaluates the risks associated with each identified hazard. This assessment shall help form the determination of mitigation strategies that may or may not be implemented. The diagram breaks down the risks into three general categories.

- Acceptable
- Acceptable with Mitigation
- Unacceptable

HAZARD/RISK ANALYSIS MATRIX



2.4.2 Safety Hazard/Risk Likelihood

Th likelihood of an event or a specific hazard occurring may be defined as how often that event or hazard can credibly be expected to happen. The hazard likelihood can also be described further as the number of potential occurrences based upon a unit of time, miles, trips/runs or passengers carried. An analysis of the agency's operating experiences can serve as a method for the determination of a specific hazard's likelihood.

Safety Hazard Risk Likelihood Table

LIKELIHOOD LEVELS		
Description	Meaning	Value

Frequent	Continuously experienced. Depending on the nature of the hazard, the potential consequence can be expected to occur more than once per month.	A
Probable	Will occur frequently. Depending on the nature of the hazard, the potential consequence may be experienced less than once per month but more than once per year.	B
Occasional	Will occur several times. Depending on the nature of the hazard, the potential consequence may be experienced less than once per year but more than once per decade.	C
Remote	Unlikely, but can reasonably be expected to occur. Depending on the nature of the hazard, the potential consequence may be experienced less than once per decade but more than once in the life of the system	D
Improbable	Unlikely to occur but possible. Depending on the nature of the hazard, the potential consequence likely will not be experienced in the life of the system but is possible	E

2.4.3 Safety Hazard/Risk Severity

Hazard severity is a subjective determination of the worst case that could be anticipated to result from human error, design inadequacies, component failure or malfunction. The categories of hazards are as follows:

- Catastrophic - Operating conditions are such that human error, design deficiencies, element, subsystem or component failure or procedural deficiencies may cause death or major system loss and require immediate termination of the unsafe activity or operation
- Critical - operating conditions are such that human error, subsystem or component failure or procedural deficiencies may cause severe injury, severe occupational illness or major system damage and require immediate corrective action.
- Marginal - Operating conditions are such that they may result in minor injury, occupational illness or system damage and are such that human error, subsystem, or component failures can be counteracted or controlled.
- Negligible - Operating conditions are such that human error, subsystem or component failure or procedural deficiencies will result in less than minor injury, occupational illness, or system damage.

The categorization of hazards is consistent with risk-based criteria for severity; it reflects the principle that not all hazards pose an equal amount of risk to personal safety.

Safety Hazard/Risk Severity Table

SEVERITY CATEGORIES		
Severity	Meaning	Value
Catastrophic	Could result in one or more of the following: multiple deaths, permanent total disability, irreversible significant environmental impact, or monetary loss equal to or exceeding $10M.	1
Critical	Could result in one or more of the following: death, permanent partial disability, injuries or occupational illness that may result in hospitalization, reversible significant impact to equipment, facilities, environment or monetary loss equal to or exceeding $1M but less than $10M.	2
Marginal	Could result in one or more of the following: Minor injury or occupational illness resulting in one or more lost workday(s) or job transfer/restrictions, injury resulting in ambulance transport, reversible moderate environmental impact, or impact to equipment or facilities, or monetary loss equal to or exceeding $100K but less than $1M.	3
Negligible	Could result in one or more of the following: Minor injury or occupational illness not resulting in a lost workday, no job transfer/restrictions, injury not resulting in ambulance transport, minimal environmental impact, or monetary loss less than $100K.	4

2.4.4 Safety Hazard/Risk Ratings

The Ann Arbor Area Transportation Authority has determined that it will assess a level of risk for each identified hazard/risk to determine the type of action(s) that shall be taken to mitigate or document the specific hazard/risk. The resulting information from the assessment process shall be provided to the affected department managers and other decision makers as needed. The intent is to understand the amount of risk involved in accepting the hazard in relation to the costs associated with reducing it to an acceptable level. The Hazard/Risk Analysis Matrix includes information that can be used as part of the overall analysis process. The information is broken down into categories such as the “Safety Hazard/Risk Index” that play key roles in the analysis process that will not only lead to a determination of the hazard but also assist with the mitigation actions if necessary.

Hazard/Risk Assessment Matrix

HAZARD/RISK ASSESSMENT MATRIX	
LIKELIHOOD	SEVERITY

	Catastrophic (1)	Critical (2)	Marginal (3)	Negligible (4)
Frequent (A)	HIGH	HIGH	HIGH	SERIOUS
Probable (B)	HIGH	HIGH	SERIOUS	MEDIUM
Occasional (C)	HIGH	SERIOUS	MEDIUM	LOW
Remote (D)	MEDIUM	MEDIUM	LOW	LOW
Improbable (E)	LOW	LOW	LOW	LOW

Safety Hazard/Risk Resolution Requirements

HAZARD/ RISK RESOLUTION REQUIREMENTS			
High	Unacceptable	Correction Required	1A;1B;1C;2A;2B;3A
Serious	Undesirable	Correction may be required, dept. manager decision	2C;3B; 4A
Medium	Acceptable with Review	With review and documented approval by dept. manager	1D;2D;3C;4B
Low	Acceptable	Without review or approval	1E;2E;3D;3E;4C;4D;4E
Eliminated	Acceptable	No Action Required	

Safety Hazard/ Risk Index

RISK LEVEL	CRITERIA
HIGH	Unacceptable – Action Required: Safety risk must be mitigated or eliminated.

SERIOUS	Undesirable- Action Required, Management Decision with review and approval by SMS Executive
MEDIUM	Undesirable – Management Decision: Dept. Management must decide whether to accept safety risk with monitoring or require additional action, with documentation
LOW	Acceptable without review: Safety risk is acceptable pending management review & approval.
ELIMINATED	Acceptable with investigation and documentation that the hazard/risk is no longer present.

- HIGH risk hazards that receive an unacceptable initial hazard analysis receive immediate attention/control. A high hazard rating requires corrective action. Hazards that receive a high hazard rating will be addressed appropriately in a timely manner.
- SERIOUS hazards are undesirable and require corrective action and decisions by management. Hazards that receive a serious hazard rating will remain on the hazard logs no more than 90 days without an approved corrective action plan.
- MEDIUM hazards are undesirable but may be acceptable with review and approval by management. These hazards/risks if accepted may also require monitoring or additional action with documentation.
    - Events from a medium hazard are less likely to occur and are less severe in nature.
- LOW risk hazards do not require review and are acceptable.
- ELIMINATED hazard is no longer present.

2.5 Mitigation

The transit environment is ever changing and presents some hazards, which are impossible to eliminate and others, which are highly impractical to eliminate. Hazard resolution can be described as the analysis and subsequent mitigation actions taken to reduce the hazard and the associated risk to the lowest level practical. Resolution is not equal to hazard elimination. Reduction of risk to the lowest practical level can be accomplished in a variety of ways including engineering factors, administrative controls, training, and others.

The hazard/risk analysis process utilized by AAATA may indicate that certain identified hazards have an acceptable level of risk, while others require mitigation to reduce their risks to an acceptable level. The AAATA will prioritize identified safety risks using tools such as a “Hazard/Risk Assessment Log” as a means of managing the associated risks.

The level of risk assigned to a hazard can be lowered by reducing the severity/impact of the potential consequences, by reducing the likelihood/frequency of occurrence and/or by reducing the exposure to that risk.

In line with the overall intent of this ASP and the SMS, the AAATA will take but not be limited to the following safety actions to mitigate all identified risks affecting the transit operations. These actions can be classified into three general categories, including:

- Physical Protections:
    - These include the use and implementation of objects and technologies that are engineered to discourage, or warn against, or prevent inappropriate action or mitigate the consequences of events (e.g. traffic control devices, fences, safety restraining systems, transit controls/signals, transit monitoring systems, etc.)

- Administrative Protections:
    - These include the establishment of procedures and work practices aimed at diminishing the likelihood of an accident/incident (e.g. safety regulations, standard operating procedures, job safety analysis, personnel proficiency, supervision inspection, training, etc.)
- Behavioral Protections:
    - These shall include behavioral interventions through education and public awareness campaigns aimed at reducing risky and reckless behavior of motorists, passengers and pedestrians, factors outside the control of the agency.

The safety risk mitigation process requires the agency to not only identify, assess, and mitigate risks, it also requires the review of new and existing mitigation efforts. The agency shall require the affected department manager or designee who approved of the mitigation plans to monitor its operations to identify the effectiveness of the mitigations. The Safety Committee shall be included on all mitigation assessments.

The Safety Committee is responsible for identifying and recommending safety risk mitigations necessary to reduce the likelihood and severity of potential consequences identified through the agency's safety risk assessment. This includes mitigations related to vehicular and pedestrian safety events involving transit vehicles and assaults on transit workers. The committee also identifies any mitigations that may be ineffective, inappropriate, or not implemented as intended.

A key component of the monitoring process is that it must determine if the mitigations are ineffective, inappropriate or were not implemented as intended. Findings from this process shall be reported to the Safety Officer to be included in the “Hazard Risk Mitigation Log” and may trigger re-submittal to the SRM process. Information related to the effectiveness of mitigation efforts by the agency shall be reported to the SMS Executive to be communicated to the Accountable Executive.

2.5.1 Contracted Services – SRM Responsibilities

The AAATA shall require that all contractors providing transit services for AAATA, have or establish a formal safety risk management program. The SRM program managed by the contracted service provider shall comply with the tenets of the FTA requirements for SMS and SRM as well as the expectations of this ASP.

The SMS Executive shall designate the Manager of Mobility Services or other member of staff to monitor the safety programs and activities of the transit contractors for compliance with all facets of this ASP and FTA SMS requirements. This shall include receiving regular reports of safety activities, safety events and the review of the SRM policies and processes of the contracted agency. To ensure success, the Safety Officer and the appointed member of staff shall work with the contracted agencies to ensure that they are well informed of these requirements and expectations.

The contractor's SRM program shall identify hazards, their consequences and the mitigation efforts taken and their monitoring.

This shall include::

- Accident/Incident Reporting
- Hazard Identification
- Hazard/Risk Assessments
- Hazard/Risk Mitigation Process
- Employee Safety Training
- Established applicable safety programs
- Tracking of NTD reportable information
- Other

2.6 Documentation - SRM

The SRM component of the ASP and SMS involves key processes that are essential to the success of safety management by AAATA. The identification, assessment, prioritization, and mitigation of identified hazards/risks facing the agency are individual measures that when managed properly will lead to an effective level of safety management.

The organization will make use of the "Hazard/Risk Assessment Log" to document and track its efforts and results that are related to SRM. This process and this log establish a level of priority for each identified hazard/risk and shall serve as a guide to the agency in terms of how it will proceed.

Additionally, the AAATA will also implement the use of the "Hazard/Risk Mitigation Log" to monitor and document its activities that are put into action to tackle the identified hazards. This document shall be updated as is necessary to ensure continual progress towards the reduction of the hazards/risks. This will assist in tracking the process for further monitoring and evaluation (safety assurance) of the effectiveness of mitigation efforts taken by the agency. The management of these two logs shall be the responsibility of the safety officer who will utilize this

information to provide the SMS Executive with updates on the performance and use of the SRM process.

The Safety Committee will review the Hazard/Risk Assessment Log and Hazard/Risk Mitigation Log on a regular basis to ensure the effectiveness of the SRM process and to make recommendations for improvements.

SECTION 3 SAFETY ASSURANCE

The agency's SRM process calls for the identification and analysis of hazards faced by its operations. These identified hazards shall be assessed as a priority based upon the level of risk that is assigned to each, with the mitigation plans establishing the goals and objectives to be achieved. After these goals and objectives have been determined safety assurance is the next phase in the SRM process.

Safety assurance is a continuous process of the SMS that is constantly interacting with the SRM function by providing essential data and information necessary to monitor progress. To be effective, safety assurance requires that a clear understanding be established as to how safety performance will be evaluated. The AAATA will determine what metrics will be used to assess system safety and determine if the safety management system is working properly and serve as an indicator of our safety efforts. The successful management of safety will mean that these metrics, goals, and objectives will be used for ongoing performance monitoring and improvement.

3.1 Safety Assurance Key Terms

The establishment of agency safety goals and objectives is a key part of strategic planning and formulation of safety policy for AAATA. To create a successful safety performance measurement system, these safety goals must first be clearly defined, understood, and communicated. Below please find key terms directly related to SMS, this ASP and the safety assurance process:

- Safety Assurance: The process within the SMS that functions to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that safety objectives are met or exceeded.
- Safety Performance Indicator (Metrics): Means data-driven, quantifiable parameter or measure that is used for monitoring and assessing safety performance
- Safety Performance: The safety effectiveness and efficiency of the organization as defined by its safety performance indicators and targets, when measured against its safety goals.
- Safety Performance Monitoring (SPM): Agency activities aimed at measuring the safety effectiveness and efficiency during service delivery operations, using safety performance indicators, targets, and objectives
- Safety Performance Target (SPT): A specific level of performance for a given performance measure over a specified timeframe related to safety management activities.
- Safety goals are general descriptions of desirable long-term impacts.
- Safety objectives are more specific statements that define measurable results.

3.2 Safety Performance Measures

Performance measurement is the systematic collection, analysis and reporting of data that tracks resources used, work produced and whether specific outcomes were achieved. It is a tool to measure and improve upon operational performance, to identify and correct behavioral performances as necessary to reduce accidents and incidents. The essential functions of performance measurement include the monitoring and evaluation of progress achieved.

For the purposes of SMS and this ASP, the identified safety goals and objectives will be measured by defining a specific level of safety performance. This shall include the establishment of both baseline and achievable/reasonable targets, for the operations of AAATA.

AAATA understands that it must not only identify but also define its safety performance measures using related safety metrics. The safety metrics used to measure performance may be both general in nature and specific to the organization, while being applicable to actual operations. The AAATA looks to identify standards of measurement that will allow for performance and progress towards the selected goals to be assessed.

3.3 Safety Performance Targets and Risk Reduction Program

The AAATA's Safety Performance Targets and Risk Reduction Program are closely interlinked components of our safety management system. Our performance targets set measurable goals for safety improvement, while the risk reduction program outlines specific strategies and actions to achieve these targets. Together, they form a comprehensive approach to enhancing safety across our transit operations.

3.3.1 General Safety Performance Targets

AAATA sets its safety performance targets using a data-driven approach. We analyze our performance data as reported to the National Transit Database for the previous three years, establishing a rolling average as our baseline. We then set targets that aim for continuous improvement while remaining realistic and achievable. The absolute goal of zero incidents is always our ultimate aspiration, informing our target-setting process even as we work towards incremental improvements.

The Ann Arbor Area Transportation Authority has specified its SPTs based upon the safety performance measures established under the National Public Transportation Safety Plan. Performance targets are set by the Safety Officer and SMS Executive with the approval of the Chief Executive Officer.

AAATA General Safety Performance Targets								
Mode of Transit Service	**Year**	**Fatalities (Total)**	**Fatalities (Per 100k VRM)**	**Injuries (Total)**	**Injuries(Per 100K VRM)**	**Safety Events (Total)**	**Safety Events (Per 100K VRM)**	**System Reliability (VRM/Failures)**
Fixed Route Bus	2021	0	0	12	.36	124	3.73	40,526
Fixed Route Bus	2022	0	0	11	.31	237	6.73	26,266
Fixed Route Bus	2023	0	0	9	.26	95	2.70	51,009
Fixed Route Bus	2024	0	0	8	.22	86	2.43	55,000
Fixed Bus Route	2025	0	0	9	.22	80	2.27	59,050

Fixed Route Bus	2026	0	0	8	.22	75	2.25	69,409

AAATA General Safety Performance Targets (New Additions)								
Mode of Transit Service	**Year**	**Transit Worker Fatality Rate**	**Collision Rate**	**Pedestrian Collision Rate**	**Vehicular Collision Rate**	**Transit Worker Injury Rate**	**Assaults on Transit Workers**	**Rate of Assaults on Transit Workers**
Fixed Route Bus	2025	March 2025	March 2025	March 2025	March 2025	March 2025	March 2025	March 2025

3.3.2 Risk Reduction Program Targets

In accordance with FTA requirements, the AAATA Safety Committee is responsible for setting annual safety performance targets for the risk reduction program. These targets are based on a three-year rolling average of data submitted to the National Transit Database and cover all modes of public transportation operated by AAATA.

	AAATA Risk Reduction Program Targets					
Safety Performance Measure	**3-Year Average (2022-2024)**	**2025 Target**	**3-Year Average (2023-2025)**	**2026 Target**	**2027 Target**	
Major Events	119	117	79	40		
Major Event Rate (ME/VRMx100,000	3.39	3.33	2.09	1.06		
Collisions	18	19	14	19		
Collision Rate (Coll/VRMx100,000)	0.52	0.53	0.37	0.5		
Fatalities	0	0	0	0		
Fatality Rate (Fat/VRMx100,000)	0	0	0	0		
Injuries	10	9	8	10		
Injury Rate (Inj/VRMx100,000)	0.30	0.27	0.22	0.26		
Assaults on Transit Workers	87	74	65	30		
Rate of Assault on Transit Workers (ATW/VRMx100,000)	2.47	2.1	1.79	0.8		
Major Mechanical Failures	134	122	135	175		
Major Mechanical Failure Rates (MMF/VRMx100,000)	2.47	2.25	3.6	4.66		

3.4 Purpose

The purpose of the Risk Reduction Program is to improve safety by reducing the number and rates of accidents, injuries, and assaults on transit workers, based on data submitted to the National Transit Database. This program addresses specific areas of concern as identified in the Bipartisan Infrastructure Law and FTA regulations, including vehicular and pedestrian accidents (with special attention to pedestrian knockdowns) and assaults on transit workers.

3.5 Process

The risk reduction program includes the following key components:

1. Reduction of vehicular and pedestrian accidents involving buses: a. The Safety Committee will conduct regular risk analyses to identify factors contributing to these accidents, with particular focus on pedestrian knockdowns. b. Special attention will be given to measures that reduce visibility impairments for bus operators, including:
    - Retrofits to existing buses
    - Specifications for future procurements that reduce visibility impairments. The committee will develop strategies to reduce pedestrian knockdowns, such as enhanced pedestrian detection systems and public awareness campaigns.
2. Mitigation of assaults on transit workers: a. The Safety Committee will perform risk analyses to identify factors contributing to assaults on transit workers. b. Based on these analyses, the committee will recommend deployment of assault mitigation infrastructure and technology on buses and in transit facilities.
3. Performance monitoring: a. The Safety Committee will set annual safety performance targets for the risk reduction program based on a three-year rolling average of data submitted to the National Transit Database. b. Progress towards these targets will be monitored quarterly.
4. Continuous improvement: a. The Safety Committee will review the effectiveness of implemented mitigations at least semi-annually. b. Based on this review, the committee will recommend adjustments to existing mitigations or new mitigations as needed.
5. Resource allocation: a. If AAATA fails to meet a safety performance target set by the Safety Committee, 0.75% of our section 5307 funds will be allocated in the following fiscal year to projects reasonably likely to meet the safety performance target.
    - The Major Mechanical Failures Safety Performance Target was not achieved for 2025. Thus, the Safety Committee completed a thorough Safety Risk Analysis.
        1. Mitigations proposed by the Safety Committee are as follows:
            - Troubleshooting Tree Booklet Cards of common and preventable mechanical failures will be designed and distributed to all buses for Motor Coach Operators
            - Install additional coolant caddies to help check fluid levels in buses and top off fluids more frequently.
            - The Fleet Department will use more physical indicators on lug notes (i.e., Lug Flags)
            - The Safety Committee will develop updated Vehicle Condition Cards to make reporting easier and more efficient for Pre and Post Vehicle Inspections.

Each component of our risk reduction program is designed to address specific safety performance targets. By focusing on reducing vehicular and pedestrian accidents and mitigating

assaults on transit workers, we aim to directly impact our targets for injuries, fatalities, and safety events.

3.6 Mitigations and Strategies

As these mitigations and strategies are implemented and developed, they will be added to the ASP as addenda. To date, the committee has implemented the following mitigations:

1. Enhanced de-escalation training has been delivered to all Motor Coach Operators and Fleet Maintenance Technicians. It will be provided to all new Motor Coach Operators, Fleet Maintenance Personnel, and Information Specialists as part of onboarding training and delivered as annual refresher training.
2. Signs have been placed on all buses to discourage the public from assaulting drivers, encouraging kindness and warning of penalties for operator assaults.
3. Fire extinguishers have been relocated behind the driver's seat to prevent their use as weapons by passengers.
4. Driver barriers have been installed on all buses and will be included in all future bus procurements. The Safety Committee will conduct a hazard risk assessment prior to procuring any buses without a Driver Barrier or selecting a new Driver Barrier system.
    - 2024, 2025, and future bus buildouts will and already include real-time camera-facing TV monitors on buses to deter undesirable passenger behavior for safety and security.
5. The Safety Committee will conduct a quarterly review of all driver assault incidents and pedestrian knockdowns to identify trends and develop new mitigation strategies.
6. Public information initiatives have been implemented to inform passengers and deter acts of violence, including clear commitments to assist law enforcement with prosecution of offenders.
7. Enhanced pedestrian detection systems are being evaluated for implementation on buses to reduce the risk of pedestrian knockdowns.
    - New automated safety announcements on all buses to passengers to encourage using the nearest crosswalks at bus stops to cross streets for their Safety to prevent pedestrian strikes.

3.7 Agency Actions

The Agency is committed to the following:

1. Operations Departmental Leadership will ensure all dispatchers and other headquarters staff are trained in the proper response to reports of assaults and pedestrian knockdowns across the transit system.
2. The agency will provide law enforcement with data and materials necessary to pursue assailants, including video surveillance.
3. Providing assault victims with resources necessary to fully recover and return to work, including Workers Compensation Program and Employee Assistance Program resources.
4. Continually assessing the effectiveness of implemented strategies, incorporating best practices from government regulators, other transit systems, and law enforcement authorities.

5. Developing and implementing new strategies to reduce assaults on transit workers and pedestrian knockdowns.

3.8 Implementation and Monitoring

1. The Accountable Executive is responsible for ensuring the implementation of safety risk mitigations recommended by the Safety Committee as part of this program.
2. The Safety Officer will track the implementation of all approved mitigations and report progress to the Safety Committee quarterly.
3. The Safety Committee will monitor the effectiveness of implemented mitigations through regular review of safety performance data and employee safety reports.
4. If a mitigation is found to be ineffective, the Safety Committee will reassess the risk and recommend alternative mitigations.

The Safety Committee will document all risk analyses, recommended mitigations, and reviews of mitigation effectiveness. This documentation will be referenced in the Agency Safety Plan.

The Safety Officer will track progress against both our general safety performance targets and our risk reduction program targets on a monthly basis. This data will be compiled into quarterly reports for the Safety Committee's review, allowing for timely adjustments to our strategies if targets are not being met.

3.9 Performance Monitoring and Evaluation

The SRM process and its safety assurance component call for AAATA to monitor its safety performance and the effectiveness of the implemented mitigation efforts.

The agency will utilize its "Safety Performance Outline" that summarizes its desired safety goals and objectives. The AAATA will reference its "Safety Performance Matrix" to monitor the measures established to reach the identified goals and objectives. These tools and the information collected will provide the agency with the means to monitor and evaluate its own safety performance, and the results, which are a direct reflection on the established agency safety goals, objectives, and measures.

The Safety Committee will review safety performance data quarterly. This review will include an assessment of progress towards safety performance targets and the effectiveness of implemented safety risk mitigations. If performance is not meeting targets, the committee will recommend additional mitigations or changes to existing strategies. Bus Operations and Fleet Leadership will be responsible for submitting this data on a quarterly basis to the Safety Officer who will compile the data and present it to the Safety Committee.

The Safety Committee shall meet annually to review collected data that coincides with the identified safety goals and objectives of the agency. This group is tasked with the review and analysis of identified safety assurance activities, determining the responsibilities and specific timelines to ensure continuous monitoring, evaluation and updating of safety performance documentation.

The monitoring of safety risk mitigations taken by the agency is a key factor in the SRM process. It is imperative to the success of the SRM process that continuous monitoring of safety

risk mitigations is conducted to identify those that are incomplete, ineffective, or not yet implemented as intended. Such items shall be subject to further review and assessment, until such time that the identified hazard has been addressed to an acceptable level. The "Hazard/Risk Mitigation Log" shall be used to track the assignment of responsibilities and timelines, also to implement new mitigations and eliminate mitigations that are no longer required or effective.

The safety performance monitoring and measurement activities, such as Accident/Incident Investigations and the resulting information related to all safety events will help identify causal factors. It is these causal factors that result in safety failures, defects and conditions that can negatively impact the fleet and operations safety.

The AAATA will utilize safety performance monitoring activities that may include internal functions such as those listed below to measure the effectiveness of existing mitigations.

- Service delivery monitoring
- Review of operational and maintenance functions and data monitoring
- Accident/Incident Report tracking and monitoring
- Monitoring the "Employee Safety Reporting Program"
- Assessment of available and applicable external safety information
- Review and evaluation of the SMS
- Regular review of Fleet Service functions for compliance with established procedures
- Review of Hazard/Risk Mitigation Plans and Results
- Review of internal and external safety audits, and inspections
- Safety Investigations
- Other

The agency shall review, investigate, and monitor safety information and actions taken resulting from internal activities, to determine that the actions taken address and reduce the risk factor to an acceptable level. If the actions taken are not considered effective, then the matter shall be subject to the SRM process for further review and analysis.

The requirement to establish and meet the Safety Assurances element and activities of SMS are extended to the contracted agencies of AAATA. As stated previously the AAATA Safety Officer and the appointed staff member shall work to provide the contracted agencies with the necessary information to allow for success and compliance with all ASP and FTA requirements. The contracted agencies shall be able to show and document compliance with this section as with all SMS elements. This information shall be maintained on file by the Safety Officer and used to update the SMS Executive.

3.10 Performance Results and Agency Decision-Making

The Ann Arbor Area Transportation Authority with the development of this ASP and the SMS is dedicated to the effective management of safety through performance-based results. It is critical to this process that performance information obtained or generated is shared with the SMS Executive to be passed along to the Accountable Executive and others as is necessary.

The agency is committed to using the data collected and information learned, to provide for informed decision making and instill positive change for its operations. The main objective of

these processes is the continuous improvement of overall system safety and its effects on the traveling public and our employees.

When established performance goals are not met, AAATA will work to identify why such goals were not met and what actions are necessary to be taken to minimize the gap in achieving the defined goals. Also, when goals are easily achieved, actions will be taken to exceed expectations and re-establish a reasonable performance baseline.

The Safety Committee plays a crucial role in interpreting performance results and recommending actions. When established performance goals are not met, the committee will work with relevant departments to identify root causes and recommend corrective actions. These recommendations will be presented to the Accountable Executive for implementation.

Uses of Performance Results may include some of the following examples:

- Focus attention on performance gaps and trigger in-depth investigations of what performance problems exists
- Help make informed resource allocation decisions
- Identify needs for staff training or technical assistance
- Help motivate employees to continue making program improvements
- Support strategic planning efforts by providing baseline information for tracking progress
- Identify best practices
- Establish a standard for accountability

3.11 Safety Performance Target Coordination

The Accountable Executive for AAATA has given his/her authorization for this ASP, including the identified safety performance targets to be shared with the local Metropolitan Planning Organization (MPO) in our service area, Southeast Michigan Council of Governments (SEMCOG), as well as the local Transportation Study, Washtenaw Area Transportation Study (WATS), each year after its certification. The AAATA Accountable Executive also ensures that a copy of this certified plan will be provided to the Michigan Department of Transportation (MDOT) as required.

It is the understanding of this agency that the Washtenaw Area Transportation Study (WATS) is responsible for sharing the safety performance information with the regional Southeast Michigan Council of Governments (SEMCOG) and state agencies. Agency personnel are available and shall work with both MDOT and WATS in the selection and coordination of safety performance targets upon request.

Safety Performance Targets Transmitted To:

- State Agency: Michigan Department of Transportation
- Transportation Study: Washtenaw Area Transportation Study
- Metropolitan Planning Organization: Southeast Michigan Council of Governments

3.12 Management of Change

Significant changes that may impact on safety performance will be reviewed by the Safety Committee. The committee will assess the potential safety impacts of the change and recommend any necessary additional safety risk mitigations.

The agency shall utilize existing procedures and protocols to identify and assess how the changes will affect operations, and the level of risk associated with the change. It is the overall impact upon AAATA's ability to manage its safety performance that must always be kept in mind when addressing changes such as:

- Long term or permanent service changes
- Major procurements
- New or moved infrastructure
- New or moved amenities
- Major Organizational Changes
- Changes to applicable regulations, laws, policies, and directives

As part of the management of changes such as those listed above and others the Project Manager will be required to complete a Hazard Risk Analysis. It is this assessment that will identify that the change will meet with the agency's desires to keep identified hazards to the lowest acceptable level.

The Hazard Risk Analysis identifies and documents all hazards associated to the desired change such as,

- the severity of the potential hazard,
- the likelihood of the hazard,
- measures necessary to mitigate the risk.

The Project Managers are required to complete the Hazard/Risk Analysis and mitigation plan and submit it to the Safety Officer for review and approval prior to implementation. The Safety Officer shall include/inform the SMS Executive of the intended mitigation plan prior to approval. The Safety Officer shall also document and track the mitigation plan and monitor for any compliance, training, and/or next steps that need completed prior to and throughout the implementation of the change.

The requirement to establish and have in place a process to manage change is an important part of this ASP and thereby is extended to the contracted agencies of AAATA. These agencies shall report to AAATA that they have an established process to identify and assess all organizational changes that may introduce new hazards or impact transit safety performance. It shall be understood that the requirement for these changes to be evaluated as part of the SRM process, is the same as it is for the AAATA.

As stated previously the AAATA Safety Officer and the appointed staff member shall work to provide the contracted agencies with the necessary information to allow for success and compliance with this ASP and FTA requirements. These agencies shall be able to show and document compliance with this section as with all SMS elements.

Any proposed changes that may impact the transit agency's safety performance must be evaluated through AAATA's Safety Risk Management process. This includes using the established hazard identification, risk assessment, and mitigation development procedures to ensure that any new risks introduced by the change are properly managed. The Safety Committee will review the results of this evaluation and make recommendations to the Accountable Executive regarding the implementation of the proposed change.

3.13 Continuous Improvement

Continuous improvement of all things safety related is not only a desire of the Ann Arbor Area Transportation Authority it is a SMS function that calls for the agency to audit its operations to allow AAATA to:

- Assess the effectiveness of the existing SMS to determine if it is performing as intended
- Assess adherence to the written and intended SMS policy, procedures, and processes for effectiveness
- Identify the causes of ineffective areas of performance
- Develop corrective action plans to address the sub-standard performance

Successful implementation of the SMS will require a measured approach by the agency. During the first three years of SMS implementation the focus will be on the measures necessary to get the SMS completely installed and functioning within the organization.

The Safety Committee plays a key role in the continuous improvement process. The committee will regularly review safety performance data, audit results, and employee safety reports to identify areas for improvement. The committee will make recommendations for safety improvements, which will be documented and tracked to ensure implementation and effectiveness.

The Safety Committee shall audit the sections of the ASP at a designated interval (semiannually or annually) to monitor plan progress, timeliness, documentation and other of efforts related to the success of the plan. Areas of the ASP that shall be reviewed may include the following subjects:

- SRM
- Operations and Maintenance procedure monitoring activities
- Safety Risk Mitigation Activities
- Employee Safety Reporting Program
- Safety Communication Activities
- Safety Training

Should the audits identify the need for corrective actions that require a change to the ASP, they shall be added as an addendum to reflect the revision and documented accordingly for review the following year. These identified deficiencies and the necessary corrective actions shall be communicated by the SMS EXECUTIVE and carried out via the direction of the Accountable Executive. Implementation shall be the responsibility of the affected department manager(s), or other as directed by the SMS EXECUTIVE or his/her designee.

SECTION 4 CONTAGIOUS VIRUS RESPONSE PLAN

4.1 Purpose

The purpose of the Contagious Virus Response Plan (CVRP) is to provide the leadership, staff, and safety committee of Ann Arbor Area Transportation Authority (AAATA) with guidance that will be both necessary and critical to contain and minimize the organizational impact of an outbreak of disease. Contagious virus or infectious disease emergencies can range from the naturally occurring illnesses to emerging infectious diseases (e.g., SARS, avian influenza) or intentional acts of bioterrorism (e.g., anthrax). The circumstances of these emergencies vary by type, magnitude of exposure, and means of transmission. Planning and preparing in advance are essential activities to deliver an effective response to this type of emergency.

4.2 Scope

This plan and its resulting actions are intended to align with guidelines put forth by the Centers for Disease Control and Prevention (CDC) and the State of Michigan to minimize exposure to infectious diseases. The goal of this plan is to ensure that there is an understanding of the contagious virus and then to curtail the negative effects upon the organization, and the health of its personnel and customers.

4.3 Mitigations and Strategies

In the event of an outbreak of disease, AAATA will follow the guidelines put forth by the State of Michigan and Washtenaw County. We will also utilize the strategies and mitigations outlined in the AAATA Contagious Virus Response Plan. This plan is updated annually. AAATA is committed to the health and safety of our employees and passengers. To ensure we meet these efforts, the agency shall adhere to the following actions:

- Supply employees with necessary PPE like masks and gloves at all AAATA facilities, and actively encourage their use during working hours.
- Immediately convene the Safety Committee in the event of a pandemic or global health emergency as defined by the CDC or State Health Authorities to discuss mitigation recommendations based on the threat of the contagious virus.
- Continue, indefinitely, enhanced housekeeping practices. This includes elevating the frequency and rigor of cleaning and disinfection activities, targeting high-touch surface areas like handrails, ticket machines, and other communal equipment.

- The Safety Committee will regularly review and update the CVRP to ensure it aligns with current public health guidelines and best practices in transit operations during health emergencies.

- Implement flexible work arrangements, such as remote work or staggered shifts, when necessary to reduce the risk of virus transmission among employees.

- Establish clear communication protocols to keep employees and passengers informed about current health risks, preventive measures, and any changes to transit operations due to health emergencies.

- Conduct regular training sessions for employees on proper hygiene practices, use of PPE, and procedures for handling potential exposure situations.

- Coordinate with local public health authorities to stay informed about local disease transmission rates and adjust operations as necessary.

- The Safety Committee will monitor the effectiveness of implemented mitigations and recommend adjustments as needed based on evolving public health guidance and operational experiences.

- Develop and maintain plans for service continuity in the event of reduced staffing due to illness, ensuring essential transit services can be maintained safely.

These mitigations and strategies will be reviewed and updated by the Safety Committee at least annually or more frequently as needed in response to specific health emergencies. Any updates to the CVRP will be communicated to all employees and integrated into relevant training programs.

SECTION 5 APPENDICES

5.1 KEY TERMS

The Ann Arbor Area Transportation Authority supports and incorporates the following FTA Public Transportation and Safety Management System key terms and their definitions.

- Accident means an Event that involves any of the following: A loss of life; a report of a serious injury to a person; a collision of public transportation vehicles; a runaway train; an evacuation for life safety reasons; or any derailment of a rail transit vehicle, at any location, at any time, whatever the cause.
- Accountable Executive means a single, identifiable person who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan of a public transportation agency; responsibility for carrying out the agency's Transit Asset Management Plan; and control or direction over the human and capital resources needed to develop and maintain both the agency's Public Transportation Agency Safety Plan and the agency's Transit Asset Management Plan.
- SMS Executive means an adequately trained individual who has responsibility for safety and reports directly to a transit agency's chief executive officer, general manager, president, or equivalent officer. A SMS Executive may not serve in other operational or maintenance capacities, unless the SMS Executive is employed by a transit agency that is a small public transportation provider as defined in this part, or a public transportation provider that does not operate a rail fixed guideway public transportation system.
- Consequence means the potential outcome(s) of a hazard.
- Equivalent Authority means an entity that carries out duties similar to that of a Board of Directors for a recipient or subrecipient of FTA funds under 49 U.S.C. Chapter 53, including sufficient authority to review and approve a recipient or subrecipient's Public Transportation Agency Safety Plan.
- Event means any Accident, Incident, or Occurrence.
- Hazard means any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.
- Hazard Analysis means the formal activities to analyze potential consequences of hazards during operations related to provision of services
- Incident means an event that involves any of the following: a personal injury that is not a serious injury; one or more injuries requiring medical transport; or damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of a transit agency.

- Investigation means the process of determining the causal and contributing factors of an accident, incident, or hazard, for the purpose of preventing recurrence and mitigating risk.
- Lagging Indicators provide evidence, through monitoring, which intended safety management outcomes have failed or have not been achieved.
- Leading Indicators provide evidence, through monitoring, that key safety management actions are undertaken as planned.
- National Public Transportation Safety Plan means the plan to improve the safety of all public transportation systems that receive Federal financial assistance under 49 U.S.C. Chapter 53.
- Near miss means a safety event where conditions with potential to generate an accident, incident, or occurrence existed, but where an accident, incident, or occurrence did not occur because the conditions were contained by chance or by existing safety risk mitigations
- Occurrence means an Event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a transit agency.
- Operator of a public transportation system means a provider of public transportation as defined under 49 U.S.C. 5302.
- Passenger means a person other than an operator who is on board, boarding, or alighting from a vehicle on a public transportation system for the purpose of travel.
- Performance measure means an expression based on a quantifiable indicator of performance or condition that is used to establish targets and to assess progress toward meeting the established targets.
- Performance target means a quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a time required by the FTA.
- Public Transportation Agency Safety Plan (or Agency Safety Plan) means the documented comprehensive Agency Safety Plan for a transit agency that is required by 49 U.S.C. 5329 and Part 673.
- Risk means the composite of predicted severity and likelihood of the potential effect of a hazard.
- Risk mitigation means a method or methods to eliminate or reduce the effects of hazards.
- Safety means the state in which the potential of harm to persons or property damage during operations related to provision of services is reduced to and maintained at an acceptable level through continuous hazard identification and SRM activities.
- Safety Assurance means processes within a transit agency's Safety Management System that function to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.

- Safety Committee means A committee established with equal representation from frontline workers and management, responsible for reviewing and approving the ASP, setting safety performance targets, and recommending safety risk mitigations.
- Safety Deficiency means a condition that is a source of hazards and/or allows the perpetuation of hazards in time.
- Safety Management Policy means a transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of its employees regarding safety.
- Safety Management System means the formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks and hazards.
- Safety Objective means a high-level, global, generic, and non-quantifiable statement regarding conceptual safety achievements to be accomplished by an organization regarding its safety performance.
- Safety Performance Indicator means a data-driven, quantifiable parameter used for monitoring and assessing safety performance.
- Safety Performance Measurement means the assessment of non-consequential safety-related events and activities that provide ongoing assurance that safety risk mitigations work as intended.
- Safety Performance Monitoring means the activities aimed at the quantification of an organization's safety effectiveness and efficiency during service delivery operations, through a combination of safety performance indicators and safety performance targets.
- Safety Performance Target means a quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a time period required by the Federal Transit Administration.
- Safety Promotion means a combination of training and communication of safety information to support SMS as applied to the transit agency's public transportation system.
- Safety Reporting Program means a process that allows employees to report safety conditions to senior management, protections for employees who report safety conditions to senior management, and a description of employee behaviors that may result in disciplinary action.
- Safety Risk means the assessed likelihood and severity of the potential consequence(s) of a hazard, using as reference the worst foreseeable, but credible, outcome.
- Safety Risk Assessment means the formal activity whereby a transit agency determines SRM priorities by establishing the significance or value of its safety risks.
- SRM means a process within a transit agency's Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.
- Safety Risk Likelihood means the likelihood that the consequence might occur, taking as reference the worst foreseeable-but credible-condition.

- Safety Risk Reduction Program means a program designed to improve safety performance by reducing the number and rates of accidents, injuries, and assaults on transit workers, based on data submitted to the National Transit Database.
- Safety Risk Severity means the anticipated effects of a consequence, should it materialize, taking as reference the worst foreseeable-but credible-condition.
- Serious injury means any injury which: (1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date when the injury was received; (2) Results in a fracture of any bone (except simple fractures of fingers, toes, or noses); (3) Causes severe hemorrhages, nerve, muscle, or tendon damage; (4) Involves any internal organ; or (5) Involves second- or third-degree burns, or any burns affecting more than 5 percent of the body surface.
- Three-Year Rolling Average means the average of data from the most recent three consecutive years, used as the basis for setting safety performance targets.
- Transit Agency means an operator of a public transportation system.
- Transit Asset Management Plan means the strategic and systematic practice of procuring, operating, inspecting, maintaining, rehabilitating, and replacing transit capital assets to manage their performance, risks, and costs over their life cycles, for the purpose of providing safe, cost- effective, and reliable public transportation, as required by 49 U.S.C. 5326 and 49 CFR Part 625.

5.2 KEY ACRONYMS

ACRONYM	WORD OR PHRASE
AAATA	Ann Arbor Area Transportation Authority
ANPRM	Advanced Notice of Proposed Rule Making
ASP	Agency Safety Plan
BIL	Bipartisan Infrastructure Law
CAP	Corrective Action Plan
CDC	Centers for Disease Control and Prevention
CEO	Chief Executive Officer
CRM	Customers Relations Management
CVRP	Contagious Virus Response Plan
ESRP	Employee Safety Reporting Program
FTA	Federal Transit Administration
MAP-21	Moving Ahead for Progress in the 21st Century
MPO	Metropolitan Planning Organization
NPRM	Notice of Proposed Rule Making
NTD	National Transit Database
OJI	On-The-Job Injury
PTASP	Public Transportation Agency Safety Plan
SEMCOG	Southeast Michigan Council of Governments
SMP	Safety Management Policy
SMS	Safety Management System
SOP	Standard Operating Procedure
SPM	Safety Performance Monitoring

SPT	Safety Performance Target
SRM	Safety Risk Management
TSI	Transportation Safety Institute
TWU	Transportation Workers Union
VCC	Vehicle Condition Card
VRM	Vehicle Revenue Miles
WATS	Washtenaw Area Transportation Study

SECTION 6 REFERENCES

6.1 Reference Introduction

This reference list provides the key sources and documents used in the development and implementation of the Ann Arbor Area Transportation Authority's Public Transportation Agency Safety Plan. It includes federal regulations, industry guidelines, and internal documents that form the foundation of our safety management system. This list is not exhaustive and may be updated as new resources become relevant to our safety practices.

6.2 References

- Federal Transit Administration. (2018). Public Transportation Agency Safety Plan Final Rule, 49 CFR Part 673.
- Federal Transit Administration. (2021). National Public Transportation Safety Plan.
- Occupational Safety and Health Act of 1970, 29 U.S.C. § 651 et seq.
- Moving Ahead for Progress in the 21st Century Act (MAP-21), Pub. L. No. 112-141 (2012).
- Bipartisan Infrastructure Law, Pub. L. No. 117-58 (2021).
- National Transit Database Reporting Manual
- Centers for Disease Control and Prevention. (2023). COVID-19 Guidance for Public Transportation.
- Ann Arbor Area Transportation Authority. (2024). Transit Asset Management Plan.
- Ann Arbor Area Transportation Authority. (2024). Safety Committee Guidelines.
- Robert's Rules of Order, Newly Revised (12th Edition).

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1.3.1 People with economic challenges have affordable transportation options from TheRide. 17

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. 20

1.3.3 People perceive TheRide's services as safe, reliable, and convenient. 25

1.4 Residents benefit from reductions of TheRide's direct and indirect environmental impacts including emissions, waste, and localized impacts. 28

1.4.1 Residents benefit from the absence of carbon and greenhouse gas emissions, and criteria air pollutants. 31

1.5 Residents of the area recognize the positive contributions of TheRide to the area's quality of life. 39

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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 mor 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.

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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 costs[1], 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).

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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

Compliance History

Policy	2024	2025	2026
X.X.X			

Commented [MC2]: This table will be replaced. Used here to illustrate concept.

All tables are fair game for comment/critique.

Commented [MC3]: New feature: compliance icon for each policy.

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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

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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.

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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 elegible 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:

Commented [MC5]: I'm not entirely satisfied with this definition as it uses activities (outputs) as proxies for outcomes. TBD

Figure 3: Service/Infrastructure Goals

	Calendar Year							
	2026	2027	2028	2029	2030	2035	2040	2045
Feasibiliy 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)	☐							
Potenital for Expanded Youth Transportation Assessed		X						
Potential for Additional Transit Priroity Measures Assessed								
Bus Lane Join Proposal Completed (w/UM)	☐							
Potenial 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	
Potenital 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			

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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

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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.

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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

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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			

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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

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(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			

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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 that 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

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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			

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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 rules[2]. 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

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- It results in average annual transportation costs *far* below one federal definition of affordable transportation[3]. 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'.

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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			

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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 industry[4] 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.

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- **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:

A. **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.
B. **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.
C. **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.
D. **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….
E. **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.
F. **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.
G. **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.

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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

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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.

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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

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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.

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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
Reliabley 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			

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

Definitions & Rationales

In this context **reduction** means a decrease in the *immediate impact* of transit operations and agency activities in general, as well as an increase in the overall *positive net impact* created by transit. This is reasonable because the policy wording and the Board's discussion in drafting it clearly intended to spur reduced impacts created by agency operations, and because we cannot clearly judge the value of negative impacts without also understanding the positive impacts we create, for example reduction in car travel because of transit. An 'impact' can be positive or negative.

Emissions are defined and evidenced in policy 1.4.1 below. Achievement with that policy satisfied this policy. This is reasonable because 1.4.1 elaborates on emissions.

I define **waste** as physical material or energy that no longer serves a purpose (e.g. packaging material, refuse, etc) or was unnecessary or inefficiency used. This is reasonable as it covers all categories of consumables. In this context *reducing* waste means minimizing it to the greatest degree that is cost effective. This is reasonable because we will always produce some waste in pursuing Ends, and reducing waste increases costs. As new technologies become available, greater reductions should become cost-effective.

Localized environmental impacts are primarily about containing any liquid waste from leaking vehicles or facilities (i.e. tanks). This is reasonable because transportation operations use dangerous fluids (e.g. diesel, oil, antifreeze, etc) that can damage waterways – a clear risk to the immediate and downstream environment - and because there are clear laws about how leaks are to be contained and remediated.

I defined **'*direct* environmental impacts'** to mean

- negative externalities created immediately on-site by our activities or equipment that degrade natural systems (e.g. air and water pollution), and
- the positive results of our work (i.e. transit ridership, offset pollution, etc).

I defined **'*indirect* environmental impacts'** to mean

- negative externalities created in the production of things we consume (e.g fuel, electricity), and
- positive impacts enabled by our services (e.g. auto-free living, higher density development, etc).

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Indicators, Targets for Achievement and Rationales

A. Direct Impacts

a. **Emissions**: Targets for emissions are addressed in policy 1.4.1 below.
b. **Waste (Interim)**: Specific targets for waste reduction are established by 202? (interim). This is reasonable because realistic targets depend on establishing a clear baseline understanding of how much 'waste' is currently produced, and assessing the viability and costs-effectiveness of solutions.
c. **Localized Impacts**: Achievement will be demonstrated when
    - **Garage Runoff:** A review of State records finds no unresolved violations of the Storm Waster Pollution Plan. This is reasonable because this Plan is the chief regulatory oversight of fluid leaks from our only garage (2700 S Industri Hwy) which is the largest point of risk to local waterways. Targets include:
        - **Underground Tanks 1:** When annual reviews of inspection records for underground tanks demonstrate that there are no sighs of leaks.
        - **Underground Tanks 2:** Periodic State inspections of underground tanks find no unresolved violations. This is reasonable because third party inspections are an independent confirmation of the integrity of the tanks.
        - **Construction Runoff:** Construction activities comply with appropriate code requirements. This is reasonable because municipal codes dictate how fluids and rain runoff from construction sites should be handled.
    - **Vehicle Spills:** There are no maintenance records of fluid leaks from vehicles that are not addressed appropriately. This is reasonable because there are clear standards for handling and cleaning a significant fluid spill from a vehicle, which could happen off site. Such incidents are unpredictable and not uncommon, so ensuring that appropriate mitigations measures were taken reduces local impacts.

B. Indirect Impacts (interim): The indirect negative and positive impacts of waste and local water are not immediately clear. By 202?, indicators, targets and evidence will be developed.

Evidence

A Direct Impacts

a. **Emissions:** See policy 1.4.1 below.
b. **Waste (Interim):** Targets and evidence due 202?.

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c. Localized Impacts

- The last Storm Water Pollution Prevention Plan state review was conducted in Feb 2022 and there were no records of unresolved violations. The next is expected in 2025.
- A review of facility inspections indicates that underground tanks were in compliance with State guidelines -including being leak-free.
- During the monitoring period, plans for the new YTC building included a review of environmental factors. Options will be discussed starting May 2025.
- During the monitoring period staff was trained and adequate equipment was available to respond to any potential vehicle leakages.

Source of Data: XXXXXX
Date of Data Review: XX/XX/XXXX as verified by XXXXXX

B. Indirect Impacts (interim): Evidence due 202?.

Compliance History

Policy	2024	2025	2026
X.X.X			

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

Definitions & Rationales

I define "**absence of**" to mean the cost-effective reduction and eventual elimination of the gaseous emissions listed in the policy. Those emissions are: carbon; other GHGs including methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride; and criteria pollutants such as Carbon Monoxide, Ground-Level Ozone, Lead, Nitrogen Dioxide, Particulate Matter, and Sulfur Dioxide - thirteen emission categories in all. This is reasonable because this is how the Environmental Protection Agency defines these terms. These emissions are primarily created by the burning of fossil fuel.

I further interpret this policy in the context of policy 1.4's reference to direct and indirect emissions to include emissions from the creation of the energy we consume as well as directly from operations. It also includes the indirect environmental benefits of people using transit rather than driving cars alone. This is reasonable considering the language of parent policy 1.4.

Indicators, Targets for Achievement and Rationales

Achievement will be demonstrated when A) emissions from agency operations decrease and eventually reach zero, and B) the offset emissions from foregone travel by single occupant vehicles increase (meaning a net decrease in emissions due to transit). These are reasonable because they both reflect a reduction in emissions that benefit residents.

Direct Impacts

A. **Emissions from Agency Operations Decrease:** More detailed achievement and targets are organized below by source of emissions, from greatest contributor to least.
    a. Emissions from **large buses** decrease in absolute terms until no emissions are produced from the tailpipe, or the agency reaches the limit of what is cost-effective and affordable considering current technologies and markets. Specific interim targets are provided in the table in the evidence section below.
    b. Emissions from **small buses (Paratransit, FlexRide, etc)** decrease in absolute terms until no emissions are produced from the tailpipe, or the agency reaches the limit of what is cost-effective and affordable

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considering current technologies and markets. Specific interim targets are provided in the table in the evidence section below.

c. Emissions from **support vehicles (trucks, staff vans, forklifts, etc)** decrease in absolute terms until no emissions are produced from the tailpipe, or the agency reaches the limit of what is cost-effective and affordable considering current technologies and markets. Specific interim targets are provided in the table in the evidence section below.

   These targets are reasonable because buses have 5-12-year lifespans, replacement over time avoids reimbursing the earlier federal investment, and truly clean technologies need more time to mature and become affordable. These timelines do rely on funding that has not been identified at this time.

d. Emissions from **facility operations (heating, cooling, lights, etc at garages, offices, terminals)** decrease in absolute terms until no emissions are produced from the buildings, or the agency reaches the limit of what is cost-effective and affordable considering current technologies and markets. This includes transportation and office operations. Specific interim targets are provided in the table in the section below. These targets are reasonable because facilities have decades-long lifespans, replacement over time avoids reimbursing the earlier federal investment, and truly clean technologies need more time to mature and become affordable. These timelines do rely on funding that has not been identified at this time.

e. **Indirect emissions for fuel and electricity** (interim): By 2020X, the CEO will determine the best way to calculate how much indirect emissions are created by the generation of energy for vehicles and buildings, and creates targets for reduction and elimination. This is reasonable because the agency has no current methodology for estimating emissions created by the creation of diesel, gasoline, or local electricity.

Indirect Impacts

B. **Offset Emissions Increase:** Net emissions will be measured by subtracting estimates of agency emissions from estimates of the emissions that did not happen because of transit ridership. The resulting net emissions figure illustrates the trade off of how many car trips were avoided because of transit. This is reasonable because one property of mass transit is the use of economies of

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scale to lower costs (and impacts) of travel. This is in contrast to single occupant vehicles trips (i.e. driving alone) which consume a greater amount of fuel and produce more emissions *on a per trip basis*.

Specific interim targets are provided in the table in the evidence section below. The targets are reasonable because they are linked to derived from changes in ridership (See policy 21.2) and the agency's emissions (above)

Evidence of Achieving Target for Period

A. Emissions from Agency Operations Decrease:

The following tables illustrates targets and evidence for reducing emissions within 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: Large Bus Emissions Targets & Evidence

	2025 (Baseline)	2027 (Current Period)	2030	2035	2040	2045	2050
Fuel Consumed (gallons)			TBD	TBD	TBD	TBD	TBD
Direct Emissions (tons)							
Carbon Target	NA	8,462	7,616 (-10%)	5,077 (-40%)	1,692 (-80%)	0 (-100%)	
Carbon Actual (est)	8,462	TBD	TBD	TBD	TBD	TBD	TBD
Methane (Target)							
Methane (Actual)							
NoX (Target)							
NoX (Actual)							
Hydrofluorocarbons (Target)							
Hydrofluorocarbons Actual							
Perfluorocarbons (Target)							
Perfluorocarbons (Actual)							
Sulfur Hexafluoride (Target)							
Sulfur Hexafluoride (Actual)							
Nitrogen Trifuoride (Target)							
Nitrogen Trifuoride (Actual)							
Carbon Monoxide (Target)							
Carbon Monoxide (Actual)							
Ozone (Target)							
Ozone (Actual)							
Lead (Target)							
Lead (Actual)							
Nitrogen Dioxide (Target)							
Nitrogen Dioxide (Actual)							
Particulate Matter (Target)							
Particulate Matter (Actual)							
Sulfur Dioxide (Target)							
Sulfur Dloxide (Actual)							

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Figure 11: Small Bus Emissions Targets & Evidence

	2025 (Baseline)	2027 (Current Period)	2030	2035	2040	2045	2050
Fuel Consumed (gallons)			TBD	TBD	TBD	TBD	TBD
Direct Emissions (tons)							
Carbon Target	NA	8,462	7,616 (-10%)	5,077 (-40%)	1,692 (-80%)	0 (-100%)	
Carbon Actual (est)	8,462	TBD	TBD	TBD	TBD	TBD	TBD
Methane (Target)							
Methane (Actual)							
NoX (Target)							
NoX (Actual)							
Hydrofluorocarbons (Target)							
Hydrofluorocarbons Actual							
Perfluorocarbons (Target)							
Perfluorocarbons (Actual)							
Sulfur Hexafluoride (Target)							
Sulfur Hexafluoride (Actual)							
Nitrogen Trifuoride (Target)							
Nitrogen Trifuoride (Actual)							
Carbon Monoxide (Target)							
Carbon Monoxide (Actual)							
Ozone (Target)							
Ozone (Actual)							
Lead (Target)							
Lead (Actual)							
Nitrogen Dioxide (Target)							
Nitrogen Dioxide (Actual)							
Particulate Matter (Target)							
Particulate Matter (Actual)							
Sulfur Dioxide (Target)							
Sulfur Dloxide (Actual)							

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Figure 12: Support Vehicle Emission Targets & Evidence

	2025 (Baseline)	2027 (Current Period)	2030	2035	2040	2045	2050
Fuel Consumed (gallons)			TBD	TBD	TBD	TBD	TBD
Direct Emissions (tons)							
Carbon Target	NA	8,462	7,616 (-10%)	5,077 (-40%)	1,692 (-80%)	0 (-100%)	
Carbon Actual (est)	8,462	TBD	TBD	TBD	TBD	TBD	TBD
Methane (Target)							
Methane (Actual)							
NoX (Target)							
NoX (Actual)							
Hydrofluorocarbons (Target)							
Hydrofluorocarbons Actual							
Perfluorocarbons (Target)							
Perfluorocarbons (Actual)							
Sulfur Hexafluoride (Target)							
Sulfur Hexafluoride (Actual)							
Nitrogen Trifuoride (Target)							
Nitrogen Trifuoride (Actual)							
Carbon Monoxide (Target)							
Carbon Monoxide (Actual)							
Ozone (Target)							
Ozone (Actual)							
Lead (Target)							
Lead (Actual)							
Nitrogen Dioxide (Target)							
Nitrogen Dioxide (Actual)							
Particulate Matter (Target)							
Particulate Matter (Actual)							
Sulfur Dioxide (Target)							
Sulfur Dloxide (Actual)							

Source of Data: XXXXXX
Date of Data Review: XX/XX/XXXX as verified by XXXXXX

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Facility Emissions Targets and Performance (interim): Targets and evidence due 202?.

Figure 13: Garage Emissions Targets & Performance

	2025 (Baseline)	2027 (Current Period)	2030	2035	2040	2045	2050
Fuel Consumed (gallons)			TBD	TBD	TBD	TBD	TBD
Direct Emissions (tons)							
Carbon Target	NA	8,462	7,616 (-10%)	5,077 (-40%)	1,692 (-80%)	0 (-100%)	
Carbon Actual (est)	8,462	TBD	TBD	TBD	TBD	TBD	TBD
Methane (Target)							
Methane (Actual)							
NoX (Target)							
NoX (Actual)							
Hydrofluorocarbons (Target)							
Hydrofluorocarbons Actual							
Perfluorocarbons (Target)							
Perfluorocarbons (Actual)							
Sulfur Hexafluoride (Target)							
Sulfur Hexafluoride (Actual)							
Nitrogen Trifuoride (Target)							
Nitrogen Trifuoride (Actual)							
Carbon Monoxide (Target)							
Carbon Monoxide (Actual)							
Ozone (Target)							
Ozone (Actual)							
Lead (Target)							
Lead (Actual)							
Nitrogen Dioxide (Target)							
Nitrogen Dioxide (Actual)							
Particulate Matter (Target)							
Particulate Matter (Actual)							
Sulfur Dioxide (Target)							
Sulfur Dloxide (Actual)							

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Figure 14: Passenger Terminal Emissions (BTC & YTC) Targets & Evidence

	2025 (Baseline)	2027 (Current Period)	2030	2035	2040	2045	2050
Fuel Consumed (gallons)			TBD	TBD	TBD	TBD	TBD
Direct Emissions (tons)							
Carbon Target	NA	8,462	7,616 (-10%)	5,077 (-40%)	1,692 (-80%)	0 (-100%)	
Carbon Actual (est)	8,462	TBD	TBD	TBD	TBD	TBD	TBD
Methane (Target)							
Methane (Actual)							
NoX (Target)							
NoX (Actual)							
Hydrofluorocarbons (Target)							
Hydrofluorocarbons Actual							
Perfluorocarbons (Target)							
Perfluorocarbons (Actual)							
Sulfur Hexafluoride (Target)							
Sulfur Hexafluoride (Actual)							
Nitrogen Trifuoride (Target)							
Nitrogen Trifuoride (Actual)							
Carbon Monoxide (Target)							
Carbon Monoxide (Actual)							
Ozone (Target)							
Ozone (Actual)							
Lead (Target)							
Lead (Actual)							
Nitrogen Dioxide (Target)							
Nitrogen Dioxide (Actual)							
Particulate Matter (Target)							
Particulate Matter (Actual)							
Sulfur Dioxide (Target)							
Sulfur Dloxide (Actual)							

Source of Data: XXXXXX
Date of Data Review: XX/XX/XXXX as verified by XXXXXX

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B. Indirect Impacts: Offset Emissions

Figure 15: Emissions Offset by Transit Riders

	2025 (Baseline)	2027 (Current Period)	2030	2035	2040	2045	2050
Passenger Miles Carried	25,372,255		TBD	TBD	TBD	TBD	TBD
Direct Emissions (tons)							
Carbon Target							
Carbon Offset (0.88lbs/mile)	22,327,584						
Methane (Target)							
Methane (Actual)							
NoX (Target)							
NoX (Actual)							
Hydrofluorocarbons (Target)							
Hydrofluorocarbons Actual							
Perfluorocarbons (Target)							
Perfluorocarbons (Actual)							
Sulfur Hexafluoride (Target)							
Sulfur Hexafluoride (Actual)							
Nitrogen Trifuoride (Target)							
Nitrogen Trifuoride (Actual)							
Carbon Monoxide (Target)							
Carbon Monoxide (Actual)							
Ozone (Target)							
Ozone (Actual)							
Lead (Target)							
Lead (Actual)							
Nitrogen Dioxide (Target)							
Nitrogen Dioxide (Actual)							
Particulate Matter (Target)							
Particulate Matter (Actual)							
Sulfur Dioxide (Target)							
Sulfur Dloxide (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			

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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*

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imaging 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 16: 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			

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The Land-Use/ Transportation/ Transit Connection

A2ZERO

EQUITABLE • SUSTAINABLE • TRANSFORMATIVE



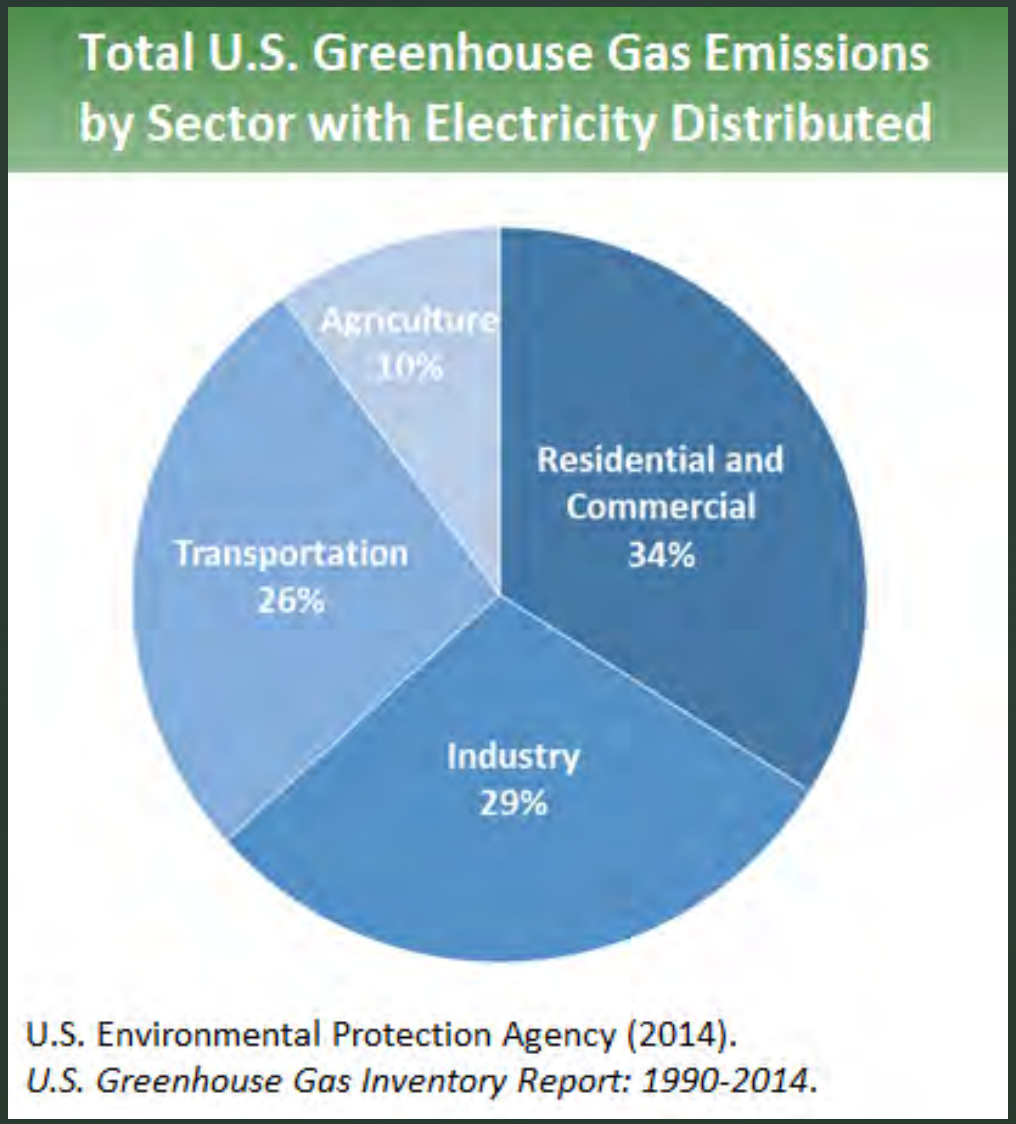
U-M Campus Sustainability & Carbon Neutrality Operational Update

FY2025

ASSOCIATE VICE PRESIDENT FOR
CAMPUS SUSTAINABILITY
UNIVERSITY OF MICHIGAN

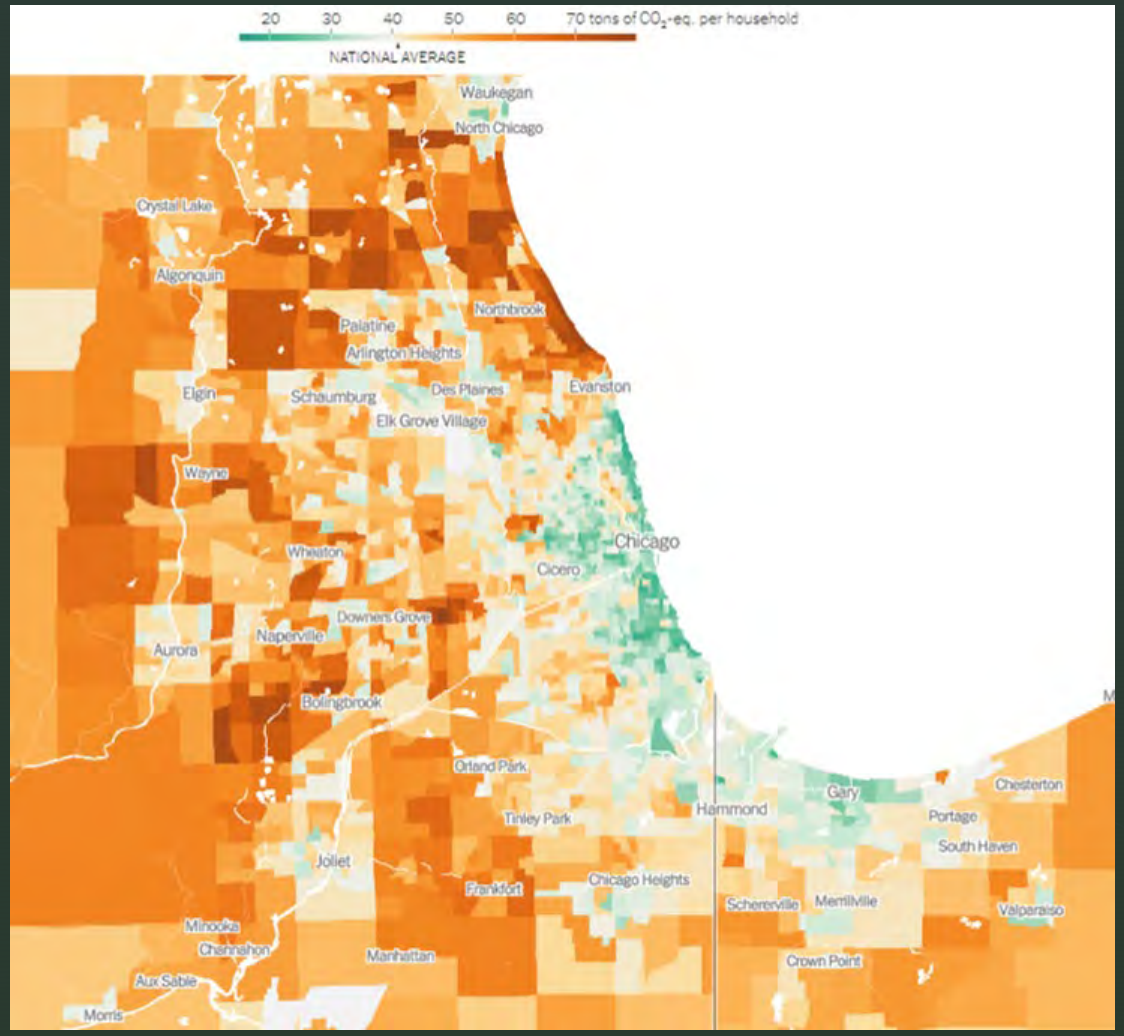


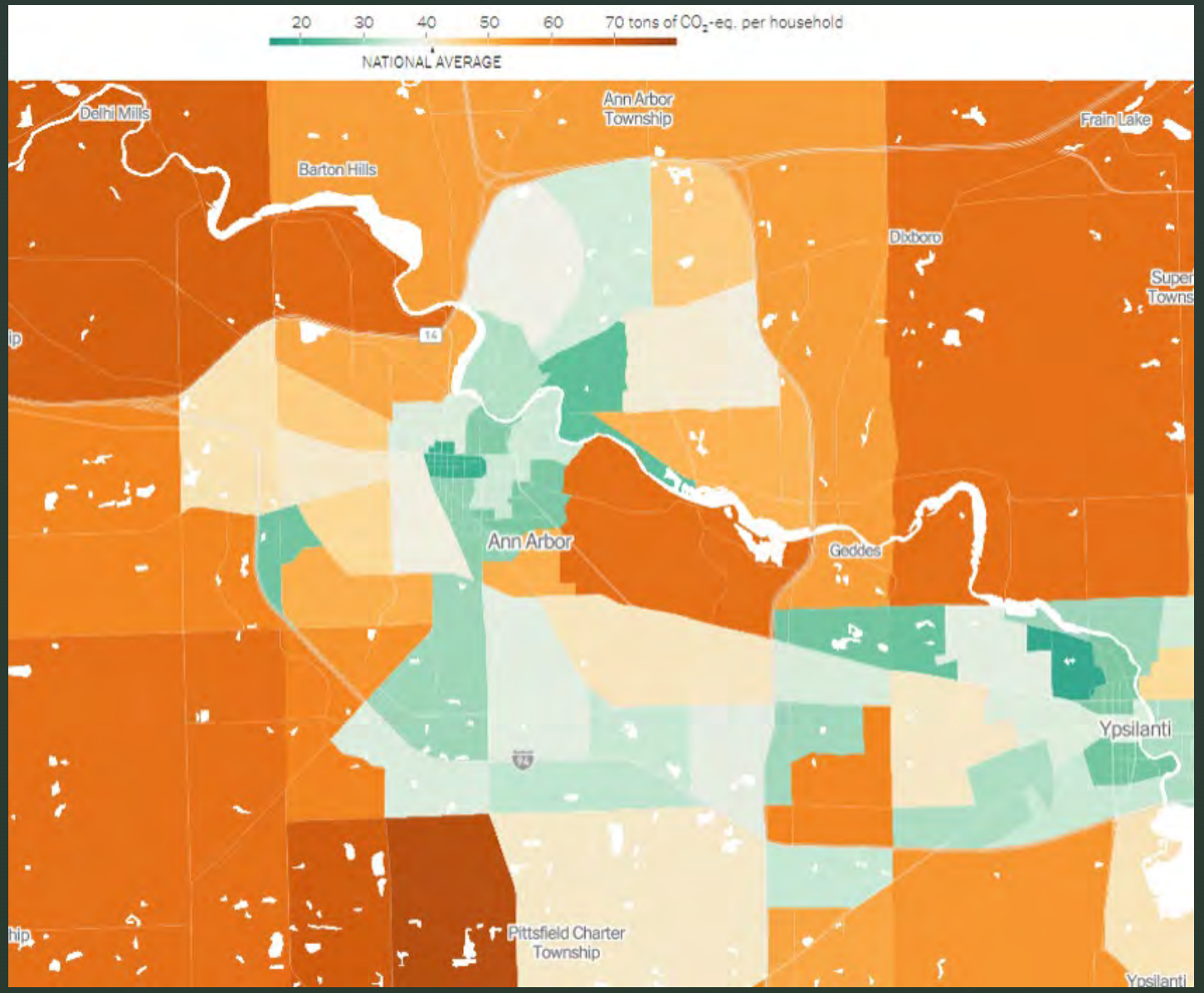
Sources of Greenhouse Gas Emissions



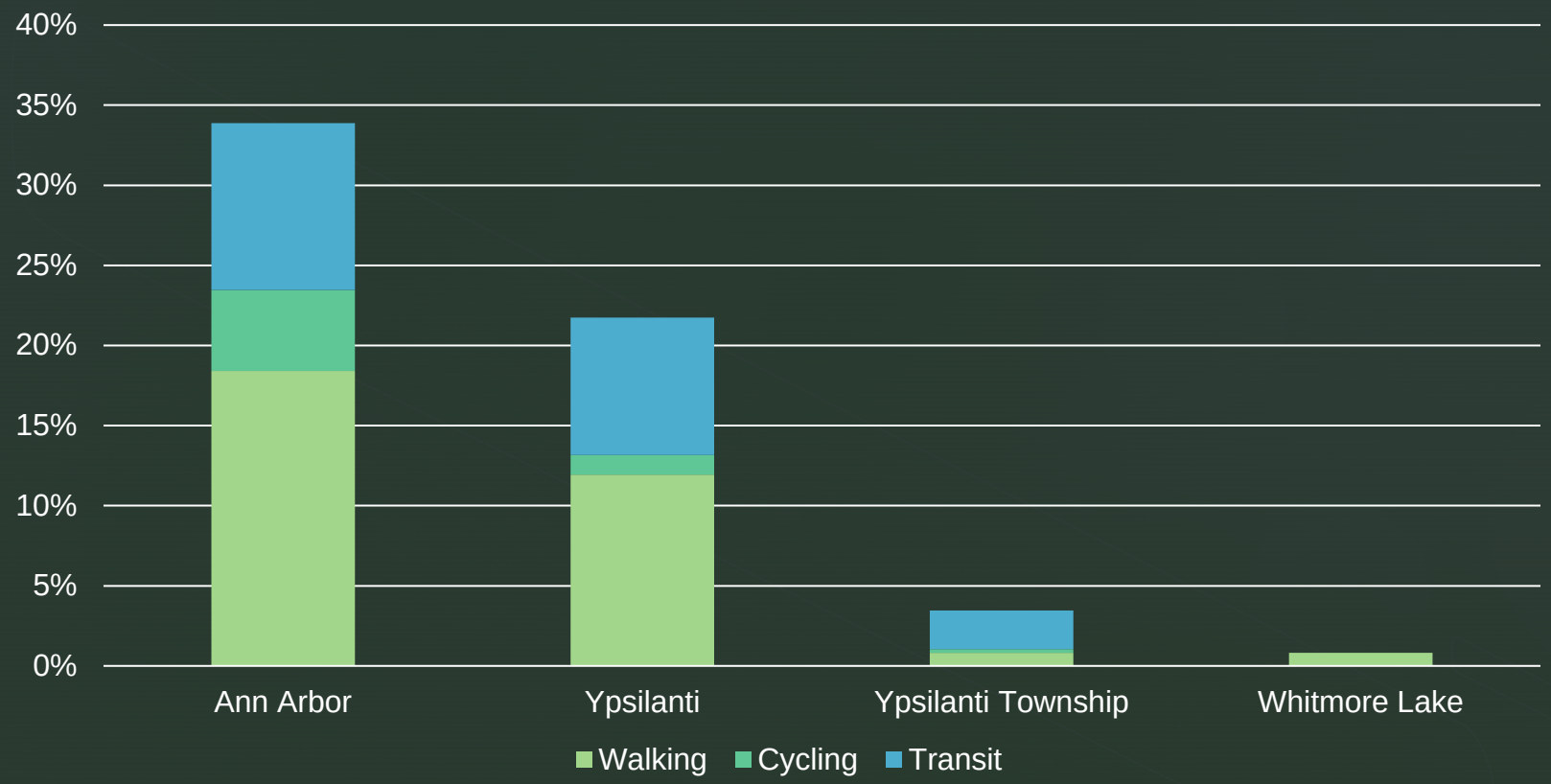
Source: Environmental Protection Agency https://19january2017snapshot.epa.gov/ghgemissions/sources-greenhouse-gas-emissions_.html

Cities are Low(er)-Carbon Zones

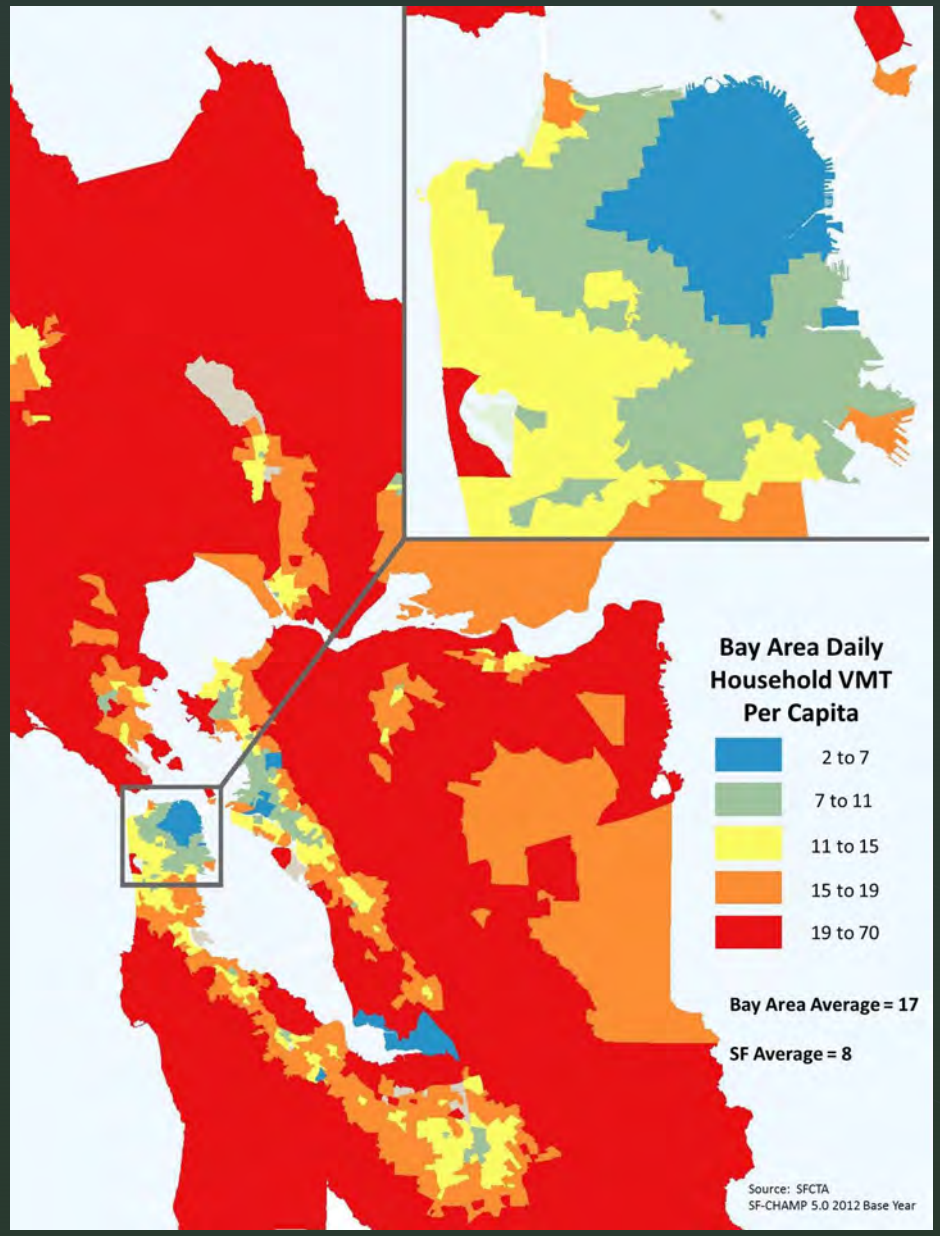



20
30
40
50
60
70 tons of CO_2-eq. per household
NATIONAL AVERAGE
Delhi Mills
Barton Hills
Ann Arbor Township
Frain Lake
Dixboro
Super Towns
14
Ann Arbor
Geddes
Ypsilanti
Pittsfield Charter Township
Ypsilanti

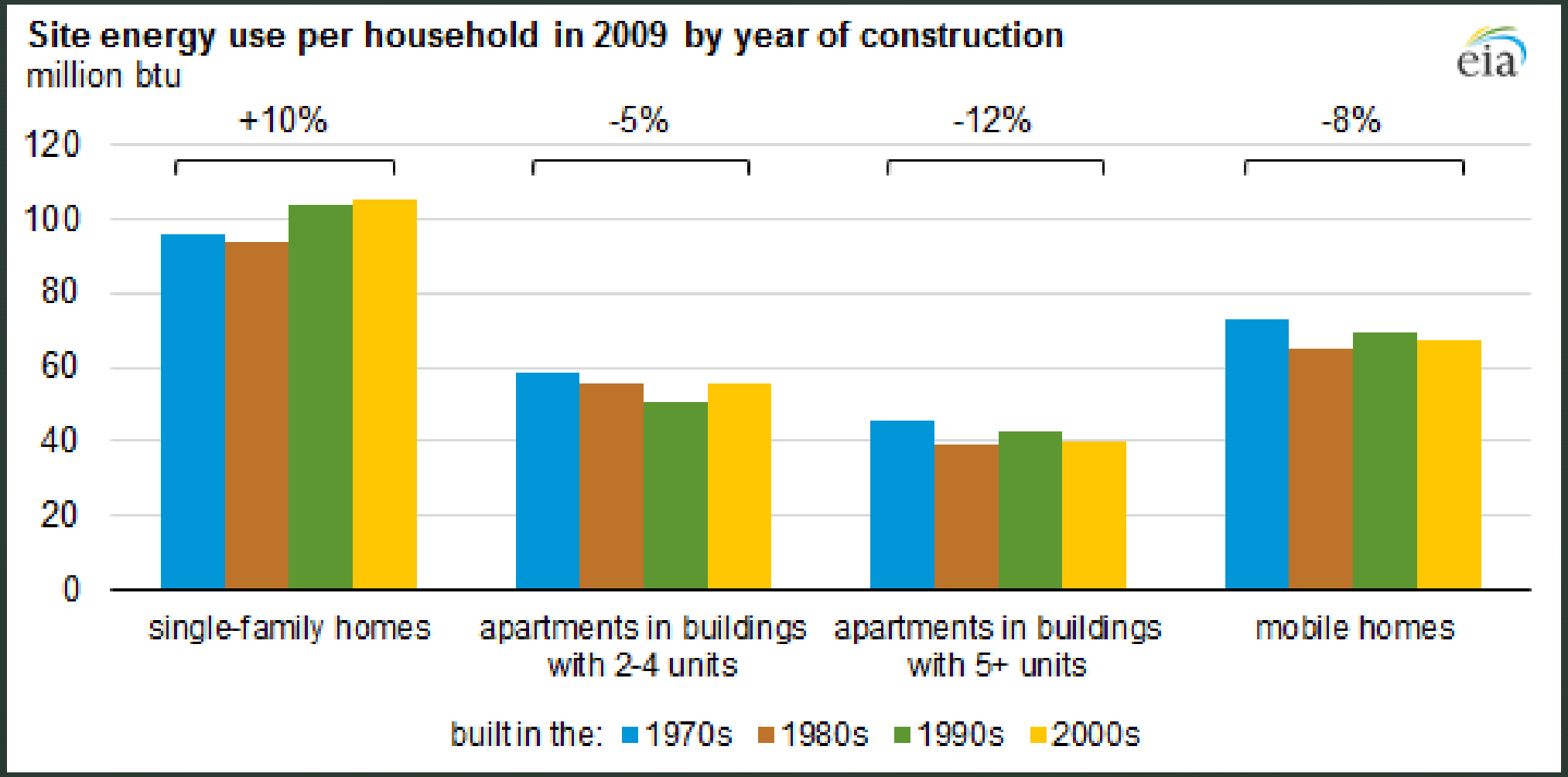
Non-Automotive Travel Mode to Work by Place of Residence, 2012-2016



Source: American Community Survey, https://factfinder.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t#none



Source: City of San Francisco Planning Department, http://sf-planning.org/align-modernize-environmental-review



Source: Energy Information Administration https://www.eia.gov/todayinenergy/detail.php?id=11731

Environmental Impact: Think Per Capita, Not Per Acre

Per Acre

A small, dense development can look "worse" ...

1 acre
(40 homes)



High impact per acre
(e.g., 100 tons CO_2/acre)

1 acre
(1 home)



Lower impact per acre
(e.g., 10 tons CO_2/acre)

Per Capita

... but the bigger picture is impact per person.

40 people
(on 1 acre)



2.5 tons CO_2 per person
(per year)

1 person
(on 1 acre)

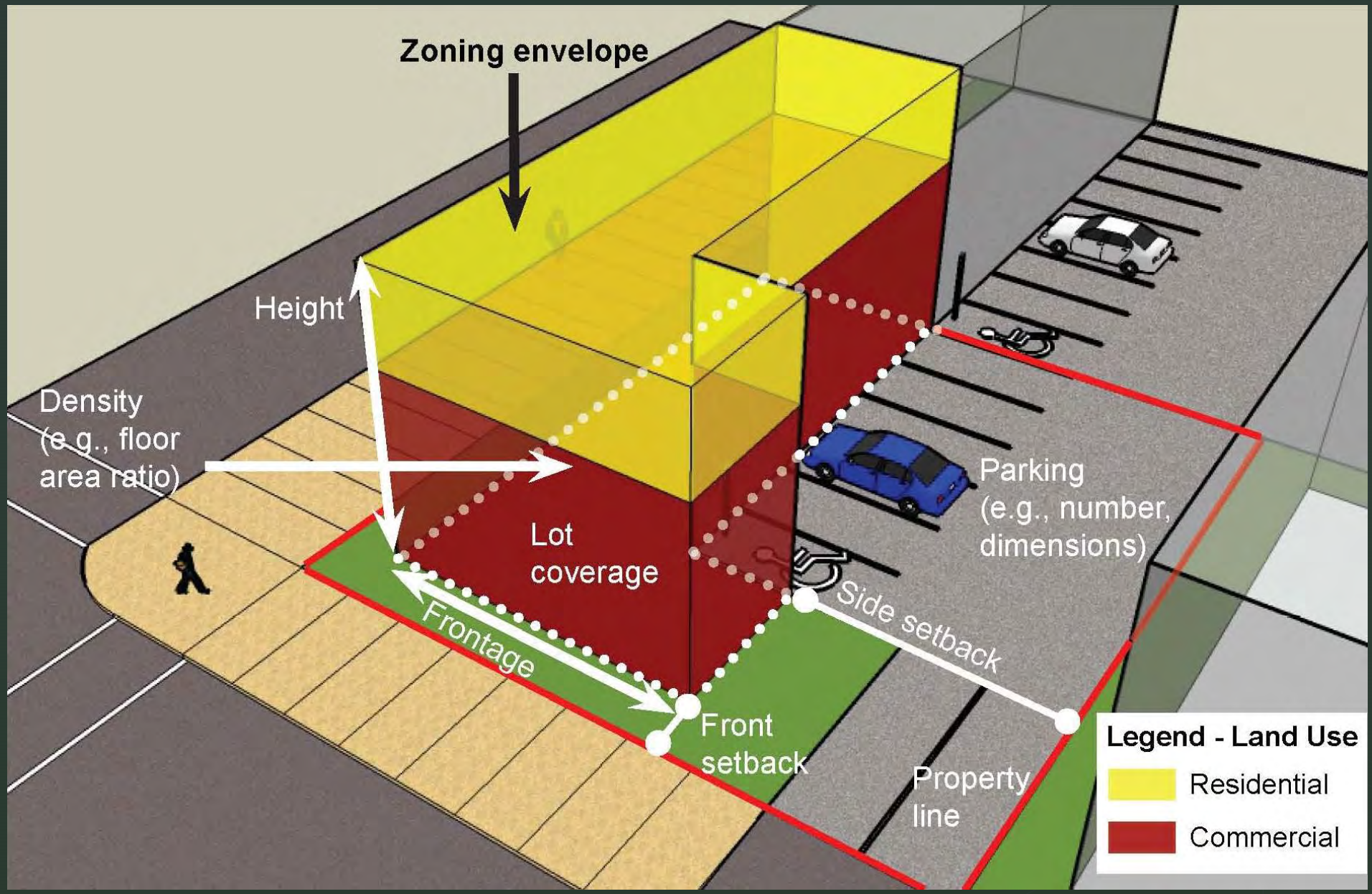


10 tons CO_2 per person
(per year)

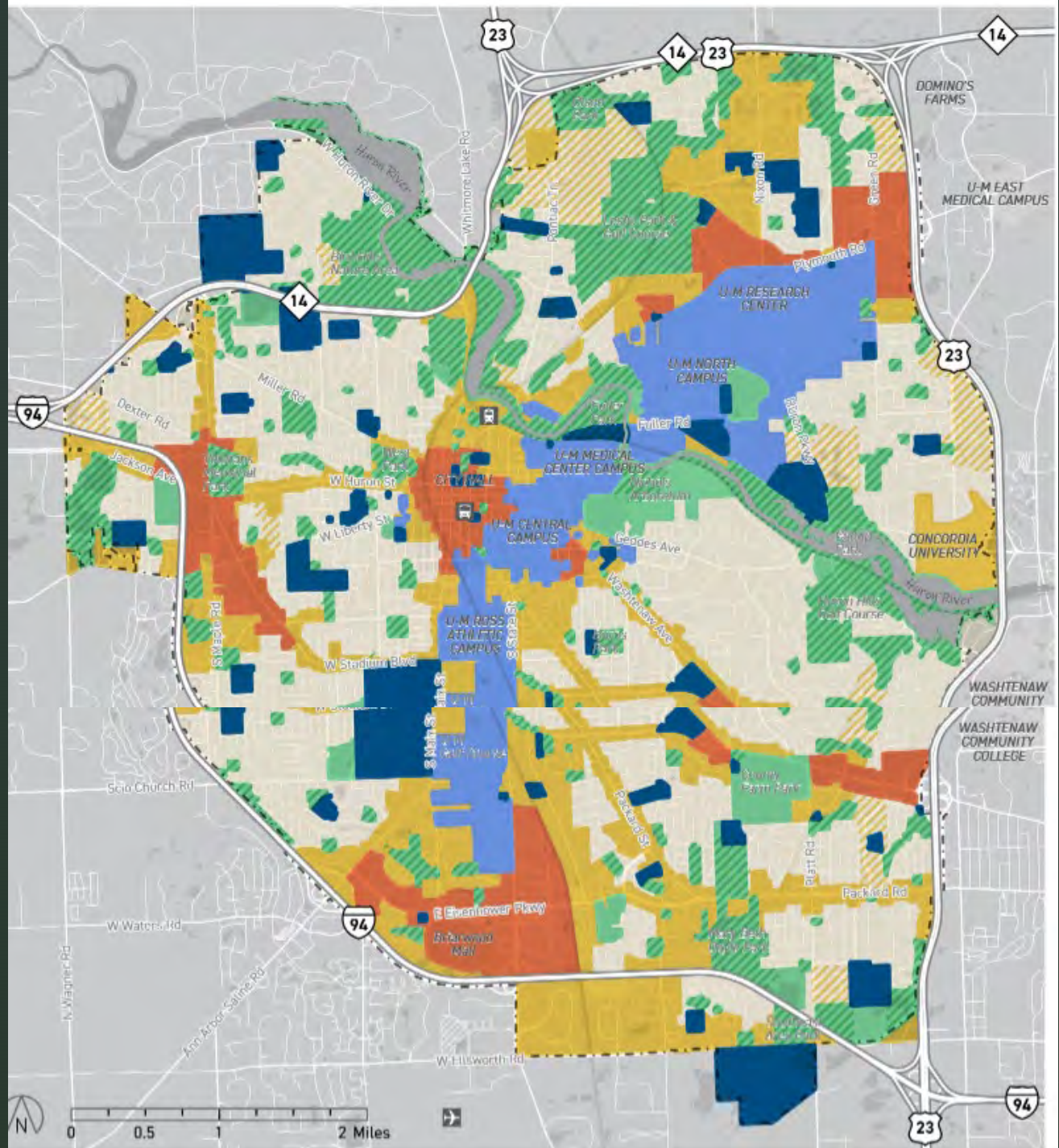
Per capita tells us the real story:
More people, not more land, drive greater environmental impact.



Source: https://patch.com/california/novato/the-great-debate-plan-bay-area-is-it-good-for-the-region-is-it-good-for-marin



Source:
http://www.markham.ca/wps/portal/Markham/MunicipalGovernment/AboutMunicipalGovernment/MajorCityProjects/ZoningBylawProject/!ut/p/a1/04_Sj9CPykssy0xPLMnMz0vMAfGjzOK9PA2cDR29Dbz8XV0NDRxNfPyN_YyMvZzcDfULsh0VAeHpvlk!/


23
14
23
14
DOMINO'S FARMS
U-M EAST MEDICAL CAMPUS
Huron River
Whitmore Lake Rd
Pontiac Trl
Nixon Rd
Green Rd
Plymouth Rd
U-M RESEARCH CENTER
14
23
94
Miller Rd
Dexter Rd
U-M NORTH CAMPUS
Fuller Rd
Fuller Park
Jackson Ave
W Huron St
CITY HALL
U-M MEDICAL CENTER CAMPUS
U-M CENTRAL CAMPUS
W Liberty St
Geddes Ave
CONCORDIA UNIVERSITY
Huron River
Washtenaw Ave
S Maple Rd
U-M RIESS ATHLETIC CAMPUS
W Stadium Blvd
S Main St
WASHTENAW COMMUNITY
WASHTENAW COMMUNITY COLLEGE
Scio Church Rd
Packard St
Platt Rd
Packard Rd
94
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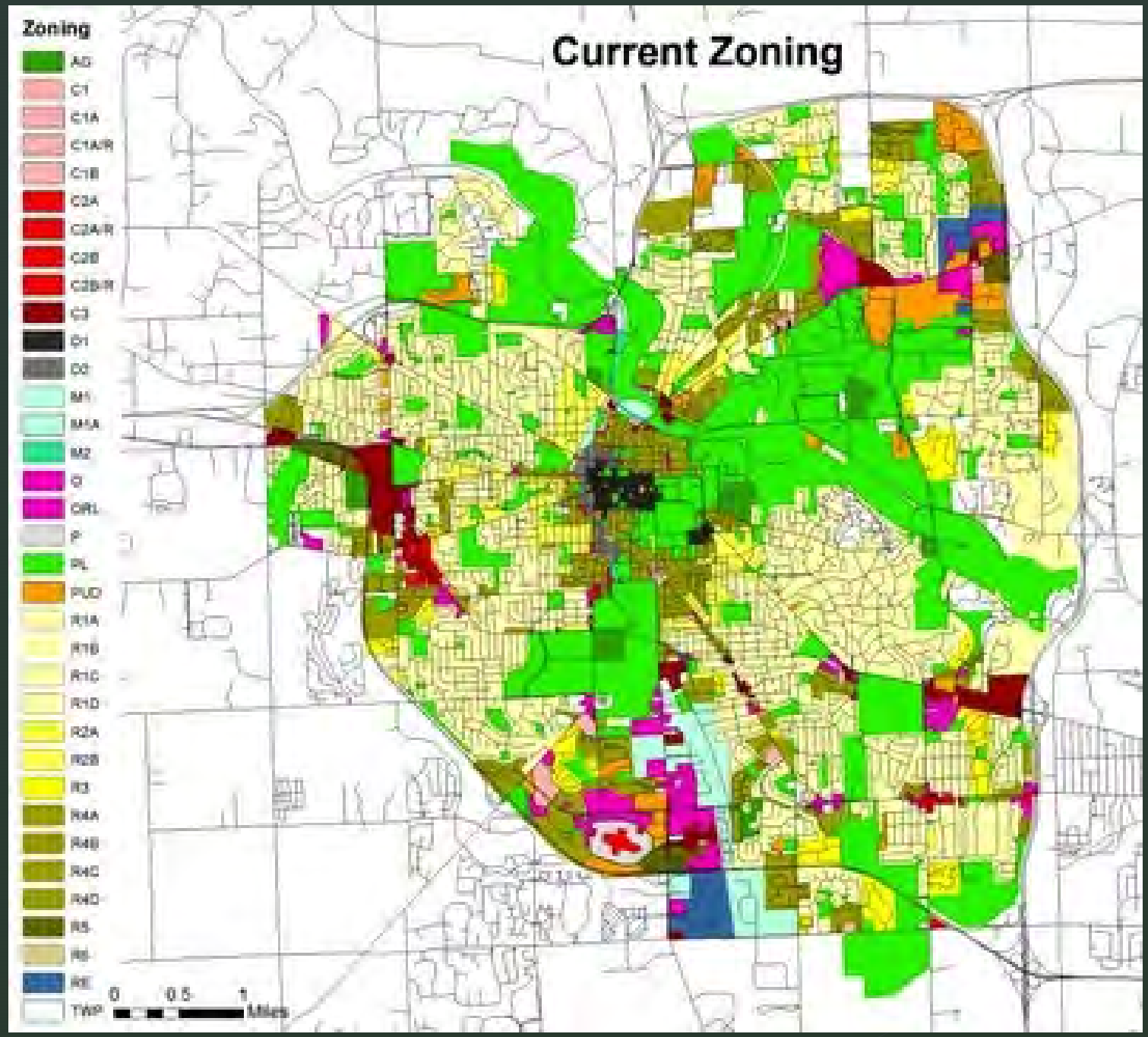
2 Miles


Current Zoning
Zoning
AG
C1
C1A
C1A/R
C1B
C2A
C2A/R
C2B
C2B/R
C3
D1
D2
M1
M1A
M2
O
ORL
P
PL
PUD
R1A
R1B
R1C
R1D
R2A
R2B
R3
R4A
R4B
R4C
R4D
R5
R6
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TWP
0
0.5
1
Miles

ANN ARBOR

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by Dominic Apap
October 15, 2026



Gabby Ceritano/Daily. Buy this photo.

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A2R2 Corridors



Green Road

Plymouth Road to Burbank Dr.



Stadium Boulevard

From Washtenaw Ave. split to just west of 7th St.



Stadium Boulevard / Maple Road

Just southeast of Pauline Blvd. to Dexter Ave.



Packard Street

Eisenhower Parkway split to US-23





It's about Space

- Technology never changes geometry!



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