



OFFICIAL COMPANY POLICY

ALEXANDRIA TRANSIT COMPANY (ATC)

Policy Name:	DASH Title VI Service & Fare Equity Analysis Policies				
Section #:	N/A	Section Title:	N/A	Former Reference ID:	N/A
Approval Authority:	ATC Board of Directors		Adopted:	03/09/2022	Reviewed: 2/9/2022
Responsible Executive:	General Manager		Revised:	N/A	
Responsible Department:	Planning & Marketing		Contact:	Martin Barna	

1. Policy Statement

The Alexandria Transit Company (ATC) prohibits any discrimination in the provision of its fixed-route bus services on the basis of race, color or national origin, as outlined by the Federal Transit Administration's Title VI Circular 4702.1B and Environmental Justice Circular 4703.1. Discrimination based on appearance or dress as it relates to racial identity or cultural practices is also prohibited.

2. Reason for Policy

In order to comply with the Federal Transit Administration's (FTA) Title VI Circular 4702.1B and Environmental Justice Circular 4703.1 requirements, the Alexandria Transit Company (ATC) and DASH are required to create and adopt Major Service Change, Disparate Impact, and Disproportionate Burden Policies. These policies are used during the planning process to evaluate the impact of major service and fare changes on minority and low-income passengers.

In the development of these policies, ATC/DASH is also required to seek input from the community including low-income, minority and limited-English proficiency (LEP) populations, which are traditionally under-represented in planning decision-making processes.

The ATC Board of Directors must approve the Major Service Change, Disparate Impact, and Disproportionate Burden policies before they can be incorporated into the Title VI Program and be submitted to the FTA. Any future amendments to the policies are also subject to Board review.

3. Who Should Read this Policy

General oversight for the following Title VI policies is performed by the City of Alexandria's Office of Human Rights. The ATC/DASH Department of Planning & Marketing, with support from the City of Alexandria's Department of Transportation & Environmental Services, is responsible for the ongoing implementation and execution of these policies. ATC and the City of Alexandria have drafted a separate Memorandum of Agreement (MOA) that will outline city roles and responsibilities and will be subject to ATC Board review and approval.

4. Resources

[Federal Transit Administration \(FTA\) Title VI Circular](#) (2012)

5. Definitions

ATC: Alexandria Transit Company (DASH)

All policies are subject to amendment at any time. Finalized policies are subject to the approval of the Approval Authority as indicated on Page 1 in the head section.

6. Title VI Service Equity Analysis Policy

In accordance with FTA Title VI requirements, ATC/DASH shall perform a Service or Fare Equity Analysis to evaluate the positive and negative impacts that all major service changes and fare changes will have on minority and low-income passengers. The Major Service Change policy determines which proposed service changes require equity analyses. The Disparate Impact and Disproportionate Burden policies are intended to provide guidance to staff in their analysis of the equity of the impacts of the proposed changes.

The Disparate Impact and Disproportionate Burden policies apply to all “major” service changes, and to all fare changes, regardless of magnitude, except as specifically defined herein. General oversight for the following Title VI policies is performed by the City of Alexandria’s Office of Human Rights. The ATC/DASH Department of Planning & Marketing, with support from the City of Alexandria’s Department of Transportation & Environmental Services, is responsible for the ongoing implementation and execution of these policies.

Major Service Change Policy

ATC/DASH implements service and fare changes based on the annual ATC Transit Development Plan (TDP), which is adopted by the ATC Board of Directors each spring after an extensive public outreach process. Most ATC/DASH service and fare changes are identified and proposed through this process.

Service Changes

Any proposed “major” service changes must be submitted to the ATC Board of Directors for review and approval. For Title VI purposes, all “major” service changes will require a Service Equity Analysis to identify any disparate impacts they may create on minority passengers, or disproportionate burden that they place on low-income riders.

The following service modifications shall be considered “major” service changes:

- The establishment of a new bus line or service;
- The elimination of a bus line or service;
- A routing change that impacts 25 percent or more of the line’s route mileage;
- A frequency or service span change that increases or decreases the revenue hours of the line by 25 percent or more;
- A series of changes on a single route within a two-year period that cumulatively meet any of the above criteria;
- Proposed changes that are anticipated to be controversial with a particular community or interested parties based on public feedback; and
- A systemwide change that concurrently increases or decreases the total system-wide revenue hours by five (5) percent or more.

The following types of modifications are exempted from the above criteria and shall not be classified as major service changes or be subject to Service Equity Analysis.

- Special Event service;
- Routing changes due to construction, or other road/facility closures;
- Special service operated during emergencies, including but not limited to rail replacement services; and
- Temporary service or route changes that are expected to operate for a period of time that is six months or less.

All policies are subject to amendment at any time. Finalized policies are subject to the approval of the Approval Authority as indicated on Page 1 in the head section.

Service change proposals that do not meet the criteria for “major” service changes are still subject to an appropriate level of public review and comment.

Fare Changes

For the purposes of this policy, a “fare change” is defined as any increase or decrease in a transit provider’s base fare or any fare product or pass with the following exceptions:

- Promotional or pilot fare programs (e.g. “Spare the Air” fare-free promotions) that last for less than six months, per the FTA definition of “permanent” fare changes; and
- Temporary fare reductions that are mitigation measures for other projects or actions such as rail closures or bus re-routes.

Any transition to or from 100% “fare-free” operation would be subject to a Fare Equity analysis.

Disparate Impact Policy

The Disparate Impact Policy establishes a threshold for determining if proposed service or fare changes would result in a fair distribution of positive and negative effects on minority passengers.

As defined by FTA Title VI Circular 4702.1B:

Disparate impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would service the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.

The policy shall establish a threshold for determining when adverse effects of fare/service changes are borne · disproportionately by minority populations. The disparate impact threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by minority populations compared to impacts borne by non-minority populations. The disparate impact threshold must be applied uniformly ... and cannot be altered until the next Title VI Program submission.

For Service or Fare Equity Analyses conducted by ATC/DASH, a disparate impact threshold of **10 percent** shall be used to determine if minority riders are more negatively affected - or less positively affected - by the proposed change (s) than DASH riders as a whole. The 10 percent threshold applies to the difference between the aggregate impacts of the proposed change(s) on minority passengers and the aggregate impacts of the proposed change(s) on overall DASH ridership. Analyses shall be based on the most recent DASH passenger survey data but may also use census data if survey data is inadequate or unavailable. Analyses will only compare ridership survey data with ridership survey data, or census data with census data, and will not mix and match different data types.

If ATC/DASH finds that a disparate impact exists with the proposed change(s), it shall analyze alternatives to determine if another alternative could serve the same legitimate objective with less of a disparate impact. If a less discriminatory alternative does not exist and ATC/DASH has substantial legitimate justification that cannot otherwise be accomplished, ATC/DASH shall take steps to mitigate the impact of the change on affected minority riders.

Disproportionate Burden Policy

The Disproportionate Burden Policy establishes a threshold for determining if a given service or fare change would result in a fair distribution of positive and negative effects on low-income riders.

As defined by FTA Title VI Circular 4702.1B:

All policies are subject to amendment at any time. Finalized policies are subject to the approval of the Approval Authority as indicated on Page 1 in the head section.

A disproportionate burden refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.

The policy shall establish a threshold for determining when adverse effects of service changes are borne disproportionately by minority populations. The disparate impact threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by minority populations compared to impacts borne by non-minority populations. The disparate impact threshold must be applied uniformly, regardless of mode, and cannot be altered until the next Title VI Program submission.

For Service or Fare Equity Analyses conducted by ATC/DASH, a disproportionate burden threshold of **10 percent** shall be used to determine if low-income riders are more negatively affected – or less positively affected – by the proposed changes(s) than DASH riders as a whole. The 10 percent threshold applies to the difference in the aggregate impacts of the proposed change(s) on low-income passengers compared to the aggregate impacts of the proposed changes(s) on overall DASH ridership. Analyses shall be based on the most recent DASH survey data but may also use census data if survey data is inadequate or unavailable. Analyses will only compare ridership survey data with ridership survey data, or census data with census data, and will not mix and match different data types.

If ATC/DASH finds that low-income populations will incur a disproportionate burden from proposed change(s), ATC/DASH shall identify alternatives available to affected low-income riders and take steps to avoid, minimize or mitigate impacts where practicable.

Service Equity Analysis Example

As an example, Table 1 below provides the results of a Service Equity Analysis for a proposed service reduction on a fictitious bus route (Line X). For the purposes of this example, staff have already determined that the proposed change to Line X meets at least one of the minimum thresholds to be considered a “Major Service Change”.

For the Disparate Impact and Disproportionate Burden analyses, staff compare the demographic percentage of riders who are negatively impacted by the proposed change with the demographic percentages of DASH riders as a whole. Since the percentage of minority passengers who would be adversely affected by the proposed change is 12 percent higher than the overall percentage of minority passengers across the DASH system, this proposed change would exceed the 10 percent threshold and create a “disparate impact”. The difference between low-income passengers who are affected by this change and the overall DASH systemwide average is less than 10 percent so no “disproportionate burden” would be created by the proposed change.

**Table 1 – Service Equity Analysis for Proposed Reduction to Line X
(For demonstration purposes only)**

	<u>Minority</u>	<u>Low Income</u>
Adversely-Impacted Riders	60.3%	22.4%
<u>DASH Service Area Average</u>	<u>48.1%</u>	<u>21.3%</u>
Delta	12.2%	1.1%

In this example, staff would be required to conduct further assessments to determine if there are alternatives that would achieve the same objectives without creating a disparate impact, or to mitigate the impact of the proposed change on affected minority riders.