



Title VI Program Update 2023

October 2023

ANN ARBOR AREA TRANSPORTATION AUTHORITY

Table of Contents

Executive Summary	1
Introduction	1
General Requirements	1
Requirements of Large Urban Areas	2
Tab A: Review and Approval	3
Tab B: Notice to the Public	.21
Tab C: Complaint Procedure	.22
Tab D: Complaint Form	.24
Tab E: Complaints	.27
Tab F: Public Participation Plan	28
Tab G: Language Assistance Plan	44
Part 1: Four Factor Analysis	.44
The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population	.44
2) The Frequency with which People of Limited English Proficiency Come into Contact with AAATA's Programs, Activities, and Services	.46
The Importance of AAATA's Programs, Activities, and Services to Persons of Limited English Proficiency	
4) Resources Available to Customers and the Associated Costs	.47
Conclusion	48
Part II: AAATA Limited English Proficiency Plan	48
Identifying LEP Individuals Who Need Language Assistance	48
Language Assistance Measures	48
Implement phone interpreter service recommendations Employee Training	.48
Outreach Techniques	49
Monitoring and Updating the LEP Plan	49
Tab H: Membership of Non-Elected Committees and Councils	.50
Tab I: Monitoring of Subrecipients	51
Tab J: Equity Analysis for Facility Location	60
Tab K: Service Standards and Policies	61
Modes of Service (Fiscal Year 2022)	.61



Servi	ce Frequency (headway)	61
On-T	ime Performance	61
Servi	ce Availability	61
Tab L: I	Demographic and Service Profile	62
Tab M:	Demographic Ridership and Travel Patterns	65
Local	Fixed Route Service Onboard Survey	65
Su	vey Data Collection	65
Su	vey Questionnaire	65
Sa	mple	65
Pa	rticipation Rates	65
Su	vey Results	68
Tab N:	Service Standards & Policies Monitoring	72
Servi	ce Standards	72
1.	Service Frequency (Headway)	72
2.	On-Time Performance (OTP)	76
3.	Service Availability	81
4.	Vehicle Load	82
5.	Vehicle Assignment	84
6.	Transit Amenities	87
	Major Service and Fare Change, Disparate Impact, and Disproportionate B	
Policies		88
Dele	gation of Authority	100
Tah P	Service and Fare Equity Analysis	101



List of Figures

Figure A - 1: AAATA CEO Letter Approving the 2023 Title VI Submission	4
Figure A - 2: AAATA Board of Director's Meeting Minutes	5
Figure A - 3: Compilation of Public Comments Received	
Figure B - 1: Notice to the Public	21
Figure C - 1: Complaint Procedure	22
Figure D - 1: AAATA Title VI Complaint Form	25
Figure F - 1: Title VI Flyer	32
Figure F - 2: Bus Cards	33
Figure F - 3: Press Release	34
Figure F - 4: Comment Card	36
Figure F - 5: Proof of Advertisement	37
Figure F - 6: AAATA Title VI Webpage Program Updates	38
Figure F - 7: Title VI FAQs	
Figure G - 1: LEP Population Concentration for AAATA Total Service Area	45
Figure L - 1: TheRide System Map	
Figure L - 2: Minority Service Coverage	63
Figure L - 3: Low-Income Service Coverage	63
Figure M - 1: Onboard Survey Form	66
Figure M - 2: Demographic Age of Riders and General Public	68
Figure M - 3: Demographics Number of Persons in the Household	68
Figure M - 4: Demographics Renting/Owning	69
Figure M - 5: Demographics Household Income, 2009-2022	69
Figure M - 6: Demographics Household Income of Riders and Population	70
Figure M - 7: Demographics Relationship of Age to Income	70
Figure M - 8: Rider Profile Fare Media Used and Household Income	71
Figure O - 1: Public Input Policy for Service and Fare Changes for major service and fare	
changes	89
Figure O - 2: 2023 Board Resolution adopting revised Public Input Policy for Service and Fa	re
Changes	93
Figure O - 3: AAATA Equity Analysis Policy for Service and Fare Changes	94
Figure O - 4: 2023 Board Resolution adopting revised Equity Analysis Policy for Service and	t
Fare Changes	99



List of Tables

Table G - 1: LEP Population	44
Table H - 1: Minority Representation on Committees and Councils Selected by AAATA	50
Table K - 1: Modes of Services (Fiscal Year 2022)	61
Table L - 1: Estimated Minority and Low-Income Population	64
Table L - 2: Minority and Low-Income Routes	64
Table N - 1: The Underlying Data of Weekdays	73
Table N - 2: The Underlying Data of Saturdays	74
Table N - 3: The Underlying Data of Sundays	75
Table N - 4: On-Time Performance for the period 6/1/22-5/31/23 by route	76
Table N - 5: On-Time Performance Monday-Friday	77
Table N - 6: On-Time Performance Saturday	78
Table N - 7: On-Time Performance Sunday	79
Table N - 9: Standing Loads by Mode	
Table N - 10: Vehicle Listing	87



Executive Summary

Introduction

The Federal Transit Administration (FTA) requires that all direct and primary recipients document their compliance with the Department of Transportation's (DOT) Title VI regulations by submitting a Title VI Program once every three years. This document provides the 2023 Title VI Program Update for the Ann Arbor Area Transportation Authority (AAATA).

The FTA Circular C 4702.1B provides requirements and guidelines for FTA recipients. The Update was prepared in accordance with the requirements of that Circular. The FTA has general requirements for all fixed-route transit providers and additional requirements for grant recipients that operate 50 or more fixed-route vehicles in peak service and are located in an urbanized area with a population of 200,000 or more.

AAATA has implemented a Title VI Program to ensure that minority, limited English populations (LEP), and low-income populations are considered in all aspects of service planning, community outreach, and service delivery.

This document is organized with tabs identified for each of the requirements to be included in the Title VI Program.

General Requirements

Tab A contains the Board Resolution pertaining to the Title VI Program by the AAATA Board of Directors.

AAATA posts a public notice of nondiscrimination as required by Title VI. The public notice and posting information are provided in Tab B.

Tab C describes the Title VI complaint procedure, and a copy of the complaint form is included in Tab D. The complaint form is posted on the AAATA website and is available in multiple languages.

Tab E contains the record of Title VI complaints received by AAATA since the last program update, including a description of the resolution.

Tab F contains the Public Participation Plan for AAATA.

The Language Assistance Plan (LAP) for Persons with Limited English Proficiency (LEP) is documented in Tab G. The plan has been updated to reflect the most recent available census data and the steps taken by AAATA to provide assistance as needed.

Tab H provides information on the membership of the Local Advisory Council Executive Committee, the only non-elected committee for AAATA. The Local Advisory Council advises the Board of Directors on issues of concern to people with disabilities and senior citizens.

AAATA is required to monitor FTA grant subrecipients. The process and results of the monitoring are described in Tab I.

We have not conducted an equity analysis for a facility location but have provided status of a future analysis in Tab J.



Tab K describes the service standards for AAATA. The service standards will be reviewed as part of a system-wide service analysis and plan.

Requirements of Large Urban Areas

The following tabs are included to meet the requirements for public transit systems operating more than 50 peak fixed-route vehicles in urbanized areas with a population of 200,000 or more.

Demographic characteristics of the service area are presented in Tab L. The minority and low-income populations are mapped, and routes designated as serving either minority and/or low-income populations are noted.

Tab M presents the results of the most recent on-board passenger survey completed in 2022. AAATA conducts a rider survey every two to three years for local fixed-route service.

AAATA is required to monitor service performance and compliance with local policies. The results of this monitoring program are presented in Tab N.

Tab O contains the policies for disparate impact and disproportionate burden analysis related to any major service changes or fare changes. This policy has been revised.

We have included equity analyses for a fare change and service changes when restoring prepandemic service in 2021.



Tab A: Review and Approval

This section contains:

- Figure A-1: The Ann Arbor Area Transportation Authority's (AAATA) CEO letter approving AAATA's 2023 Title VI Program submission.
- Figure A-2: Meeting minutes from the AAATA Board's 2023 meeting, where they approved the Draft Plan as part of the consent agenda.
- Figure A-3: Compilation of public comments received in response to the 2023 Title VI Program Update.



Figure A - 1: AAATA CEO Letter Approving the 2023 Title VI Submission



Dawn Gabay Operations Center 2700 S. Industrial Highway Ann Arbor, MI 48104

Phone: 734-973-6500 Fax: 734-973-6338 Online: TheRide.org

November 15, 2023

Ms, Kelley Brookins Regional Administrator Region 5 Office Federal Transit Administration 200 West Adams St., Suite 320 Chicago, IL 60606

Dear Ms. Brookins.

On behalf of the Ann Arbor Area Transportation Authority (AAATA), I am pleased to submit our 2023 Title VI Program Update to the Federal Transit Authority (FTA).

As the Chief Executive Officer, it is my responsibility to review and approve this report as the executive representative of our organization. We are proud to continue AAATA's compliance with FTA requirements regarding the Civil Rights Act of 1964 in supporting non-discrimination of transit service. AAATA provides ongoing programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act.

Staff has prepared this update in accordance with FTA Circular 4702.1B requirements to revise our Title VI Program every three years. The 2023 Title VI Program Update was reviewed and approved by our Board at their meeting on October 19, 2023, as a part of the Consent Agenda.

Please feel free to contact me with questions or concerns.

Sincerely,

Matthew Carpenter

What Estin

CEO

ANN ARBOR AREA TRANSPORTATION AUTHORITY



Figure A - 2: AAATA Board of Director's Meeting Minutes



Board of Director's Meeting Minutes

Meeting Date/Time: October 19, 2023 - 6:30 - 9:00pm

Members: Kathleen Mozak (Chair), Mike Allemang (Treasurer), Jesse Miller (Secretary), Simi

Barr, Susan Pollay, Kyra Sims

Location: Ann Arbor District Library (4th Floor)

Virtual attendance available via Zoom

Chairwoman Mozak called the meeting to order at 6:30pm

Agenda Item

1. OPENING ITEMS

1.1 Approve Agenda

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

All in favor of approving the updated agenda:

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

Ms. Susan Pollay: Yes Ms. Kyra Sims: Yes

Chairwoman Kathleen Mozak: Yes

The approval of the updated agenda passed unanimously.

1.2 Public Comment

Jim Mogensen noted the meeting had a wide range of topics to be discussed and how they will impact the agency. He asked the organization to consider how the decisions they are considering will impact those who need to use public transportation.

1.3 General Announcements

No general announcements.

2. CONSENT AGENDA

- 2.1 Board Meeting Minutes September 21, 2023
- 2.2 Committee Meeting Summaries
- 2.3 Title VI Program Approval



Mr. Miller motioned to approve the Consent Agenda, seconded by Mr. Barr.

All in favor of approving the Consent Agenda:

Mr. Mike Allemang: Yes Mr. Simi Barr: Yes Mr. Jesse Miller: Yes Ms. Susan Pollay: Yes Ms. Kyra Sims: Yes

Chairwoman Kathleen Mozak: Yes

The approval of the Consent Agenda passed unanimously.

3. OWNERSHIP LINKAGE

3.1 Open Dialogue Task Force Updates

Chairwoman Mozak shared a brief update from Mr. Chang who was unable to attend the meeting. In the update it was noted that Mr. Carpenter had presented an operational update to the Ann Arbor City Council at their October 16th meeting as a part of a new bi-monthly update. The hope is to soon be able to provide a board perspective of updates at those meetings. Mr. Chang has contacted Mayor Brown of Ypsilanti and is working to schedule a meeting with her soon.

4. MONITORING

4.1 Monitoring Task Force Update

Mr. Allemang shared that after the June monitoring report of Policy 2.7, the board requested the task force review the policy as it was noted that policy 2.7.2 was a duplicate of policy 2.5.3. The task force met in October and provided a recommendation for board consideration.

Mr. Allemang motioned to recommend that policy 2.7.2 be removed (for redundancy to policy 2.5.3) and that 2.7.2.1 be renumbered as 2.7.2, seconded by Ms. Sims.

All in favor of removing policy 2.7.2 and renumbering 2.7.2.1 as 2.7.2:

Mr. Mike Allemang: Yes Mr. Simi Barr: Yes Mr. Jesse Miller: Yes Ms. Susan Pollay: Yes Ms. Kyra Sims: Yes

Chairwoman Kathleen Mozak: Yes

Motion to accept the removal of policy 2.7.2 and policy 2.7.2.1 renumbered as 2.7.2 passed unanimously.

Updates to the policy manual will be made.

After the vote Mr. Allemang also shared that at the October task force meeting, they discussed the proposal of Governance Coach Rose Mercier that policy 2.8 CEO Succession be incorporated into 2.4 Financial Planning and Budgeting and that Policy 2.4 be broadened to include all planning. The task force concluded that these two policies not be revised at this time. Instead, it recommended that these policies be considered by the Governance Committee, along with other policies, when they determine which 2-3 policies should receive a full review each year. This recommendation will be discussed at the next Governance Committee meeting along with the suggestion that the task force be concluded after 3 years of work.



5. POLICY

5.1 Construction Monitoring (2.10)

Mr. Carpenter shared an overview of the monitoring report for Construction (2.10) with a notation that little construction had taken place in the previous year. Mr. Miller provided input from the Service Committee meeting where a discussion took place on the CEO's suggestion of 2.10.4 – as no construction has taken place, the committee determined no changes should be made until a policy has been tested out. The Service Committee recommended the report be accepted as in compliance.

Mr. Allemang motioned to accept Construction Monitoring (2.10) as (A) Compliant, seconded by Ms. Sims.

All in favor of accepting Construction Monitoring (2.10) as (A) Compliant:

Mr. Mike Allemang: Yes Mr. Simi Barr: Yes Mr. Jesse Miller: Yes Ms. Susan Pollay: Yes Ms. Kyra Sims: Yes

Chairwoman Kathleen Mozak: Yes

The motion to accept Construction Monitoring (2.10) as (A) Compliant, passed unanimously.

6. BOARD EDUCATION/DISCUSSION

7. OPERATIONAL UPDATES

7.1 Zero-Emissions Bus Recommendation

Mr. Carpenter introduced to the Board for their consideration his recommendation for zero emissions bus propulsion technology (Board packet, pg. 48). A complete presentation is available online to the public on the Zero Emission Bus Initiative page. He is recommending a 4-5 year pilot project for 2 hydrogen fuel-cell buses and if successful, Fleet will begin transitioning from diesel to hydrogen fuel-cell buses in 2030. Board discussion and public feedback will be through the end of the year with a January board decision. Grant preparation and submission deadline are March/April 2024 with October/November 2024 being the anticipated grant award. During his presentation he provided the pros/cons for battery electric vs. hydrogen buses for cost, range, impacts to fleet management, safety and storage, and a proposed transitionary timeline.

Upon concluding his presentation, Mr. Carpenter fielded questions / comments from the Board.

Questions to be answered in more detail for next Board meeting:

- Has the organization looked at issuing bonds?
- Pilot cost breakdown more details
- Transition plan if pilot project is successful
- Info on other systems who have successfully used battery and hydrogen
- Analysis on downstream carbon emissions for battery or hydrogen
- Pilot project projections for battery
- Info on battery disposal and environmental impacts
- Would there be Title VI equity and/or funding impacts if electric buses could only be used on shorter routes?

Discussions will continue at the November and December Board meetings.



7.2 CEO Report

Mr. Carpenter shared several highlights from the CEO Report – the planning contract for the Ypsilanti Transit Center has been signed and public engagement will begin soon about detailed planning for the millage services. He also thanked Mr. Brooks and his team for participating in the Bus Rodeo which had resumed after a hiatus of several years – MCO Kilo Coward had taken first place.

8. EMERGENT ITEMS

No emergent items.

9. CLOSING ITEMS

9.1 Action Item Recap

There were several board member questions during the ZEB recommendation presentation that were unable to be answered and/or required more robust details – Mr. Carpenter and staff will be working to provide thorough answers by the November Board meeting.

9.2 Topics for Next Meetings

Treatment of the Traveling Public (2.1) Compensation & Benefits Monitoring (2.3) Zero-Emission Bus (Continued 2 of 4)

9.3 Public Comment

No public commenters.

9.4 Adjournment

Ms. Sims motioned to adjourn the meeting, seconded by Mr. Miller.

All in favor of adjourning the meeting:

Mr. Mike Allemang: Yes Mr. Simi Barr: Yes Mr. Jesse Miller: Yes Ms. Susan Pollay: Yes Ms. Kyra Sims: Yes

Chairwoman Kathleen Mozak: Yes

Chairwoman Mozak adjourned the meeting at 9:10 pm.

Respectfully Submitted by Deborah Holt



On July 17, 2023, AAATA announced via its website, press release, bus cards, flyers, and local print 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. A slide presentation of the proposed changes, a summary table of changes, proposed updated complaint procedure, and proposed updated equity analysis and public input policies were made available on AAATA's website at this time.

AAATA presented its proposed Title VI program update to the AAATA Board of Directors and members of the public on July 20, 2023, at the regularly scheduled Board Meeting. Public input was received at this meeting.

AAATA advertised and held two virtual public input meetings, one on July 25, 2023, and another on July 26, 2023, at which it presented a summary of the proposed changes to the Title VI program. AAATA staff discussed the reasons for these changes, the ways in which these changes would benefit the public, AAATA and its riders, and received public input. These meetings were recorded.

AAATA also held two in person public input information sessions, one July 25, 2023, at the Blake Transit Center and one on July 27, 2023, at the Ypsilanti Transit Center. At these sessions, AAATA staff met over 300 passengers and members of the public, explained the proposed changes to the Title VI program and the reasons behind them, answered questions, and collected public input.

At AAATA's regularly scheduled August 17, 2023, Board Meeting, the public was provided another opportunity to provide comment and feedback regarding its proposed Title VI program update.

All public input received through the meetings outlined above, email, comment card, 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 summary of public input is below. The public input log is provided in Figure A-3.

Summary of Public Input Received Regarding Proposed Title VI Program Updates

All public input received regarding the proposed Title VI program update was considered. Much of the input received was regarding AAATA's service overall.



Figure A - 3: Compilation of Public Comments Received

Public Input Log for Title VI Program Update

*Note: Personal contact information removed to maintain privacy

Marra	Doto	Contact	Comments and Overtions
Name	Date	Contact Forum	Comments and Questions
Robert Pawlowski	8/17/2023	August Board Meeting	Commented positively on the Title VI public feedback opportunities and current work being done at the organization to gather customer feedback in person for those who don't have digital accessibility.
Jim Mogensen	7/20/2023	July Board Meeting	FTA published its Title VI Circular in 2012 which requires a Title VI program to be updated every three years. In 2021, FTA asked for public comment regarding its update to the Title VI Circular. I provided my comments regarding the Circular to FTA at that time. Generally, in these updates, agencies seem to use the analysis like everything is okay and don't really make needed changes. Title VI programs seem to follow a basic script in which the policies included are too vague. I have taken a copy of the presentation with proposed changes to the program and updated policies and will provide future feedback in the upcoming public input sessions.
Kathleen (Board Member)	7/20/2023	July Board Meeting	Question: Where or how are the elderly and women protected under Title VI?
Rich (Board Member)	7/20/2023	July Board Meeting	Question: How does AAATA choose the equity analysis rate? Question: What is required in the program update? Question: Is the Authority just to update the demographics & LEP?
			I would like to express my thanks to the staff for completing this program update. Question: On average how many Title VI complaint submissions do we get in a year?
Monica (Board member)	7/20/2023	July Board Meeting	Question: What is considered "Low Income" and how is "Low Income" defined? Question: Is there any way that this data/reference point can be included within the program?



Name	Date	Contact	Comments and Questions
		Forum	
Robert Pawlowski	8/17/2023	August Board Meeting	Commented positively on the Title VI public feedback opportunities and current work being done at the organization to gather customer feedback in person for those who don't have digital accessibility.
Rich (Board Member)	7/20/2023	July Board Meeting	Question: Regarding "Low Income", how much is the population of the Asset Limited, Income Constrained, Employed (ALICE) affected? Question: What percentage of the population is ALICE and is 150% of the poverty line? I feel that the ALICE population overall is forgotten. Question: Can we broaden the definition of low income? Question: Does this program update encompass the ALICE population within Washtenaw County?
Kathleen (Board Member)	7/20/2023	July Board Meeting	Please share with the board via e-mail the information of all public input sessions. An invitation to listen to the public meetings should be extended to board members if they have time and an opportunity to do so.
Jim Mogensen	7/25/2023	July 25 Virtual Session	Regarding the Title VI complaint procedures: In my opinion, there are two different kinds of Title VI complaints. The first kind is an Individual complaint, and the second kind is a System complaint. If I were to have a system complaint, I would make the complaint directly to FTA in Washington, DC versus filing it locally. Some of the proposed modifications make good sense. From a service perspective, there were a lot of changes made due to the pandemic. These changes started as temporary and then became permanent. Question: What was the base line of service used in the program update? My suggestion would be to review the permanent changes and compare it to what service was prepandemic. Regarding the use of census data and the ACS, there are in my opinion segregation issues within the AAATA service area. Please use block group data versus census tract data in the program



Name	Date	Contact	Comments and Questions
		Forum	
Robert Pawlowski	8/17/2023	August Board Meeting	Commented positively on the Title VI public feedback opportunities and current work being done at the organization to gather customer feedback in person for those who don't have digital accessibility.
			I understand that Route 47 was discontinued during the pandemic but was restored based on public feedback. The opportunity to provide feedback and input is greatly appreciated. The fare media changes make sense, however, don't get rid of cash and token fares. Not everyone has a cell phone or bank/debit/credit card and relies on the ability to use cash fares and/or tokens. There are diverse areas of coverage of P&R that tell a story of AAATA ridership within the census data.
			The Washtenaw County opportunity index should be utilized in conjunction with all other data used.
			The University student population impacts Low Income route(s).
Karl Longstreth	7/25/2023	Email/ website	I see that your Title VI program update to conform with the 1964 Civil Rights Act and the legal policies and procedures in the Federal Transit Administration Circular 4702.1b seem to be a sensible and simple set of rules and processes that should provide assurance the customers and employees of the Ride on this issue of discrimination. I certainly am assured.
Michelle Bennett	8/2/2023	Email/ website	Question: Is there anything that can be done to make women feel safer on buses?
			E-mail sent to AAATA customer service representative as it is a safety concern and not Title VI related.
Carole Lang	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center Public Engagement in person meetings	Love, Love, the AirRide - It is awesome service with awesome drivers.



Name	Date	Contact	Comments and Questions
		Forum	
Robert Pawlowski	8/17/2023	August Board Meeting	Commented positively on the Title VI public feedback opportunities and current work being done at the organization to gather customer feedback in person for those who don't have digital accessibility.
Helen Hollis	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center Public Engagement in person meetings	I love our transit system. We need a train to the airport.
Joy Duffy	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center Public Engagement in person meetings	I like the expansion.
Unnamed woman using a walker	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center Public Engagement in person meetings	Things are great, I have no concerns about the service or Title VI Program.
Netta Berlin	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center Public Engagement in person meetings	Connections for commuters are important. I have no concerns about the Title VI Program.
Lucille	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center Public Engagement	Service is great! Staff treats me very nicely!



Name	Date	Contact	Comments and Questions
		Forum	
Robert Pawlowski	8/17/2023	August Board Meeting	Commented positively on the Title VI public feedback opportunities and current work being done at the organization to gather customer feedback in person for those who don't have digital accessibility.
		in person meetings	
Ezekiel Koster	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center Public Engagement in person meetings	Things are working great! Service staff is great!
Chinese speaking woman	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center Public Engagement in person meetings	I have no concerns about the Title VI program. Service and people are great!
Tony	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center Public Engagement in person meetings	Things work well.
A-Ride Customer	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center Public Engagement in person meetings	UM Hospital needs to be a priority when scheduling trips, and other trips should be secondary. Otherwise, there are no issues. Veterans should get free rides- other agencies do this. Things are great as a new rider since May. I moved here from Lansing, MI.
Angelina M.	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center	Please bring back the stop outside of Lakeshore Apartments on Route 45.



Name	Date	Contact	Comments and Questions
		Forum	
Robert Pawlowski	8/17/2023	August Board Meeting	Commented positively on the Title VI public feedback opportunities and current work being done at the organization to gather customer feedback in person for those who don't have digital accessibility.
		Public Engagement in person meetings	
Tyrice Dupree	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center Public Engagement in person meetings	Things are good.
Paul Spence	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center Public Engagement in person meetings	Bring back commuter service to Canton/Superior. Ypsilanti Transit Center (YTC) needs covers or a canopy. The Blake Transit Center (BTC) has one and a bigger waiting area. Generally, I am very pleased with service.
Jene	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center Public Engagement in person meetings	I have no concerns.
Mike Jones	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center Public Engagement in person meetings	We need a bus stop at 5900 Bridge Rd Ypsilanti MI 45197.
Unnamed Female	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti	I ride from the stop at Textile and McKing. I like FlexRide and its availability.



Name	Date	Contact	Comments and Questions
Name		Forum	
Robert Pawlowski	8/17/2023	August Board Meeting	Commented positively on the Title VI public feedback opportunities and current work being done at the organization to gather customer feedback in person for those who don't have digital accessibility.
		Transit Center Public Engagement in person meetings	Thank you AAATA for getting her where she needs to go.
Chris Kopeck	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center Public Engagement in person meetings	There are not enough buses on each route throughout the day. We need more, not just during the morning and afternoon peaks
Unnamed Male, GoldRide	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center Public Engagement in person meetings	We need free rides for veterans or at least a veteran's discount! I would like the FlexRide type services to be easier to use and I would like AAATA to expand their zones.
Jeanie	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center Public Engagement in person meetings	There are no bus pass sales at Ypsilanti Transit Center (YTC). Sunday hours should be longer with more buses to be added to Sunday and Saturday services.
Unnamed Female	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center Public Engagement in person meetings	The bus cleaning at Transit Centers is too much. The sprayed chemicals are on the arms and it bothers my skin.



Name	Date	Contact	Comments and Questions
		Forum	
Robert Pawlowski	8/17/2023	August Board Meeting	Commented positively on the Title VI public feedback opportunities and current work being done at the organization to gather customer feedback in person for those who don't have digital accessibility.
Michelle Tobbs	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center Public Engagement in person meetings	They do a good job for me. I love riding on the bus.
Henry Burnell	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center Public Engagement in person meetings	It is a good Ride.
Henry	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center Public Engagement in person meetings	On FlexRide Services, the FlexRide East should connect to Ann Arbor.
Harold W Klenk	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center Public Engagement in person meetings	I would like the buses to run later.
John Hamiliton	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center Public Engagement	I would like the route I ride to go to Rawsonville like the regular routes do.



Name	Date	Contact	Comments and Questions
		Forum	
Robert Pawlowski	8/17/2023	August Board Meeting	Commented positively on the Title VI public feedback opportunities and current work being done at the organization to gather customer feedback in person for those who don't have digital accessibility.
		in person meetings	
James Davis	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center Public Engagement in person meetings	All is good.
La'Qeuta	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center Public Engagement in person meetings	I am just writing to inform people that I was discriminated against by a business (Family Dollar) due to not being liked by management due to my race and religion. The management terminated me.
Bruce D. Berry	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center Public Engagement in person meetings	Updating the Title VI program is a very good idea.
Roxanne A Allison	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center Public Engagement in person meetings	I would like to have express to Meijer from Stone School on Route #5.
Unnamed Rider	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center	The service and people are great and nice. I have no concerns about the Title VI Program.



Name	Date	Contact	Comments and Questions
		Forum	
Robert Pawlowski	8/17/2023	August Board Meeting	Commented positively on the Title VI public feedback opportunities and current work being done at the organization to gather customer feedback in person for those who don't have digital accessibility.
		Public Engagement in person meetings	
Sam White	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center Public Engagement in person meetings	On weekdays, my working until 615pm is fine. Getting home after work on Sunday will be an issue until service is expanded.
Unnamed Male	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center Public Engagement in person meetings	I would like to have more handicap accessibility in lead walks, sidewalks, and at bus stops.
Debra Miller	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center Public Engagement in person meetings	I would like the AirRide to go further away from her house.
Daniel Robinson	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti Transit Center Public Engagement in person meetings	Thank you so much for the service provided. It is a life saver.
Unnamed	7/25/23 and 7/27/23	Blake Transit Center/ Ypsilanti	Illegible comment card received.



Name	Date	Contact Forum	Comments and Questions
Robert Pawlowski	8/17/2023	August Board Meeting	Commented positively on the Title VI public feedback opportunities and current work being done at the organization to gather customer feedback in person for those who don't have digital accessibility.
		Transit Center Public Engagement in person meetings	



Tab B: Notice to the Public

Ann Arbor Area Transportation Authority

Title VI Notification Procedure

The notice below is provided:

- As a poster on-board each AAATA bus.
- On the AAATA website on the Title VI Page with a link provided on all pages of the website.
- On the Table of Contents page of each edition of the printed RideGuide. The RideGuide is the principal publication of the AAATA and includes all routes and schedules as well as information on all AAATA services, fares, accessibility, contact information, news and riding tips. The RideGuide has been published 3 times per year and more than 100,000 copies are distributed free of charge. The notice will be included in all future appropriate printed materials.
- As a poster in the AAATA Headquarters lobby, Blake Transit Center, and Ypsilanti Transit Center.

Figure B - 1: Notice to the Public

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



Tab C: Complaint Procedure

Figure C - 1: Complaint Procedure

Title VI Complaint Procedure

This revised policy was adopted and implemented in 2023

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 on the Customer Service page within 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.



Tab D: Complaint Form

The Ann Arbor Area Transportation Authority Complaint Form for Title VI is attached as Figure D-1.

Please see Figure C-1 for complaint procedures. The Complaint Form is available on the website in English, Spanish, Chinese, Korean, and Arabic.



Figure D - 1: AAATA Title VI Complaint Form

AAATA TITLE VI COMPLAINT FORM

	Phone (v	vork):	
Large Print		Audio Tape	
TDD		Other	
nt on your own behalf?		Yes*	No
his question, go to Section	on III.	•	
me and relationship of th	e person		
ve filed for a third party:			
*		Yes	No
I experienced was based	l on (check	all that apply):	
Color	[] Nation	al Origin	
ation (Month, Day, Year)):		
vere involved. Include the you (if known) as well a	e name and s names and	contact information of d contact information of	the person(s)
	nt on your own behalf? his question, go to Section and relationship of the hing: we filed for a third party: we obtained the permission of the hing on behalf of a third ling on behalf of a third ling on the hing. I experienced was based color ation (Month, Day, Year) and were involved. Include the you (if known) as well a	Large Print TDD Int on your own behalf? his question, go to Section III. me and relationship of the person ning: we filed for a third party: we obtained the permission of the filing on behalf of a third party. I experienced was based on (check Color [] Nation ation (Month, Day, Year): where involved. Include the name and you (if known) as well as names and	TDD Other Int on your own behalf? Yes* This question, go to Section III. The and relationship of the person oning: The obtained the permission of the Yes obtained the permission of the Yes obtained the party. The experienced was based on (check all that apply): The color [1] National Origin



Title VI Program Update 2023

Section IV		
Have you previously filed a Title VI complaint with this	[] Ye	es [] No
agency? Section V		
	1 1	
Have you filed this complaint with any other Federal, State or State court?	e, or local agen	cy, or with any Federa
[] Yes [] No		
If yes, check all that apply:		
[] Federal Agency:		
[] Federal Court [] S	tate Agency	[]
State Court [] I	ocal Agency _	
Please provide information about a contact person at the filed.	gency/court wh	nere the complaint was
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. Signature and date required below:	that you think	is relevant to your cor
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		



Tab E: Complaints

AAATA received two complaints during the period 2020-2023.

- 1. Passenger claimed racial discrimination from the driver's arm gestures. Investigation found complaint was not valid.
- 2. One phone complaint was made about driver discrimination. Complaint was not officially filed, but per phone conversation, investigation was made. Based on investigation the verbal complaint was found not valid.

Both complainants were notified of the AAATA disposition after proper consideration. In addition, all complaint information has been available for more than five (5) years.



Tab F: 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.
- On-Board 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, face to face communication opportunity 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 inperson 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.

AAATA List of Public Participation Activities

The following is a list of public participation activities over the last three years along with the topics discussed.

2022

- January Board Meeting
 - Virtual
- February Board Meeting Canceled
- March Board Meeting
 - In person/Virtual
- January LAC Meeting
 - Virtual
- February LAC Meeting
 - Virtual
- March LAC Meeting
 - Virtual
- Upcoming: Long-Range Plan

2021

- Board Meetings January December
 - Virtual
- LAC Meetings January December
 - Virtual
- March-April: Service Recovery Plan
 - Virtual
- June: Fare Proposal & Service Recovery Plan
 - Virtual
- September: FY22 Budget
 - Virtual
- October-November: Long-Range Plan
 - o In-person: Ypsilanti
 - o In-person: Ann Arbor
 - Virtual

<u> 2020</u>

- Board Meetings January February
 - In-person
- Board Meetings February December
 - Virtual
- LAC Meetings January February
 - In-person
- LAC Meetings February December
 - Virtual
- March-December: COVID Communications
 - o Website
 - Dedicated COVID page



- Social media
- Signage
 - On bus
 - At transit centers
- o Temporarily suspended fares
- August: Temporary Service Plan
 - Virtual
- November: Temporary Service Plan & Title VI
 - Virtual

2023 Title VI Public Outreach Materials

The public communication information that has been launched for the Title VI Program Update includes:

- 1) Title VI Flyer (see Figure F-1)
- 2) Bus Card, placed on all buses (see Figure F-2)
- 3) Press Release, went out to all e-mail recipients Monday, 7/17/23 (see Figure F-3)
- 4) Comment Card, this will be handed out to in person sessions at transit centers (see Figure F-4)
- 5) Proof of Advertisement within MLive Newsletter (see Figure F-5)
- 6) Webpage that publishes Title VI Program update data (see Figure F-6)
- 7) FAQ sheet- attached on the AAATA website (see Figure F-7)



Figure F - 1: Title VI Flyer



Voice your comments!

There are many ways to provide your feedback on the program updates:

- Attend a virtual or in-person public meeting (see meeting dates and times on the right)
- Call 734-794-1882
- Fill out a form on TheRide.org/Title-VI
- Email TitleVIProgram@TheRide.org
- Mail: AAATA c/o Title VI Program Updates 2700 S. Industrial Hwy. Ann Arbor, MI 48104



Visit **TheRide.org/Title-VI** for more information.

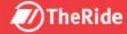




Figure F - 2: Bus Cards

Title VI Program Update Voice your comments! Public input accepted July 20 – August 20, 2023 • Attend a meeting • Write a letter • Call 734-794-1882 • Fill out a form on TheRide.org/Title-VI • Email TitleVIProgram@TheRide.org ID: 0137 7/2023 Learn More at TheRide.org/Title-VI



Figure F - 3: Press Release

PRESS RELEASE

For immediate release July 17, 2023



2700 South Industrial Hwy, Ann Arbor, Michigan 48104 734-973-6500; 734-973-6338F; TheRide.org Samantha Potter

734-794-1879; spotter@TheRide.org

TheRide Welcomes Community Feedback on Title VI Program

Public input accepted July 20 – August 20, 2023

ANN ARBOR, MI – The Ann Arbor Area Transportation Authority (<u>TheRide</u>) has announced that it is updating its Title VI Program and providing to the public for review and feedback. TheRide is hosting a series of virtual and in-person meetings to hear the community's final feedback on the program updates.

"We review our Title VI Program every 3 years to ensure we are in compliance and make any necessary updates to our program and policy," said Forest Yang, Deputy CEO of Planning & Innovation at TheRide. "We encourage our community to review our program updates and provide any feedback they may have."

TheRide will be introducing the program and policy updates at the July 20 Board of Directors Meeting.

Feedback on TheRide's Title VI program updates is being accepted July 20 – August 20, 2023. There are many ways to provide your feedback on the program updates:

- Attend a virtual meeting
- Attend an in-person meeting
- Visit: TheRide.org/Title-VI
- Email: TitleVIProgram@theride.org
- Call: 734-794-1882
- Mail:
 - O AAATA

c/o Title VI Program Updates 2700 S. Industrial Hwy. Ann Arbor, MI 48104

TheRide invites the public to learn about the Title VI Policy plan updates at a series of public and virtual meetings:

Virtual meetings will be held via Zoom at the following times:

Date	Time
Tuesday, July 25	12:00 p.m. – 1:00 p.m.
Wednesday, July 26	6:00 p.m. – 7:00 p.m.



In-person meetings/drop-in sessions will be held at the following locations:

Date	Time	Location
Tuesday, July 25	2:00 p.m. – 6:00 p.m.	Blake Transit Center
Thursday, July 27	2:00 p.m. – 6:00 p.m.	Ypsilanti Transit Center

To learn more about the Title VI Policy, visit: https://www.theride.org/title-vi.

To help reduce the spread of COVID-19, TheRide continues to enforce the established preventive measures to keep both riders and drivers safe:

- Customers are encouraged to wear a face mask, but not required.
- The driver is to be approached for emergencies only.
- Buses are cleaned with CDC-recommended protocols.
- Plastic barriers are added to separate drivers and riders on fixed-route buses.
- Sanitation supplies are provided to employees.
- Masks, gloves and face shields are provided for drivers' use.
- · Lost and Found collection has been temporarily suspended.

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 <u>TheRide.org</u>.

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

Connect with TheRide on <u>Facebook.com/CatchTheRide</u>, <u>Twitter.com/CatchTheRide</u>, YouTube.com/CatchTheRide, and Instagram.com/catchtheride/.



Figure F - 4: Comment Card

Public Comment Card

TOPIC:	TOPIC:
Name:	Name:
Phone:	Phone:
Email:	Email:
☐ I want to receive TheRide's e-newsletter. ☐ I wish to be followed up with by TheRide.	☐ I want to receive TheRide's e-newsletter. ☐ I wish to be followed up with by TheRide.
Resident of (please check):	Resident of (please check):
☐ City of Ann Arbor ☐ City of Ypsilanti	☐ City of Ann Arbor ☐ City of Ypsilanti
☐ Ypsilanti Twp ☐ Superior Twp	☐ Ypsilanti Twp ☐ Superior Twp
☐ Pittsfield Twp ☐ Scio Twp ☐ Other	☐ Pittsfield Twp ☐ Scio Twp ☐ Other
Comments (continue on back if needed):	Comments (continue on back if needed):
₹ TheRide	⊘ TheRide

Public Comment Card



Figure F - 5: Proof of Advertisement

THE ANN ARBOR NEWS SUNDAY, JULY 16, 2023 A5

Operator facing denial of gravel mine offers to pay 'impact fee'

The 400-acre operation could be rejected as it seeks approval from Sharon Township.





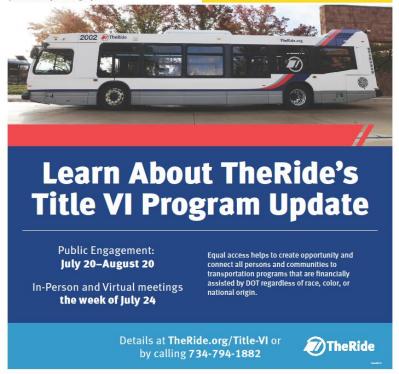
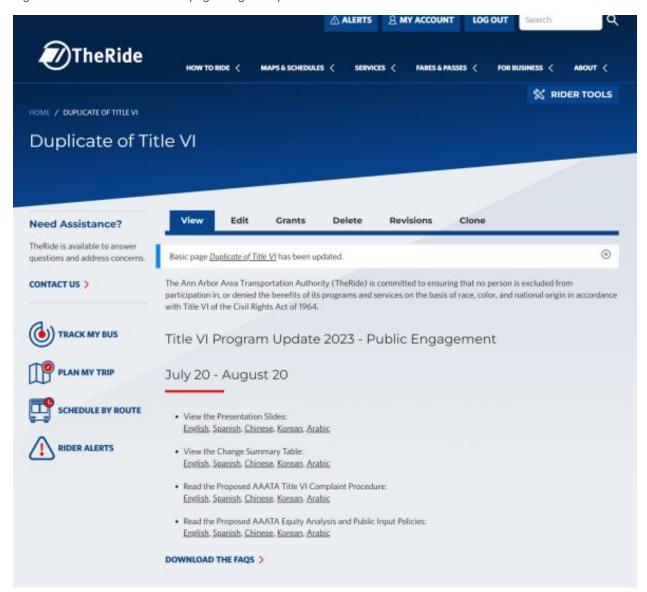




Figure F - 6: AAATA Title VI Webpage Program Updates





Public Comments
2 200 an a sa s
The Public is invited to provide comments in a variety of ways:
Attend the July 25 in-person meeting Attend the July 27 in-person meeting
Attend the July 25 virtual meeting Attend the July 26 virtual meeting
Send us an <u>email</u>
Call 734-794-1862 Fill out the webform below
Mail a letter to:
o AAATA
c/b Title VI Program Updates 2700 S. Industrial Hwy.
Ann Arbor, MI 48104
Public input accepted July 20 through August 20, 2023.
First*
Last*
Phone
Email*
Email*
Email* Message*
Message*



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 nondiscrimination obligations, or to file a complaint if you believe you have been subject to unlawful discrimination, please contact TheRide. please CONTACT THERADE. By Mall. Online Ann. Arbor Area Transportation Authority Tell List The Bide.org. Ann. Title VI The Bide.org. Atter Title VI 2706'S. Industrial Hwy. Ann Arbor, MI 48104 Title VI AAATA 2020 TITLE VI PROGRAM UPDATE AAATA 2018 TITLE VI PROGRAM UPDATE 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: · Complaint Form (English) . Complaint Form (Spanish) . Complaint Form (Chinese) Complaint Form (Korean)



Title VI Complaint Procedure

Each complaint which is received that alleges discrimination on the basis of race, color, or national origin will be investigated using the procedure below, whether it specifically references Title VI or not. The complainant will be notified within 7 days that their complaint has been received and is being investigated. This notice may include a request for additional information necessary to investigate the complaint (e.g. date or specific time of an incident). A written response of the determination will be provided to the complainant within 30 days whenever possible. If the investigation and determination cannot be completed within 30 days, the complainant will be provided with written notice including an explanation of the reason a longer time is required, and a descline for a determination.

If the allegation concerns a specific incident involving a driver or information specialist, a preliminary investigation of the facts will be conducted by the AAATA Transportation Department management staff. It should be noted that all of AAATA's buses and facilities are equipped with cameras. These cameras have proved to be extremely useful in resolving 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 – e.g. regarding AAATA service design or fares – the CEO, Deputy CEO, or their delegate will determine the appropriate member of senior staff 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 complaints alleging discrimination on the basis of 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 allegation of discrimination on the basis of race, color, or national origin was valid, and any corrective action that will be taken. Note that even if the allegation of 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 to the complainant, including whether the allegation of discrimination was found to be valid, and corrective actions that the AAATA has taken or promises to take. The letter will inform the complainant of the opportunity to provide additional information that may lead the AAATA to reconsider its decision, and of the complainant's right to file a complaint with the Federal Transit Administration (FTA).





Figure F - 7: Title VI FAQs



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 Complaint Procedure, Equity Analysis Policy, and Public Input Policy. 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:
 - Attend a virtual meeting
 - Attend an in-person meeting
 - Visit: TheRide.org
 - Email: TitleVIProgram@theride.org
 - Call: 734-794-1882
 - Mail: AAATA
 c/o Title VI Program Updates 2700 S. Industrial Hwy.
 Ann Arbor, MI 48104



7. When and where are the meetings?

a. Two virtual and two in-person meetings will be held:

Virtual meetings will be held via Zoom at the following time:

Date	Time
Tuesday, July	12:00pm –
25	1:00pm
Wednesday,	6:00pm –
July 26	7:00pm

In-person meetings/drop-in sessions will be held at the following locations:

Date	Time	Location
Tuesday, July 25	2:00pm – 6:00pm	Blake Transit Center
Thursday, July 27	2:00pm – 6:00pm	Ypsilanti Transit Center

8. How long is public engagement?

a. Public engagement runs from July 20 – August 20. The program and policy updates will be introduced at TheRide's July 20 Board of Director's meeting.

9. Where can I learn more?

More information is available at TheRide.org/Title-VI or by calling 734-794-1882.



Tab G: Language Assistance Plan

Part 1: Four Factor Analysis

Limited English Proficiency (LEP) guidance requires a four-factor analysis to determine the level of assistance required to provide meaningful access. The analysis performed by the Ann Arbor Area Transportation Authority (AAATA) is contained below.

1) The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population

Based on data from the five-year American Community Survey for 2021, the population of the AAATA service area is 275,473 persons. Of this total, an estimated 8,469 (3.07%) indicated that they speak English less than "very well". The figures and percentages for the total population and for the LEP populations that meet the Safe Harbor threshold by native language are shown in Table G-1.

Table G-1: LEP Population			
Number of Persons Percent of Total			
Total Population	275,473	100%	
LEP Population	8,469	3.07%	
	Number of Persons	Percent of Total	
Language Group			
Chinese LEP	3,744	1.36%	
Spanish LEP	2,604	0.95%	
Korean LEP	1,052	0.38%	
Arabic LEP	1,069	0.39%	

Table G - 1: LEP Population

Persons who speak English "less than 'very well'" are considered to have limited English proficiency (LEP) for the purposes of this report. The map below (Figure G-1) shows the concentration of LEP persons by Census tract (the smallest level for which data is available) in the AAATA service area, with higher than average concentrations being those above 4.89%. The AAATA service area crosses 79 census tracts. Of these, 17 census tracts have between 100 and 200 LEP persons, 8 census tracts have between 200 and 300 LEP persons, and 13 census tracts have over 300 LEP persons.



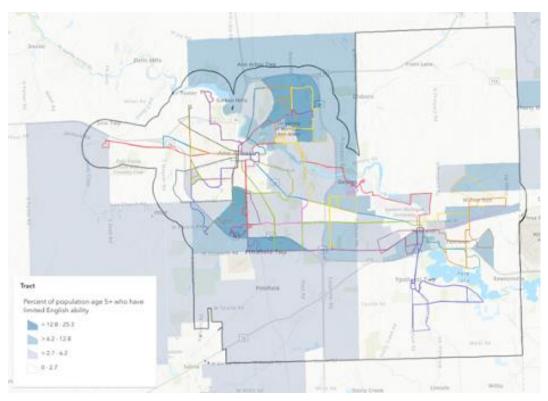


Figure G - 1: LEP Population Concentration for AAATA Total Service Area



^{*}Data based on 2021 ACS 5-year Community Survey

2) The Frequency with which People of Limited English Proficiency Come into Contact with AAATA's Programs, Activities, and Services

AAATA has received no requests for translated materials in a foreign language 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)
- On-board 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 for married students. Jewish Family Services is the agency designated to provide services for refugees, migrants, and new arrivals in Washtenaw County. AAATA works closely with each of these agencies and has not received any requests for additional assistance with LEP persons in the use of AAATA service. AAATA originally worked with Casa Latina, a non-profit organization working to connect local Hispanics with community resources, to produce a Spanish RideGuide, effective August 2023. Currently, 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 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.

3) The Importance of AAATA's Programs, Activities, and Services to Persons of Limited English Proficiency

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, in order 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. In order 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 assistance 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 skill is required for this process, but another person can make the reservation. Once again, agencies and family members make reservations for clients. No additional language skills are necessary during the trip. The service is designed to provide service for persons 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 is being 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.

4) Resources Available to Customers and the Associated Costs

At this time, AAATA has translated key documents and materials including Title VI Complaint forms and established contracts for over the phone interpreter assistance, providing 24/7 support. Given the relatively small number of overall LEP individuals, the variety of languages, and the online as well as community resources available, additional alternative print services are not necessary at this time. Most language groups, especially Chinese and Korean native speakers, show a greater preference for seeking information through AAATA's website. AAATA will continue to evaluate and investigate telephone interpreter services and will continue to use I-Speak cards to collect more information on individuals who could benefit from greater language assistance.

There are significant resources available to assist persons in using AAATA service. Agencies such as the University of Michigan Office of International Programs (UMOIP) for students and their families, and Jewish Family Services (JFS) for immigrants in the community, referenced above in Section 2, all provide assistance to persons with limited or no English as a central part of their mission. UMOIP provides cultural immersion, intensive language learning, and participation in another educational system for foreign students. JFS provides a wide range of services for refugees, migrants, and new arrivals in Washtenaw County including case management, acculturation, English as a Second Language (ESL) classes, document translation services, employment services, language partnership service, and accompanied transportation. The transportation service is particularly important in this context as it is used to provide a bridge for persons to the use of public transit service provided by AAATA.

In addition to these agencies, AAATA has a relationship with many other human service, religious, and governmental agencies that provide assistance in the use of AAATA service for their clients, which includes LEP persons on occasion.



Conclusion

Based on the analysis above, AAATA has decided to further investigate additional translation or new language assistance services and continue working with agencies that have specific expertise to provide assistance. An increased level of effort and assistance is warranted to identify persons with limited English proficiency, to enhance the website, and to prepare additional services to meet identified future needs. Specific actions are defined in detail in Part II, below.

Part II: AAATA Limited English Proficiency Plan Identifying LEP Individuals Who Need Language Assistance

- AAATA will continue to keep records of persons with whom we come into contact who need language assistance.
- AAATA will continue to proactively seek information from public and private agencies about their experience with people with limited English proficiency.

Language Assistance Measures

AAATA's selection of the following procedures is based on the relatively low need for language service and the limited resources available for this purpose:

- Provide enhanced language translation capabilities on the AAATA's website at TheRide.org since July, 2013.
- Provide information on TheRide.org website on options for where to obtain community language assistance.
- Supply an updated copy of AAATA emergency icon forms and basic key phrases translated for transit employees into simplified Chinese, Spanish, Korean, and Arabic to motor coach operators and transportation supervisors.
- Distribute RideGuides translated in Chinese, Spanish, Korean, and Arabic in print (when requested/on demand) and online to LEP persons and agencies in the AAATA service area.
- Prepare printed information on where to obtain language assistance to give or send to riders, provided to motor coach operators and information specialists, specifically with contact cards for outside organizations and community partners like UMOIP and JFS.

Implement phone interpreter service recommendations Employee Training

- AAATA conducts refresher training annually for all existing motor coach operators and information specialists.
- The training includes the following elements, at a minimum:
 - A summary of AAATA's responsibilities under the DOT LEP guidance
 - A summary of AAATA's language assistance plan



- A summary of the number and proportion of the LEP persons in the service area and the frequency of contact
- o A description of the language assistance that AAATA is currently providing
- A description of AAATA's cultural sensitivity policies and practices
- Management staff has been provided with an overview in the areas listed above as part of an annual organizational meeting.
- All employees are directed to keep a record of any language assistance requests.
 AAATA monitors LEP contact through employees to watch for indicators of the need for more formal data collection. AAATA collects data every three years, or more often if there is reason to believe from employee monitoring procedures that change is occurring which requires added attention.

Outreach Techniques

Based on the four-step analysis above, contact by LEP persons directly with AAATA is limited. AAATA uses effective techniques to reach LEP persons and to maintain service information in other languages through the AAATA website and continues to work with the agencies that provide assistance to LEP persons, including production and distribution of the RideGuide (when requested/on demand).

In particular, the University of Michigan Office of International Programs (UMOIP) and Jewish Family Services (JFS) are designed to provide assistance in any language needed. This is important because the overall population of LEP persons speak a variety of languages. Continuing and expanding the cooperative relationship with these agencies and others is the most cost-effective way to reach LEP populations throughout AAATA's service area.

Monitoring and Updating the LEP Plan

The action steps above are designed to produce increased assistance for LEP persons and continuous feedback on the frequency of contact with LEP persons both within AAATA and from external agencies. This feedback will be used to determine if there is a significant change in the frequency of contact or a marked increase in any specific language group population in the service area, which could impact the use of AAATA information and service accessibility for LEP persons, requiring additional resources.

AAATA will continue to use subsequent sessions of the periodic refresher training for motor coach operators and information specialists to keep monitoring the experience in implementing the action steps.

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.



Tab H: Membership of Non-Elected Committees and Councils

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 10 members of the Executive Committee as indicated below. Based on the most recent Census, minority representation should include more Hispanic 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

Table H-1: Minority Representation on Committees and Councils Selected by AAATA					
	Caucasian	Hispanic	African American	Asian American	Native American
Local Advisory Council (LAC)	90%	0%	10%	0%	0%

Table H - 1: Minority Representation on Committees and Councils Selected by AAATA



Tab I: Monitoring of Subrecipients

AAATA monitored adherence to Title VI planning requirements for six subrecipients for the period 2020-2022. 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 attached questionnaire 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 timely. 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.



TheRide

AAATA Subrecipient Programs

Form: 2020 -2022 Subrecipient Desk Review Questionnaire

Reporting Period: FY20 -FY22 (10/1/2019 - 3/31/2022)

Contact: LaTasha Thompson, lthompson@theride.org

Subrecipients of Federal funds are required to complete an annual desk review questionnaire as part of AAAT'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 grants@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:

Q: Please provide the most recent organization chart for your organization.

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. A recipient must promptly notify the FTA of any current or prospective legal matters that may affect the Federal government

Q: Did your organization pay for lobbying activities 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:	
	Q:	Are there any false claims received or criminal violations committed related to Federal assistance since the last review? Any law enforcement investigations?
	A:	
SECTION 3		
	gem	ent and Capacity
		one 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. If there are written procedures, please provide them.
	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:	
	Q:	Provide the position and job descriptions for the current financial and accounting staff with financial duties for managing grant funds. Also provide the knowledge and skills of the related financial and accounting staff (i.e. resumes).
	A:	
	Q:	Provide the results of any internal or external audits for the time period of this questionnaire.
	Q:	How is the organization's local share considered to be stable for future funding?
	A:	
	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:
- Q: Is any of your agency's FTA-funded real property located in a flood hazard zone? If so, is there appropriate insurance to cover risk?
- A:
- Q: What procedures do you have to prevent loss, damage or theft of FTA-funded equipment?
- 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.)
- 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 preventative maintenance records for the past year.)
- A:



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

A:

SECTION 6

Procurement

Federal Requirement: Subrecipients must conduct procurements using Federal funds in accordance with FTA Circular 4220.1F and federal law, in full and open competition, and in compliance with Buy America requirements.

Q: Has the organization made any procurements with FTA funds outside of the use of the State Contract during the time period listed above?

A:

Q: If so, please list the date, dollar value, type, method (i.e. request for proposal), status of contract (open, completed), and contractor?

A:

SECTION 7

Title VI (Civil Rights Act of 1964)

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

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

A:

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

A:

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

Q: Please provide a list of language assistance training for staff.

A:



Q: Please provide a list of Title VI investigations, complaints, and lawsuits that have occurred since Oct 2018.

A:

Q: Please provide examples of public participation activities performed since Oct 2018.

A:

Q: Please provide a list of transit facilities sited and copies of corresponding equity analyses since Oct 2018.

A:

Q: Please provide a list of transit facilities to be constructed/leased in the upcoming three Federal fiscal years and copies of equity analysis completed or schedule for equity analysis completion.

A:

Q: Please provide a list of any fare increases or major service changes since Oct 2018; date of change; and a brief description of the change.

A:

Q: Please provide a list of any service equity or fare equity analyses conducted for major service changes or any fare changes since Oct 2018.

A:

SECTION 8

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? Describe your ADA complaint procedures. Are the ADA complaint procedures on the website? Are the ADA complaints responded to promptly?



A:

Q: Has your organization received any ADA-related complaints in the past four years, FY2018-2022? (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:

Q: Does your organization provide ADA Complementary Paratransit (required of public transit agencies operating fixed routes)? If so, describe system and compliance?

A:

Q: Has your agency contracted out the complementary paratransit service on behalf of the agency? If so, does the subrecipient monitor the service for compliance with the US DOT ADA regulations?

A:

SECTION 9

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:

Q: Describe how your organization implements the EEO plan.



A:

SECTION 10

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? If applicable, provide the latest MIS (Management Information System) report.

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 11

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? If so, reported to AAATA?

A:

SECTION 12

Conclusion

Q: Do you have any questions, concerns, or additional information to share regarding your agenc's compliance with Federal requirements and capacity to carry out Federally funded projects?

A:

Q: Will you be sending any attachments with your response or as a follow-up? (If so, please summarize the contents so files can be collated.)

A:

Q: Describe how your agency's services meet the specific needs of seniors and individuals with disabilities?

A:



Tab J: Equity Analysis for Facility Location

In 2016, the AAATA implemented a significant expansion of the local and regional transit service including service to and from the City of Ypsilanti and Ypsilanti Township. This service increase included an expansion of service to the rural service area. As a result, AAATA determined that the Ypsilanti Transit Center had reached its limits in terms of physical space to meet the current routes and riders and undertook a Passenger Terminal Needs Assessment of Transit Center in 2017. This assessment determined that the Center was no longer adequate to accommodate the transit operational needs at its current location.

In 2018, a consultant team was engaged to develop design alternatives and identify potential sites to meet the requirements of the new facility. Nine (9) sites within a 1-mile radius of the existing facility met the minimum requirements for the new facility. Each site was then evaluated and ranked based on the following set of scoring criteria with the top three (3) sites being considered for further evaluation:

- Onsite Transit Operations/Vehicle Access
- Route Restructuring/Off-Site Operations
- Pedestrian Access & Safety
- Environmental Impacts (Hazardous Materials, NEPA, NREPA
- Cost
- Environmental Justice
- Intermodal Connectivity
- Traffic Impact
- Community Impact/Compatibility/Planning/Land Use/Future Development Impact
- Site Availability/Ownership

This process resulted in the identification of three (3) top-ranked sites to consider for further evaluation. Four (4) conceptual layout options based on these three (3) locations were prepared and presented to the public for comment at a public meeting held on August 29, 2018. At the meeting, there was overall public consensus that Site 1 would best serve AAATA customers. A further meeting with stakeholders also identified Site 1 as the best option. A disparate impact analysis was not completed since all of the work completed on the project was in a preliminary phase.

As of August 31, 2023, no further action was taken based on this study and no site has been formally selected. A future site selection study is being planned during which a formal equity analysis will take place.



Tab K: Service Standards and Policies

Modes of Service (Fiscal Year 2022)

Table K-1: Modes of Service				
Fixed-Route Service D2A2 Commuter Service				
Number of Routes	30	1		
Method of Operation	Operated by AAATA	Contracted Services		
Annual Riders (FY22)	3,367,345	27,243		
Annual Vehicle Revenue Hours (FY22)	247,668	13,486		

Table K - 1: Modes of Services (Fiscal Year 2022)

Service Frequency (headway)

<u>Local fixed-route service</u> – The minimum service frequency is every 30 minutes during weekday peak hours and every 60 minutes at other times (midday, evenings and weekends). Weekday peak hours are from 6:00 – 9:00 a.m. and 3:00 – 6:00 p.m.

<u>Commuter bus</u> – Express route between downtown Detroit to downtown Ann Arbor. Runs every 45 – 60 minutes during weekday and every 90 – 120 minutes on weekends. Additional Vanpool service program is also offered

On-Time Performance

<u>All Modes</u> – A minimum of 90% of scheduled trips will be completed within 5 minutes of the scheduled time.

Service Availability

<u>Local fixed-route service</u> – 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. All of the cities of Ann Arbor and Ypsilanti are included in the 5YTIP fixed-route service area, as well as most of Ypsilanti Township north of Textile Road. The majority of Ypsilanti Township south of Textile Road is not included in the 5YTIP fixed-route service area because the population density is relatively low. The 5YTIP designates this area to be served by a Dial-a-Ride Plus service, which began September 27, 2017, called FlexRide, available to the general public, as well as seniors and people with disabilities.

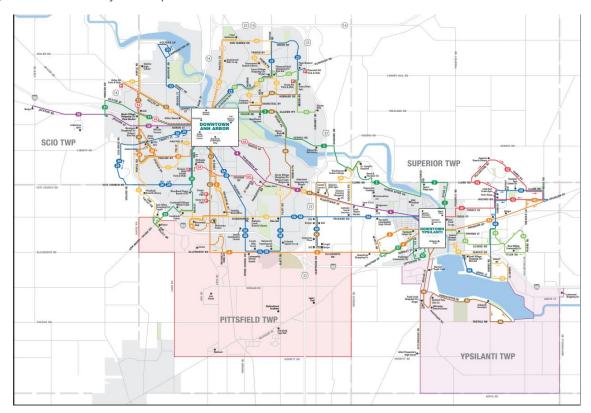


Tab L: Demographic and Service Profile

Maps and charts showing service coverage for minority and low-income populations are included in Tab L, profiling service demographics. Below is a list of the Figures and what each details:

- Figure L-1: TheRide System Map
- Figure L-2: Minority Population Service Coverage for TheRide
- o Figure L-3: Low-Income Population Service Coverage for TheRide

Figure L - 1: TheRide System Map



As shown in Table L-2, approximately 36.7% of TheRide bus routes (11 out of 30 routes) are considered minority routes, where the population of minority riders is higher than average for the service area within a quarter mile of the routes. Ridership was used to define minority routes in order to account for routes that pick up passengers in generally non-minority areas and then travel through predominantly minority block groups.

As shown in Table L-2, approximately 90% of TheRide bus routes (27 out of 30 routes) are categorized as low-income routes, where the population of low-income riders is higher than average for the service area within a quarter mile of the routes. Ridership was used to define low-income routes in order to account for routes that pick up passengers in generally low-income areas and then travel through predominantly non low-income block groups. AAATA defines low-income riders as those that are below 150% of the HHA poverty guidelines for 2023.



Figure L - 2: Minority Service Coverage

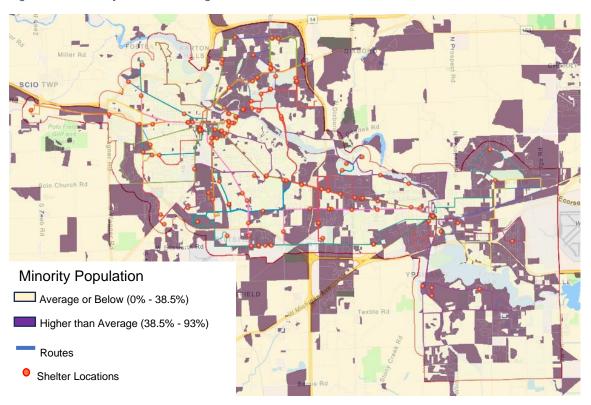


Figure L - 3: Low-Income Service Coverage

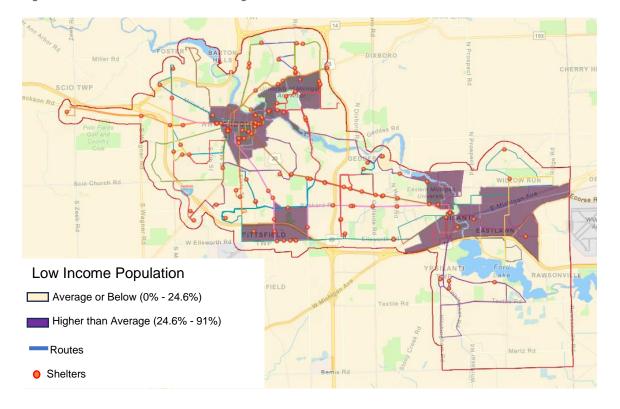




Table L-1: Estimated Minority and Low-Income Population				
Minority Low-Income				
Population	95,166	60,807		
Total Population	247,185	247,185		
Average Percent	38.5%	24.6%		

Table L - 1: Estimated Minority and Low-Income Population

Table	L-2: Minority and	Low-Income Routes	
Route #	Minority Route	Low-Income Route	Both
3	No	Yes	No
4	No	Yes	No
5	No	Yes	No
6	No	Yes	No
22	Yes	Yes	Yes
23	Yes	Yes	Yes
24	Yes	Yes	Yes
25	No	Yes	No
26	No	Yes	No
27	No	No	Neither
28	No	Yes	No
29	No	No	Neither
30	No	Yes	No
31	No	No	Neither
32	No	Yes	No
33	No	Yes	No
34	No	Yes	No
42	Yes	Yes	Yes
43	No	Yes	No
44	Yes	Yes	Yes
45	Yes	Yes	Yes
46	Yes	Yes	Yes
47	Yes	Yes	Yes
61	No	Yes	No
62	No	Yes	No
63	No	Yes	No
64	No	Yes	No
65	Yes	Yes	Yes
66	Yes	Yes	Yes
68	Yes	Yes	Yes
Total Yes	11	27	11
Total No	19	3	16
Total Neither	-	-	3

Table L - 2: Minority and Low-Income Routes



Tab M: Demographic Ridership and Travel Patterns

Local Fixed Route Service Onboard Survey

Survey Data Collection

The 2022 survey was conducted onboard AAATA buses during the month of April, a period different to the timing of previous survey efforts. The AAATA conducts a rider survey every two to three years for local fixed-route service.

Temporary workers conducted the survey under the supervision of an experienced survey research firm, CJI Research Corporation. Surveyors rode buses for a run (a set period of time) and approached all riders (who appeared to be 16 years old or older), rather than a sample of riders. Surveyors handed a survey to each rider and asked them to complete the survey, along with providing them with a free pen. Because the AAATA has used the same methodology to conduct onboard surveys previously, many riders are familiar with the process and readily accepted and completed the survey. At the end of the run, the survey personnel placed the completed surveys in an envelope marked with the route and the run and reported to the survey supervisors who completed a log form detailing the run. All surveyors were trained to provide assistance and also provided a Spanish version of the survey to passengers, as needed.

Survey Questionnaire

A copy of the survey instrument is included as Figure M-1. The survey forms were serial numbered so that records could be kept for the route and day of the week on which the survey was completed. This was found to be a more accurate method than asking riders to provide information on the route, day, and time.

Sample

A random sample of runs was drawn from a list of all TheRide runs. This initial sample was examined to determine whether the randomization process in the relatively small universe of all runs had omitted any significant portion of the TheRide's overall route structure. The sample was adjusted slightly to take any such omissions into account.

The resulting total sample size is 1,263 useable responses. When all respondents are included, this sample has a sample error level of +2.6%. When a sub-sample is used, sample error increases somewhat, though with such a large overall sample, this would affect the findings only in very rare circumstances in which only very small sub-segments of the ridership were being examined separately.

Participation Rates

Surveyors reported instances where a survey was not completed and the most common apparent reason was riders stating they had already completed a survey, which occurred 5% of the time (92 respondents). Passengers also stated a language barrier (i.e., other than English or Spanish) to be the reason, which occurred 2% of the time (42 respondents). To eliminate language barrier as a reason that passengers cannot complete a survey, AAATA will ensure that future survey forms will be made available in the languages identified in the Language Assistance Plan (English, Spanish, Chinese, Korean, and Arabic).



Figure M - 1: Onboard Survey Form

here were you before you went to the bus stop for this trip? Home 2 Work 3 Shopping Social visit or recreation 6 Doctor/medical Other. If you transfer to another TheRide bus during this trip? 1 Ye hat are the cross streets at the place you are coming from now? treet:	ton for this trin?		4 ☐ Fare Deal card (for low income) 5 ☐ F	2 ☐ Good as Gold (senior card) 5 ☐ Fare Deal Card (age 60-64)	Card (age	60-64)			s ∟ rare Deal Card (for disgbility)	
□ Social visit or recreation	ping	4 🗆 School/college	13. Which routes do you use regularly on TheRide? (Choose up to 4) Routes: 3 4 5 6 22 23 24 25 26 27 3 33 34 42 43 44 45 46 47 61 62	ieRide? (C) 24 25 46 47	26 51	1p to 4) 27 28 62 63	29	30 31	32	
ill you transfer to another TheRide bus durin hat are the cross streets at the place you are treet:	or/medical	7 ☐ Church	g today, on which of the p	ven days	have yo	u ridden	on TheR	ide? (All	that app	(A)
hat are the cross streets at the place you are treet:	ng this trip? 1□ Yes	es 2□No	1□Mon 2□Tue 3□Wed 4□Thurs		5 Fri	6 ☐ Sat	7 □ Sun		8 □ All 7 days	ays
	e coming from now		15. How satisfied or dissatisfied are	MO	þəij					
			you with menue service in each of	Don,t kn	tsitsssiQ		Neutral		;,-;,3	Satisfiec
nat city? (Circle one): Ann Arbor area Tpsilanti ther:	anti area				3		(1)		•	①
urer.			a. Drivers' courtesy with passengers		-	2	3 4	2	9	7
get to the first bus stop you use	d on this trip?		b. Overall quality of customer information		-	2	3 4	വ	9	7
☐ Walked 2 ☐ Wheelchair/scooter	3 ☐ Bike	e Ve	c. Cleanliness of bus interiors		-	2	3 4	2	9	7
iow many minutes and it take to get to the first bus stop you used on this trip:	stop you used on th	is mp; windles	d. Safety from accidents		-	2	3 4	5	9	7
ır FINAL destination for th			e. Personal security while using TheRide		-	2	3 4	വ	9	7
	guid	4 School/college	f. Shelter at stops you use		-	5	3 4	2	9	7
☐ Social visit or recreation 6 ☐ Doctor/medical	or/medical	7 ☐ Church	g. Distance to bus stop you use most often		-	2	3 4	S	9	7
_ orner			h Sufficient service to areas you want to go to	ᇢ	-	2	3 4	D.	9	7
hat are the cross streets at your final destination?	ation?		i. Dependability of making transfers		-	2	3 4	Ŋ	9	7
rreet:			j. Directness of routes		-	2	3 4	വ	9	7
ross street:			k. Total duration of your trip		-	2	3 4	Ŋ	9	7
hat city? (Circle one): Ann Arbor area Ypsilanti	anti area		I. Predictability of bus arrivals		-		3 4	2	9	7
ther:			m. TheRide Service overall		-	7	3	വ	9	7
oout how many minutes will this total trip take?	ike?		16. How likely are you to recommend TheRide to a friend or colleague?	de to a fr	end or	colleagu	e,			
tow many separate one-way bus trips will you make today? (For example, even if you transfer, oing to work is only one trip; going home from work is a second trip)	ou make today? (Fo m work is a second t	r example, even if you transfer, rip)	Not at all likely 0 1 2 3 4	rs	9		8 Ext	Extremely likely 9 10	kely 10	
□1trip b□2trips c□3trips d□	d ☐ 4 trips e ☐ Other	her(how many?)	17. Was a car (or truck or motorcycle) available to you to make this trip?	e to you	to make	this trip	? 1□ Yes		2 No	
ow did you pay for this trip?						•				
2 ☐ EZFare		fer 5 ☐ 30-Day pass	Please furn the survey over and complete the questions on the back	wer and o	omnlet	a the all	estions o	n the ha	ž	2
☐ go!pass 7☐ Token 8☐ EMU Pass	Pass 9 ☐ Other					a hama				3



2 No 2 No 2 No 2 No 2 No 4 Native-American Indian 2 No 36. Do you frequently use a cell phone to send and receive text messages? □ Yes 2□No 35. If you use social media, which of the following do you use regularly? (Circle all that apply) 5 or more 2 Get a car but keep using TheRide also 1 Nes 1 \rightarrow 1 \(\text{Yes} \) 4 Stop using TheRide for other reason □ Yes 1 Ves 1 Ves 34. Do you use social media? 1□ Often 2□ Occasionally 3□ Rarely or never 9 More than \$100,000 6 □ \$35,000 to \$49,999 3 - \$15,000 to \$19,999 f. Facebook, Twitter, Instagram, Pinterest, Nixle or other social media 2 Down 3 Caucasian/white 2 No LinkedIn 1 Rent 37. Where do you often get route and schedule information? What is your total combined annual household income? 1 Ves 38. Have you any comments or suggestions for TheRide? Pinterest 31. What language do you most often speak at home? 8 ☐ \$75,000 to \$100,000 5 34,999 to \$34,999 2 1 \$10,000 to \$14,999 32. Do you rent or own the home where you live? 30. Do you (a/so) identify as Hispanic/Latino(a)? 33. How many people live in your household? 29. Do you identify as... (Circle all that apply): a. TheRide website on a desktop/laptop d. 734-996-0400 information number 2 Asian 6 □ Other b. TheRide website on a smartphone 26. A year from now, would you prefer to: Instagram 1 ☐ Keep using TheRide as often as now 3 Get a car and stop using TheRide c. The printed Ride Guide 5 ☐ Pacific Islander/Hawaiian 2 Spanish 1 African-American/Black e. A smartphone app 7 \$50,000 to \$74,999 Twitter 4 \$20,000 to \$24,999 27. How old are you? ___ 1 ☐ Less than \$10,000 1 English Facebook 19. Before the pandemic which began in March 2020, on how many days a week did you typically 25. If you used Uber or Lyft in the past thirty days, did TheRide have service you could have used 3 ☐ Non-binary 4 ☐ Prefer not to answer 3 ☐ Two or three times 4 ☐ Four or five times 5 ☐ More than five C. If you are employed, did you do your job from home continuously for more than a week at 3 Not a student I I No - Could not have used TheRide because those were trips to places where TheRide had no or C. If you are a student, did you do attend classes from home continuously for more than a 4 Six or seven 4 Six or seven 20. During the pandemic in 2020 and 2021, on how many days a week did you typically use ! ☐ No - Could not have used TheRide because it was a time of day when TheRide had no or very □ more than 15 years 6 ☐ Retired 24. In the past 30 days, about how many times, if at all, have you used Uber or Lyft? 4 Concordia 2 - Employed for pay in your home : □ 3-5 years 2 No 2 No 2 No 21. Which one of the following best describes you? Are you (circle only one): 2 ☐ One to three 3 ☐ Four or five 3 - Four or five week at any time during the pandemic? 1 ☐ Yes 2 ☐ No 2 ☐ College student 1 \rightarrow Yes ☐ Yes - I could have used TheRide, but preferred to use Uber or Lyft 1 Yes c. Start work before 7:00 am on any day? 1 ☐ Yes s ☐ Unemployed A. If you are employed, in a typical week, do you usually? any time during the pandemic? 1□ Yes 2□ No 7 Other: 3 - WCC 2 One to three 23. Do you identify as... 1 Male 2 Female o ☐ 11-15 years B. If you are a college student, which college? a. Work after 9:00 PM on any day? b ☐ 1-2 year b. Work Saturday and/or Sunday 18. For how long have you been using TheRide? □ Employed for pay outside your home 6 ☐ Cooley 2 EMU A. 1□ High school student 4 Homemaker use TheRide? 1□ Not at all 1 Not at all □ Not at all 2□ Once very limited service 1 U of M 5 ☐ Cleary a ☐ Less than a year limited service d | 6-10 years for that trip? TheRide?



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

Survey Results

Figure M-2 identifies the age distribution of TheRide's passengers. The dominant fact related to age is that the youngest cohort (younger than thirty) has always been dominant with no less than 53% of all riders and ranging up to 60% in the 2022 survey. TheRide's customers reflect the general population of the AAATA service area which has a young population as Chart M-1 demonstrates. Like ridership nationally, TheRide passengers tend to be somewhat younger than the general population. The difference with TheRide is that the total 16-29 year old population on the service area is younger than in most urban areas in the United states.

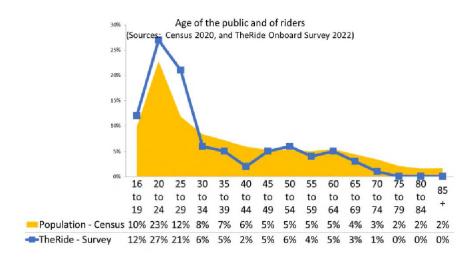


Figure M - 2: Demographic Age of Riders and General Public

Figure M-3 identifies Rider's household size. Two-person households made up about one-third (33%) of households. Single person households comprise another 28% of the rider population. Multi-person households with three or more people face different transportation costs and logistic challenges than single or even two person households. They currently comprise 37% of the rider households.

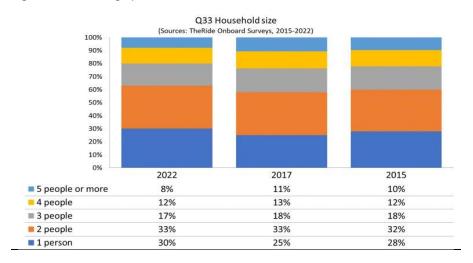


Figure M - 3: Demographics Number of Persons in the Household



In 2022, most riders (82%) live in rented homes, as found in Figure M-4. This is a small increase over 2017 when 79% said they rented. The difference could be a matter of sample error. However, given the challenges of affordable housing in Ann Arbor and the vicinity, it would be reasonable to assume that the change may be a real reflection of a gradual change in housing practices.

Q32 Do Riders rent or own their homes? (Sources: TheRide Onboard Surveys, 2017 and 2022) 90% 82% 79% 80% 70% 60% 50% 40% 30% 21% 18% 20% 10% 0% 2022 2017

Figure M - 4: Demographics Renting/Owning

The income distribution among TheRide passengers has changed somewhat in the past thirteen years. In 2009, 78% of riders had household incomes of less than \$50,000. In 2022, 86% had that level of income. Thus, the ridership has become somewhat poorer. The fact that these are not inflation adjusted figures magnifies the change.

■ Rent ■ Own

There was one unusual year (2017) when rider income was somewhat higher than in previous surveys. The fact that the 2022 data, shown in Figure M-5, are more in line with data prior to 2017 suggests that the 2017 result was atypical, and not the beginning of a new trend.

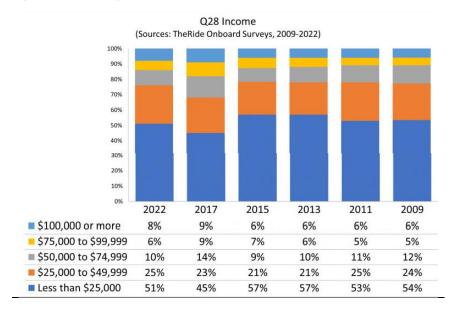


Figure M - 5: Demographics Household Income, 2009-2022



As is typical for bus riders in most United States transit systems, TheRide's riders are almost twice as likely as the general population to have very low household incomes. One might assume that the high proportion of student riders would explain this contrast. The inherently low incomes of most student riders do explain it in part. Student household incomes are lower than non-student household incomes as Figure M-6 shows visually and in the table. However, all riders, including non-students, tend to have low household incomes, so the high proportion of students among the riders does not explain the riders' low-income characteristics.

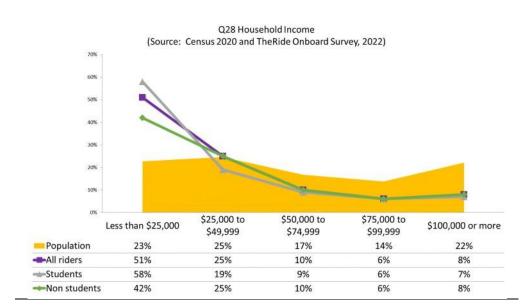


Figure M - 6: Demographics Household Income of Riders and Population

Figure M-7 shows that Household income is very low among the youngest riders but rises somewhat with age, presumably because people get jobs and earn more as they grow older. However, the percentage of riders with low incomes then increases among riders in their early forties and peaks among those older than fifty.

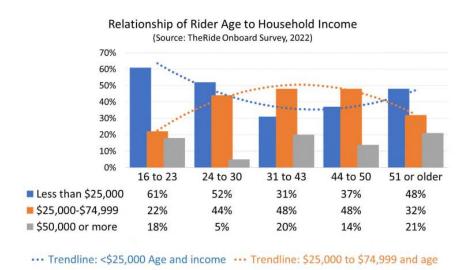


Figure M - 7: Demographics Relationship of Age to Income



It is generally the case in public transit markets that people from lower income households are more likely than those from households with higher incomes to use cash rather than to pay in advance for discounted passes. That is the case for those using TheRide. However, unlike riders on most transit systems, the reason is not so much that they are less likely to purchase a thirty-day pass for income-related reasons, but rather that they are much less likely to have a pass subsidized by the University. Figure M-8 illustrates the relationship between fare media used and household income.

Q11 Fare Medium Used by Income Groups (Source: TheRide Onboard Survey 2022) 70% 60% 50% 40% 30% 20% 10% Less than \$25,000-\$50,000-\$75,000-\$100,000 or \$25,000 \$49,999 \$74,999 \$99,999 more MCard 46% 64% 53% 64% 72% Cash 24% 17% 9% 9% 10% ■ EZFare 10% 9% 6% 8% 8% Used a discount card 8% 9% 7% 4% 5% go!pass 4% 5% 6% 5% 1% 30 day pass 6% 3% 3% 3% 0% ■ Token 2% 3% 0% 2% 2% ■ Transfer 1% 1% 4% 0% 0% **■** EMU pass 2% 0% 1% 2% 0%

Figure M - 8: Rider Profile Fare Media Used and Household Income

The MCard is the fare medium used more often than other fare media (48%). Other findings:

- Use of cash fare decreased somewhat, from 25% in 2017 to 20% in 2022.
- The EZ fare appears in 2022 for the first time (8%).
- Use of the go!pass declined from 10% to 4%, perhaps because of the pandemic reduction in downtown office work.
- A small number of riders (1%) wrote in the "Other" category that they had used an Ann Arbor Public Schools pass.



Tab N: Service Standards & Policies Monitoring

The Service Standards and Policies for Title VI are included in Tab K: Service Standard. This section includes the results of the monitoring of the service standards and policies.

Service Standards

1. Service Frequency (Headway)

Requirement:

The minimum service frequency is every 30 minutes during weekday peak hours and every 60 minutes at other times (midday, evenings and weekends). Weekday peak hours are from 6:00 – 9:00 a.m. and 3:00 – 6:00 p.m.

The results of the analysis of headway by route for Weekdays, Saturdays, and Sundays are based on the standards and collected performance data.

For local fixed-route service on weekdays, headways are shown for four periods: AM peak, midday, PM peak, and evening. Weekday peak hours are from 6:00-9:00 a.m. and 3:00-6:00 p.m. All routes meet the minimum headway of 60 minutes during midday and evening, and during the peak AM and PM periods.

The analysis shows no disparity on weekends for local fixed-route service. Service on all local routes operates every 30-60 minutes on Saturdays and Sundays. On Saturdays, one minority route (Route 23) operates every 30 minutes for the majority of the day, reducing to every 60 minutes in the evenings. On Saturdays, two routes operate more frequent service, every 30 minutes on average, Route 23 is a minority route. The remaining routes operate every 60 minutes on Saturdays, and all operating routes run every 60 minutes on Sundays.

The underlying data of Weekdays, Saturdays, and Sundays from August 2023 is included below:

Route		FREQUENCIES			SPAN OF SERVICE		SPAN HOURS
Route	Route		Day	Eve	Start	End	
		C	urrent		Curr	rent	Current
3.Huron River	Wkday	30	30	60	6:15	22:45	16.5
4.Washtenaw	Wkday	8	15	30	6:00	0:30	18.5
5.Packard	Wkday	15	15	30	6:10	0:00	17.8
6.Ellsworth	Wkday	30	30	60	6:45	23:45	17.0
22.Pontiac - Dhu							
Varren	Wkday	30	30	60	6:10	23:30	17.3
23.Plymouth	Wkday	15	15	30	6:30	0:00	17.5
24.Eisenhower -							
Golfside	Wkday	30	30	60	6:15	23:15	17.0
25.Ann Arbor -							
Saline Rd	Wkday	30	30	60	6:20	23:15	16.9
26.Scio Church	Wkday	30	60	60	6:30	23:15	16.8



		FRE	QUENCIE	ES	SPAN OF SERVICE		SPAN HOURS
Route		Peak	Day	Eve	Start	End	
		(Current		Cur	rent	Current
27.W. Stadium -							
Oak Valley	Wkday	30	30	60	6:05	23:05	17.0
28.Pauline	Wkday	15	30	60	6:15	23:45	17.5
29.Liberty	Wkday	30	60	60	6:30	18:45	12.3
30.Jackson Rd	Wkday	30	30	60	6:00	23:30	17.5
31.Dexter Ave	Wkday	30	30	60	6:25	23:25	17.0
32.Miller - Maple	Wkday	30	30	60	6:15	23:45	17.5
33.Newport	Wkday	30	30		6:45	21:00	14.3
34.Maple - Dexter	Wkday AM	30			6:30	9:00	
	Wkday PM	30			15:15	18:15	
	Total	30					5.5
42.MacArthur-							
Michigan Ave	Wkday	30	30	60	6:00	23:00	17.0
43.E. Michigan							
Ave	Wkday	30	30	60	6:00	23:30	17.5
44.Ecorse - Tyler	Wkday	30	30	60	6:15	23:00	16.8
45.Grove	Wkday	30	30	60	6:30	22:30	16.0
46.Huron - Paint					0.00	00.1-	40.0
Creek	Wkday	30	30	60	6:00	22:45	16.8
47.Harriet -	\A/Isalass	20	20	60	6.00	22.00	47.0
Michigan 61.U-M - Miller	Wkday	30	30	60	6:00	23:00	17.0
61.U-M - Miller 62.U-M - State	Wkday	30	30		6:15	19:15	13.0
	Wkday	9	14	30	6:40	22:00	15.3
63.U-M - Pontiac	Wkday AM	30			7:15	9:05	
	Wkday PM	30			15:50	18:15	4.0
C4 Coddes - F	Total	30					4.3
64.Geddes - E. Stadium	Mkdov ABA	30			6.20	0.20	
Statituiii	Wkday AM	30			6:30 15:30	9:30 18:30	
	Wkday PM Total	30					6.0
65.U-M -	I Otal	30		+			0.0
Downtown -							
Green	Wkday	30	30	30	6:45	21:15	6.0
66.Carpenter -					00	0	5.0
Huron Pkwy	Wkday	30	30	60	6:35	0:00	17.4
68.Harris - Ford	Wkday	30	30		6:15	18:45	12.5
Table N. 1: The Underlyin			1	1			

Table N - 1: The Underlying Data of Weekdays



Pauto		FREQ	UENCI	ES	SPAN OF	SERVICE	SPAN HOURS
Route		Peak	Day	Eve	Start	End	
			Curren	t	Current		Current
3.Huron River	Sat		60	60	8:45	22:45	14.0
4.Washtenaw	Sat		30	30	7:30	23:00	15.5
5.Packard	Sat		60	60	8:30	23:00	14.5
6.Ellsworth	Sat		60	60	8:45	23:00	15.25
22.Pontiac - Dhu Varren	Sat		60	60	7:30	22:30	15.0
23.Plymouth	Sat		30	30	8:20	22:30	14.2
24.Eisenhower - Golfside	Sat		60	60	8:15	22:45	14.5
25.Ann Arbor - Saline Rd	Sat		60	60	8:30	23:15	14.8
26.Scio Church	Sat		60	60	7:45	22:15	14.5
27.W. Stadium - Oak							
Valley	Sat		60	60	8:45	23:30	14.8
28.Pauline	Sat		60	60	8:15	22:45	14.5
29.Liberty	Sat		60	60	8:15	22:45	14.5
30.Jackson Rd	Sat		60	60	8:00	22:45	14.8
31.Dexter Ave	Sat		60	60	8:45	22:15	14.5
32.Miller - Maple	Sat		60	60	8:15	22:45	14.5
33.Newport	Sat						
34.Maple - Dexter	Sat						
42. MacArthur – Michigan							
Ave	Sat		60	60	7:15	23:00	15.8
43.E. Michigan Ave	Sat		60	60	8:00	22:30	14.5
44.Ecorse - Tyler	Sat		60	60	7:45	22:15	14.5
45.Grove	Sat		60	60	8:00	21:30	13.5
46.Huron - Paint Creek	Sat		60	60	8:00	22:45	14.8
47.Harriet - Michigan	Sat		60	60	8:30	22:00	13.5
61.U-M - Miller	Sat						
62.U-M - State	Sat						
63.U-M - Pontiac	Sat						
64. Geddes – E. Stadium	Sat						
65.U-M - Downtown -							
Green	Sat						
66.Carpenter - Huron							
Pkwy	Sat		60	60	8:35	23:00	14.4
68.Harris - Ford	Sat						

Table N - 2: The Underlying Data of Saturdays



Bouto		FREQUENCIES			SPA SER	SPAN HOURS	
Route		Peak	Day	Eve	Start	End	
			Current		Cur	rent	Current
3.Huron River	Sun		60	60	8:45	19:45	11.0
4.Washtenaw	Sun		30	30	8:00	19:30	11.5
5.Packard	Sun		60	60	8:15	19:00	10.8
6.Ellsworth	Sun		60	60	8:45	19:45	11.0
22.Pontiac - Dhu Varren	Sun		60	60	8:00	19:30	11.5
23.Plymouth	Sun		60	60	8:45	19:15	10.5
24.Eisenhower - Golfside	Sun		60	60	7:45	19:30	11.8
25.Ann Arbor - Saline Rd	Sun		60	60	8:30	19:15	10.8
26.Scio Church	Sun		60	60	8:45	19:00	10.3
27.W. Stadium - Oak Valley	Sun		60	60	8:45	19:30	10.8
28.Pauline	Sun		60	60	8:15	19:45	11.5
29.Liberty	Sun						
30.Jackson Rd	Sun		60	60	9:00	19:45	10.8
31.Dexter Ave	Sun		60	60	8:45	19:15	10.5
32.Miller - Maple	Sun		60	60	8:15	19:15	11.0
33.Newport	Sun						
34.Maple - Dexter	Sun						
42. MacArthur – Michigan							
Ave	Sun		60	60	8:15	19:00	10.8
43.E. Michigan Ave	Sun		60	60	9:00	19:30	10.5
44.Ecorse - Tyler	Sun		60	60	8:45	19:15	10.5
45.Grove	Sun		60	60	9:00	19:30	10.5
46.Huron - Paint Creek	Sun		60	60	9:00	19:45	10.8
47.Harriet - Michigan	Sun		60	60	8:30	19:00	10.5
61.U-M - Miller	Sun						
62.U-M - State	Sun						
63.U-M - Pontiac	Sun						
64.Geddes - E. Stadium	Sun						
65.U-M - Downtown - Green	Sun						
66Carpenter - Huron Pkwy	Sun						
68.Harris - Ford	Sun						

Table N - 3: The Underlying Data of Sundays



2. On-Time Performance (OTP)

Requirement:

All Modes – A minimum of 90% of scheduled trips will be completed within 5 minutes of the scheduled time.

The results of the analysis of headway by route for Weekdays, Saturdays, and Sundays are based on average performance and the standards and collected performance data.

On-Time Performance for the period 6/1/22-5/31/23 by route:

Route	% On Time	% Late	% Early
3 - Huron River	89.42	9.56	1.02
4 - Washtenaw	85.82	13.02	1.16
5 - Packard	81.95	15.61	2.44
6 – Ellsworth	82.59	14.73	2.68
22 - Pontiac - Dhu Varren	87.87	11.09	1.04
23 - Plymouth	84.21	14.93	0.86
24 - Eisenhower - Golfside	82.86	13.00	4.14
25 - Ann Arbor - Saline Rd	87.87	11.47	0.66
26 - Scio Church	80.58	18.43	0.98
27 - W Stadium - Oak Valley	92.63	6.81	0.57
28 - Pauline	91.49	7.76	0.75
29 - Liberty	81.14	14.96	3.90
30 - Jackson Rd	82.14	12.86	5.00
31 - Dexter Ave	67.43	31.90	0.67
32 - Miller - Maple	88.72	10.04	1.24
33 - Newport	88.07	9.73	2.19
34 - Maple - Dexter	89.53	8.86	1.61
42 - Forest - MacArthur	89.60	9.27	1.13
43 - E Michigan Ave	90.71	8.68	0.60
44 - Ecorse - Tyler	90.29	9.38	0.34
45 - Grove	91.44	7.46	1.10
46 - Paint Creek	89.27	9.63	1.10
47 - Harriet - W Michigan	90.61	8.16	1.22
61 - U-M Miller	83.46	13.70	2.83
62 - U-M - State	85.18	9.94	4.87
63 - U-M - Pontiac	86.20	12.32	1.49
64 - Geddes - E Stadium	87.94	9.98	2.07
65 - U-M - Downtown - Green	85.31	13.21	1.48
66 - Carpenter - Huron Pkwy	82.53	16.71	0.77
68 - Harris - Ford	85.05	13.29	1.67
Total	85.49	12.76	1.75

Table N - 4: On-Time Performance for the period 6/1/22-5/31/23 by route



Monday-Friday

oute	% On Time	% Late	% Early
3 - Huron River	89.10	9.93	0.97
4 - Washtenaw	86.23	12.66	1.11
5 - Packard	82.35	15.18	2.48
6 – Ellsworth	82.91	14.35	2.74
22 - Pontiac - Dhu Varren	89.94	9.04	1.01
23 - Plymouth	84.53	14.67	0.80
24 - Eisenhower - Golfside	83.47	12.35	4.18
25 - Ann Arbor - Saline Rd	88.73	10.69	0.58
26 - Scio Church	79.33	19.68	0.99
27 - W Stadium - Oak Valley	93.60	5.96	0.45
28 - Pauline	91.73	7.59	0.68
29 - Liberty	81.66	14.38	3.96
30 - Jackson Rd	82.54	11.93	5.53
31 - Dexter Ave	65.31	33.94	0.75
32 - Miller - Maple	88.54	10.27	1.19
33 - Newport	88.07	9.73	2.19
34 - Maple - Dexter	89.53	8.86	1.61
42 - Forest - MacArthur	90.47	8.43	1.09
43 - E Michigan Ave	90.49	8.90	0.42
44 - Ecorse - Tyler	90.74	8.90	0.36
45 - Grove	91.75	7.06	1.19
46 - Paint Creek	88.90	10.08	1.02
47 - Harriet - W Michigan	90.62	8.23	1.14
61 - U-M Miller	83.46	13.70	2.83
62 - U-M - State	85.18	9.94	4.87
63 - U-M - Pontiac	86.20	12.32	1.49
64 - Geddes - E Stadium	87.94	9.98	2.07
65 - U-M - Downtown - Green	85.31	13.21	1.48
66 - Carpenter - Huron Pkwy	82.52	16.76	0.72
68 - Harris - Ford	85.05	13.29	1.67
otal	85.72	12.51	1.77



Saturday Routes/Service

Saturday Routes/Service	% On Time	% Late	% Early
3 - Huron River	89.78	8.98	1.24
4 - Washtenaw	79.04	19.29	1.67
5 - Packard	71.80	19.29	1.67
6 – Ellsworth	76.88	20.78	2.34
22 - Pontiac - Dhu Varren	73.91	24.78	1.31
23 - Plymouth	82.51	16.11	1.37
24 - Eisenhower - Golfside	77.08	18.35	4.57
25 - Ann Arbor - Saline Rd	79.78	18.89	1.32
26 - Scio Church	85.53	13.40	1.07
27 - W Stadium - Oak Valley	84.46	14.33	1.21
28 - Pauline	87.50	11.61	0.89
29 - Liberty	77.83	18.62	3.55
30 - Jackson Rd	80.19	18.02	1.79
31 - Dexter Ave	77.20	22.47	0.33
32 - Miller - Maple	86.10	12.08	1.82
42 - Forest - MacArthur	84.78	14.09	1.13
43 - E Michigan Ave	94.02	5.10	0.88
44 - Ecorse - Tyler	87.79	12.09	0.12
45 - Grove	85.99	13.83	0.18
46 - Paint Creek	91.65	7.12	1.23
47 - Harriet - W Michigan	93.17	5.16	1.67
66 - Carpenter - Huron Pkwy	82.56	15.93	1.51
Total	81.91	16.45	1.65
Table N - 6: On-Time Performance Saturday			



Sunday Routes/Service

Sulfucy Routes/ Sci Vice			
Sunday Routes/Service	% On Time	% Late	% Early
3 - Huron River	93.24	5.29	1.47
4 - Washtenaw	88.20	10.38	1.43
5 - Packard	86.36	11.00	2.64
6 – Ellsworth	85.82	11.79	2.39
22 - Pontiac - Dhu Varren	78.88	20.13	0.99
23 - Plymouth	79.74	19.21	1.05
24 - Eisenhower - Golfside	82.60	14.86	2.54
25 - Ann Arbor - Saline Rd	86.25	12.85	0.90
26 - Scio Church	87.49	11.80	0.72
27 - W Stadium - Oak Valley	90.08	8.50	1.42
28 - Pauline	92.62	5.69	1.70
29 - Liberty	79.07	19.03	1.90
30 - Jackson Rd	81.20	18.67	0.13
31 - Dexter Ave	95.13	3.80	1.07
32 - Miller - Maple	84.77	13.59	1.65
42 - Forest - MacArthur	89.00	8.32	2.68
43 - E Michigan Ave	87.54	12.05	0.41
44 - Ecorse - Tyler	94.42	4.55	1.03
45 - Grove	91.07	6.91	2.02
46 - Paint Creek	87.05	11.17	1.78
47 - Harriet - W Michigan	90.08	8.50	1.42
Total Table N - 7: On-Time Performance Sunday	86.55	11.91	1.55

Table N - 7: On-Time Performance Sunday

Conclusion

For all days, the OTP performance standard was not met on 22 routes and the average for the system is 73% late. There are 11 minority routes, 27 low-income routes, and 19 non-minority routes. Of the 11 minority routes, 11/11 are also low-income routes. This analysis is based on the average arrival times for all stops arriving at designated time points within five minutes of the scheduled time less than 90% of the time.

On weekdays, approximately 64% of minority routes (7/11 routes) and 74% of low-income routes (20/27 routes) fall below the standard. This compares to non-minority route performance of 79% (15/19).

On Saturdays, approximately 78% of minority routes (7/9 routes) and 79% of low-income routes (15/19 routes) fall below the standard. This compares to non-minority route performance of 85% (11/13 routes) falling below the standard.

On Sundays, approximately 63% of minority routes (5/8 routes) and 72% of low-income (13/18 routes) fall below the standard. This compares to non-minority route performance of 69% (9/13 routes) falling below the standard.



Based on this analysis, there is no disparate impact found for Weekdays, Saturdays, and Sundays on-time performance.

AAATA will review performance of the Saturday and Sunday service to further analyze and determine frequency of on-time performance issues on specific trips, impact on riders, and the potential causes in order to plan appropriate corrective action such as improved scheduling and planning, headway, and vehicle operator availability.



3. Service Availability

Requirement

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.

Conclusion

Local fixed-route service availability is shown in Table N-8. The 90% standard is met in the combined three member jurisdictions, as well as in Ann Arbor and Ypsilanti. The 90% standard is not met in Ypsilanti Township, where 20.81% of the population has no fixed route coverage. This impact will be evaluated each year during service planning. AAATA will adjust the service standard to distribute routes such that a specified percentage of all residents in the service area are within a one-quarter mile walk of bus service or have a maximum distance between bus stops.

Service Availability - Local Fixed-Route Service	Block Group Population
3 Member	Jurisdictions
Total	199,440
Quarter (Count)	163,115
Quarter (%)	81.79%
Half (Count)	184,618
Half (%)	92.57%
No Coverage (Count)	14,822
No Coverage (%)	7.43%
Ann	Arbor
Total	122,731
Quarter (Count)	110,104
Quarter (%)	89.71%
Half (Count)	120,177
Half (%)	97.92%
No Coverage (Count)	2,554
No Coverage (%)	2.08%
Ypsi	lanti
Total	20,448
Quarter (Count)	18,865
Quarter (%)	92.26%
Half (Count)	20,448
Half (%)	100.00%
No Coverage (Count)	0
No Coverage (%)	0.00%
Ypsilanti	Township
Total	56,261
Quarter (Count)	34,146
Quarter (%)	60.69%



Half (Count)	43,993
Half (%)	78.19%
No Coverage (Count)	12,268
No Coverage (%)	21.81%

Source: 2017-2021 ACS 5YR by Block Group

Table N - 8: Service Availability - Local Fixed-Route Service

Vehicle Load

Requirement

The number of riders exceeds the number of seats on 1% of trips or fewer. A frequency higher than this threshold warrants further investigation into the regularity of the occurrences on particular trips, the number of standees, and the duration of standing to determine if corrective action is needed.

Table N-9 shows weekday, Saturday, and Sunday standing loads by mode. Drivers record standing loads electronically when they occur, so the sample is the total population of weekday trips.

Conclusion

The data shows that standing loads occur on less than the standard of 1.0% of trips on all routes except for Route 23 and Route 66 which are minority routes, so this is a disparate impact as called for in the equity policy. The service will be analyzed every three months to further determine whether additional vehicles or route trips should be implemented. It should be noted that Routes 4, 23, and 66 currently have some of the highest number of daily trips and each has very frequent service.



	Wee	kday		Saturday				Sunday			
		Avg tot	Pct			Avg tot	Pct			Avg tot	Pct
	Avg no of	standing	standing		Avg no of	standing	standing		Avg no of	standing	standing
Rt	trips	load trips	load trips	Rt	trips	load trips	load trips	Rt	trips	load trips	load trips
3	57		0.0%	3	28		0.0%	3	22		0.0%
4	159	1	0.6%	4	59	2	3.4%	4	43		0.0%
5	115		0.0%	5	28		0.0%	5	21		0.0%
6	58		0.0%	6	29		0.0%	6	22		0.0%
22	59		0.0%	22	30		0.0%	22	23		0.0%
23	114	10	8.8%	23	55		0.0%	23	22		0.0%
24	58		0.0%	24	30		0.0%	24	23		0.0%
25	60		0.0%	25	30		0.0%	25	22		0.0%
26	50		0.0%	26	30		0.0%	26	21		0.0%
27	60		0.0%	27	30		0.0%	27	22		0.0%
28	80		0.0%	28	30		0.0%	28	24		0.0%
29	39		0.0%	29	30		0.0%	30	22		0.0%
30	61		0.0%	30	30		0.0%	31	22		0.0%
31	58		0.0%	31	30		0.0%	32	22		0.0%
32	59		0.0%	32	29		0.0%	42	22		0.0%
33	54		0.0%	42	32		0.0%	43	22		0.0%
34	21		0.0%	43	30		0.0%	44	22		0.0%
42	59		0.0%	44	30		0.0%	45	22		0.0%
43	60		0.0%	45	28		0.0%	46	21		0.0%
44	59		0.0%	46	30		0.0%	47	22		0.0%
45	56		0.0%	47	28		0.0%				
46	60		0.0%	66	29		0.0%				
47	60		0.0%								
61	51		0.0%								
62	132		0.0%								
63	16		0.0%								
64	21		0.0%								
65	55		0.0%								
66	61	1	1.6%								
68	50		0.0%								

Table N - 9: Standing Loads by Mode



5. Vehicle Assignment

Requirement

AAATA's vehicle assignment policy is to allocate its bus fleet based on random assignment and to maintain a uniform vehicle age by fleet size in the system.

A fleet roster is shown below. As noted in the standard, service is operated from a single facility housing 109 fixed route vehicles. All buses are low-floor and have the same environmental, security, and accessibility features. For the active fleet, 97 buses are 40 feet long and 12 buses are 35 feet long. The average age of the entire active fleet is less than five years old, comprised of a great majority of newer buses. Buses are assigned randomly each day based on how they are parked in AAATA's garage.

Conclusion

There is no disparate impact since vehicles are randomly assigned to the routes. The vehicle list is included below:

Mode	Vehicle #	Model & Manufacturer	VIN	Seats
A. Fixed Rt	443	GILLIG HYBRID LOW FLOOR 40' 2007	15GGD301571078378	38
A. Fixed Rt	444	GILLIG HYBRID LOW FLOOR 40' 2007	15GGD301771078379	38
A. Fixed Rt	446	GILLIG HYBRID LOW FLOOR 40' 2008	15GGD301381078381	38
A. Fixed Rt	448	GILLIG HYBRID LOW FLOOR 40' 2008	15GGD301781078383	38
A. Fixed Rt	449	GILLIG HYBRID LOW FLOOR 40' 2008	15GGD301981078384	38
A. Fixed Rt	450	GILLIG HYBRID LOW FLOOR 40' 2009	15GGD301491176238	38
A. Fixed Rt	451	GILLIG HYBRID LOW FLOOR 40' 2009	15GGD301691176239	38
A. Fixed Rt	452	GILLIG HYBRID LOW FLOOR 40' 2009	15GGD301291176240	38
A. Fixed Rt	453	GILLIG HYBRID LOW FLOOR 40' 2009	15GGD301491176241	38
A. Fixed Rt	454	GILLIG HYBRID LOW FLOOR 40' 2009	15GGD301691176242	38
A. Fixed Rt	455	GILLIG HYBRID LOW FLOOR 40' 2009	15GGD301891176243	38
A. Fixed Rt	456	GILLIG HYBRID LOW FLOOR 40' 2009	15GGD301X91176244	38
A. Fixed Rt	457	GILLIG HYBRID LOW FLOOR 35' 2010	15GGB3019A1176598	32
A. Fixed Rt	458	GILLIG HYBRID LOW FLOOR 35' 2010	15GGB3010A1176599	32
A. Fixed Rt	459	GILLIG HYBRID LOW FLOOR 35' 2010	15GGB3013A1176600	32
A. Fixed Rt	460	GILLIG HYBRID LOW FLOOR 35' 2010	15GGB3015A1176601	32
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	463	GILLIG HYBRID LOW FLOOR 40' 2011	15GGD3011B1180074	36
A. Fixed Rt	464	GILLIG HYBRID LOW FLOOR 40' 2011	15GGD3013B1180075	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	467	GILLIG HYBRID LOW FLOOR 40' 2011	15GGD3019B1180078	36



Mode	Vehicle #	Model & Manufacturer	VIN	Seats
A. Fixed Rt	468	GILLIG HYBRID LOW FLOOR 40' 2011	15GGD3010B1180079	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
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



Mode	Vehicle #	Model & Manufacturer	VIN	Seats
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	521	GILLIG LOW FLOOR 40' 2018	15GGD2716J3187766	36
A. Fixed Rt	522	GILLIG LOW FLOOR 40' 2018	15GGD2718J3187767	36
A. Fixed Rt	523	GILLIG HYBRID LOW FLOOR 40' 2017	15GGD3017H3187768	36
A. Fixed Rt	524	GILLIG HYBRID LOW FLOOR 40' 2017	15GGD3019H3187769	36
A. Fixed Rt	525	GILLIG HYBRID LOW FLOOR 40' 2017	15GGD3015H3187770	36
A. Fixed Rt	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	538	NOVB LFS-40 Bus 2022	4RKYL82JXN9778509	36
A. Fixed Rt	539	NOVB LFS-40 Bus 2022	4RKYL82J6N9778510	36
A. Fixed Rt	540	NOVB LFS-40 Bus 2022	4RKYL82J8N9778511	36
A. Fixed Rt	541	NOVB LFS-40 Bus 2022	4RKYL82JXN9778512	36
A. Fixed Rt	542	NOVB LFS-40 Bus 2022	4RKYL82J1N9778513	36
A. Fixed Rt	543	NOVB LFS-40 Bus 2022	4RKYL82J3N9778514	36
A. Fixed Rt	544	NOVB LFS-40 Bus 2022	4RKYL82J5N9778515	36
A. Fixed Rt	545	NOVB LFS-40 Bus 2022	4RKYL82J7N9778516	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



Mode	Vehicle #	Model & Manufacturer	VIN	Seats
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 2020	4RKYL82J9L9777669	36
A. Fixed Rt	2001	NOVB LFS-40 Bus 2021	4RKYL82J1M9777893	36
A. Fixed Rt	2002	NOVB LFS-40 Bus 2021	4RKYL82J3M9777894	36
A. Fixed Rt	2003	NOVB LFS-40 Bus 2021	4RKYL82J5M9777895	36
A. Fixed Rt	2004	NOVB LFS-40 Bus 2021	4RKYL82J7M9777896	36
A. Fixed Rt	2005	NOVB LFS-40 Bus 2021	4RKYL82J9M9777897	36
A. Fixed Rt	2006	NOVB LFS-40 Bus 2021	4RKYL82J0M9777898	36
A. Fixed Rt	2007	NOVB LFS-40 Bus 2021	4RKYL82J2M9777899	36

Table N - 10: Vehicle Listing

6. Transit Amenities

Requirement

Passenger shelters shall be provided at bus stops with 50 or more boardings per day where there is no other shelter available, and a shelter is physically and legally feasible.

The location of transit amenities along bus routes is based on the number of passenger boardings at individual bus stops. Seating, information, and a trash receptacle are also provided at these bus stops. This policy is applied consistently within the system. A trash receptacle is provided near the front door of every bus. In addition, a trash receptacle is installed at bus stops at which a third- party agrees to service it. Electronic information displays are provided at the three AAATA transit centers.

A map of locations of shelters owned by AAATA is included in Figures L-2 and L-3 (see hyperlinks below). There are a total of 137 shelters of which 90 (65.6%) are in or adjacent to minority block groups. In addition, the AAATA works with community partners (e.g. colleges and universities and commercial areas) to provide their own shelters.

Maps and charts showing service coverage for minority and low-income populations are included in Tab L, profiling service demographics. Below is a list of the Figures and what each details:

- Figure L-2: Minority Population Service Coverage for TheRide
- Figure L-3: Low-Income Population Service Coverage for TheRide

Conclusion

Based on this data and information, there is no disparate impact for amenities in the transit system.



Tab O: Major Service and Fare Change, Disparate Impact, and Disproportionate Burden Policies

Two policies which have been adopted by the AAATA Board of Directors are attached:

- Public Input Policy for Service and Fare Changes for major service and fare changes (Figure O-1)
- 2023 Board Resolution adopting revised Public Input Policy for Service and Fare Changes (Figure O-2)
- Equity Analysis Policy for disparate impact and disproportionate burden (Figure O-3)
- 2023 Board Resolution adopting revised Equity Analysis Policy for Service and Fare Changes (Figure O-4)

The Service and Fare Change policy was adopted by the AAATA Board of Directors in September 2023. A copy of the resolution follows as Figure O-2. The public process was documented in the Title VI Program submitted in December 2023. This policy was discussed in conjunction with the Fare Equity Policy, and revision to the Service and Fare Change policy was not determined to be necessary.

The Equity Analysis Policy was adopted in September 2023. A draft policy was developed in 2023. In July 2023, the AAATA published a notice of the draft policy in the local newspaper, posted it on the website, and emailed the notice to contacts at organizations representing minority and low-income residents. Virtual and in-person public comment meetings were held. A copy of the notice and the distribution list follows as Figure O-4 and Figure O-5.

The draft policy was discussed by staff and members of the Board of Directors at their July 2023 meeting, which was open to the public. Staff sought public comments and feedback on the revised policies through two online public forums and public outreach at both transit centers. Following minor revisions, the PI Division recommended approval in September, and the Board of Directors adopted the policy at their meeting in September 2023 which was open to the public for comments before the board vote. A copy of the adopted resolution follows as Figure O-6.

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 O - 1: Public Input Policy for Service and Fare Changes for major service and fare changes

Ann Arbor Area Transportation Authority

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 enewsletters. 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 O - 2: 2023 Board Resolution adopting 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.

September 21, 2023

Jesse Miller, Secretary

September 21, 2023



Figure O - 3: AAATA Equity Analysis Policy for Service and Fare Changes

Ann Arbor Area Transportation Authority

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 O - 4: 2023 Board Resolution adopting 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.

September 21, 2023

September 21, 2023

Jesse Miller, Secretary



Delegation of Authority

AAATA's Board has delegated authority to the CEO to review and approve official agency matters under Section 4 of the AAATA Governance Policy.

Per the AAATA Board Policy Manual:

4.3.3 - As long as the CEO uses any reasonable interpretation of the Board's Ends and Executive Limitations policies, the CEO is authorized to establish all further policies, make all decisions, take all actions, establish all practices and develop all activities.



Tab P: Service and Fare Equity Analysis

The following service and fare changes were made for calendar years January 2020-November 2023:

- 1) 2020 January
 - a. Service effective 1/26/20
 - Minor fixed route changes to Route 3 Huron River: no formal public input period
 - ii. LeForge & Norris: Stop will continue to be served, but will not be a scheduled timepoint.
 - iii. State & Washington: Stop will continue to be served, but will not be a scheduled timepoint.
 - iv. The remaining timepoints will be adjusted to improve on-time performance.
- 2) 2020 COVID Emergency Plans
 - a. Service effective 3/19/20
 - i. Rapid emergency response plan: no formal public input period
 - ii. No service on Route 63 (U-M Pontiac) or Route 41 (EMU College of Business Shuttle)
 - iii. Route 4 (Washtenaw) service reduced to every 15-30 minutes mornings/afternoons and every 30 minutes evenings; no 4B service; service will operate from 6:08 a.m. to 12:30 a.m.
 - iv. Route 62 (U-M State) service will be reduced to every 30 minutes with trips leaving Wolverine Tower at :15 and :45 minutes past the hour; service will operate from 6:45 a.m. to 10:15 p.m.
 - v. Service on AirRide, direct service to Detroit Metro Airport from Blake Transit Center has been suspended until further notice
 - vi. Temporarily suspended collection of fares on its fixed-routes and demand response services and temporarily closed to the public the Ypsilanti Transit Center, Blake Transit Center, and TheRide's front desk at 2700 S. Industrial Highway.
 - b. Service effective 3/26/20
 - i. Rapid emergency response plan: no formal public input period
 - ii. Fixed route reductions for routes: 21, 22, 23,24,25,26,27, 28, 29, 30, 31, 32, 3, 42, 43, 44, 45, 46, 4, 5, 6
 - c. Service effective 4/15/20
 - i. Rapid emergency response plan: no formal public input period
 - ii. Fixed route reductions for routes: 21, 22, 23,24,25,26,27, 28, 29, 30, 31, 32, 3, 42, 43, 44, 45, 46, 4, 5, 6
 - d. Service effective 6/15/20
 - i. Rapid emergency response plan: no formal public input period



- Fixed route Park-&-Ride new shuttle additions: State P&R and Miller-Green-Plymouth P&R
- e. Service effective 7/13/20
 - i. Rapid emergency response plan: no formal public input period
 - ii. Fixed route reductions: same reduced coverage; added Trips to major routes 3, 4, 5, 6, 28 and 30
- f. Service effective 8/30/20 aka "Temporary Service Plan"
 - i. Major systemwide reductions: August 2020 public input period
 - 1. Virtual Town Halls: August 4, 6, 11, 13, 18, 19, 20
 - 2. Summaries and feedback can be provided
 - ii. Systemwide fixed route reductions
 - 1. Route 3: Continue service between Ann Arbor and Ypsilanti; add Saturday and Sunday service
 - 2. Route 4: Use 4A routing for both directions
 - 3. Route 5: Use 5A routing for both directions; modify all trips to also serve Carpenter Rd corridor to Meijer
 - 4. Route 6: Use 6A routing for both directions; increase weekday frequency to 15 minutes for entire route during weekday peak hours
 - 5. Route 22: Shorten route BTC Food Gatherers
 - 6. Route 23: Use 23A routing for both directions; end route to Plymouth P&R lot; add time to route to serve Tuebingen Pkwy & Traverwood Dr and aid on-time performance
 - Route 25: Adjust route to provide service from BTC Pioneer HS Cranbrook Tower Meijer (AA-Saline Rd)
 - 8. Route 28: Use 28B routing for all trips
 - 9. Route 30: Shorte route, eliminate service west of Wagner Road; outbound routing use Rt 31 BTC Jackson/Wagner Rd.
 - 10. Route 32: Use modified 32C routing for both directions; Miller Rd P&R will be served; serve Skyline HS before/after bell times only
 - Route 42: Modify routing, outbound routing use Rt 42 YTC MacArther; inbound routing use Rt 43 MacArthur – YTC via Michigan Ave.
 - 12. Route 44: Maintain current routing; add time to aid on-time performance
 - 13. Route 45: Shorten route YTC Grove Rd/Harry St area
 - Route 46: Shorten route YTC Paint Creek Shopping Ctr/Ypsi Twp Ctr area
 - 15. Route 62: Maintain current daytime routing; operate during weekday peak hours only
 - Route 65: Modify routing Green Rd P&R U-M North Campus/VA Hospital – BTC
 - 17. Eliminated Routes:
 - a. 21 (coverage provided by Rt 22)
 - b. 24 (coverage in higher productivity areas to be provided by Rts 3, 4, 5, 6, and 25)
 - c. 26 (Scio Twp area coverage to be provided by FlexRide

- service)
- d. 27 (coverage provided by Rts 25, 28, and FlexRide service in Pittsfield Twp)
- e. 29 (coverage provided by Rt 28 and FlexRide service in Scio Twp)
- f. 31 (coverage provided by Rt 30)
- g. 33 (Coverage removed due to low productivity)
- h. 41 (service provision is contingent upon funding from EMU)
- i. 43 (coverage provided by Rt 42)
- i. 47 (coverage provided by Rts 6, 45, and 46)
- k. 60 (coverage provided by Rts 32 and 23)
- I. 63 (coverage provided by Rt 22)
- m. 64 (partial coverage provided by Rt 4; coverage eliminated in areas of low productivity)
- n. 66 (coverage in higher productivity areas provided by Rts 3, 4, 5, and 65)
- o. 68 (coverage in areas north of I-94 provided by Rts 42 and 44; areas south of I-94 by Rts 45 and 46)
- p. 81 (replaced by vanpools where possible)
- q. 91 (replaced by vanpools where possible)
- r. 92 (replaced by vanpools where possible)
- iii. FlexRide area extensions
- g. Service effective 11/22/20
 - i. November 2020: four (4) public virtual update meetings; November 4 (12:00pm and 6pm); November 5 & 10 (6pm)
 - ii. Fixed route adjustments/additions
 - 1. Temporarily suspended routes: 41, 62
 - 2. Route 22: route to share BTC boarding location with Route 32 on Fourth Ave
 - 3. Route 25: route expanded to service Target on Waters Rd.
 - 4. Route 26: restore route as one-way clockwise loop; BTC departure times at :15 and :45 past the hour; route to share BTC boarding location with Route 4 and Fourth Ave
 - iii. FlexRide area adjustments; FlexRide-East service expanded to weekends
- 3) 2021 January
 - a. Service effective 1/17/21
 - b. Rapid emergency response plan: no formal public input period
 - c. Fixed route adjustments
 - i. Route 6: adjust routing in Ypsilanti from Michigan Ave to Hewitt Rd and Congress St for all trips
 - ii. Route 22: Adjust inbound routing from the Glen Ave/Fuller Rd area to use Beakes Ave and Fifth Ave through Kerrytown; connect all trips with Route 3 at the Blake Transit Center
 - iii. Route 23: Adjust routing in downtown Ann Arbor from William St to Washington St and Thayer St to reach the U-M Central Campus Center; add more time to Saturday/Sunday schedules to improve on-time

- performance; route to share boarding location with Route 4 on Fourth Ave; connect all trips with Route 22 at Blake Transit Ceter
- iv. Route 26: Route to move boarding location at BTC
- v. Route 32: Adjust routing from the U-M Central Campus area to end at the Blake Transit Center for all trips; connect all trips with Route 23 at Blake Transit Center
- vi. Route 62: Service resumes January 18, 2021
- 4) 2021 April
 - a. No changes
- 5) 2021 August
 - a. Service effective 8/29/21
 - b. March 2021 virtual public input period
 - i. 3/22, 3/23, 3/24, 3/30, 3/31, 4/1
 - c. June 2021 public input period
 - d. Systemwide fixed route full restorations
 - e. FlexRide area adjustments/reductions
- 6) 2021 November
 - a. No changes
- 7) 2022 January
 - a. Service effective 1/23/22
 - b. Minor changes: no formal public input period
 - c. Fixed route adjustments:
 - i. Route 23 Plymouth: move routing from Washington St and Thayer St to Huron St and Fletcher St in the downtown Ann Arbor area
 - ii. Route 32 Miller Maple to Blake Transit Center: afternoon school trip to Skyline High School (SHS) to depart from Pennsylvania and Maple at 2:45 p.m. Bus will arrive at SHS at approximately 2:59 p.m.
 - iii. Route 46 Paint Creek to Brookwood: add additional afternoon trip to Arbor Preparatory High School (APHS). Bus will depart Ypsilanti Transit Center at 4:00 p.m. and arrive at APHS at approximately 4:15 p.m.
 - iv. Route 46 Paint Creek to Ypsilanti Transit Center: move 4:21 p.m. departure from Tuttle Hill and Brookwood to depart from APHS at 4:18 p.m.
 - v. Route 61 U-M Miller: move routing from Washington St and Thayer St to Huron St and Fletcher St in the downtown Ann Arbor area; timepoints adjusted
 - vi. Route 65 U-M Downtown Green: timepoints adjusted
 - vii. Route 66 Carpenter Huron Parkway morning trips to Green Road Parkand-Ride (P&R) lot: 6:30 a.m. Meijer departure changed to end at Glacier Hills at 7:12 a.m.; trip will no longer serve the Golfside Rd area; 7:30 a.m. Meijer departure will serve the Golfside Rd area and arrive at Huron High School (HHS) at 7:54 a.m.
 - viii. Route 66 Carpenter Huron Parkway morning trips to Meijer Carpenter Rd: 6:40 a.m. Glacier Hills departure changed to depart from Green Rd

- P&R at 6:4 a.m.; 7:15 a.m. Green Rd P&R departure changed to depart ag Glacier Hills at 7:15 a.m., bus will arrive at HHS at approximately 7:36 a.m.
- ix. Route 66 Carpenter Huron Parkway afternoon trips to Green Road Park-and-Ride (P&R) lot: 2:30 p.m. Meijer departure will now end at Green Rd P&R at 3:12 p.m.; 3:00 p.m. Meijer departure will not end at Glacier Hills at 3:42 p.m., bus will arrive at HHS at approximately 3:18 p.m.
- x. Route 66 Carpenter Huron Parkway afternoon trips to Meijer Carpenter Rd: 3:15 p.m. Glacier Hills departure will now depart from Green Rd P&R at 3:15 p.m.; 3:45 p.m. Green Rd P&R departure will now depart at Glacier Hills at 3:45 p.m.
- 8) 2022 April
 - a. No changes
- 9) 2022 August
 - a. No changes
- 10) 2022 November
 - a. No changes
- 11) 2022 Other Emergency Plans
 - a. Service effective 12/23 1/29
 - b. Rapid emergency response plan: no formal public input period
 - c. Due to Motor Coach Operators shortages, AAATA had to run an emergency plan reducing certain blocks on routes with high frequency, where the public would not notice a slight increase in wait times.
 - d. Reduced blocks in routes 62, 4, 24 and 61/65, and continued to suspend route 68 due to low productivity of route.

12) 2023 January

- a. Service effective 1/22/23
- b. Minor fixed route changes: no formal public input period
- c. Fixed route adjustments:
 - i. Route 3 Huron Dr both directions: adjust multiple timepoints on weekday, Saturday, and Sunday schedules
 - ii. Route 4 Washtenaw both directions: move Washtenaw & Golfside timepoint to Washtenaw & Glencoe Crossing; adjust multiple timepoints on weekday, Saturday, and Sunday schedules
 - iii. Route 23 Plymouth both directions: adjust multiple timepoints on weekday schedules
 - iv. Route 25 Anne Arbor Saline Rd both directions: adjust multiple timepoints on weekday, Saturday, and Sunday schedules
 - v. Route 26 Scio Church both directions: adjust multiple timepoints on weekday, Saturday, and Sunday schedules
 - vi. Route 26 Scio Church to Blake Transit Center: change routing to start at Scio Ridge & Sudbury north on Scio Ridge (R) Liberty St (R) Second St (L) William St (L) Fourth Ave end at BTC
 - vii. Route 29 Liberty both directions: adjust multiple timepoints on weekday

- and Saturday schedules
- viii. Route 31 Dexter Ave both directions: adjust multiple timepoints on weekdays, Saturday, and Sunday schedules; remove Huron & Seventh timepoint
- ix. Route 32 Miller Maple to Blake Transit Center: adjust multiple timepoints on weekdays, Saturday, and Sunday schedules
- x. Route 32 Miller Maple to Pennsylvania & Maple: adjust multiple timepoints on weekdays, Saturday, and Sunday schedules; trips departing Penn/Maple at 7:12 a.m., &:42 a.m., 2:42 p.m., and 3:12 p.m. will serve Skyline High School
- xi. Route 33 Newport to Blake Transit Center: 8:06 a.m. and 3:36 p.m. trips will serve Rudolf Steiner Lower School
- xii. Route 43 E. Michigan Ave both directions: connect all weekday trips from 6:00 a.m. to 6:13 p.m. to Route 68 at Holmes & Ridge; adjust multiple timepoints on weekday, Saturday, and Sunday schedules
- xiii. Route 46 Huron Paint Creek to Huron River & Textile: change routing to Ypsilanti District Library north on service drive (R) Huron River Dr (R) Tuttle Hill Rd (L) Textile Rd (L) Huron River Dr end route; move Tuttle Hill & Brookwood timepoint to Huron River & Textile; trips leaving YTC at 7:00 a.m., 7:30 a.m., 3:00 p.m., and 4:00 p.m. will serve Arbor Preparatory High School
- xiv. Route 46 Huron Paint Creek to Ypsilanti Transit Center: move Tuttle Hill & Brookwood timepoint to Huron River & Textile; change routing to start at Huron River & Textile west on Huron River Dr (L) Library service drive resume current routing at Ypsilanti District Library; trips arriving at YTC at 7:36 a.m., 8:12 a.m., 3:39 p.m., 4:39 p.m. will serve Arbor Preparatory High School
- xv. Route 61 U-M Miller both directions: adjust multiple timepoints on weekday schedule
- xvi. Route 65 U-M Downtown Green both directions: adjust multiple timepoints on weekday schedule
- xvii. Route 65 U-M Downtown Green to Central Campus Transit Center: move Kerrytown timepoint to Broadway & Swift
- xviii. Route 68 Harris Ford both directions: connect all trips to Route 43 at Holmes & Ridge; adjust multiple timepoints on weekday service

13) 2023 April

- a. Service effective 4/30/23
- b. Minor fixed route changes: no formal public input period
- c. Fixed route changes:
 - Route 4 Washtenaw: Spring/Summer schedule goes into effect, service reduced to every 15-16 minutes mornings/afternoons and every 30 minutes evenings; multiple timepoints adjusted
 - ii. Route 23 Plymouth: multiple timepoints will be adjusted on weekday schedules
 - iii. Route 32 Miller Maple: to Blake Transit Center trips, BTC arrive timepoints adjusted
 - iv. Route 43 E. Michigan Ave: to Ypsilanti Transit Center trips, YTC arrival timepoints adjusted
 - v. Route 46 Huron Paint Creek: routing and timepoints adjusted on trips serving Arbor Preparatory High School

vi. Route 62 U-M – State: Spring/Summer schedule goes into effect, service reduced to every 12-14 minutes mornings/afternoons and every 30 minutes evenings

14) 2023 August – NOT COMPLETE YET

- a. Service effective 8/27/23
- b. Minor changes: no formal public input period
- c. Minor fixed route changes:
 - i. Route 4 Washtenaw: Fall/Winter schedule goes into effect
 - ii. Route 24 Eisenhower Golfside: extend routing from the Briarwood Mall area to the Oakbrook Drive/Northbrook Place area near Cranbrook Tower; adjust multiple timepoints
 - iii. Route 34 Maple Dexter to Miller Rd Park-&-Ride Lot: new trip departing Blake Transit Center at 6:45 a.m.
 - iv. Route 62 U-M State: Fall/Winter schedule goes into effect
 - v. Route 66 Carpenter Huron Pkway: adjust multiple timepoints to allow for interlining with Route 5B at Meijer (Carpenter Rd) on weekdays; all trips will pull into VA Hospital on Fuller Rd
 - vi. Blake Transit Center: reverse the boarding locations on the transit mall drive for Routes 6/24 and Routes 25/27; move routes 3/31/33/34 to the boarding locations on Fourth Avenue nearest Liberty St; buses will line up in their order of arrival; all other routes on Fourth Ave will board in their current locations; route departure times will not change

15) 2023 November

a. No changes

Copies of the No Gold Ride fare change. GoldRide Fare Change, and Service Changes equity analyses are included below.