

Title VI Program Changes

JULY 2023

AAATA 2023 Title VI Program Update

AAATA is updating its Title VI Program consistent with the Civil Rights Act of 1964 and the requirements outlined in the Federal Transit Administration's Circular 4702.1B.

The purpose of the Program is to describe the non-discrimination efforts undertaken by AAATA to ensure that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance from the Department of Transportation.

Changes Made to Title VI Program in the Following Areas:

- Complaint Procedure
- Equity Analysis Policy
- Public Input Policy
- Updated Information Used for the Overall Program Update
 - New Rider Demographic Information
 - New Census Data
 - New Limited English Populations
 - New Service Performance Monitoring Data

Overview of Changes by Area

Complaint Procedure

Changes:

- Complaint procedures will be available in English and in the following languages identified as meeting or near the Safe Harbor threshold:

Chinese	Spanish	Arabic	Korean
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- Title VI complaints must be filed within 180 calendar days of the alleged incident
- AAATA will confirm, in writing, receipt of a Title VI complaint within 7 days of receiving it
- AAATA will provide a written response to a Title VI complaint within 30 days of its confirmed receipt

Equity Analysis for Service and Fare Changes

Changes:

- Definition of a Major Service Change:
 - A change of 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
- Definition of Fare Change:
 - Any change in fare, or
 - Any change to payment or fare media that would be subject to the fare change

Equity Analysis for Service and Fare Changes - continued

- Conditions for Disparate Impact / Disproportionate Burden – Service Change

A possible disparate impact / disproportionate burden is determined by either:

1. 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
2. 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

Equity Analysis for Service and Fare Changes - continued

- Conditions for Disparate Impact / Disproportionate Burden – Service Change (continued)

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% or greater

The rate of 10% is consistent with the commonly used standard for disparate impact and allows for variations in the statistical reliability of the underlying data

Equity Analysis for Service and Fare Changes - continued

- Conditions for Disparate Impact / Disproportionate Burden – Fare Change
 - 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
 - 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% greater than the proportion of minority/low-income riders system-wide

Public Input Policy

Changes:

- Public Input Policy has been updated to include revised definitions of Major Service Change and Fare Change as outlined in the revised Equity Analysis Policy
- Public Input Policy has been updated to incorporate current practices, approaches, and technologies such as virtual public meetings

Other Changes

Other Areas of the Title VI Program including Language Assistance Plan, Demographic and Service Profile, Demographic Ridership and Travel Patterns, and Service Standards Monitoring are being updated based on the following updated information:

- Census (2020)
- American Community Survey (ACS) 5-Year Data
- AAATA's 2022 Onboard Rider Survey
- AAATA's Recent Operational Data

Ways to Provide Comments

- Attend a virtual or in-person meeting
- Visit: TheRide.org/title-vi
- Email: TitleVIProgram@theride.org
- Call: 734-794-1882
- Mail:
AAATA
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