

## Changes to Key Areas in AAATA's Title VI Program Update

Area	Current Version	Proposed Version
<b>Complaint Procedure</b>		
Translated Language(s)	<ul style="list-style-type: none"> <li>English</li> </ul>	<ul style="list-style-type: none"> <li>English, Chinese, Spanish, Arabic, and Korean</li> </ul>
Time frame for complaint to be provided after alleged incident	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>Within 180 calendar days (per FTA Circular)</li> </ul>
Response time to acknowledge receipt	<ul style="list-style-type: none"> <li>Within 7 days of receipt</li> </ul>	<ul style="list-style-type: none"> <li>Within 7 days, confirm receipt and advised the complaint is being investigated</li> </ul>
Response time for AAATA to address complaint	<ul style="list-style-type: none"> <li>30 days, whenever possible</li> </ul>	<ul style="list-style-type: none"> <li>30 days in writing</li> </ul>
<b>Equity Analysis Policy</b>		
Definition of Major Service Change	<ul style="list-style-type: none"> <li>Change affecting more than 25% of riders of a route, or</li> <li>Change affecting more than 25% of the miles of a route, or</li> <li>Changes on multiple routes affecting more than 10% of riders or route miles of overall fixed- route service.</li> </ul>	<ul style="list-style-type: none"> <li>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</li> <li>Implementation of a new route, or</li> <li>Elimination of a route.</li> </ul>
Definition of Fare Change	<ul style="list-style-type: none"> <li>Change in the base fare (i.e. full adult cash fare)</li> <li>Any change affecting the fare of more than 10% of fare-paying riders (i.e. not including riders whose fare is paid by a third party such as an employer or university)</li> </ul>	<ul style="list-style-type: none"> <li>Any change in the fare, or</li> <li>Any change to payment or fare media that would be subject to the fare change.</li> </ul>

Area	Current Version	Proposed Version
<b>Equity Analysis Policy (continued)</b>		
<p>Conditions for Disparate Impact / Disproportionate Burden – Service Change</p>	<p>For service improvements, the basis for comparison is between the route(s) to be improved and the non-minority / non-low-income routes in the system as a whole.</p> <ul style="list-style-type: none"> <li>• Increase in the frequency: A finding of disparate impact / disproportionate burden is made if               <ol style="list-style-type: none"> <li>a) the service improvement is on non-minority / non-low-income route(s), and</li> <li>b) after the change, the route(s) with changed service have a greater frequency than the majority of minority / low-income routes.</li> </ol> </li> <li>• Increase in the span of service: A finding of disparate impact / disproportionate burden is made if               <ol style="list-style-type: none"> <li>a) the service improvement is on non-minority / non-low-income route(s), and</li> <li>b) after the change, the route(s) with increased span of service have a longer span than the majority of minority / low-income routes.</li> </ol> </li> <li>• Increase in the days of operation: A finding of disparate impact / disproportionate burden is made if               <ol style="list-style-type: none"> <li>a) the service improvement is on non-minority / non-low-income route(s), and</li> <li>b) after the change, the route(s) with increased days of service operate on days on which the majority of minority / low-income routes do not operate.</li> </ol> </li> </ul> <p>Similarly, for service reductions, the basis for comparison is between the route(s) to be reduced and the non-minority / non-low-income routes in the system as a whole.</p>	<p>A possible disparate impact / disproportionate burden is determined by either</p> <ul style="list-style-type: none"> <li>• comparing the proportion of the minority / 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 a minority / low-income for the entire service area, or</li> <li>• comparing the proportion of minority / low-income riders on the route or segment of the route being changed with the proportion of minority / low-income riders on the entire system.</li> </ul> <p>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.</p> <p>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.</p>

Area	Current Version	Proposed Version
<b>Equity Analysis Policy (continued)</b>		
Conditions for Disparate Impact / Disproportionate Burden – Fare Change	<p>Disparate impact exists if the minority population will bear 5% or more of the cumulative increase in fares than would be expected based on the percentage of minority persons in the population of riders.</p> <p>A finding of disproportionate burden will be made if low-income population will bear -10% or more of the cumulative increase in fares than would be expected based on the percentage of low-income persons in the population of riders.</p>	<p>A possible disparate impact / disproportionate burden is determined by comparing the fare changes for fare categories used disproportionately by minorities / persons with low-incomes with the fare changes for the entire system.</p> <p>A possible disparate impact / disproportionate burden is deemed to occur when particular fare categories are increased more than the average overall system fare increase and the proportion of minority / low-income riders in the fare category is more than 10 percent greater than the proportion of minority / low-income riders system-wide.</p>
<b>Public Input Policy</b>		
Definition of Major Service Change and Fare Change	<ul style="list-style-type: none"> <li>See definitions under Equity Analysis Policy.</li> </ul>	<ul style="list-style-type: none"> <li>See definitions under Equity Analysis Policy.</li> </ul>
Notification of Proposed Changes	<ul style="list-style-type: none"> <li>Public Input Policy has been updated to incorporate current practices, approaches, and technologies such as virtual public meetings.</li> </ul>	